

Witness Name: Claire Waxman OBE

Statement No: WITN0455001

Dated: 19 May 2026

THE NOTTINGHAM INQUIRY

FIRST WITNESS STATEMENT OF CLAIRE WAXMAN OBE

I, Claire Waxman OBE, will say as follows:-

Introduction

1. I am the Victims' Commissioner for England and Wales.
2. This witness statement is made in response to a request made under Rule 9 of the Inquiry Rules 2006, dated 20 April 2026 ("the Request") from the Nottingham Inquiry ("the Inquiry"). This witness statement draws upon the relevant knowledge and experience of others within my office and has been drafted with the assistance of a lawyer.
3. It should be noted that in my role I am expressly prohibited from intervening in individual cases. Therefore, I am unable to comment on the individual cases or operational decisions which are the focus of the Inquiry. Instead, I will focus on identifying recurring structural issues and proposing improvements to policy, practice, and accountability across the criminal justice system in an effort to assist the Inquiry in its important work. In order to avoid repetition, I have not set out recommendations within each individual section below, but have instead brought them together in a single, consolidated "proposals for change" section at the conclusion of this submission, which reflects the cross-cutting nature of the issues identified.

4. I note that I have not had direct engagement with the survivors or bereaved families involved in the Inquiry prior to providing this evidence. I would, however, be open to engaging with survivors and families should they wish to do so following the conclusion of this stage of proceedings.

Role, Background and Experience

5. The role of Victims' Commissioner for England and Wales was established under the Domestic Violence, Crime and Victims Act 2004. The statutory purpose of the role is to promote the interests of victims and witnesses; encourage good practice in their treatment; and review the operation of the Victims' Code [WITN0455002].
6. I was appointed to the role of Victims Commissioner in January 2026. Prior to my appointment at national level, I served as London Victims' Commissioner between 2017 and 2025, during which time I worked closely with the Metropolitan Police Service, Crown Prosecution Service ("CPS"), local authorities, health services and victim support organisations across London. In that role, I engaged directly with victims and bereaved families affected by serious violence, including homicide, and led work to improve multi agency coordination, independent support provision, and victim access to information across complex justice processes.
7. A central part of my current statutory role is monitoring and promoting compliance with the Victims' Code, which sets out the rights and entitlements victims and bereaved families should receive from criminal justice agencies. This includes identifying patterns of non-compliance, systemic barriers to delivery, and opportunities to strengthen accountability across agencies.
8. In discharging my current role, I engage with victims and survivors directly and through representative organisations, scrutinise the performance of criminal justice agencies and publish research, thematic reviews, and policy recommendations based on systemic evidence.

9. Relevant to the Inquiry, my office has published multiple reports examining bereaved families' experiences following homicide, the availability and impact of advocacy services, the position of victims in cases involving mentally disordered offenders, communication failures across the justice system, and structural weaknesses in information sharing and coordination. I have exhibited those of relevance throughout my statement.

Communication Issues

Police

10. Evidence from my work (and which I understand is supported by evidence heard by the Inquiry) indicates that communication between the police and bereaved families is often inconsistent and fragmented, characterised by periods of limited contact followed by large volumes of information, unclear in terms of what information can be shared and when and overly procedural and process-driven, rather than sufficiently trauma-informed and sensitive.
11. In this regard, families frequently report the need to chase for updates, uncertainty about who to contact and variation in the quality and frequency of communication. I have found that these issues are particularly acute in cases involving multiple agencies.

Crown Prosecution Service (CPS)

12. Similar themes arise in relation to CPS engagement. Families report difficulties in understanding charging decisions and evidential thresholds, engaging with plea discussions and understanding sentencing outcomes, particularly in complex cases (e.g. those involving diminished responsibility).
13. Communication is often irregular and inconsistent (with periods of limited engagement), largely one-way (with limited opportunity for families to ask questions or seek clarification), provided late in the process, insufficiently explained and delivered in ways that assume prior legal knowledge. This can leave families feeling excluded from processes that directly affect them.

