The background of the cover is a light blue gradient. It features several stylized human figures in various colors (purple, blue, green, yellow) and a globe with latitude and longitude lines. The figures and globe are slightly blurred, creating a sense of depth. The text is overlaid on this background.

**JOINT REPORT BY
CIVIL SOCIETY
ORGANIZATIONS ON
THE HUMAN RIGHTS
SITUATION
IN ESTONIA**

Universal Periodic Review, UPR

2025

Joint Submission to the Fourth Periodic Review of Estonia

52nd UPR Session 2026

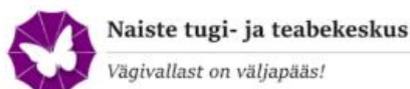
By the Equal Treatment Network in Estonia.

The Equal Treatment Network was established in 2013 by Estonian Human Rights Centre. It brings together NGOs promoting the equal rights of their representative groups.

The following organisations are members of the Network and have contributed to this joint submission: the Estonian Human Rights Centre, the Estonian Union for Child Welfare, the Estonian Centre of Disabled Persons, Feministeerium NGO, the Estonian LGBT Association, the Estonian Vegan Association, the Estonian National Youth Council, the Estonian Student Unions, Estonian Refugee Council, Women's Support and Information Centre, URALIC Centre and the Estonian Trans Alliance.

The report focuses on the areas of competence of the organisations in the reporting group.

The reporting group welcomes the opportunity to submit its views to the UPR on Estonia.



Hate Speech, Incitement to Hatred and Hate Crimes

1. Estonia's legal framework on hate speech remains inadequate and misaligned with international standards¹. Section 151 of the Penal Code offers only limited protection, classifying hate speech as a misdemeanour and only when it leads to concrete harm, such as threats to life, health, or property. Therefore, the provision is rarely used. In 2024, one misdemeanour and one criminal offense were registered under provision. In June 2023, the government initiated a draft law² amending the Penal Code, Code of Criminal Procedure, and Code of Misdemeanour Procedure, which passed the first reading in the Parliament on 27 September 2023. The draft law provides for the punishment of individuals who incite hatred in a manner that may endanger public order. Disability has been added as a new protected ground; however citizenship, gender identity, gender expression, and sex characteristics should also be included.
2. There is currently no specific law that defines hate crimes. However, the draft law provides for an aggravating circumstance if an offense is committed with a motive of hatred. As of September 2025, the adoption of the draft law has not progressed in Parliament, and its future remains uncertain.

3. Recommendations

- a. To move forward with the draft law. Properly criminalise hate speech and make hate motivation an aggravating circumstance when committing a crime.
- b. Open discussion about new prohibited grounds such as citizenship, gender identity, gender expressions and sex characteristics.

Discrimination

4. The anti-discrimination legislation is insufficient and the implementation weak. While discrimination is generally prohibited in the Constitution, the sectoral laws differentiate between grounds. Gender-based discrimination is prohibited in all areas of social life according to GEA³. Discrimination on the grounds of nationality (ethnicity), race or colour is prohibited in almost all areas of life, but on the basis of

¹ European Commission Against Racism and Intolerance. [ECRI conclusions on the implementation of the recommendations in respect of Estonia subject to interim follow-up](#). 2024.

² Draft law amending the *Code of Criminal Procedure* and the *Code of Misdemeanour Procedure* (provisions on incitement to hatred and hate-motivated crimes). 2023.

³ [The Gender Equality Act](#)

religion or belief, age, disability or sexual orientation, it is prohibited only in the field of employment according to ETA⁴. ETA offers no protection for these groups in areas such as the provision of housing, healthcare, social welfare, education, goods and services. Consequently, such discrimination cases don't qualify for advice and assistance from the Gender Equality and Equal Treatment Commissioner, and victims can't claim compensation for damage.

