



ESTONIAN HUMAN
RIGHTS CENTRE

Child Safeguarding Policy

Addendum to the [Guide for the Prevention of Sexual Abuse, Exploitation and Harassment](#) (PSEAH Guide)

Overall responsibility	Director of EHRC (sole accountability)
Designated Safeguarding Lead	Director of EHRC (day-to-day contact for safeguarding)
Cover during absence	A standing deputy safeguarding contact, designated in advance and in writing by the Director, who acts during any absence or unavailability of the Director
Approved by	Director of the Estonian Human Rights Centre
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Next review	Every two years, or sooner following a serious incident or a change in the law
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Table of contents

Section 1: Introduction and purpose	3
Section 2: Definitions	3
Section 3: Scope and guiding principles	4
Section 4: Policy statement and communication	5
Section 5: People — roles, recruitment, conduct and training	6
Section 5.1: Responsibilities of everyone	6
Section 5.2: Designated Safeguarding Lead	6
Section 5.3: Safer recruitment and vetting	6
Section 5.4: Code of Conduct for working with and around children	7
Section 5.5: Training and awareness	7
Section 6: Procedures — risk, reporting and response	8
Section 6.1: Risk assessment and mitigation	8
Section 6.2: Reporting a concern	8
Section 6.3: Responding to a concern	8
Section 6.4: Integration into EHRC's systems.....	9
Section 7: Accountability, monitoring and review	9
Section 8: Where to get help.....	10
Annex A: Code of Conduct — acknowledgement	11
Annex B: Child safeguarding risk assessment (template).....	12
Annex C: Child safeguarding concern — report form	13

Section 1: Introduction and purpose

The Estonian Human Rights Centre (hereinafter EHRC) is committed to ensuring that every child who comes into contact with its work is safe from harm. This Child Safeguarding Policy (hereinafter the Policy) sets out how EHRC prevents harm to children and how it responds when a concern arises. It reflects EHRC's conviction that the safety and well-being of children must come before the interests of the organisation, its staff or its projects.

This Policy is an addendum to, and forms an integral part of, [EHRC's Guide for the Prevention of Sexual Abuse, Exploitation and Harassment](#) (the PSEAH Guide). Where this Policy is silent, the definitions, reporting channels, complaints procedures, confidentiality rules and sources of assistance set out in the PSEAH Guide apply. Where a matter concerns a child, the additional and more protective provisions of this Policy prevail.

The Policy is grounded in the United Nations Convention on the Rights of the Child and in Estonian law, in particular the Child Protection Act (Lastekaitseadus), the Penal Code and the Personal Data Protection Act. It gives practical effect to the statutory duty that rests on everyone in Estonia to notify the authorities of a child in need of assistance or in danger.

Purpose. The Policy aims to:

- a) prevent harm to children arising from contact with EHRC's staff, associated persons, activities, premises or communications;
- b) ensure that everyone acting for or with EHRC understands their safeguarding responsibilities and knows how to act on a concern;
- c) provide clear, locally appropriate procedures for reporting and responding to safeguarding concerns; and
- d) hold EHRC accountable for implementing, monitoring and improving its safeguarding practice over time.

Section 2: Definitions

The following definitions apply in addition to those in Section 1 of the [PSEAH Guide](#).

- 1) Child means any person under the age of 18 years, in line with the UN Convention on the Rights of the Child and Estonian law, regardless of the age of majority or consent that may apply for any other purpose.
- 2) Child safeguarding means the responsibility that an organisation has to make sure its staff, operations and activities do no harm to children, and that any concerns the organisation has about children's safety are reported to the appropriate authorities.
- 3) Child protection means the specific measures taken to protect an individual child who is identified as being at risk of, or suffering, harm.
- 4) Child abuse means all forms of physical or emotional ill-treatment, sexual abuse, neglect or negligent treatment, and commercial or other exploitation, resulting in actual or potential harm to a child's health, survival, development or dignity. It includes, in particular:
 - a) physical abuse — the use of physical force that harms or risks harming a child;

