



**Comments submitted by the Netherlands  
on GREVIO's first thematic evaluation:**

**Building trust by delivering support, protection and  
justice**

**Received by GREVIO on 27 November 2025**

GREVIO/Inf(2025)15-add

Published on 5 December 2025



Ministerie van Volksgezondheid,  
Welzijn en Sport

**Council of Europe Convention on preventing and  
combating violence against women and domestic  
violence**

**Comprehensive policy response by the Government of  
the Netherlands on the recommendations of GREVIO's  
first thematic evaluation '*Building trust by delivering  
support, protection and justice*,  
received on 10 juli 2025**

**27 November 2025**

## Response to GREVIO recommendations

Subject of recommendations	Definitions
Relevant Article Istanbul Convention	3

### **Recommendations**

Referring to the findings of its baseline evaluation report, GREVIO (Group of Experts on Action against Violence against Women and Domestic Violence) urges the Dutch authorities to ensure that any definitions in use in policy documents and measures taken in their implementation reflect more clearly the fact that domestic violence affects women disproportionately and, in this respect, has a gendered dimension. Therefore, policy documents and measures must ensure a gendered understanding of such violence.

GREVIO further urges the Dutch authorities to align and harmonise the definitions of 'domestic violence' across Dutch legislation with the requirements of Article 3b of the Istanbul Convention, in particular to include economic violence as a form of domestic violence and to include acts of violence perpetrated by a member of the family or of the domestic unit, or by a former or current spouse, whether or not the perpetrator shares or has shared the same residence with the victim.

### **Policy response**

GREVIO's recommendations emphasise the importance of a gender-sensitive approach to domestic violence and violence against women. The Netherlands has already addressed these issues in recent policy programmes, as GREVIO itself points out. For example, the National Action Programme against Sexually Transgressive Behaviour and Sexual Violence (*Nationale actieprogramma Aanpak seksueel grensoverschrijdend gedrag en seksueel geweld - 2023*) and the Stop Femicide Action Plan (*Plan van aanpak Stop femicide - 2024*).

In addition, the Dutch government is currently preparing legislation to implement the EU Directive on combating violence against women and domestic violence<sup>1</sup> (EU Directive). This includes steps to tighten up the definition of domestic violence and the addition of a definition of violence against women in national legislation. The new definition will also include forms of economic violence, even though economic violence already falls within the definition of domestic violence in the 2015 Social Support Act (WMO). At the time of writing, the new legislation is under consultation with sector stakeholders. As a result, this policy response cannot go into further detail on the exact implications of the revised statutory definitions of domestic violence and violence against women.

GREVIO also considers that the definition of domestic violence in the WMO and in the Temporary Domestic Exclusion Order Act should state explicitly that domestic violence may also be perpetrated by an offender who does not share a residence with the victim. In the WMO this follows from the definition used, in which 'immediate social environment' is a social construct unrelated to a particular location (in other words, domestic violence does not solely refer to violence taking place in the victim's home or place of residence). This is also explained in the Explanatory Memorandum to the WMO. With regard to the Temporary Domestic Exclusion Order Act, the government is currently exploring how the 'more than incidentally' criterion in this Act can be clarified. It is also examining how such orders and other protective

---

<sup>1</sup> Directive (EU) 2024/1385.

measures under administrative law can be employed if a suspected perpetrator of domestic violence and child abuse does not live at the same address as the presumed victim. The government will decide on the basis of this review whether and how legislation should be amended.

National legislation, including the WMO, forms the basis for both central government policy and municipal policy. Central government’s aim in tightening up the definitions in national legislation is to ensure they are applied consistently nationwide and at local level. Ultimately, the goal is to achieve at all levels of government a uniform, coherent and gender-sensitive approach to domestic violence, child abuse and violence against women. Under the EU Directive, the amended legislation must enter into force no later than 14 June 2027.

<b>Subject of recommendations</b>	<b>Coordinated policy</b>
<b>Relevant Article Istanbul Convention</b>	<b>7</b>

**Recommendations**

GREVIO strongly encourages the Dutch authorities to:

- a. ensure that any policies and measures taken in relation to preventing and combating violence against women and domestic violence are coordinated and well-funded, including at municipal level, and that they cover all forms of violence against women covered by the Istanbul Convention, including economic violence and forced sterilisation;
- b. ensure that such policies take into consideration and integrate the perspective of women who are or might be exposed to intersectional discrimination;
- c. assign the role of coordinating body to fully institutionalised entities, equip these with clear mandates, competences and the necessary human and financial resources, while ensuring that their functions are exercised in close consultation with relevant civil society organisations and are supported by adequate data;
- d. evaluate such policies regularly on the basis of predefined indicators in order to assess their impact and ensure that policymaking is based on reliable data;
- e. ensure the involvement, on a regular basis, of NGOs working with women victims of violence, in policymaking as well as in the monitoring and evaluation of policies and measures with a view to making use of their expertise.

**Policy response**

Since the Istanbul Convention entered into force on 1 March 2016, the Dutch government has established a variety of national action programmes focusing on combating gender-based violence. Examples include ‘Violence has no place in the home’ (*Geweld hoort nergens thuis* –2017), the Action Plan on Harmful Practices (*Actieagenda schadelijke praktijken* – 2020), the Future Scenario on the Protection of Families and Children (*Toekomstscenario kind- en gezinsbescherming* – 2021), the National Action Programme on Sexually Transgressive Behaviour and Sexual Violence (2023) and the Stop Femicide Action Plan (2024). Although GREVIO appreciates these efforts, it also emphasises the importance of more closely coordinating these programmes in order to reduce the risk of fragmented policy.

The Netherlands has conducted a study into the coordination, implementation, monitoring and evaluation of the approach to domestic violence, child abuse and

violence against women. To this end researchers have consulted 47 stakeholders, including implementing agencies and NGOs. The results will be used to develop scenarios showing ways of improving coordination within the approach. The study has been completed in autumn 2025 and its conclusions will be included in the implementation process of the EU Directive.

Also relevant is Article 22 of the EU Directive, obliging member states to designate one or more bodies that will publish reports and make recommendations on domestic violence, child abuse and violence against women, and exchange information with relevant European bodies. These tasks are currently performed by a range of organisations and institutions, including the relevant ministries, various implementing agencies, research institutions, NGOs, the Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) and the Government Commissioner on sexually transgressive behaviour and sexual violence (*regeringscommissaris grensoverschrijdend gedrag en seksueel geweld*). There is as yet no single, formally designated national body that performs these tasks in a structural and integrated way. A statutory basis for such a body has therefore been included in the proposed legislation to implement the EU Directive.

The EU Directive also calls for national action plans to be adopted. In developing these plans, account will be taken of the interests of women exposed to intersectional discrimination, for example on the basis of ethnicity, belief or sexual orientation.

The consultation of NGOs and other organisations is part of the process of implementing the EU Directive. This is a standard component of other legislative processes, for example in relation to the bill specifically criminalising psychological violence that is currently in preparation. In addition, the bill implementing the EU Directive regulates the involvement of civil society organisations on the basis of the national planning cycle. Representatives of advocacy groups, care and support services and NGOs will be consulted before this planning cycle is set up.

<b>Subject of recommendations</b>	<b>Financial resources</b>
<b>Relevant Article Istanbul Convention</b>	<b>8</b>

### **Recommendations**

GREVIO strongly encourages the Dutch authorities to ensure appropriate and sustainable funding for women’s rights organisations running specialist support services for women victims of all forms of violence, including smaller community-based NGOs. Funding opportunities should support continuity in service provision, for example through long-term grants. Procurement procedures for such services should include qualitative criteria, such as the need to ensure a gender-sensitive approach as well as expertise in the provision of such services.

GREVIO strongly encourages the Dutch authorities to:

- a. allocate appropriate, sufficient and sustainable funding for policies, programmes and measures on all forms of violence against women, both at central and at municipal level;
- b. introduce, in all relevant ministries and other state entities, separate budget and funding lines for this policy, based on the principle of gender budgeting.

### **Policy response**

The Netherlands endorses the importance of sufficient and sustainable funding for measures to combat domestic violence, child abuse and violence against women. In the Netherlands responsibility for implementation lies primarily with the municipalities, within the legislative framework of the WMO. To enable the municipalities to carry out their tasks, central government allocates long-term funding from the Municipalities Fund and provides grants such as the decentralised grants for women's shelters. The municipalities have policy discretion when it comes to spending these resources, so that they can develop a customised, local approach that matches local needs. The police and criminal justice authorities are also funded by central government. The Dutch government considers the current funding provided by central government in this area to be stable and sustainable, in line with the Istanbul Convention.

In both drafting and accounting for the budget, the government takes note of broader developments in society, including gender equality. In recent years the government has taken steps to integrate a broader-based concept of prosperity, also known as wellbeing, into the budget and accountability cycle. It is appropriate for a learning government to review the development of wellbeing in the Netherlands. This is not just about examining economic indicators. On Accountability Day, when the government reports on its spending, Statistics Netherlands (CBS) publishes its Monitor of Wellbeing and Sustainable Development Goals. Gender equality occupies a prominent position in the Monitor. As of next year, on Accountability Day CBS will also publish wellbeing factsheets directly or indirectly linking indicators to ministry budgets and policy areas. By integrating wellbeing into budget documents, the government is moving towards a greater focus on gender in its budgets.