5. In May 2024, the then Minister of Social Protection sent the draft Gender Equality and Equal Opportunities Act to state institutions and stakeholders for consultation. The purpose of the draft was to consolidate ETA and GEA into a single piece of legislation. The draft law provides equal and comprehensive protection against discrimination across all protected grounds. It also broadens the list of protected characteristics to include, for example, gender identity and state of health. In addition, the mandate of the Commissioner would be extended, for instance, granting the Commissioner the right to go to court on behalf of an individual, with their consent, to protect that person's rights. In November 2024, the Ministry of Justice unexpectedly commissioned a parallel draft from the private sector without prior consultation with civil society organisations. As of September 2025, the Government's next steps remain unclear.

6. Recommendations

- a. To move forward with the draft law of the Gender Equality and Equal Opportunities Act or amend the Equal Treatment Act, so that discrimination is prohibited in all areas on all grounds.
- b. Add new protected grounds in the legislation based on Constitution §12 but also state of health, gender identity, gender expression and sex characteristics.

Free Elections

7. In Estonia, all prisoners are automatically disenfranchised by law, amounting to a blanket ban on prisoners' voting rights. This measure is considered both unconstitutional and contrary to the European Convention on Human Rights⁵.
8. People with disabilities are effectively disenfranchised, which is in conflict with the CRPD. If a court places a person under full guardianship, the individual is automatically regarded as lacking legal capacity to exercise the right to vote.

⁴ [The Equal Treatment Act](#)

⁵ Ruling of Circuit Court in Tallinn no. [3-15-403](#)

9. Many polling stations offer partial accessibility. However, people can choose between different polling stations and many choose and prefer e-voting. Information about actual accessibility remains varying. The State's Election Website is only partially or poorly accessible due to difficulties searching information from the webpage.
10. In March 2025, the Estonian Parliament adopted a constitutional amendment⁶ revoking the right of third-country nationals residing in Estonia to vote in local (municipal) elections. Under the new rules, effective from October 2025, only Estonian citizens and citizens of other EU Member States will retain the right to vote in municipal elections. Stateless residents will still be permitted to vote in the 2025 elections but will lose this right starting in 2026. The reform has been criticized by some observers for weakening integration and democratic inclusion, particularly for long-term residents.

11. Recommendations

- a. Amend the relevant laws so that the voting ban only applies to prisoners who have it as an additional punishment in their sentence⁷.
- b. Declare illegal the constitutional impediment, upon which a person who has by court been declared without legal capacity cannot vote. Provide full right to participate in voting processes to people with mental health problems and people with intellectual disabilities, based on their abilities.
- c. Make polling stations and information about elections accessible.
- d. Take into account the recommendations of international and domestic experts to ensure transparency of e-voting and greater trust in it.

Freedom of Assembly and Association

12. In 2024, the first signs of significant state budget cuts emerged, reducing resources for CSOs and for public sector positions dedicated to civic engagement and open governance. Many CSOs have faced ongoing uncertainty regarding the timing, amount, and conditions of public funding. Transparency in policymaking and meaningful consultation with civil society have become increasingly problematic. Although public consultation frameworks are in place, their application remains

⁶ [Act on the Amendment of the Constitution of the Republic of Estonia \(No. 536 SE\)](#)

⁷ Article 3 of Protocol 1 to the ECHR prohibits automatic and discriminate restriction on an individual's right to vote due to his status as a convicted prisoner.

inconsistent. Civil society actors are frequently invited to participate at a late stage, after key decisions have already been made, or without clarity on how their input will be considered.⁸

13. Restrictions on the freedom of assembly have been imposed by the Police and Border Guard (PBG) on demonstrations in support of Palestine, with national security cited as the justification. In Tartu, PBG prohibited the organisation of a planned demonstration, a decision that was subsequently deemed unlawful by the court⁹. In a separate case, young people were fined for using the phrase “*From the river to the sea*”; however, the Supreme Court of Estonia later annulled the sanctions, finding in favour of the protesters¹⁰.

14. Recommendations

- a.** Ensure sustainable and predictable funding mechanisms for human rights CSOs.
- b.** Strengthen state investment in meaningful civil society participation in policymaking processes.
- c.** PBG should ensure that demonstrators can exercise their right to peaceful assembly without intimidation or punitive measures.