Cross-cutting issue: fragmentation and lack of continuity

14. Across both policing and CPS functions, the evidence consistently points to a fundamental structural issue – that there is no single point of responsibility for ensuring that communication with families is coherent across the justice process.
15. This issue leads to fragmented communication, inconsistent information, duplication and gaps, and leaves families needing to navigate between agencies themselves.

Family Liaison Officer (“FLO”)

Role and Function

16. FLOs are a central component of homicide investigations. Their primary function is to act as the designated point of contact between the police and bereaved families, while also supporting the investigation. This includes:
 - 16.1. providing updates on investigative developments;
 - 16.2. gathering relevant information sensitively from families;
 - 16.3. guiding families through investigative, judicial and (where applicable) coronial processes; and
 - 16.4. signposting to relevant support services.
17. The role therefore combines investigative, communicative and welfare functions, delivered within a policing framework. While many families report positive relationships with individual FLOs, evidence from my work and from the Inquiry indicates that the practical experience of this role is not consistent, and that its current design does not always meet the full range of needs of bereaved families across the justice process.
18. Families have reported the following issues in particular:
 - 18.1. delays in the allocation of a FLO;
 - 18.2. variability in availability and frequency of contact;
 - 18.3. changes in FLO without clear communication;
 - 18.4. uncertainty about the scope of the role (including in relation to CPS processes or coronial proceedings); and

18.5. inconsistent provision of information and support.

19. These experiences suggest that the quality of support is often dependent on factors such as resourcing, how the role is delivered in practice, and the circumstances of the case, rather than being consistently assured across the system. This indicates that, alongside structural limitations, there are inconsistencies in the standard of delivery.

20. Evidence therefore points to a need not only for structural improvements, but also for strengthened practice to include more robust selection and oversight of FLOs; and more consistent provision of training, including in trauma-informed approaches, to ensure that all officers are equipped to engage sensitively and effectively with bereaved families.

How can FLOs best perform their duties?

21. Evidence suggests that FLOs are most effective where they are able to:

- 21.1. Provide timely, proactive and regular communication. Families consistently value regular updates, even where there is limited new information. In contrast, long gaps followed by large volumes of information can be distressing and difficult to process.
- 21.2. Offer clear, accessible explanations. Families benefit from explanations of investigative processes, key decisions and next steps, in plain and accessible trauma-informed language.
- 21.3. Maintain consistency and continuity of contact. Positive experiences are associated with a consistent FLO relationship over time. Conversely, changes in personnel without explanation or reduced availability can undermine trust and continuity.
- 21.4. Support coordination with other agencies. While FLOs are police officers, families often look to them as a gateway to the wider system. Where FLOs are able to facilitate communication or manage expectations around CPS and other agencies, this improves overall experience.

22. However, it is important to note that many of these factors are dependent on system design rather than individual capability. Evidence indicates that FLOs' ability to perform their role effectively may be constrained where the role is combined with other operational duties, communication responsibilities are unclear across agencies or expectations of the role extend beyond its formal remit.

Balance between duties to families and role as police officers

23. There is an inherent structural tension in the FLO role. FLOs are a point of support for families, but also part of the investigative team and therefore accountable to investigative priorities.

24. This dual role can create challenges, for instance: where information cannot be shared due to evidential or legal constraints; where communication is shaped by investigative considerations; or where families expect the FLO to advocate on their behalf in ways that fall outside their policing role.

25. Evidence from both the Inquiry and wider work conducted by my office suggests that families often value individual FLOs highly, but may still experience uncertainty about what information can be shared, leading to a perception of incomplete or delayed information and a lack of clarity about the scope of the FLO's role.

26. This indicates that the tension is structural, rather than individual, arising from the design of the role itself.

Benefit of better defining the role

27. In my view, there would be a clear benefit to further definition and clarification of the FLO role, whether through strengthened guidance or, if considered appropriate, statutory underpinning.