<b>Subject of recommendations</b>	<b>Data collection</b>
<b>Relevant Article Istanbul Convention</b>	<b>11</b>

### **Recommendations**

Recalling its earlier findings GREVIO strongly encourages the Dutch authorities to:

- a. adapt their data categories for use by the justice sector and law-enforcement agencies to reflect the sex and age of the victim and perpetrator, their relationship and geographical location as well as the type of violence;
- b. collect data on the number of women, girls and any accompanying children who contact the 'Safe at Home' centres (*Veilig Thuis*) seeking help in relation to their experiences of violence, disaggregated by the type of violence and the victim's sex, age and relationship with the alleged perpetrator;
- c. introduce the harmonised collection of data across the healthcare sector to ensure that data collected by public and private healthcare providers encompass instances of contact made by victims of violence;
- d. ensure that the collection, storing and processing of data complies with the standards on data protection contained in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS No. 108), to ensure confidentiality and respect for the privacy of victims, perpetrators and other persons involved.

### **Policy response**

In 2019, as part of the implementation of the Istanbul Convention, the Netherlands developed an instrument to measure the impact of the approach to domestic

violence and child abuse (*Impactmonitor Aanpak Huiselijk Geweld en Kindermishandeling*). This Impact Monitor combines data from police, criminal justice authorities, Safe at Home and the youth care sector. GREVIO recommends that the existing monitor be expanded to include the care sector, for example, and to further harmonise data and monitoring across the relevant sectors.

In recent years the Netherlands has taken steps to further improve data collection relating to domestic violence, child abuse and violence against women. A major improvement made in 2024 was an addition to the Ministry of Health, Welfare and Sport Data Processing (Miscellaneous Provisions) Act, giving CBS a statutory basis for using citizen service numbers to link data supplied by Safe at Home to other CBS databases in a secure manner that cannot be traced back to individuals. This enables CBS to enrich data supplied by Safe at Home, creating greater insight into the background of victims and perpetrators of domestic violence and child abuse, as well as into the care and support provided and any interventions by the criminal justice authorities. This is necessary if policy and the approach are to be improved in the long term. This amendment is currently being implemented in practice, taking the greatest possible care with regard to privacy and data security. The relevant requirements are laid down in the Statistics Netherlands Act, which means that CBS meets the current EU standards with regard to the anonymised processing of and reporting on the data available to it.

CBS is also working with affiliated sectors and relevant ministries to further develop the Impact Monitor. A major point for improvement is the removal of duplicate data, creating more space for new data categories and clear overview pages. CBS also intends to record the geographical location where violence has taken place, and to link this to existing data on domestic violence. Another plan is to enrich existing data with the living situation and presumed relationship status of persons involved in domestic violence and violence against women.

A further step will be to obtain more insight into how victims of violence are supported in the care sector as a whole. This is a complex challenge in view of the sector's diversity, comprising both public and private care providers, each with their own registration systems, indicators and reporting systems which cannot easily be harmonised. Moreover, the Dutch care sector is facing severe staff shortages. Parties in the care sector have therefore agreed in the Integrated Care Agreement that care professionals organisations working in the field must not be burdened with more bureaucratic requirements than strictly necessary. The relevant ministries are conducting talks with CBS on the issue of how the care sector can be more involved in data collection relating to domestic violence without this increasing their administrative burden.

Police records already contain data on the sex and age of presumed victims and suspects, their relationship to each other, the geographical location and type of violence (category of offence, in combination with social classifications of domestic violence and child abuse). Records kept by the Public Prosecution Service include case-level data regarding the sex and age of suspects/perpetrators, the geographical location and type of violence (category of offence, in combination with social classifications of domestic violence and child abuse). The Public Prosecution Service also registers whether crimes of violence involve women victims. The police, Public Prosecution Service and CBS will explore ways in which the aggregated data can be made more transparent with regard to domestic violence, child abuse and violence against women, in line with the requirements of the Istanbul Convention and the EU Directive. They will also investigate the extent to which the paths

followed by suspects/perpetrators and presumed victims within the care and public safety system can be identified at aggregated level in the interests of further research and policy evaluation.

<b>Subject of recommendation</b>	<b>General obligations</b>
<b>Relevant Article Istanbul Convention</b>	<b>12</b>

### **Recommendation**

GREVIO welcomes the variety of awareness-raising measures and campaigns and their strong focus on promoting gender equality. It encourages the Dutch authorities to ensure wider preventive measures for forms of violence against women currently unaddressed through primary prevention, in particular intimate partner violence, and to address it as a pervasive phenomenon affecting all parts of society in order to challenge societal attitudes, cultural norms and gender stereotypes rooted in the perceived inferiority of women. The impact of awareness-raising campaigns should be assessed regularly.

### **Policy response**

The Netherlands is taking broad-based measures to prevent and raise awareness of gender-based violence, as noted by GREVIO. The approach to gender-based violence aims to promote gender equality and combat sexism, stereotyping and harmful views that can lead to violence. This is done through publicity campaigns, provision of information to specific target groups, a structural focus on gender equality in education and in national policy programmes including the National Action Programme against Sexually Transgressive Behaviour and Sexual Violence (2023). Recently, the public campaign 'Man, speak up!' was launched to encourage men to speak out against sexually inappropriate remarks within their own social circles. The national campaign is aligned with the local campaigns 'Is this love?' (*Is dit Liefde?*), on the theme of intimate terrorism and identifying red flags for potential femicide. The impact of central government awareness-raising campaigns is routinely evaluated.

In June 2025 the State Secretary for Education, Culture and Science sent the most recent policy document on equal opportunities (*Emancipatienota Veilig Meedoen*) to the House of Representatives, setting out measures aimed at increasing equality between men and women. As noted by GREVIO, promoting gender equality helps combat gender-based violence. Alongside gender equality measures in fields such as employment and care that indirectly contribute to preventing gender-based violence, there are also various initiatives that specifically aim to prevent gender-based violence by discussing and challenging harmful norms and views. Current examples include the Act4Respect and Change from Within (*Verandering van Binnenuit*) alliances. However, these are temporary projects that do not have national coverage. To implement the EU Directive the government will make an inventory of what is needed for a sustainable and nationwide approach with regard to primary prevention of violence against women.

The Dutch Research Council (NWO) is currently funding a national research programme on an effective and preventive approach to sexually inappropriate behaviour and sexual violence as part of the 2024-2026 National Science Agenda. In this programme, researchers, civil society organisations and care providers secure existing knowledge and develop new insights into effective interventions and prevention strategies as part of a broad societal approach to sexually inappropriate behaviour and sexual violence.

<b>Subject of recommendations</b>	<b>Education</b>
<b>Relevant Article Istanbul Convention</b>	<b>14</b>

### **Recommendations**

GREVIO strongly encourages the Dutch authorities to take measures to ensure that schools provide teaching on all elements listed in Article 14 of the Istanbul Convention, within the framework of the mandatory curriculum, and to assess whether and to what extent relevant teaching material is being used by teachers.

GREVIO strongly encourages the Dutch authorities to ensure that teachers are aware of and meet their obligation under the domestic violence and child abuse protocol (*meldcode huiselijk geweld en kindermisbruik*) to report suspicions of violence against a child.

GREVIO encourages the Dutch authorities to increase their efforts to teach children, in an age-appropriate manner, about the notion of freely given consent in sexual relations, and to raise their awareness of the harmful effects of violent pornography and the sharing of intimate images of oneself and others, while also providing a comprehensive overview of the concept of violence against women by articulating the underpinning principles that all forms of violence against women share.

### **Policy response**

Statutory attainment targets (in the updated curriculum) and examination syllabuses are set at national level, and establish the broad outlines of what primary and secondary pupils are expected to learn.

The National Institute for Curriculum Development (SLO) is currently updating the attainment targets and syllabuses. The themes set out in article 14 of the Istanbul Convention are addressed within four learning areas in the updated attainment targets for primary schools and the lower years of secondary school (digital literacy, citizenship, humans and society, and humans and nature). The SLO is developing age-appropriate learning trajectories for these learning areas, which teachers and teaching material developers can use in shaping their teaching and educational provision.

Digital literacy is a new learning area aimed at teaching pupils to recognise online risks, deal with inappropriate content and become digitally resilient. The second new learning area, citizenship, focuses on respectful interaction, including when there are differences of opinion with regard to subjects such as gender, and how to identify and reflect on stereotypical thinking and behaviour. The third learning area, humans and society, is about encouraging safe interaction, learning to develop a respectful attitude to sexuality, and expressing and discussing wishes and boundaries. Finally, as part of the learning area on humans and nature pupils in the lower years of secondary school are expected to gain insight into relational and sexual health and to contribute to a safe and respectful environment in terms of behaviour and dealing with diversity and sexuality. In the upper years of secondary schools, teaching is not based on attainment targets but on exit qualifications set out for each subject in the syllabuses. The syllabuses too are being updated on the basis of the Istanbul Convention. The draft syllabus for social studies, for example, sets out exit qualifications that address social inequality, stereotypes, gender roles and conflict. The content of these learning areas is incorporated, where appropriate, into other subjects. In this way every pupil acquires equal grounding in these themes, regardless of their choice of subjects.