Human Rights Infrastructure

15. There has been limited engagement from the responsible institutions on equality-related issues. Following the transfer of the equality portfolio to the Ministry of Economic Affairs and Communications, stakeholders express expectations that the responsible minister will assume clear ownership of the portfolio, provide strategic leadership, and maintain active dialogue with the public, partners, and other stakeholders. Persistent concerns remain regarding the adequacy of funding for the Gender Equality and Equal Treatment Commissioner, which has been insufficient in relation to the scope of its mandate.

16. Recommendation

⁸ [Civic Space Report 2025](#)

⁹ [Tartu Administrative Court: Banning Palestinian protest was unlawful](#)

¹⁰ [Case webpage](#), Estonian Human Rights Centre. 2025.f

a. In view of the potential extension of the Commissioner's responsibilities, ensure that the institution is provided with adequate financial and human resources to effectively fulfil its mandate.

Refugees and Asylum Seekers

17. The Ministry of the Interior has proposed a draft Act on Granting International Protection to Foreigners, which includes concerning plans to restrict applicants' movement to a single county and to treat administrative acts as delivered solely by email without confirmation. The unclear implementation of EU and national amendments warrants monitoring their impact on applicants' rights.
18. Estonia continues to apply entry bans in an overly rigid manner. In 2025, the Supreme Court annulled a three-year entry ban imposed by the Police and Border Guard Board (PBG) on an asylum seeker, finding that the PBG failed to assess individual circumstances or demonstrate the necessity and proportionality of the measure, despite the applicant's lawful entry, full cooperation, and absence of any threat to public order or national security.
19. The interpretation of family reunification rights remains unduly restrictive, particularly for LGBTIQ refugees. In 2024, the PBG rejected a transgender refugee's request to reunite with her same-sex partner, citing the absence of a registered partnership or marriage, despite such registration being impossible in the country of origin. This approach fails to account for the realities faced by LGBTIQ individuals and risks violating both Estonian and EU human rights obligations.¹¹
20. There have also been problems with reception conditions of LGBTIQ individuals and in some cases with procedural rights of vulnerable applicants. In one case, receiving prescription for continuation of hormonal treatment for a transgender asylum seeker was not provided by the detention centre and therefore it took over 3 months to receive the necessary medication through a court proceeding and with the help of legal representation.
21. The concepts of public order and national security have become central in both international protection and residence permit procedures for Ukrainian citizens, at times overshadowing fundamental rights and legal principles. Estonia has refused to review residence permit applications from men of conscription age and required documents impossible to obtain. Similar requirements have since been applied in asylum proceedings, the impact of which remains unclear and warrants close monitoring.¹²

22. Recommendations:

¹¹ [Case webpage](#), Estonian Human Rights Centre. 2025.

¹² [Case webpage](#), Estonian Human Rights Centre. 2025.

- a. To end the automatic issuance of entry bans following negative asylum decisions and ensure that such measures are applied only after a thorough individual assessment based on necessity and proportionality.
- b. To lift restrictions that prevent LGBT refugees from reuniting with their partners and to recognise alternative forms of evidence of family life in cases where legal marriage or partnership registration is not possible due to discriminatory laws in the country of origin.
- c. Refrain from invoking public order and security as grounds to discriminate against or exclude refugees from Ukraine, and ensure that all applications are assessed individually in line with human rights obligations.

Women

- 23.** The gender pay gap in Estonia is one of the highest in the EU (16.9% in 2023, the EU average being 12.0%)¹³. The pay gap is primarily caused by gender stereotypes that influence women's and men's educational and occupational choices, career paths, the division of care work, and employers' wage and personnel policies¹⁴. In addition, a gender gap in poverty among older people persists (the at-risk-of-poverty rate for older women is 47,9 %, almost 21 percentage points higher than for men)¹⁵. The pay gap is also highest for women aged 35–44, which roughly corresponds to childrearing age¹⁶, but the salary and career conditions of women aged 25-49 are worse than those of men, even if they do not have children¹⁷. Although generously paid, long parental leaves often lead to slower career progression for women - only 36.8% of children below the age of three took part in formal childcare in 2024¹⁸.
- 24.** There is a lack of obligatory childcare provision - while municipalities are legally required to provide a place in childcare to every child from 18 months onwards, some struggle to do so due to a shortage of places¹⁹. Since the burden of care is affects women more than men²⁰, the availability of flexible and affordable care for

¹³ [Eurostat Pay Gap statistics](#)

¹⁴ [Equal Pay Day marks the reduction of the gender pay gap](#). Ministry of Economic Affairs and Communications. 2025.