28. Based on the experience mentioned above, there are a number of areas where I feel greater clarity would assist:

28.1. the scope and limits of information-sharing with families;

- 28.2. the relationship between FLOs and CPS communication responsibilities;
- 28.3. expectations in relation to coronial processes;
- 28.4. expectations in relation to the court process; and
- 28.5. the distinction between the FLOs' liaison, support, and advocacy functions.

29. Clearer definition would help manage expectations for families, support consistency of practice across forces and help to reduce variability in the experience of the role.

Desire for independent support alongside FLOs

30. I understand the Inquiry has heard evidence that, alongside FLO support, families often value access to independent support not affiliated with the police or other statutory agencies. This is strongly consistent with the evidence which has been seen within work conducted by my office.

31. Evidence we have seen suggests that independent support is valued for a number of reasons:

- 31.1. Explanation and interpretation of processes including legal terminology, stages of proceedings, and potential outcomes.
- 31.2. Support in preparing for engagement with police or CPS, including guidance on what questions to ask and how to navigate meetings.
- 31.3. Consistency across the justice journey regardless of changes in personnel or agency responsibility.
- 31.4. Perceived neutrality and independence which can increase trust, particularly where families are uncertain about the completeness or framing of information.

32. Evidence also suggests that the need for independent support may be more pronounced for some communities, particularly among Black and minoritised groups, where levels of trust in policing may be affected by wider experiences of institutional failings or discrimination. In such contexts, access to support that is

clearly independent of the police can play an important role in building confidence and ensuring that families feel able to engage with the process.

33. Finally, an independent individual or service is better placed to focus solely on the interests of the family, and may be more able - both in perception and in practice - to support families in challenging or seeking clarification from police and CPS decision-making, without being constrained by their role within the investigation.

34. It should be noted that the desire for independent support does not necessarily reflect a rejection of the FLO role by families. Rather, it reflects a gap between the scope of the FLO role and the broader needs of families who are attempting to navigate across multiple agencies (police, CPS, courts, coroners) - often in extended timeframes - and understand complex legal or procedural issues.

35. In practice, independent support often fulfils functions that sit outside the formal remit of FLOs but are nevertheless critical to the experience of families, such as ensuring that Victims' Code entitlements are understood, delivered, and acted upon consistently across different stages of the process.

Victims' Advocates

36. There is a clear and well-evidenced need for independent advocacy for bereaved families in homicide cases. Research conducted by my office (considered below) and the evidence heard by the Inquiry demonstrates that families often face significant challenges in understanding complex legal processes (including charging decisions, pleas, and sentencing outcomes), engaging effectively with police and CPS decision-making and navigating a system which involves multiple agencies without a single coordinating point.

37. In this context, advocacy can therefore play a critical role in supporting understanding of processes and decisions, enabling effective engagement with agencies and ensuring that families are aware of, and able to exercise, their rights under the Victims' Code.

38. The desire expressed by families for someone who can “advocate” on their behalf should be understood not as a request for legal representation in the strict sense, but as a need for support in navigating the system, guidance in preparing for key decisions, reassurance that their interests are being understood (and communicated) effectively and for a separation between support and investigation
39. A key aspect of this is the value of support that is distinct from investigative and prosecutorial functions. In this regard, I understand that bereaved families involved in the Inquiry have described the importance of having someone who is clearly not part of the investigation, and who can therefore focus solely on their needs and perspective.
40. This separation can create space for more trauma-informed practice, allowing engagement to be paced appropriately and tailored to individual circumstances. It may also enable a more confident approach to questioning and challenge, supporting families to raise concerns or seek further explanation from police or CPS without concern about the implications for the investigation.
41. Evidence indicates that, in the absence of such support, families may feel excluded from processes, unclear about outcomes and unsure how to raise concerns or seek clarification.

Who is best placed to provide advocacy?

42. The report, Victim’s Commissioner, *Going Above and Beyond: Mapping the Provision and Impact of Victim Advocacy* (2024) was published by my office [INQY0000028]. This found that advocacy services in England and Wales are unevenly distributed, with significant geographic variation, often dependent on local commissioning arrangements and not consistently available to all victim groups, including bereaved families.
43. The evidence suggests that advocacy is most effective when it is independent of criminal justice agencies (including police and CPS), delivered by specialist, trained practitioners and clearly defined and resourced as a distinct function.