In addition to the attainment targets, the statutory obligation to provide citizenship education also requires primary and secondary schools to promote knowledge of and respect for diversity. This requirement and the attainment targets for citizenship are two different statutory obligations resting on schools, laid down in different rules and regulations, that nevertheless complement each other.

The content of the new, draft attainment targets (and examination syllabuses) is based on a comprehensive reflection process by teams of teachers and experts. Schools are free to determine how they will organise teaching towards the attainment targets, as laid down in article 23 of the Constitution. In practice, themes such as consent and online resilience are key topics in the most popular teaching packages in the Netherlands on the subject of sex and relationships. Although the attainment targets focus on themes that contribute to the prevention of gender-based violence, the compulsory curriculum does not specifically require any teaching regarding such violence, as required by Article 14 of the Istanbul Convention.

In view of the fact that the curriculum is now in the final stage of the updating process, it is not considered desirable at this point for central government to make further additions to the statutory curriculum or to require schools to address specific themes or definitions. In the short term, however, an official study will make an inventory of ways in which schools can be encouraged to address the issue of gender-based violence within the existing legislation. The aim is to seek cooperation with and learn from European countries that have already incorporated this subject into their curriculums. This will also contribute to the implementation of the EU Directive, which alongside measures in the educational domain also refers more broadly to providing information and raising awareness in society about violence against women.

Because of the constitutional principle of freedom of education central government cannot assess the extent to which schools make use of relevant teaching materials. They are free to make their own choices in this. Nevertheless, a range of measures is currently being taken to encourage schools to use evidence-based and age-appropriate materials where possible. The aim is to set up a quality alliance for teaching materials working towards high quality materials and their effective use. In addition, consultations are ongoing with a range of organisations, including the Netherlands Initiative for Education Research (NRO) and the SLO, on the development of a national quality framework for teaching materials, based on research, with input from the quality alliance and aligned with the updated attainment targets.

In addition, the Ministry of Education, Culture and Science, in cooperation with experts from organisations such as Rutgers (centre of expertise for sexual health), SOA Aids Nederland (provides information on HIV and STIs) Offlimits (centre of expertise on online abuse), the Victim Support Fund (*Fonds Slachtofferhulp*) and the School and Safety Foundation (centre of expertise for a safe social learning environment), has published updated guidance on online safety and sexual development (*Wegwijzer Seksualiteit Online*). It offers educators in primary, secondary and vocational secondary education practical guidance on dealing with incidents involving sexually inappropriate online behaviour. The guide also contains a detailed overview of preventive instruments, both those that schools themselves can apply and external expertise that can be called in. There is a clear description with every instrument of the theme and the age group for which it is intended. Themes include pornography and safe sharing of intimate photos. The guidance also lists training courses for teachers and policymakers, and resources for parents.

Finally, this year the Ministry is also investing in targeted professional development for educational staff, with a particular focus on applying the domestic violence and child abuse protocol, the role of Safe at Home centres and further training for school liaison officers for domestic violence and child abuse.

<b>Subject of recommendations</b>	<b>Training of professionals</b>
<b>Relevant Article Istanbul Convention</b>	<b>15</b>

### **Recommendations**

Recalling earlier findings, and in view of persisting gaps in the field of training of professionals, whose contribution to a system of support, protection and justice is vital, GREVIO urges the Dutch authorities to step up the training of all professionals dealing with victims of violence against women on all the forms of violence covered by the Istanbul Convention, including in their digital dimension. Such training must be accompanied by standardised protocols aimed at identifying, providing support to and further referring victims to other general and specialist services, and should be regularly evaluated. It should focus on the victims' human rights, safety, individual needs and empowerment, as well as the prevention of secondary victimisation through a victim-centred and trauma-informed approach, and should be provided to all those in the justice, law-enforcement, social welfare, healthcare and education sectors. The impact of such training efforts should be maximised by drawing on the expertise of women's rights organisations and providers of specialist services.

### **Policy response**

The Netherlands aims to ensure that all professionals who work with victims of violence in relationships of dependency have the requisite knowledge and skills to recognise the signs of gender-based violence promptly, to respond appropriately and to offer effective support to victims. Strengthening the expertise of professionals on issues such as femicide, coercive control, stalking and harmful practices is essential to an effective approach to domestic violence and violence against women.

The relevant bodies in the care and public safety system are already working on increasing expertise within their own organisation and field, for example through in-service training and information provision to professionals. Recent examples include the following.

- Safe at Home has developed a theoretical framework on intimate terrorism to enable professionals to recognise and understand this form of structural and controlling violence in partner relationships. The framework is used in additional training for staff.
- The Ministry of Justice and Security has commissioned a pilot project to increase expertise in relation to psychological violence (including coercive control) and adequate evidence gathering as part of preparations for a bill to make psychological violence a separate offence.
- In September 2025, Safe at Home launched a new online platform where both citizens and professionals can access knowledge and information about domestic violence and specifically the red flags for femicide. Additionally, work is underway on developing a toolkit for professionals and expanding the chat function to 24/7.
- The Police College has further refined its domestic violence and child abuse module. The frontline teams of the Dutch police are making extra efforts to

increase knowledge about stalking, coercive control, harmful practices and other risk factors for femicide.

- Every district court office of the Public Prosecution Service has a public prosecutor responsible for coordinating cases involving domestic violence and child abuse. These specialised officials support colleagues handling complex cases and promote the sharing of knowledge within the Public Prosecution Service.
- Pharos (Centre of Expertise on Health Disparities) has developed tools to support medical professionals in dealing with cases or suspicions of female genital mutilation. It also produces training materials for GPs and midwives.
- Other initiatives described in the Stop Femicide Action Plan and in the letter to Parliament on progress regarding the priorities in the Action Plan contribute to further development of expertise and awareness among professionals. Examples include improvements to safety and risk assessments and to evidence gathering in cases of psychological violence (including coercive control), so as to identify underlying patterns and not just incidents of violence. Another example is improvements regarding insight into safety concerns in parental responsibility and access cases.

Alongside individual efforts, parties in the care and public safety system have joined forces to work on a new strategy to permanently strengthen expertise in the field of gender-based violence. The strategy focuses on increasing expertise both within organisations and in the system. The parties involved comprise the police, the Public Prosecution Service, 3RO (the three organisations providing probation services), Safe at Home, the Child Care and Protection Board (*Raad voor de Kinderbescherming*), Valente (women's shelters), the Sexual Assault Centre (*Centrum Sexueel Geweld*), Victim Support Netherlands (*Slachtofferhulp Nederland*), the Association of Netherlands Municipalities (VNG) and the National Care and Criminal Justice Network (*Landelijk Netwerk Zorg en Straf*, comprising Safe at Home, police and criminal justice authorities). The development of this strategy is part of the Stop Femicide Action Plan and is facilitated by the Ministry of Health, Welfare and Sport and the Ministry of Justice and Security. The strategy must be ready for implementation in the first half of 2026.

Sectors and branches within the healthcare system are themselves responsible for increasing expertise on gender-based violence. Each organisation independently determines what in-service training is available and compulsory. As a result, the way expertise is promoted can vary, depending on the organisation's target group. The ministries are conducting a dialogue with the healthcare sector to encourage a structural focus on domestic violence and violence against women. In addition, expertise and knowledge centres are developing guidance, tools, information material and training courses to increase professional expertise. The implementation of the EU Directive will encourage further steps to secure a systematic approach to professional expertise regarding gender-based violence.

<b>Subject of recommendations</b>	<b>Preventive intervention and treatment programmes</b>
<b>Relevant Article Istanbul Convention</b>	<b>16</b>

### **Recommendations**

GREVIO encourages the Dutch authorities to:

- a. expand the number and increase the geographical availability of perpetrator programmes for domestic violence and ensure they are widely attended, including by reducing barriers to voluntary attendance;
- b. develop common minimum standards for perpetrator programmes, in line with the principles of the Istanbul Convention, taking account of the need for a gender-sensitive approach and for perpetrators to examine and identify the patriarchal and misogynist nature of their values and attitudes, to take full responsibility for their actions and to modify their behaviour;
- c. collect data on attendance at perpetrator programmes and ensure an external evaluation of the programmes, in line with recognised best practices, in order to assess whether the programmes serve their intended preventive aims.

GREVIO encourages the Dutch authorities to expand the treatment programmes for perpetrators of sexual violence to voluntary settings, in line with the requirements of Article 16, paragraph 2 of the Istanbul Convention.