- b) emotional or psychological abuse — persistent ill-treatment that harms a child's emotional development, including humiliation, intimidation, threats and bullying;
 - c) sexual abuse — involving a child in any sexual activity, whether or not the child is aware of what is happening, including online sexual abuse; any sexual activity with a person under 18 is prohibited;
 - d) neglect — the persistent failure to meet a child's basic physical or psychological needs; and
 - e) exploitation — the use of a child for the benefit of another, including sexual exploitation and the misuse of a position of trust or power over a child.
- 5) Grooming means building a relationship, trust or emotional connection with a child in order to manipulate, exploit or abuse them, including online. Encouraging a child to keep secrets from caregivers or trusted adults is a warning sign of grooming.
 - 6) Child in need of assistance means, under the Child Protection Act, a child whose well-being is at risk, or in whose case there is a suspicion of abuse, neglect or another situation that violates the child's rights.
 - 7) Child in danger means, under the Child Protection Act, a child whose life or health is at risk, or whose behaviour endangers the life or health of the child or of others.
 - 8) Associated persons means all persons acting for or on behalf of EHRC, whether or not they are paid: employees, board members, trainees, interns, volunteers, consultants, mandataries, service providers, subcontractors and project partners.
 - 9) Contact with children means any direct interaction with children (for example trainings, workshops, events, interviews, service provision or accompaniment) or indirect contact (for example access to children's personal data or images), whether one-off or regular, in person or online.
 - 10) Designated Safeguarding Lead (DSL) means the person who holds day-to-day responsibility for child safeguarding and is the first point of contact for concerns. Given the small size of EHRC, this role is held by the Director, who also holds overall responsibility for this Policy. During any absence or unavailability of the Director, a standing deputy designated in advance and in writing by the Director acts as the safeguarding contact; this designation does not transfer overall responsibility.
 - 11) Best interests of the child means the principle that in all actions concerning children, the child's best interests are a primary consideration.

Section 3: Scope and guiding principles

- 1) This Policy applies to all associated persons of EHRC, in all of EHRC's work, whether or not a particular activity is designed for children. It applies on EHRC's premises, at events and trainings, during travel, in the course of projects and partnerships, and in all communications, including online and on social media.
- 2) EHRC acknowledges that a human rights organisation whose core work is with adults nonetheless comes into contact with children — for example as participants in events, as members of families EHRC assists, as members of the public reached through campaigns, or through images and personal data. The Policy is designed to cover both planned and incidental contact with children.
- 3) EHRC applies the following guiding principles:

- a) Best interests first. The best interests and safety of the child take precedence over all other considerations.
- b) Do no harm. Activities are designed and delivered so as not to expose children to risk.
- c) Zero tolerance. EHRC does not tolerate any form of abuse, exploitation or harm to children by its associated persons; substantiated cases result in termination of employment or cooperation and, where appropriate, referral to the authorities.
- d) Mandatory reporting. Everyone has a legal duty to notify the authorities of a child in need of assistance or in danger; no one is required to be certain before reporting a genuine concern.
- e) Non-discrimination and inclusion. All children are protected equally, with particular attention to children in vulnerable situations.
- f) Participation. Children are listened to, and their views are taken into account in an age-appropriate way.
- g) Child- and survivor-centred approach. Consistent with the victim-centred approach in the [PSEAH Guide](#), the rights, wishes, dignity and well-being of the child guide every response.
- h) Confidentiality and data protection. Information about a child is shared only on a need-to-know basis and handled in accordance with the Personal Data Protection Act.