44. I believe that independent organisations are therefore best placed to provide such advocacy because they are not embedded within investigative or prosecutorial decision-making, they can maintain the trust of families and are able to adopt a whole-journey perspective, rather than focusing on a single stage. While professionals within the system (including FLOs or CPS staff) play important roles in communicating information, their position within institutional structures creates inherent constraints which limit their ability to act in an advocacy capacity.

45. The most effective model is therefore one in which advocacy is complementary to, rather than substituting for, statutory roles and integrated within a broader framework of coordinated victim support.

Particular challenges for advocacy for bereaved families

46. Advocacy in homicide cases requires specialist support. Such cases often involve a number of distinct challenges; such as lengthy investigations and court proceedings, involving multiple stages (criminal trial, sentencing, appeals, inquests), which demand prolonged engagement over months or years. In order to respond to these challenges, advocacy services therefore require sustained funding, continuity of personnel, guidance as to how other agencies will work with them and capacity to support long-term engagement.

47. Homicide cases often involve multiple agencies; police, CPS, courts, coroners and, in some cases, health services, local authorities or other bodies. Advocates in such cases must therefore be able to navigate complex systems and support families across organisational boundaries.

48. Equally, such cases involve a complexity of legal and evidential issues, such as defences of diminished responsibility, psychiatric evidence and sentencing frameworks. These can be difficult to understand, even when formally explained. Advocates require sufficient knowledge to translate complex information into accessible terms, while not duplicating legal advice.

49. The unique trauma and family circumstances of those bereaved through homicide also mean that families may be experiencing acute trauma and grief, often in different ways within the same case and engaging with the system at varying levels. Advocacy must therefore be trauma-informed, flexible and responsive to individual circumstances and needs.

Current Provision

50. In reality, access to advocacy for bereaved families of victims of homicide is often ad hoc, rather than guaranteed, and provision may depend on referral pathways or local services meaning support is not consistently available across the full justice journey.

51. It should be noted that there are a range of services available to support bereaved families following homicide, including the National Homicide Service provided by Victim Support, as well as specialist organisations such as Advocacy After Fatal Domestic Abuse and Support After Murder and Manslaughter. In addition, the CPS Bereaved Families Scheme provides engagement with prosecutors at key stages to explain decisions and case outcomes.

52. Taken together, these services provide important emotional, practical and informational support. However, as evidence from bereaved families provided to the Inquiry suggests, despite this provision, there remain significant unmet needs. In particular, families have identified gaps in support relating to understanding complex legal decisions and processes in a clear and accessible way, trouble engaging effectively with police and CPS decision-making and gaining access to a consistent, trusted point of contact across different stages and agencies.

53. While services such as the CPS Bereaved Families Scheme can provide important explanation at key points, they are episodic in nature and not designed to provide ongoing support, navigation, or advocacy across the justice process. Taken together, this suggests that while a range of support exists across the system, it is not consistently coordinated, accessible, or aligned to the full range of families'


needs, particularly in relation to continuity, navigation, and engagement with decision-making.

Legislative Developments

54. I am asked to comment on a number of recent and proposed legislative developments in this area.

Victims and Prisoners Act 2024 and Victims' Code compliance

55. I am asked to provide my view on a Ministry of Justice policy statement, published in September 2025, concerning the Independent Public Advocate ("IPA") and aspects of the Victims and Prisoners Act 2024. It is not within my statutory remit to comment on the operation or performance of other Arm's Length Bodies, including the IPA. My comments are therefore limited to observations about the broader system landscape. In light of the matters being examined by this Inquiry, it may assist the Inquiry to explore directly with the IPA and/or the sponsoring department how issues that have emerged are intended to be addressed within the existing framework.