### **Policy response**

The Netherlands recognises the importance of targeted intervention programmes for perpetrators to prevent and minimise the risk of domestic violence and violence against women. Both voluntary and compulsory intervention programmes have been set up across the country. These programmes include support groups, peer support groups, help with aggression regulation, individual counselling and psychosocial treatments. Perpetrators and potential perpetrators can voluntarily enrol in such interventions via Safe at Home and other organisations. Under the Stop Femicide Action Plan, work is being done on mapping and enhancing the services available to perpetrators on a voluntary basis.

Since the end of 2025, the Research and Data Centre (*Wetenschappelijk Onderzoeken Datacentrum*; WODC) has been exploring whether behavioural skills training, as used by the probation services in the case of suspects and convicted perpetrators of partner violence (the BORG training course), can be offered outside the criminal justice framework, for example when Safe at Home has received a report of suspected violence or if the local authority has imposed a temporary domestic exclusion order. In addition, together with the probation service and forensic mental healthcare services, the Ministry of Justice and Security will examine how the European Standards for Perpetrator Programmes can be incorporated into the further development of quality guidelines and behavioural skills training.

Behavioural skills training courses and treatment programmes for perpetrators are being evaluated for further development. At the request of the Ministry of Justice and Security, the WODC has assessed the effectiveness of the BORG training course.<sup>2</sup> And as part of the 2024-2030 Research Programme on the Approach to Domestic Violence and Child Abuse (*Onderzoeksprogramma aanpak huiselijk geweld en kindermishandeling 2024-2030*), in 2026 the WODC is expected to commence a study into the experiences of perpetrators and their partners/family with the

<sup>2</sup> Parliamentary Papers, House of Representatives 2022-2023, nos. 258 and 264.

forensic mental healthcare services and into the effectiveness of forensic treatment programmes in preventing reoffending.

The Stop Femicide Action Plan aims to set up a men’s alliance, in the first place to raise awareness and change norms amongst men, with the ultimate objective of preventing femicide. Second, the men’s alliance will focus on men as bystanders to potential femicide, so that they can recognise the signs and know how to respond. Third, the men’s alliance will cooperate with relevant organisations to improve support and interventions for perpetrators of violence against women. Steps to increase expertise among professionals is also part of this. The alliance will be designed in accordance with the European standards for perpetrator programmes established by the European Network for the Work with Perpetrators of Domestic Violence. Efforts will also be made to acquire greater knowledge on the role of men in preventing femicide. The aim is to launch the men’s alliance in the first quarter of 2026.

In the Netherlands the municipalities play an important role alongside national services. Local authorities draw up local policy plans to combat domestic violence, child abuse and violence against women, also addressing interventions aimed at providing support to (potential) perpetrators of domestic violence. The basic principle is that such support packages must be available on a voluntary basis in every region. There are currently challenges with regard to the availability and geographical spread of such support and the Action Plan is also addressing these problems.

<b>Subject of recommendations</b>	<b>Protection and support – General obligations</b>
<b>Relevant Article Istanbul Convention</b>	<b>18</b>

### **Recommendations**

GREVIO strongly encourages the Dutch authorities to ensure that multi-agency cooperation mechanisms on forms of violence covered by the Istanbul Convention take a distinctly gendered approach. This cooperation must be based on guidelines and protocols guaranteeing the safety of victims and respect for their human rights as required by Article 18, paragraph 2 of the Istanbul Convention.

GREVIO strongly encourages the Dutch authorities to include more systematically the health sector and women’s rights organisations providing specialist support services in multi-agency cooperation structures.

GREVIO further encourages the Dutch authorities to increase the number of ‘one-stop shops’ that provide a broad range of protection and support services to victims of sexual violence.

### **Policy response**

GREVIO rightly points out that the Sexual Assault Centre (CSG) is a good example of an organisation using the multi-agency approach. Victims of sexual violence can go to a single centre (the CSG) for multidisciplinary support from Safe at Home, hospitals, the municipal health service (GGD), victim support services, the police and other organisations. In addition, the CSG has opened a walk-in centre in Amsterdam offering support to anyone experiencing sexual violence. The CSG has drawn up quality criteria for staff in all the disciplines working at a sexual assault centre who have direct contact with victims of sexual violence. The criteria include

working in a sex and gender sensitive way, being aware of the differences between men and women in help-seeking behaviour and impact of abuse, and being able to respond appropriately.

In other fields too, the Dutch government promotes multidisciplinary cooperation. One example is the Future Scenario on Child and Family Protection, a programme that focuses on a simpler, family-oriented approach to domestic violence and child abuse. In regional pilots the relevant parties are jointly developing the new approach. More generally, parties work closely together in combating domestic violence and child abuse, as described in the Stop Femicide Action Plan, in areas such as safety assessment, risk assessment and increasing professionals' expertise. The National Care and Criminal Justice Network, a learning network of the major implementing agencies in the care and criminal justice sector, plays a major role here. Cooperation takes place within the statutory boundaries of each participant, with tasks and responsibilities being aligned to ensure they strengthen one another. The basic principle is to work together to ensure direct, enduring safety, with specific (and gender-sensitive) approaches to victims and perpetrators, adults and children. The network operates both nationally and regionally with 25 Safe at Home centres in ten court districts, and has a national administrative network in which ministries and other parties such as Valente (shelters for men and women) and Victim Support Netherlands are involved.

<b>Subject of recommendations</b>	<b>General support services</b>
<b>Relevant Article Istanbul Convention</b>	<b>20</b>

### **Recommendations**

GREVIO strongly encourages the Dutch authorities to continue their efforts to ensure the recovery and economic independence of women victims of violence throughout the country through general social services, including measures involving financial assistance, education/training and assistance in finding employment and affordable, permanent housing, through schemes that prioritise them. More measures need to be taken to raise awareness of social services staff about the needs of victims of all the forms of violence against women covered by the Istanbul Convention.

GREVIO strongly encourages the Dutch authorities to ensure, across the healthcare sector, the identification of victims of all forms of violence against women covered by the Istanbul Convention, their diagnosis, treatment and referral to appropriate specialist support services in a gender-sensitive and non-judgmental manner, as well as the provision of a forensic report for victims documenting their injuries.

GREVIO strongly encourages the Dutch authorities to ensure that women with intellectual disabilities who undergo sterilisation are able to make their decision on the basis of having sufficient information on the procedure, which is presented to them in an accessible manner by professionals who are trained on gender and disability issues and which allows them to give their informed consent to such a procedure. In any procedure authorising the sterilisation of legally incapacitated women, less invasive birth control options should be considered with due regard to the best interests and self-determination of the women concerned.

### **Policy response**

The Netherlands continues to work towards the recovery and (economic) empowerment of women as an important part of the support provided to victims of

domestic violence and violence against women. This type of support is largely provided by municipalities and women's shelters. It includes administrative and financial support, strengthening resilience, appropriate daily activities (paid or voluntary work, education or training) and help in finding housing. Support in the various areas of life is also offered in the community. In addition, the women's shelters provide recovery-oriented support, tailored to the individual's own needs. The Housing (Strengthened Coordination) Act (*Wet versterking regie volkshuisvesting*) due to enter into force in 2026 is relevant to the housing of victims after a stay in a women's shelter. The Act will oblige municipalities to award priority to women leaving women's shelters, where this was previously optional. The Dutch government is aware that housing for victims will remain an important issue in the years to come in light of the current housing shortage.

The domestic violence and child abuse protocol helps professionals step-by-step from identifying signs of violence to sending a report to Safe at Home. The protocol is launched when there are suspicions or signs of domestic violence, child abuse or violence against women. Nearly all the professional groups working within the healthcare sector are legally obliged to follow the protocol and each has a sector-specific assessment framework. The framework supports professionals in following the steps in the protocol. Organisations are also obliged to train their staff in the use of the protocol.

Once it has received a report, Safe at Home assess the safety aspects of the situation. Safe at Home then ensures that appropriate follow-up measures are taken, including the use of specialised support. If there are serious signs of child abuse and/or sexual violence, organisations including Safe at Home, the Child Care and Protection Board, the Public Prosecution Service and the police can request a full physical examination. In the case of children, the examination is carried out by a forensic physician and the aim is to document any injuries objectively. In addition, doctors can report concerns about injuries suffered by children and the possible causes to the National Child Abuse Expertise Centre (*Landelijk Expertise Centrum Kindermishandeling* – LECK). The LECK advises on the possible causes of injuries; it also establishes whether further examinations are necessary and if so, what kind. If they recommend a full physical examination, this is carried out by a forensic physician.

The 2023 policy outlook on intimacy and sexuality for people with a disability sets objectives that will contribute to removing stigma and taboos around intimacy and sexuality for this group. They include developing and providing easy access to practical information, including within residential care organisations. In addition, the policy outlook aims to increase awareness regarding intimacy and sexuality among people with a disability, their families and care professionals. For example, through tips for families and friends on how to start a conversation on the subject, or information videos to raise awareness and facilitate discussion. Domestic violence and child abuse specialists within care organisations contribute to creating a structural focus on intimacy and sexuality issues.