¹⁵ [European Council Recommendation for Estonia 2023](#)

¹⁶ [Statistical Webpage on Gender Equality, Equal Treatment and Accessibility](#)

¹⁷ [Statistical Webpage on Gender Equality, Equal Treatment and Accessibility](#)

¹⁸ [Social Survey 2024 Statistics Estonia](#).

¹⁹ [European Council Country Report on Estonia 2025](#)

²⁰ [The Invisible Part of the Economy: The Cost of Unpaid Care Work](#). PRAXIS. 2024.

other dependent relatives (like elderly and people with special needs) might also create obstacles in women's career paths. Another cause of the pay gap is very high gender segregation in the labour market²¹. Steps have been taken to reduce the gender pay gap, including the development of a digital tool prototype²² to help employers analyse the wage gap in their company and take informed wage decisions²³.

- 25.** Progress has been made in combating violence against women in Estonia, particularly in developing victim support services; however, challenges remain. In sexual assault cases, the burden of proof is high and sentences tend to be lenient. In August 2025, the Ministry of Justice completed a draft consent law adopting a so-called yes-model. Under the proposal, rape will be defined primarily by the absence of consent. The bill also specifies situations in which free and explicit consent cannot be deemed to exist.
- 26.** The legal framework on the age of marriage and consent has improved. The minimum legal age of marriage is now 18 years, with no exceptions. Since 1 June 2022, the legal age of consent has been 16 years, raised from the previous threshold of 14.
- 27.** Hostile and belittling attitudes towards women and women's rights subjects are displayed at the parliament level. For example members of parliament ridicule and downplay the necessity of the subject²⁴.

28. Recommendations

- a.** Move forward with the adoption of the draft consent law (so-called yes-model).
- b.** To apply measures, including temporary special measures, to advance the achievement of de facto gender equality, particularly in addressing the gender pay gap and unequal distribution of care responsibilities.

People with Disabilities

- 29.** The national definition of disability remains narrower than that established under the CRPD. As noted in the previous reporting period, changes to administrative procedures for assessing disability have resulted in many children and adults

²¹ [Statistical Webpage on Gender Equality, Equal Treatment and Accessibility](#)

²² [Palgapeegel](#). Ministry of Economic Affairs and Communications. 2025.

²³ [European Council Country Report on Estonia 2025](#)

²⁴ [Plenary Sitting, Transcript from 20 March 2025](#)

previously recognised as persons with disabilities losing that status. There has also been a notable statistical decrease in the number of persons officially recognised as having disabilities. Since 2018, the Estonian Chamber of People with Disabilities has raised concerns about changes in assessment practices, particularly in repeated evaluations, where decisions often lack adequate reasoning. In 2015, an estimated 145,000 persons, or 11 per cent of the population, were recognised as having disabilities. By June 2025, this figure had fallen to 104,000, or 7.6 per cent of the population. This decline indicates that many individuals in need of support are no longer receiving appropriate assistance, as access to a wide range of state and municipal services and benefits remains dependent on the formal determination of disability severity.