56. More generally, the Victims and ^{Courts 2026} ~~Prisoners Act 2024~~ strengthened the statutory framework for victims by providing me with new powers to report on compliance with the Victims' Code across criminal justice agencies. This reflects a recognition that rights require independent oversight if they are to be effective in practice. 

57. However, the effective exercise of these powers is currently constrained by the lack of available data. There is no comprehensive system for collecting, sharing, or analysing information about whether individual victims receive their Code entitlements at different stages of the criminal justice process. Data is typically held in siloed systems, focused on cases rather than victims, and is not designed to support meaningful compliance assessment.

58. As my office has set out in successive reports and briefings (for instance, the Victims' Survey 2024 [WITN0455003]), this absence of data represents a fundamental barrier to effective monitoring and accountability. One proposed

solution is the introduction of a unique victim identifier (see proposals for change for more detail) - a system whereby each victim is assigned a consistent identifier that is used across police, CPS, courts and other agencies. This would enable information about a victim's interactions with the justice system to be linked across currently separate systems, allowing their journey to be tracked over time. It would also support stronger and more consistent recording of victims' needs, enabling assessments to be updated and shared across agencies, and ensuring that those needs are recognised and responded to throughout the justice process.

59. For monitoring of Victims' Code compliance to be effective, there must also be consistent collection and sharing of data on whether key entitlements have been delivered at each stage, alongside the ability to aggregate this information across agencies and identify where responsibility for any failures lies. There is currently no system in place to do this. Without one, it is not possible to determine systematically whether Code entitlements have been delivered in individual cases or across the system as a whole. As a result, compliance monitoring remains partial and reactive.

60. While the Victims and Prisoners Act provides an important statutory basis for strengthened oversight, the relevant monitoring powers cannot yet be fully utilised. Until this gap is addressed, breaches of the Victims' Code are likely to continue to be identified, primarily through victim complaints, surveys, or advocacy intervention, rather than through routine system assurance.

61. In the context of the Inquiry, this limitation is significant. Many of the communication and information sharing difficulties described in evidence correspond to established Victims' Code entitlements. Strengthening the infrastructure for monitoring compliance would therefore provide a critical safeguard for bereaved families and support systemic learning.

62. In the absence of comprehensive system data, a Victim Care Hub model (see proposals for change for more detail) would provide an additional layer of practical assurance. By maintaining an overview of an individual victim's journey, a

hub-based single point of contact could help ensure that Victims' Code entitlements are identified, explained, and pursued across agencies, and that gaps or delays are escalated appropriately. This would not replace formal compliance monitoring, but would significantly strengthen delivery in practice while longer-term data solutions are developed.

Victims and Courts Act 2026

63. The Victims and Courts Act is relevant to several systemic issues touched on by the Inquiry, including stronger oversight of Victims' Code compliance and improved post-sentence information provision.

64. My office has welcomed the Acts' intent but has also highlighted gaps. These include:

- 64.1. the absence of a unique victim identifier (considered above), which would support information-sharing and continuity across agencies (see Victims' Commissioner, *Victims and Courts Bill briefing: Unique Victim Identifier* (2026) [WITN0455004]); and
- 64.2. the need for greater attention to the specific position of victims of mentally disordered offenders, who often face barriers in understanding sentencing outcomes and risk management arrangements (see Victims' Commissioner, *Victims of Mentally Disordered Offenders* (2018) [WITN0455005] and Victims' Commissioner, *Victims and Courts Bill briefing: Mentally Disordered Offenders* (2026) [WITN0455006]).

Issues Arising in the Inquiry

65. I am asked to comment on some of the issues which have arisen in the Inquiry, specifically regarding difficulty in communication between the many agencies involved and bereaved families in homicide cases.

66. As outlined above, communication difficulties between police, CPS and bereaved families in such cases are common and driven by fragmentation and lack of coordination. This is particularly so as these are typically multi-agency cases,

meaning that families may experience fragmented or inconsistent information, uncertainty about disclosure and barriers to accessing relevant information.

67. This is particularly acute in cases involving mentally disordered offenders, where information-sharing frameworks add another level of complexity (see exhibits referred to at paragraph 64.2 above).