Forced sterilisation of women because of a disability is never permitted. The 'Not Pregnant Now' (*Nu Niet Zwanger*) initiative offers care professionals a practical toolkit to engage in dialogue with their clients on the desire to have children, sexuality and contraception. The aim is to prevent unwanted pregnancies. If a client indicates that they do not wish to have children, the care professional involved discusses appropriate contraception with them. The programme is now available

nationwide and falls under the municipal health service. The Rutgers expertise centre takes part in the project.

Finally, the Dutch working agenda on the UN Convention on Disability Rights aims to increase knowledge and improve the skills of professionals in the care and public safety system with regard to violence and abuse suffered by people with a disability. It also addresses collecting available expertise and making it better available to the support services. The aim is to provide better protection against violence, abuse, exploitation and neglect for people with a disability.

<b>Subject of recommendations</b>	<b>Specialised support services</b>
<b>Relevant Article Istanbul Convention</b>	<b>22</b>

### **Recommendations**

29. GREVIO urges the Dutch authorities to:

- a. take more decisive action to align the conceptualisation of domestic violence that underpins professional practice at Safe at Home centres with the principles of the Istanbul Convention and to ensure relevant staffing levels and more harmonised service provision;
- b. increase the number and capacity of women’s shelters providing safe accommodation to victims of all forms of violence against women, in line with the standards set by the Istanbul Convention and in an adequate geographical distribution, with the aim of achieving the standard set out in the Explanatory Report to the Istanbul Convention of one family place per 10,000 heads of population;
- c. ensure that shelters and other specialist services can accommodate and cater for the needs of women subject to intersectional discrimination and their children, including women without a residence permit, women with disabilities and young women and girls.

### **Policy response**

The Netherlands has a decentralised system in which responsibility for combating domestic violence and child abuse rests primarily on the municipalities. This means that the municipalities have primary responsibility for ensuring that local Safe at Home centres work on the basis of a perspective on domestic violence that is aligned with the principles of the Istanbul Convention. Central government, together with the VNG and the National Safe at Home Network (*Landelijk Netwerk Veilig Thuis*), endeavours to encourage uniformity in the way municipalities and individual Safe at Home centres operate. Safe at Home centres follow a single procedural protocol, an important part of which is the ‘Phased cooperation on safety’ strategy.

According to this strategy, the approach to situations that are unsafe consists of three phases. The first priority is to re-establish immediate safety by making safety plans. This involves identifying the most unsafe situations, when they occur, what can trigger such situations and exploring who can do what to prevent such situations arising or to minimise their intensity. In the second phase (risk-based care), an analysis of deeper, more structural causes of violence is made. The underlying risk factors (and protective elements) for every member of the family or household are examined, as well as what is needed in terms of arrangements, support by social services or other partners in the care system, or use of social networks in order to reduce the structural factors that lead to unsafety. In the third and last phase

(recovery-oriented care), the focus is on reducing and healing the trauma ensuing from violence and addressing associated problems.

The Safe at Home centres work according to the strategy and system outlined above in all cases in which they are actively involved. In the second phase, involving a closer look at the underlying causes of violence, there is room for a broad analysis of the family or household, addressing questions such as what triggers the violence, what makes it worse, and how can this be resolved. After immediate safety has been restored in the first phase, there is room in the second phase to consider gender-specific factors that contribute to the development of unsafety. For example, thoughts or perceptions based on gender stereotypes or other factors that contribute to violence against women because they are women. All Safe at Home staff are trained to work according to this strategy. An added key advantage is that this also applies to all the partners working with Safe at Home in the field of unsafe families.

As part of the implementation of the EU Directive the authorities will work on the basis of national action plans. At the time of writing, the precise content of these plans was not yet known, although it can be assumed that they will share the perspective of the Istanbul Convention on domestic violence and child abuse and will subscribe to its principles.

The final point of part a. of the recommendation, with regard to the availability of sufficient staff, is receiving growing attention. In addition to regular discussions between municipalities and their regional Safe at Home organisation on the funding required, central government is also providing funding, such as for a large-scale information campaign aiming both to improve Safe at Home's public image and, in view of staff shortages, to inform a much broader public of the employment opportunities it offers.

Organising and funding shelters for victims of domestic or sexual violence is a municipal responsibility, as laid down in the WMO. In 2025 Valente and the VNG published the Safe Shelters Monitor containing figures on the national and regional capacity of women's shelters.<sup>3</sup> In 2023 the Netherlands had 1,024 places for victims of domestic and sexual violence, or one place per 17,500 heads of population. According to the standard of 1 place per 10,000 people set out by the Istanbul Convention, this should be around 1,780 places. Furthermore, the explanation of this recommendation states that the number of shelter places should be based on actual demand within the Dutch context. Involved parties such as Valente signal that there is currently a shortage of safe shelter places. Recently, the Dutch government structurally committed an additional €12 million to increase capacity in the women's shelters.

There is also concern for individual needs and specific groups. The order in council on the reception of victims of domestic and honour-based violence who have no residence permit grants the right to shelter to such victims who as yet have no residence permit and are not covered by the WMO 2015. Additional funds have also been made available for this target group. The implementation of the EU Directive will further secure these rights. The Directive contains requirements regarding shelter, including on recovery-oriented care, the necessary capacity and access to shelter for all victims regardless of their residence status.

---

<sup>3</sup> Full version of Report on 2022-2023 Safe Shelters Monitor.

Under the safety and legal protection section of the working agenda on the UN Convention on Disability Rights, measures are being taken to increase the physical accessibility of shelters for people with disabilities. These are expected to be implemented in 2026.

Both shelters and specialist services address the specific (gender-based) needs of victims of domestic and gender-based violence. They tailor their approach to victims' individual situation and take account of intersectionality and any greater risk involved.

The CSG works with national, uniform quality criteria which dictate that care provided to victims of sexual violence must be integral, multidisciplinary and intersectoral. Basic training for CSG case managers specifically addresses intersectionality, such as support for victims with a disability or mental illness, and under-acknowledged target groups, such as men and boys. The CSG Academy facilitates staff's ongoing professional development.

The CSG also provides information tailored specifically to, for example, LGBTIQ+ people and people with an intellectual disability. Online support and online chat are available to victims who for whatever reason wish to remain anonymous. Since age is also a risk factor in sexual violence, the CSG aims to increase its visibility at schools and universities.

<b>Subject of recommendations</b>	<b>Support for victims of sexual violence</b>
<b>Relevant Article Istanbul Convention</b>	<b>25</b>

### **Recommendations**

With a view to expanding the response to sexual violence and rape, GREVIO strongly encourages the Dutch authorities to:

- a. increase the number of sexual violence referral centres such as the Sexual Assault Centres with a view to reaching the target of one such centre per 200,000 heads of population and ensuring an even geographical distribution;
- b. ensure the provision of comprehensive support, including immediate, medium and long-term psychosocial support for all victims of rape and sexual violence through adequate funding and staffing levels;
- c. remove any barriers, including financial and those linked to health insurance status or physical access, to women's access to the full range of services provided;
- d. step up outreach and awareness-raising activities about the availability of these support services.

### **Policy response**

In the Netherlands, the CSG plays an important role in providing support to victims of sexual violence. Anyone can contact the organisation, free of charge, and will be referred on to accessible and multidisciplinary care and support. This is provided by 16 regional centres, which form a nationwide network. The number of CSGs in the Netherlands is based on geographical distribution, accessibility for victims and the capacity of existing services. The centres are easy to reach, within a reasonable travelling distance and have sufficient capacity to be able to respond to all requests for support.

In addition to medical and forensic care, the CSGs also offer psychoeducation and trauma-focused support for a maximum of four weeks, also known as the 'watchful waiting' period. If it becomes clear that the victim needs more specialist treatment they are referred to the mental health service (GGZ). The victim and care professional make a decision on the duration of support together, but in principle support will be provided for as long as the victim needs it.

To make the support provided locally more stable, the government is exploring the scope for a statutory basis for support to victims of sexual violence. This is also part of the process implementing the EU Directive. With regard to sufficient capacity, there are staff shortages throughout the care sector. It is of course important that there are sufficient numbers of professionals with the appropriate expertise available to support victims of sexual violence. At present, the CSG provides nationwide coverage and there are no indications that more centres are required. Investing in staff with the requisite knowledge and skills is the current priority and will remain so in the years ahead.

The mandatory excess (compulsory own risk) under the Healthcare Insurance Act (ZVW) is a fixed amount per calendar year that applies to certain types of medical care covered by the ZVW. How much excess a person needs to pay for treatment depends on how much of their annual excess they have already paid for other treatments that year. The mandatory excess applies to everyone aged 18 and over who is obliged to take out health insurance under the ZVW. No distinction is made between medical treatment that is necessary because of a disease, a disorder or an external cause, such as sexual violence. A pilot project and a number of studies looked at whether the excess might deter victims of sexual violence from seeking help. These showed that victims can experience a number of barriers, including shame, guilt and anxiety. Having to pay for all or part of their care through the mandatory excess was not a significant barrier. This makes it all the more important to focus efforts on reducing other highly problematic interpersonal and sociocultural obstacles. The multiannual National Action Programme against Sexually Transgressive Behaviour and Sexual Violence therefore concentrates on breaking down the taboos around this subject, opening it up to discussion and strengthening efforts to bring about a culture change, with the objective of achieving lasting change in this area. The Government Commissioner on sexually transgressive behaviour and sexual violence also plays a major role in encouraging public debate on this issue.