- 30.** Estonia does not have legislative acts or state policies that address the situation of women with disabilities, and there have been no studies conducted to examine their situation²⁵. The term “multiple discrimination” is not used in legislation. The rights of women with disabilities are not linked to women’s rights, which indicates that the gender aspect is not really embraced.
- 31.** Serious coordination gaps persist between the social, education, and health systems. For the same child in need, parallel plans are prepared by different specialists without data-sharing, joint implementation, or coordinated evaluation. In practice, no institution ensures integrated case management for children with disabilities, and information exchange remains minimal. As a result, families carry the main responsibility for coordinating support, adding a heavy administrative burden and hindering the effective realization of the rights of children with disabilities.²⁶
- 32.** There are significant regional disparities regarding accessibility. Accessible housing is very hard to find and accessibility in older apartment buildings remains unsolved. The scope of the Building Code Regulation “Requirements for Building Accessibility” (2026) covers the following residential buildings: residential buildings with three or more apartments, except terraced houses; care institution buildings; dormitories.
- 33.** The Public Transportation Act does not oblige commercial carriers to provide accessibility for persons with mobility impairments. One of the largest commercial carriers, Lux Express, carried out the largest procurement in its history, but the buses only allow independent boarding, meaning that wheelchairs must be folded, which does not enable better access for wheelchair

²⁵ [UN CRPD Shadow report of Estonia Estonian Chamber of Disabled People.2019.](#)

²⁶ [Report on the UN Convention on the Rights of the Child: Additions, Comments and Proposals from Estonian Non-Governmental Organisations. 2023.](#)

users. Most buses serving county routes are inaccessible for wheelchair users²⁷. Only a few traffic lights are equipped with sound signals.

- 34.** There are few guiding signs with embossed script or good contrasts and almost no signs in Braille in the city environment. The city of Tartu has some Braille and tactile print in city spaces, and Pärnu, but not Tallinn which makes regional differences also evident. It makes independent movement and orientation for blind people almost impossible²⁸.
- 35.** Article 12 of UN CRPD Equal recognition before the law was ratified by Estonia with a declaration. Estonia is utilising the substituted judgment model, which gives the legal guardian right to decide instead of the person with disabilities²⁹. Legal provisions for supported decision making are not available in Estonia. Lack of legal capacity is adversely affecting the rights and interests of an individual³⁰. Over the past decade, the number of adults placed under guardianship has doubled (from 2,958 in 2013 to 6,036 in 2023), a trend that current data cannot adequately explain. Full guardianship is imposed far more often than partial.³¹
- 36.** Due to the different capacities of local municipalities, disability services are not rights-based. There is no effective monitoring system for local authorities' ability to offer adequate assistance for the protection of the rights of people. Unjustifiably, access to services depends heavily on the disabled person's ability to seek help, while this should primarily depend on the need for assistance.
- 37.** The queues for special care services are not allowing user to select the provider or time of service provision³². The quality of special care services does not always meet the requirements established by law or the principles of the UN CRPD³³. Furthermore, services remain underfunded and waiting lists are long. No significant increase in service places or additional funding has taken place in recent years.
- 38.** As of 28 June 2025, the Products and Services Act entered into full effect, obliging the private sector as well to provide accessible websites and technical solutions. Even when the legislation has passed through, it doesn't guarantee

²⁷ [UN CRPD Shadow report of Estonia. 2019.](#)

²⁸ Estonian Blind Union expert opinion. Estonian Chamber of Disabled People.2020.

²⁹ Frolik, L. A., Whitton, L. S. The UPC Substituted Judgment / Best Interest Standard for Guardian Decisions: a Proposal for Reform. University of Michigan Journal Law Reform, Vol 45, 739. 2012.

³⁰ [UN CRPD Shadow report of Estonia. 2019.](#)

³¹ [Proposals from the Estonian Chamber of People with Disabilities Network concerning the study commissioned by the Ministry of Social Affairs "Study on the Guardianship System for Adults in Estonia." 2024.](#)

³² [UN CRPD Shadow report of Estonia. 2019.](#)

³³ Opinion of Chancellor of Justice. 23.8.2019 no [7-9/190891/1904137](#).

user-friendliness and the process is still ongoing due to lack of knowledge and the needs of people with disabilities.