The media

68. One other area I wish to mention is the role of the media. While the media can be a hugely important and constructive resource for victims to share their experiences and advocate for change, it also plays a vital role in upholding the principles of open justice, ensuring that criminal proceedings are subject to public scrutiny and accountability. However, media coverage can also seriously impact victims' ability to cope and recover. All too often I meet victims who have been retraumatised by media reporting - either of their own case or in coverage of similar incidents - and by insensitive or intrusive practices by journalists and news outlets.

69. The conclusion of a trial – the verdict and sentencing – are vital points of closure for victims, and more must be done to ensure that victims are told about this, and that the outcome is explained. Timeliness, accuracy and consistency in official communication with victims is increasingly important in the age of social media and 24-hour news coverage, where court outcomes can be reported near instantaneously to a large audience. I recognise that the media will often be better placed to report a verdict more quickly than the justice service. However, it is crucial that victims are notified of sentencing outcomes before they are reported in the media. I believe there is an opportunity to ensure that these outcomes are reported in a trauma-informed way, minimising the risk of re-traumatisation to the victim in question and signposting other people who may be affected by the issues reported to relevant support.

70. In this regard, I would suggest that the Editors' Code, issued by the Independent Press Standards Organisation ("IPSO"), should be revised to:

70.1. include guidance on reporting of violent excessive details of homicides;

- 70.2. require that IPSO member organisations to provide trigger warnings and signposting to support services;
- 70.3. require that IPSO member organisations should consider how footage of incidents is being shared; and
- 70.4. develop or strengthen guidelines to ensure that use of such footage does not retraumatise victims, family members or the bereaved.

Proposals for Change

71. The evidence heard by the Inquiry, together with my wider work, indicates that the challenges experienced by bereaved families arise from a system characterised by fragmentation, lack of continuity, and weak accountability mechanisms. Addressing these issues requires system-level reform, alongside improvements in practice and delivery.

72. I would therefore suggest a number of proposals for change that I feel would, if implemented, make meaningful positive changes for victims.

Introduction of a coordinated Victim Care Hub ("VCH") model

73. A central theme emerging from both the Inquiry and the wider work of my office is that there is currently no single system or agency responsible for supporting victims to navigate the criminal justice process as a whole. Instead, responsibility is dispersed across multiple agencies, resulting in fragmentation, inconsistency, duplication and gaps in communication and support.

74. Consideration should therefore be given to the development of a VCH model, providing a single, independent point of contact for victims throughout their justice journey. The core function of a VCH would be to act as a central point of liaison or "justice navigator", supporting victims across police, CPS, courts, and support services. In practice, this would involve:

- 74.1. coordinating communication across agencies;
- 74.2. tracking victims' needs and the delivery of their rights;
- 74.3. supporting victims to navigate the justice process;
- 74.4. referring into appropriate support services;

- 74.5. troubleshooting issues to prevent disengagement and improve progression
- 74.6. using data collected by the VCH to inform and improve justice agencies performance; and
- 74.7. reducing the burden on families to navigate the system.

75. A coordinated model of this kind would directly address the fragmentation identified across the evidence. By maintaining visibility across the system, a VCH could ensure clearer allocation of responsibility for communication at each stage, improved coordination between agencies at key decision points, and more consistent and structured handover between services, reducing duplication and the risk of information gaps. This would help ensure that victims receive coherent, timely and accessible communication, and reduce the burden currently placed on families to navigate multiple agencies themselves.

76. Importantly, the VCH model is not intended to replace existing roles or services. Rather, it would complement and strengthen them, including, the role of FLOs - who would continue to provide police-led liaison during the investigation - and the contribution of independent support and advocacy services, which would provide specialist and ongoing support. Instead, the Hub would provide the coordinating structure currently missing, helping to ensure that these roles operate together as part of a coherent system.

77. While the model offers a clear response to the challenges identified, there are also important considerations for implementation. These include ensuring clarity of roles (to avoid duplication with existing services), establishing appropriate data-sharing and governance frameworks and considering how such a model could be scaled and embedded across different areas.