With regard to improving physical accessibility to services, the working agenda on the UN Convention on Disability Rights includes a number of measures to improve both information provision and physical accessibility in cooperation with the organisations and municipalities.

Furthermore, it is important for victims to be able to easily access support services, including the CSG. Public awareness of the CSG is promoted through information campaigns and other forms of communication, to which central government contributes in a number of ways. Central government public communication refers to the CSG. In addition, the national CSG organisation receives funding for its own (social media) campaigns and communication. For instance, it invested this in improving its website and in a long-term campaign encouraging victims of sexual violence to seek support ('What can help me?' (*Watkanmijhelpen.nl*)). At regional level too, the CSGs are working to raise their profile in ways that tie in with the regional context and regional media. In addition, since 2012 the *slachtofferwijzer.nl*

online platform has provided information for victims, care providers and families/friends on practical, legal, emotional and financial support. It can also refer victims to relevant organisations, including the CSG. The site is now accessible to people with visual or language impairment. It has also become more attuned to victims' lived experience.

<b>Subject of recommendations</b>	<b>Custody, visitation rights and safety</b>
<b>Relevant Article Istanbul Convention</b>	<b>31</b>

### **Recommendations**

GREVIO strongly encourages the Dutch authorities to take the following priority actions with regard to custody and visitation rights to ensure the safety of victims and their children:

- a. systematically screen all pending cases on custody and visitation for instances of domestic violence, consult with all relevant bodies, including on whether criminal proceedings are pending against the perpetrator or have been brought in the past, and request the disclosure of the perpetrator's criminal record, any reports against him for violence or risk assessments and safety plans drawn up by the police and social services (and other relevant bodies);
- b. ensure that the negative impact that violence against women has on children is a mandatory criterion to be taken into account when deciding on custody and visitation rights;
- c. take all appropriate measures to ensure that all relevant professionals, including social workers, members of the judiciary, court experts and child psychologists, are aware of the lack of a scientific basis for 'parental alienation syndrome' and refrain from using concepts that position women victims of abuse as hostile or uncooperative;
- d. provide a sufficient number of safe premises for supervised visits.

### **Policy response**

In response to 'Where violence becomes invisible' (*Waar geweld uit beeld raakt*), a study published in 2024 by the Verwey-Jonker Institute, an independent Dutch institute for applied research into social issues, a plan of improvement has been launched aiming to increase attention to domestic violence in family law proceedings.<sup>4</sup> One of the Institute's recommendations is to develop an assessment framework, which could make a valuable contribution to this process. According to the researchers, this would mean that risk assessment and screening in relation to patterns of violence would take place at the beginning of proceedings and would improve the exchange of criminal justice information in family law proceedings. This recommendation is in line with GREVIO's recommendation to screen current custody and visitation cases for possible domestic violence.

As part of the plan of improvement, exploratory talks have already taken place with the judiciary, the Child Care and Protection Board and the researchers at the Verwey-Jonker Institute. The Institute's recommendations will be taken into account in further talks with judiciary, the Child Care and Protection Board and other relevant organisations and their staff, including the legal profession and Victim Support Netherlands. GREVIO's four recommendations will also be incorporated into the plan

---

<sup>4</sup> Appendix to Parliamentary Papers, House of Representatives 2024-2025, 28345, no. 285.

of improvement, since they are relevant to increasing attention to domestic violence in family law proceedings.

Within the current legislative system the family law courts play a passive role: the parties determine the extent of the dispute. A domestic violence project group is currently exploring how judges can receive more and better information about cases within the current statutory boundaries. It is clear that domestic violence, including intimate terrorism, is more frequently and more explicitly referred to in proceedings and taken into account in the decisions handed down, sometimes with explicit references to the Istanbul Convention. A statutory basis for a screening requirement would further support this development.

With regard to 'parental alienation syndrome', we would refer to 'When contact is not straightforward after divorce' (*Als contact niet vanzelfsprekend is na scheiding*), a study conducted by the Verwey-Jonker Institute in 2023. This shows that there is no consensus in the Netherlands regarding content and terminology. Increasingly, therefore, the phrase 'disrupted parent-child relationships following divorce' (*'geblokkeerde ouder-kindrelaties na scheiding'*) is used, as this better describes the complexity of loss of contact and leaves room for relationships to be repaired. Through training courses and the project group, the judiciary encourages legal professionals to apply current research findings on loss of contact and domestic violence in their work.

The plan of improvement and ongoing initiatives provide follow-up to GREVIO's recommendation on priority actions in the field of custody and visitation rights, with a view to increasing the safety of victims and their children.

<b>Subject of recommendation</b>	<b>Prohibition of mandatory alternative dispute resolution processes or sentencing</b>
<b>Relevant Article Istanbul Convention</b>	<b>48</b>

### **Recommendation**

GREVIO urges the Dutch authorities to move away from practices that amount to mandatory mediation in parental separation proceedings initiated without prior and pro-active screening for a history of domestic violence and towards a thorough understanding of the power imbalances created by domestic violence and the fact that family law proceedings are often a tactic in post-separation abuse. This includes referring the non-abusive parent to joint counselling or family therapy, which is often seen as compulsory.

In its earlier findings, GREVIO had strongly encouraged the Dutch authorities to introduce clear protocols and guidance in all areas of law where mediation is used. These must contain safeguards for free and informed consent from women victims of violence, integrate risk assessments into all offers of mediation and give victims the opportunity to withdraw at any time without negative consequences.

### **Policy response**

A referral by the court to civil law mediation is never mandatory and participation in mediation is not a precondition for a court decision. Every court has a mediation office with appropriately trained staff. Before a referral to mediation is made, the mediation officer screens cases for suitability. The voluntary participation of both

parties is the guiding principle in all cases. The parties will never be compelled to start or continue the mediation process.

A referral by a court to mediation always takes into account the mediator's profile and whether they are well suited to the case and parties in question. The mediation officer plays an indispensable role here, using the information available to them to decide which mediator should be appointed, having regard to their knowledge and expertise. The courts also take the issue of safety into account.

When a court refers parties to mediation, it will always be with a mediator registered with the Federation of Dutch Mediators (MFN). Registered mediators must satisfy several quality criteria. Their training is based on a professional profile focusing on knowledge and skills, after which they specialise and continue to train in particular subject areas. This may include psychological components, conflict dynamics or recognition of unequal power relations.

Under the Victims of Criminal Offences Decree (*Besluit slachtoffers strafbare feiten*) and the Policy Framework on Restorative Justice (*Beleidskader herstelrechtvoorzieningen*), where mediation takes place in criminal cases, parties – including the victim – can choose not to participate or discontinue their participation in mediation. This applies to all criminal offences and therefore also to those involving violence against women. Deciding not to participate or to discontinue participation in mediation has no impact on the disposal of the case. In practice, the victim is always informed of this at several points in the process, both by the court mediation officer and by the mediators concerned. The voluntary nature of mediation and the option to discontinue participation in mediation are fully described in the MFN mediation agreement, the MFN Code of Conduct and the MFN regulations, all of which are made available to the parties.

In practice, whether mediation is appropriate is considered at several points in the criminal proceedings:

1. before a case is referred to mediation by the referring public prosecutor or judge;
2. by the mediation office at the district court before mediation is started;
3. by the mediators in separate intake interviews with the victim and the perpetrator before a joint meeting takes place;
4. by the parties themselves during mediation.

When a case is referred to mediation, the Public Prosecution Service or the court takes all relevant information, including the domestic violence and child abuse protocol, into account.

Although mediators do not have access to all the information in the criminal file, all MFN-registered mediators who are members of the Association of Mediators in Criminal Law Proceedings comply with a professional profile requiring the application of a perpetrator-victim dynamic, including elements of the interactions involved in violence against women and domestic violence. In addition, mediation in criminal cases is always conducted by two specialised criminal law mediators.

<b>Subject of recommendations</b>	<b>General obligations – Immediate response, prevention and protection</b>
<b>Relevant Articles of Istanbul Convention 49, 50</b>	

### **Recommendations**

GREVIO urges the Dutch authorities to diligently pursue, on their own initiative, every case of rape or sexual violence that is brought to their attention, and to end any practices that dissuade women victims from reporting, such as imposing 'reflection periods' (paragraph 167).

GREVIO strongly encourages the Dutch authorities to take measures to increase trust in law-enforcement agencies and encourage women victims of violence to report, including women who are at risk of or subject to intersectional discrimination, for example women with disabilities, LGBTI women, women in prostitution and migrant women.

GREVIO strongly encourages the Dutch authorities to take all necessary measures to ensure that investigations into all forms of violence against women covered by the Istanbul Convention are conducted without undue delay and that investigating authorities proactively collect evidence beyond the victim's statement in order to ensure an effective prosecution, including in the context of the newly introduced definition of rape and sexual violence based on the absence of consent.