Section 4: Policy statement and communication

- 1) Overall responsibility for this Policy rests solely with the Director of EHRC, who is accountable for ensuring that it is implemented, resourced and reviewed, who personally carries out the compliance measures that require restricted access (such as background checks), and who acts as EHRC's Designated Safeguarding Lead (Section 5.2). During any absence or unavailability of the Director, a standing deputy designated in advance and in writing by the Director acts as the safeguarding contact, so that it is always clear who is responsible. Where a safeguarding concern relates to the Director, it is reported to the Supervisory Board, which handles it under the complaints procedure in Section 5 of the [PSEAH Guide](#). Regardless of internal arrangements, every associated person always retains the direct duty to notify the authorities under Section 6.2, so the protection of a child never depends on the availability of any single person.
- 2) The Estonian Human Rights Centre is committed to safeguarding children from all forms of harm. EHRC will not knowingly engage anyone who poses a risk to children, and it requires all associated persons to share this commitment and to act on any concern.
- 3) This Policy is approved by the Director of the EHRC and is publicly available on EHRC's website and intranet. Approval, review and any material amendment are recorded in the version table on the cover page.
- 4) EHRC communicates this Policy so that it is understood by those it affects:
 - a) all associated persons receive the Policy and confirm that they have read and understood it, and are bound by the Code of Conduct in Section 5;
 - b) a short, child-friendly version explaining what children can expect from EHRC and how to raise a concern is made available to children who take part in EHRC's activities;

- c) caregivers are informed of the Policy and of how to raise a concern before their children take part in EHRC's activities; and
- d) partners, funders and other relevant stakeholders are made aware of the Policy, and partners are required to comply with it or with equivalent measures of their own.

Section 5: People — roles, recruitment, conduct and training

Section 5.1: Responsibilities of everyone

- 1) Every associated person is required to: read, understand and comply with this Policy and the Code of Conduct; act at all times in a way that keeps children safe; recognise the signs of possible abuse; and report any concern about a child's safety immediately, in accordance with Section 6. A concern must be reported even where it is only a suspicion, and no one may carry out their own investigation before reporting.

Section 5.2: Designated Safeguarding Lead

- 1) EHRC's Designated Safeguarding Lead (DSL) is the Director. Because EHRC has a small team, the same person holds overall responsibility for this Policy and day-to-day responsibility for safeguarding. The DSL:
 - a) is the first internal point of contact for safeguarding concerns and advice;
 - b) acts as the organisation's contact person for the purpose of reporting a child in need of assistance, as provided by the Child Protection Act, and makes or oversees statutory notifications to the authorities;
 - c) maintains the confidential safeguarding record, oversees risk assessments, and coordinates the response to concerns;
 - d) ensures that safeguarding training is delivered and kept up to date; and
 - e) reports to the Supervisory Board on implementation, incidents and lessons learnt.
- 2) So that safeguarding cover is never interrupted, the Director designates, in writing, a standing deputy safeguarding contact who acts whenever the Director is absent or unavailable, including at short notice, and informs the whole team who this is. The designation is role-independent; it does not transfer the Director's overall responsibility. Where a safeguarding concern relates to the Director, it is reported to the Supervisory Board (Section 4).
- 3) In all circumstances — including where no cover has been designated, or the Director and any designated contact are unavailable — every associated person retains the direct statutory duty to notify the authorities (Sections 6.2 and 8). No child's protection depends on the availability of one person.

Section 5.3: Safer recruitment and vetting

- 1) Safeguarding is built into recruitment and engagement for every role, and more rigorously for roles that involve contact with children:
 - a) vacancy notices and terms of reference state whether the role involves contact with children and refer to EHRC's safeguarding commitment;

- b) for any role that involves working with children, the candidate must submit an extract from the Criminal Records Database before starting, and the Director verifies that the person is not subject to a restriction on working with children under the Child Protection Act (§ 20), and the check is repeated at least every three years for as long as the role involves contact with children. This applies in addition to, and is consistent with, Section 3(5) of the [PSEAH Guide](#);
- c) reference checks under Section 3(4) of the [PSEAH Guide](#) expressly include whether any safeguarding or child-protection concern has been raised about the candidate;
- d) the self-declaration in employment contracts ([PSEAH Guide](#), Section 3(7)) is extended so that the person also confirms that they are not subject to any restriction on, or investigation relating to, working with or harming children; and
- e) no associated person begins contact with children before completing induction, including this Policy and the Code of Conduct.