78. While a coordinated model such as a VCH may require initial investment, there is potential for improved efficiency across the system by reducing duplication, improving coordination and streamlining support, while delivering a more seamless, high-quality service for victims and addressing many of the systemic

issues identified by this Inquiry. It is recognised that the Victim Care Hub model has not yet been piloted in practice and is currently set out as a conceptual model, most fully developed in the London Victim Care Hub Blueprint. As such, there would be value in piloting the model in a number of areas to test delivery, evaluate impact, and understand costs and benefits in practice. This would enable the development of a full business case, building on the work undertaken in London, and support informed decisions about scalability, resourcing and value for money (see Greater London Authority, *London Victim Care Hub Blueprint (2024)* [WITN0455007]).

79. I recognise that elements of victim engagement and information-sharing already exist across different criminal justice agencies, but as I have explained above these are often delivered on a fragmented, single-agency basis. A coordinated model, supported by a single point of contact, would bring these functions together and improve continuity for families.

Strengthen independent advocacy within a coordinated system

80. As explained above, there is a clear need for more consistent access to independent advocacy, particularly for bereaved families navigating complex, multi-agency processes.

81. A more consistent national approach to advocacy provision - supported by clearer expectations and commissioning - would help address current variability in access. Evidence suggests that advocacy is most effective when it is delivered as part of a more coordinated system of support, rather than in isolation. Embedding advocacy within a model such as a VCH may help to improve continuity and reduce fragmentation. Advocacy should complement, rather than replace, roles such as FLOs.

Strengthen the consistency and capability of FLO provision

82. The FLO role remains a critical part of the system. However, evidence indicates a need to improve consistency in how the role is delivered, clarity around its scope and limitations and professional standards and oversight.

83. In this regard, there should be a stronger focus on robust training, including in trauma-informed approaches and ensuring officers are equipped to provide sensitive and effective engagement with bereaved families.

Strengthen monitoring and accountability for Victims' Code compliance

84. My office have consistently identified that monitoring of the Victims' Code remains weak, with compliance mechanisms lacking reliable data, independent scrutiny, and meaningful victim feedback. In my view, without a system of national data collection, effective monitoring and enforcement of the Code is not currently possible (see, Victims Commissioner, *A new Victims' Code: consultation response* (2026) [WITN0455008]).

85. In order to address this, I have suggested introduction of mechanisms to enable the tracking of victims' experiences across agencies, strengthening the collection and use of victim feedback and ensuring effective oversight and accountability for delivery of Code entitlements.

Introduce a Unique Victim Identifier

86. Finally, as explained above, a key enabler of improved monitoring and coordination would be the introduction of a Unique Victim Identifier. This would enable information-sharing across agencies, improve continuity of support and communication, reduce the need for victims to repeat information and strengthen accountability and safeguarding across the system.

87. In my view, this should form part of a broader approach to improving data infrastructure and supporting a more joined-up, victim-centred system.



Statement of Truth

I believe the content this witness statement to be true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

GRO-B

Signed: _____

Dated: 19th May 2026

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No.	Description	URN
1.	Code of Practice for Victims of Crime in England and Wales (2020).	WITN0455002
2.	Victims' Commissioner, <i>Victims' Survey 2024</i> (2025).	WITN0455003
3.	Victims' Commissioner, <i>Victims and Courts Bill briefing: Unique Victim Identifier</i> (2026).	WITN0455004
4.	Victims' Commissioner, <i>Entitlements and experiences of victims of mentally disordered offenders</i> (2018).	WITN0455005
5.	Victims' Commissioner, <i>Victims and Courts Bill briefing: Mentally Disordered Offenders</i> (2026).	WITN0455006
6.	Greater London Authority, <i>London Victim Care Hub Blueprint</i> (2024).	WITN0455007
7.	Victims' Commissioner, <i>A new Victims' Code: consultation response</i> (2026).	WITN0455008