- 39.** There are no common standards on how to offer sign language interpretation services. University of Tartu has discontinued the provision of university level education of sign-language interpreters to the regret of the deaf community and Estonian disability movement³⁴.
- 40.** Schools and kindergartens lack teachers, assistant teachers, and support specialists with the necessary skills. As a result, about one-third of children in kindergartens and one-quarter of children in primary schools who need support do not receive it. The number of university study places and graduates is also insufficient to meet the demand for specialists in the coming years.³⁵
- 41.** Due to the growing number of people in need of care in Estonia and the limited availability of formal care services, the burden on caregivers has become disproportionately high—both in terms of providing care and covering the associated costs. Furthermore, poverty is often closely linked to unmet needs for long-term care. The care reform introduced in 2023 sought to ensure that a place in a nursing home would be affordable at the level of an average pension. However, it is estimated that one in three individuals remain unable to cover their personal contribution through their pension or the supplementary benefit provided by local authorities to bridge the gap to the average pension. ³⁶

42. Recommendations

- a.** Bring the definition of “disability” into accordance with the UN CRPD.
- b.** Conduct studies on the execution of the rights of women with disabilities in Estonia.
- c.** Provide equal, adequate social protection for children and adults with disabilities at municipal level, deriving from common methods of evaluation of their needs, and introduce real monitoring mechanisms for municipal service provision.
- d.** Improve access to housing for people with disabilities, including social housing.
- e.** Introduce measures to make public spaces accessible and bring the Public Transportation Act into accordance with the UN CRPD.

³⁴ Civil society comments to the state response to the List of issues in relation to the initial report of Estonia. Estonian Chamber of Disabled People. 2020.

³⁵ Availability of education support services. National Audit Office. 2020.

³⁶ Care reform audit report. The National Audit Office. 2025.

- f.** Establish preconditions for moving from the substituted judgement model towards a supported decision-making model and consider withdrawal of the declaration of article 12 issued when the UN CRPD was ratified.
- g.** Ensure that people residing at care facilities are provided with high quality and accessible health services.
- h.** Develop quality and flexible care possibilities, reducing the burden of care on relatives of children and adults with disabilities, as well as enabling active participation in the labour market and societal life.
- i.** Secure adequate access to sign language interpretation for people with hearing impairments.
- j.** Secure a sufficient level of support for the provision of specialised services, to enable real implementation of inclusive education.

LGBTIQ

- 43.** In 2023 Estonia became the first Baltic country to introduce marriage equality and with the involvement of civil society, the Government has developed the Principles and Action Plan for Promoting Equal Opportunities for LGBTIQ People 2025–2030, which, as of September 2025, is awaiting adoption³⁷.
- 44.** LGBTIQ people continue to face significant barriers in the healthcare system, including limited awareness and insufficiently trained healthcare professionals. The vast majority of healthcare workers have acknowledged that their training did not adequately prepare them to work with LGBTIQ patients³⁸.
- 45.** There is a lack of common practice among health care providers regarding intersex children. Since the issue has not been researched in Estonia, it is not possible to assess if gender reassignment procedures occur with the person's informed consent, especially in cases of intersex children. There is no information on if or how many intersex children are subjected to irreversible medical gender reassignment procedures.
- 46.** The gender recognition process in Estonia remains excessively complex, bureaucratic, and difficult to access. One of the principal challenges faced by trans persons is the disproportionately long waiting time for legal gender recognition and

³⁷[The Government's decision on the "Principles and Action Plan for Promoting Equal Opportunities for LGBTIQ People 2025–2030"](#)

³⁸ [Attitudes and Awareness of Healthcare Professionals and Students Regarding LGBTI People. Research Report. PRAXIS.2023.](#)

trans-specific healthcare services. Currently, the average waiting period to access trans-specific healthcare is approximately two to three years, while amending one's gender marker and related personal data in official documents takes an estimated four to five years. By contrast, for cisgender Estonian citizens, the average waiting time to update personal data in legal documents is approximately 30 days. This situation is grave and has a direct adverse impact on the well-being and human rights of trans persons in Estonia.