GREVIO welcomes the working method for domestic violence cases applied by Rotterdam district court, where all pending family law and criminal cases concerning one family are dealt with in a combined hearing by the same judge. GREVIO invites the Dutch authorities to consider the rollout of this working method to other courts across the country.

GREVIO strongly encourages the Dutch authorities to:

- a. ensure that all acts of violence against women and domestic violence covered by the Istanbul Convention are sanctioned swiftly, in particular by taking sustained measures to reinforce the capacity of courts that hear cases of sexual violence so as to reduce delays;
- b. ensure that sentences and measures imposed for the offences covered by the Istanbul Convention are effective, proportionate and dissuasive;
- c. identify the root causes of attrition in the criminal justice sector by introducing data collection and case tracking across the sector and taking adequate measures.

### **Policy response**

Victims always have the right to report an offence. If they wish, they can take advantage of the reflection period. This is not an obligation but a right and is not routinely required. The aim of the reflection period is to allow the victim to make a considered choice on whether or not to lodge a criminal complaint and possibly to consult a lawyer specialising in domestic violence. There is no attempt to dissuade the victim from reporting. If a victim decides not to lodge a criminal complaint, the public prosecutor may nevertheless decide to start an investigation on their own initiative.

The government and the organisations in the criminal law system are actively working to increase confidence in the system and improve victim support. The position of the victim is the main focus of the action plan on strengthening the

system-wide approach to sex offences (*Actieplan versterken ketenaanpak in zedenzaken*) Professionals are trained to duly counsel victims, discussing all the options available to them. This includes victims who are at risk of intersectional discrimination, for example women with disabilities, LGBTI women, women in prostitution and migrants.

To ensure that investigations are conducted with appropriate speed and care, steps are being taken within the criminal justice system to accelerate the handling of sex offences. In recent years, investigative capacity has been increased. Sexual offences investigators are specially trained police officers whose daily concern is safety in the community. They investigate the facts, track down online sexual offences and refer victims to appropriate follow-up that contributes to maintaining the legal order and safety, while aiding victims' recovery. This type of work demands professionalism, neutrality, tailored approaches and a keen eye for both the quality criteria applying to the investigation process and the interests of all involved in an investigation into sex offences. Interacting with victims and suspects in sex crime investigations is specialist work and requires specific competences and skills. As a result, certain procedures are restricted to sexual offences investigators who have completed the necessary specialist training.

The approach to domestic violence and child abuse is based on a strategy of phased cooperation on safety. This means that the first step is to secure the victim's immediate safety based on a safety assessment, safety criteria and a safety plan. By coordinating safety measures early on, interventions can take place concurrently and complement each other, increasing the chance of restoring safety. Once the victim's immediate safety has been secured, risk-based care is introduced to tackle the risk factors behind recurrent violence and unsafety, after which support or treatment aimed at recovery is provided.

Early and intensive cooperation through the Safety First (*Veiligheid Voorop!*) alliance comprising the police, Safety at Home, the Public Prosecution Service, the Child Care and Protection Board and the probation service is essential to the immediate safety phase. These organisations work closely together to ensure immediate intervention in situations of acute danger and take appropriate safety measures. Victims are also systematically evaluated via the Individual Victim Assessment Method so they can be better protected against revictimisation, intimidation or retaliation. If necessary, the police or Public Prosecution Service will implement protective measures.

The government endorses the importance of sufficient capacity at the courts, in particular for sexual offence cases. To this end, it has provided for structural reinforcements. In addition, the effectiveness of sentencing has been secured in the Domestic Violence Sentencing Guidelines (*Richtlijn voor strafvordering huiselijk geweld*), which state that suspects are in principle always summoned to appear in court. Partly prompted by the 'Where violence becomes invisible' study, steps are also being taken to improve data collection within the criminal law system. This will help better establish where and why cases are dropped and enable targeted measures to be taken to counter 'attrition'.

Further, the above study also prompted the launch of a plan of improvement to strengthen the connection between criminal and civil law. The working method in use at Rotterdam District Court – which holds combined hearings of all pending criminal and family law cases that concern the same family – fits in well with the plan and will be taken into account in further studies.

Finally, there is no specific provision criminalising domestic violence in Dutch law. This form of violence is prosecuted on the basis of other provisions, such as assault and stalking. The sentence imposed in a specific case depends on the relevant facts and circumstances (see also [oriëntatiepunten voor straftoemeting en overige LOVS-afspraken](#) (orientation points for sentencing and other agreements made by the National Committee on Criminal Law Matters (LOVS), available in Dutch only) and [rechtspraak.nl](#) (case law)). These orientation points pay specific attention to assault in the context of domestic violence: a fine is not an option. Rotterdam District Court follows a specific approach in domestic violence cases.<sup>5</sup> The Dutch Council for the Judiciary (*Raad voor de Rechtspraak*) has indicated that the evaluation report and its recommendations will be drawn to the attention of the courts.

<b>Subject of recommendations</b>	<b>Risk assessment and risk management</b>
<b>Relevant Article Istanbul Convention</b>	<b>51</b>

### **Recommendations**

GREVIO strongly encourages the Dutch authorities to ensure that:

- a. gender-sensitive risk assessments are systematically and mandatorily carried out in situations of domestic violence and other forms of violence covered by the Istanbul Convention, and not limited to situations of serious violence;
- b. risk assessment, risk management and preventive measures are carried out and applied in a harmonised manner across the country, for example through training, guidelines and awareness-raising measures;
- c. an effective multi-agency approach is taken to risk assessment in order to ensure the human rights and safety of the individual victim while giving due consideration to the rights and safety needs of child witnesses of intimate partner violence;
- d. systematically review and analyse all cases of killings, suicides and suspicious deaths of women to determine whether the perpetrator's motive was gender-based or whether the woman had previously been subjected to domestic violence or another form of violence covered by the Istanbul Convention, and to identify any possible systemic gaps in the institutional response of the authorities.

### **Policy response**

Safety and risk assessments play a crucial role in the approach to gender-based violence, including steps to prevent potential femicide. In the care and public safety system professionals use these instruments to estimate acute unsafety and project future scenarios. Scientific knowledge regarding risk factors has developed further in recent years. The Netherlands considers it necessary for the instruments used by the various parties to be up-to-date and in line with the most recent research insights.

The parties in the care and criminal justice sectors that are involved in the Stop Femicide Action Plan are currently reviewing their safety and risk assessment instruments. They are assessing whether the instruments are up-to-date, are sufficiently sensitive to the red flags for femicide and whether professionals are

<sup>5</sup> [Huiselijk geweld | Rechtbank Rotterdam | Rechtspraak](#), see also paragraph 37.

deploying the instruments at the right time and in the right way. The participating parties are Safe at Home, the police, women's shelters, the probation service, the Child Care and Protection Board and the outpatient forensic mental health services. The project is facilitated by the ministries of Health, Welfare & Sport, and Justice & Security. The results are expected at the end of this year. In addition, Valente has developed a set of risk assessment instruments for women's shelters.

At the same time, the government is looking at cooperation between the parties in the system. The aim is to identify signs of imminent fatal violence more quickly and effectively by improving not only the instruments but also cooperation between organisations. In this connection, a pilot project is currently underway involving Forensic Physicians Rotterdam-Rijnmond (FARR) and the Amsterdam municipal health service, working together with the National Research and Expertise Bureau for Forensic Medical Examinations (*Landelijk Onderzoeks- en Expertisebureau voor Forensisch-Medisch Onderzoek* – LOEF). The aim is to improve forensic medical examinations in cases of non-fatal strangulation, to strengthen early identification and enhance cooperation between key parties such as Safe at Home, the police and the Public Prosecution Service. The project will produce a guide for professionals to help them identify the signs of non-fatal strangulation in order to call in forensic medical expertise as soon as possible. Its findings will also contribute to improving standard safety and risk assessment in cases of domestic violence and child abuse.

In addition, recently an exploratory study will start into a standard approach to the analysis of murder and homicide cases occurring in the 'immediate social environment' (domestic homicide reviews or DHR). In this study possible study designs for DHRs are explored, and analytic methods are tested, evaluated and translated into specific tools for decision-making and implementation. The study takes into account the different forms of killing in the context of domestic violence, such as suicide and child killing. The aim is to gain insight into (gender-based) motives, previous signs of violence and possible problem areas or shortcomings in the approach. The exploratory phase, in which DHRs are tested in practice, is expected to have a duration of over a year.

Finally, the Ministry of Justice and Security is funding the 2025-2029 Netherlands Femicide Monitor set up by Leiden University. The Monitor will provide insight into the extent and nature of femicide in the Netherlands and the characteristics and subtypes of these cases through a scientific analysis of data supplied by the police, Public Prosecution Service and the courts, as well as publications in the media since 2014. The findings will provide a deeper insight into the annual CBS statistics on murder and homicide in the Netherlands. As of 2025, Leiden University will publish annual statistics relating to the previous year. In addition, regular overviews will be published covering a longer period. The University also produces reports on specific characteristics of femicide in the Netherlands and a website on femicide in the Netherlands, and promotes the exchange of knowledge through workshops and symposia. Furthermore, it makes the relevant research data available to the WODC and the CBS, for the purposes of further, in-depth research. Finally, the Femicide Monitor can also serve as the basis for the selection of cases for the DHRs referred to above.