- 47.** As a result of advocacy by Estonian human rights organizations, limited progress has been achieved. In September 2025, the Minister of Social Affairs adopted a new regulation "*Conditions and Procedure for Making a Decision on Gender Incongruence.*" Under this framework, access to transition-related healthcare is no longer contingent upon genetic testing or ministerial authorization. Nevertheless, no corresponding reform has been introduced in the area of legal gender recognition, which continues to lack a procedure based on the principle of self-determination.
- 48.** The field of education and the school environment concerning LGBTIQ issues have not been adequately studied or addressed by the Government and require urgent attention. There is a lack of education on these topics, both within the national curriculum and in teacher training. In addition, bullying has increased significantly. The proportion of LGBTIQ students who reported experiencing bullying, ridicule, teasing, insults, or threats during their time in school rose from 38% in 2019 to 65% in 2023³⁹. The adoption of the Principles and Action Plan is expected to address some of these concerns, as it includes specific requirements and measures for schools.

49. Recommendations:

- a.** Adopt the Principles and Action Plan for Promoting Equal Opportunities for LGBTIQ People 2025–2030 and secure its full implementation.
- b.** Curricula at all school levels must address the topic of equal treatment of marginalised groups. Educational materials should adopt a neutral approach to LGBTIQ topics, e.g. in subjects related to family, health and sex education, incorporating evidence-based and non-judgmental perspectives on sexual and gender diversity as a natural part of various subjects
- c.** Information about the needs of LGBTIQ patients should be included in training for healthcare professionals. Primary and additional medical training should adopt a human rights-based approach.

³⁹ [European Union Agency for Fundamental Rights. LGBTIQ Equality at a Crossroads: Progress and Challenges. 2024.](#)

- d. To study the situation and treatment of children born intersex and ensure that their human rights are not violated through irreversible, medically unnecessary and coerced medical practices, and to provide up-to-date training for medical staff on the subject.
- e. To adopt a gender recognition framework that fully respects the principle of self-determination.

Children and Youth

- 50. Children's and young people's participation remains problematically low, particularly among vulnerable groups such as those in contact with child protection services. Studies indicate even when involved, participation is often passive, and children's opinions are poorly documented or insufficiently analysed.⁴⁰
- 51. The well-being and coping of households with children largely depend on household type and area of residence. Statistics and various surveys highlight inequalities in health and differences in the availability of services, support specialists, and extracurricular education, with geographical location playing a significant role.⁴¹
- 52. Following the administrative reform, the number of specialists engaged in child protection work has decreased, even as the number of children in need of assistance has grown. Work overload and the risk of burnout among child protection workers remain major concerns. A worrying new development is the rise of anti-child rights rhetoric and organised movements spreading misinformation about the role of child protection services. Such narratives risk undermining public trust in child protection authorities and discouraging individuals from reporting cases where a child may need support.⁴²
- 53. Relevant and up-to-date statistics are essential for developing effective measures. However, child-centred data remain limited in mainstream statistics. Information related to children is fragmented, with little data available on children's participation, self-assessments, and opinions. Relevant databases are not yet interconnected.
- 54. Alarming, sexual abuse of children constitutes most sexual crimes in Estonia. According to the Ministry of Justice's 2023 crime statistics, 637 out of 731 registered sexual offences involved child victims. Nearly half of these offences were

⁴⁰ [The Child's Voice in Child Protection Work – Children's Participation Experiences 2021](#).

⁴¹ [Puudega lastega perede toimetuleku ja vajaduste uuring 2017](#) and [Child's Needs-Based Minimum Maintenance Allowance – Final Report](#). 2020.

⁴² Expert input from the Estonian Union for Child Welfare. 2025.

committed by family members or close relatives, underscoring the strong link between sexual violence and domestic abuse.⁴³

- 55.** The number of children with disabilities has increased over the past decade, while they continue to face inadequate protection against discrimination, limited inclusion and assistance, and restricted access to education. In June 2025, Estonia adopted a law extending disability support for children up to the age of 18. Starting from 1 February 2027, children with disabilities will no longer be required to undergo work ability assessments at age 16; instead, disability severity assessments will continue until adulthood, ensuring smoother support for families and a fairer alignment of systems. Children with rare diseases will also be eligible for support until age 18, even without a formal disability rating.
- 56.** Children's mental health in Estonia remains in a critical state, with no clear care pathway or coordinated support system in place. According to recent data, more than half of girls aged 15 to 17 are at risk of depression or anxiety, while access to mental health services continues to be fragmented⁴⁴. There is a nationwide shortage of child and adolescent psychiatrists, as well as school psychologists and mental health nurses. In 2022, the Mental Health Act was amended to guarantee a child's right to consult a psychiatrist without parental consent or court approval, which was a progressive but insufficient step on its own.
- 57.** Although the Social Welfare Act has stipulated the obligation to give preference to family-based alternative care since 2018, and the state has actively contributed to the recruitment of foster families in recent years, there are still 762 children in substitute or children's homes and 154 in foster families. In 2022, a total of 2,319 persons were in alternative care in Estonia (1,403 children in a guardianship family and 20 children adopted into a new family).⁴⁵

58. Recommendations:

- a.** Promote the participation of children and young people in decision-making processes and public life, ensuring that their views are meaningfully considered in matters affecting them.
- b.** Enhance coordination between the health, social services, and education sectors to ensure equal access and quality of support services for all children, regardless of residence or special educational needs, and strengthen multidisciplinary cooperation.

⁴³ [State statistics – Crime in Estonia in 2023](#)

⁴⁴ [Estonian Children's Mental Health Survey 2024](#)

⁴⁵ [Estonian Union for Child Welfare's Additional Report on the UN Convention on the Rights of the Child: Estonia. 2023.](#)

- c. Ensure that all local governments have a sufficient number of qualified child protection workers to meet the needs of children and families.
- d. Improve the collection, processing, and publication of child-centred data.
- e. Address sexual violence against children through legal measures, awareness-raising, and prevention activities that promote positive, non-violent, and inclusive parenting methods.
- f. Strengthen the mental health support system for children and adolescents by expanding access to services, increasing the number of mental health professionals, and ensuring early intervention and counselling are available in all regions.
- g. Develop and expand family-based alternative care, ensuring high-quality substitute and follow-up care and reducing institutionalisation, particularly for children under the age of three.

Vegans

- 59. Estonian law provides insufficient protection against discrimination on the ground of belief, which under human rights standards also includes veganism. While the Constitution prohibits discrimination based on beliefs in all areas of life, the Equal Treatment Act applies only to employment. As a result, it does not cover most discrimination cases faced by vegans in schools, hospitals, or prisons.
- 60. Legally and in practice, the provision of fully plant-based food in Estonian preschool institutions remains unclear, as existing regulations and practices are contradictory. Catering in Estonian kindergartens is regulated by the *Health Protection Requirements for Catering in Preschool Institutions and Schools*, which stipulates that one-third of the protein requirement must be covered by animal products. At the same time, according to the Health Board, kindergartens are not prohibited from offering a vegan menu if agreed upon with the child's parent. The situation in schools is somewhat better, not because of systemic support, but because school-age children are generally more independent in making their own food choices.⁴⁶

61. Recommendations

- a. Ensure by legal norms that vegans are entitled to food and other equipment, including medical treatment, in line with their beliefs in hospitals, schools and kindergartens, summer camps for children, military service and prisons.

⁴⁶ [If You Choose to Live Differently, Then Suffer": Institutional Readiness to Support Sustainable Lifestyles – A Study from the Perspective of Vegan Parents](#) Estonian Vegan Society. 2024

b. Ensure that, when proceeding with the draft Gender Equality and Equal Opportunities Act or amending the Equal Treatment Act, protection on the ground of belief is extended to all areas of life, and that veganism is explicitly recognised as falling under this protected ground.

c. Ensure that the National Nutritional Guidelines provide clear, evidence-based guidance on healthy plant-based eating for those following a vegan lifestyle.

d. Canteens in public institutions, should have a legal obligation to serve at least one vegan option every day, regardless of whether there has been a vegan client demanding such meals or not.