<b>Subject of recommendations</b>	<b>Emergency barring orders, restraining or protection orders</b>
<b>Relevant Articles of Istanbul Convention</b>	<b>52 and 53</b>

### **Recommendations**

In order to ensure full compliance with Article 52 of the Istanbul Convention, GREVIO urges the Dutch authorities to take legislative and other measures to:

- a. amend the Temporary Domestic Exclusion Order Act (*Wet tijdelijk huisverbod*) with a view to including victims who do not cohabit with the perpetrator, and to include the possibility of ordering a prohibition on approaching and contacting victims and their children;
- b. ensure that the relevant authorities are vested with the power to issue such orders immediately where there is imminent danger, without the high threshold of a 'serious' risk;
- c. promote the use of emergency barring orders among law-enforcement officials in cooperation with Safe at Home centres;
- d. ensure the diligent enforcement of such orders, and in particular that perpetrators are duly informed of any extension.

GREVIO strongly encourages the Dutch authorities to take legislative or other measures to ensure that:

- a. no gap in the protection of the victim arises because of the expiry of any emergency barring order and/or restraining order, by making available successive protection measures that can be applied for and issued immediately afterwards, including for victims' children;
- b. children are included in the same restraining order as their mothers, particularly in cases where the children are directly the victim of violence or are exposed to the violence;
- c. efforts are made to promote, monitor and enforce restraining orders.

### **Policy response**

Together with municipalities and other relevant organisations, the government is currently examining how, in order to protect victims, temporary exclusion orders for perpetrators of domestic violence and child abuse can be imposed more swiftly and effectively. On the basis of the report 'A new perspective on the temporary domestic exclusion order',<sup>6</sup> pilot projects are being prepared in four regions to explore how the various stages in the exclusion order procedure (launching the procedure, completing the risk assessment, imposing the order, implementing the order, providing the necessary support and care, and enforcing the order) can be improved.

The aim is to deploy temporary exclusion orders not just in acute crises but before such a situation arises, on the basis of well-substantiated suspicions of structural unsafety. Besides the police, other parties could and should take the initiative to approach the mayor with a request for an exclusion order. The pilot projects are expected to start in January of 2026 in four regions. Because a temporary domestic exclusion order involves many parties, it must be meticulously prepared in cooperation with the municipalities and implementing agencies involved, including

<sup>6</sup> Kleinjan – Van Zwet, M., 'Het tijdelijk huisverbod vanuit een nieuw perspectief, Analyse van de knelpunten en concrete voorstellen voor een verbeterde werkwijze van de Wet tijdelijk huisverbod' ('A new perspective on the temporary domestic exclusion order. Analysis of problem areas and specific proposals for improvements in the working of the Temporary Domestic Exclusion Order Act'), March 2024. See Parliamentary Papers, House of Representatives 2023-2024, 28345, no. 278.

the police, Safe at Home, crisis intervention teams, the Child Care and Protection Board, the Public Prosecution Service, the probation service and local care and support services.

At the end of May 2026, guidance for professionals on more effective use of the temporary exclusion order will be published. It will provide background information and tips, based partly on the findings of the pilot projects referred to above, enabling professionals to improve their approach within the existing legislative framework. At the same time, the pilot projects can provide insights and further substantiation for amendments to the Temporary Domestic Exclusion Order Act and allied legislation. In this same period the Minister for Legal Protection will examine whether, in order to better protect victims of domestic abuse and child abuse, mayors can make better use of their current powers under administrative law, or whether these powers should be supplemented and if so, how. It is essential for victims to always be adequately protected and for protection to be maintained if necessary after an exclusion order has expired, or if such an order is not expedient. There should also be scope for criminal law measures, for example even before an antisocial behaviour order under article 509hh of the Code of Criminal Procedure is imposed.

Subject of recommendation	Measures of protection
Relevant Article Istanbul Convention	56

### **Recommendation**

42. GREVIO strongly encourages the Dutch authorities to identify and address barriers to the practical implementation of all measures covered by Article 56 of the Istanbul Convention, doing this from a victim’s perspective in order to close possible shortfalls in their application.

### **Policy response**

Although in the Netherlands victims of crime have a range of rights during a criminal trial, GREVIO has identified a number of shortcomings in the practical implementation of those rights. It points out that in the past, victims’ personal data was often included in the case files. The privacy of victims has been better protected since 1 July 2025 when new legislation entered into force<sup>7</sup> that ensures that eight types of personal data relating to victims, including their address, citizen service number and telephone number, are no longer routinely recorded in case files. Such data can only be included if it is relevant to the decision to be taken by the court. In addition, under this legislation victims who joined proceedings as injured parties automatically receive the judgment and no longer have to apply for it to be sent to them.

Under article 51b of the Code of Criminal Procedure, victims have the right to request access to the documents in the action from the Public Prosecution Service, or if proceedings have already started, from the criminal court. This is a crucial right for victims since it enables them to gain insight into a case that concerns them. The Minister for Legal Protection does not agree with the impression given that the position of victims in relation to this right has been weakened by the new Victims in Criminal Proceedings Instructions (*OM aanwijzing slachtoffers in het strafproces – 2024A001*). The Instructions emphasise the fact that the public prosecutor must

<sup>7</sup> <https://zoek.officielebekendmakingen.nl/stb-2025-29.html>.

weigh the victim's interest in access against other interests, such as the interests of the investigation and the suspect's right to personal privacy. This balance is crucial if both the interests of the victim and those of the suspect are to be safeguarded. In the new Code of Criminal Procedure, the article on access for victims will be clarified. In addition, a provision will be made for victims to lodge an objection with the examining magistrate against a decision refusing access from the Public Prosecution Service. This amendment can improve the uniformity of decisions on such requests and will clarify the position of victims, offering them more clarity and certainty in this process.

Furthermore, the concern that victims cannot obtain representation during the preliminary investigation is unfounded. The Ministry of Justice and Security has contacted the Public Prosecution Service on this issue. The relevant passage in the Victims in Criminal Proceedings Instructions makes it clear that a person providing support to the victim – a lawyer, a staff member of Victim Support Netherlands, an authorised representative or a family member – can act on behalf of the victim but not instead of them. This means that it must be clear that the victim approves of the actions of the specialist lawyer or other professional offering legal assistance. This prevents a situation arising in which the victim is bypassed, for example if an insurer asks for documents without the victim being informed. Authorised legal representatives are therefore not sidelined; the victim retains their own autonomy. It has been agreed with the Public Prosecution Service that the text of the Instructions will be amended in the next round to avoid confusion on this point. Until then, public prosecutors will act in accordance with the above explanation.

With regard to the observation that victims' right to information on the perpetrator's release or escape is safeguarded primarily for those who are represented by a lawyer, it should be noted that victims are informed in such cases whether they have legal representation or not. Although the possibility cannot be excluded that this does not always go well in practice, there are no indications of problems. This also applies to the treatment received by victims with and without legal representation: there should be no distinction.

Better protection and good support are once again priorities in the 2025-2028 Multi-year Victim Policy Agenda.<sup>8</sup> The aim is always to provide clarity and predictability for victims and to ensure they can make autonomous decisions on whether or not to exercise certain rights. Like GREVIO, the Dutch government notes that research into existing barriers to the full implementation of support and protective measures, including from the victim's perspective, would help to identify possible shortfalls in their application. The Multi-year Victim Policy Agenda states that greater insight is needed into the effectiveness and efficiency of measures in order to ensure that policy on victims is effective. The WODC has launched a multi-year research programme into victims' needs, the size of the target group, victims' use of existing provisions and rights and the resulting effects, and victims' experiences on the road to recovery. The research results will be used to define more focused policy goals and where necessary to recalibrate current policy. In addition, there are ongoing studies in specific research areas that can produce relevant recommendations for consideration in policymaking and implementation.

Work on a harmonised and coordinated approach to assistance and support is being undertaken by an alliance comprising the CGS, Safe at Home, Victim Support Netherlands, Perspectief Herstelbemiddeling (an organisation offering restorative

---

<sup>8</sup> Parliamentary Papers, House of Representatives, 2024-2025, 33552, no. 137.

mediation), the Public Prosecution Service and the police. The aim is to further improve cooperation and to provide better support to victims, (possible) perpetrators and others involved in violence, more specifically sexual abuse and sexual violence, in relationships of dependency. The joint approach focuses on the needs of victims and their immediate or wider social environment. The parties work together to achieve the most appropriate approach for victims with regard to safety, criminal or civil law, support (medical and psychological) and recovery. The method will be trialled in the second half of 2025 in the regions of The Hague and East Brabant, to determine whether the approach actually produces the desired improvements for victims. Depending on the findings, a decision will be taken in the first half of 2026 on a national rollout. At the same time, the parties involved will explore whether the joint approach is also feasible with respect to other groups of victims of violence in relationships of dependency, starting with victims of stalking by ex-partners.