Section 5.4: Code of Conduct for working with and around children

Every associated person must sign the Code of Conduct (Annex A). The Code requires the following.

You must:

- treat every child with respect and dignity and act in their best interests;
- keep activities with children observable and interruptible, and avoid being alone and unobserved with a child; wherever practicable apply the two-adult principle;
- maintain professional boundaries and use only EHRC's official channels to communicate with children;
- obtain informed consent — from the child in an age-appropriate way and from a caregiver — before photographing or filming a child, and use and store any images only as agreed and in line with data-protection rules;
- report any concern about a child's safety immediately in accordance with Section 6.

You must never:

- harm a child physically, sexually, emotionally or through neglect, or exploit a child in any way;
- engage in any sexual activity or sexualised behaviour with a person under 18, or develop a relationship with a child that could be abusive; this is prohibited and may be a criminal offence;
- use language or behaviour that is degrading, humiliating, frightening, sexually provocative or otherwise inappropriate;
- spend excessive time alone with a child, invite a child to your home or accommodation, or arrange private contact unrelated to EHRC's work;
- contact a child through private accounts, give a child your personal contact details, or ask or encourage a child to keep secrets;
- share images of, or information about, a child on personal accounts or social media;
- be under the influence of alcohol or drugs while responsible for or in contact with children.

A breach of the Code of Conduct is handled under the complaints procedure in Section 5 of the [PSEAH Guide](#) and may result in disciplinary measures up to and including termination of employment or cooperation, in addition to any report to the authorities.

Section 5.5: Training and awareness

- 1) EHRC organises safeguarding training on a tiered basis, integrated with the PSEAH training in Section 3.2 of the [PSEAH Guide](#):
 - a) All associated persons complete an introduction to child safeguarding as part of onboarding (within one month of starting, and in any event before any contact with children) covering: the types and signs of child abuse; the Code of Conduct; and how and to whom to report a concern.
 - b) Those in regular contact with children complete enhanced training before contact begins and a refresher at least every two years, covering risk assessment, safe activity design, online safety and the response procedure.
 - c) The DSL completes specialist safeguarding training and keeps their knowledge current; any staff member who may be designated as safeguarding cover receives equivalent preparation beforehand.
- 2) The EHRC Director keeps a record of training completed. The DSL ensures that training content is accurate and up to date, and that safeguarding is a recurring item at team meetings and the annual strategic seminar.

Section 6: Procedures — risk, reporting and response

Section 6.1: Risk assessment and mitigation

- 1) Before any activity or project that may involve contact with children, the responsible project manager, together with partners, carries out a child safeguarding risk assessment (Annex B), integrated into the project risk analysis under Section 3.1 of the [PSEAH Guide](#). The assessment considers, among other things: the nature, setting and duration of contact; the age and vulnerability of the children involved; online components; travel or overnight arrangements; photography and communications; and the involvement of third parties.
- 2) For each risk identified, a mitigation measure is put in place — for example the two-adult principle, supervised and observable settings, controlled use of images and data, vetting of third parties, and clear reporting arrangements. If a risk cannot be adequately mitigated, the activity or the relevant part of it is not carried out or is suspended. Risks are reviewed as the project progresses, and the DSL signs off the assessment.

Section 6.2: Reporting a concern

- 1) Anyone — an associated person, a child, a caregiver or a member of the public — may raise a safeguarding concern. You do not need to use any particular format: you can fill in the concern form in Annex C if you find it helpful, or simply tell or write what happened in your own words, using whichever channel is easiest for you. What matters is that the concern is raised, not how it is written. The PSEAH reporting channels in Section 4 of the [PSEAH Guide](#) are available, including the form on EHRC's website (which may be used anonymously) and the address

kaebused@humanrights.ee. A concern can also be raised directly and immediately with the DSL, or, where it relates to the Director, with the Supervisory Board.

- 2) Statutory external reporting. Internal reporting never replaces the legal duty to notify the authorities. Under the Child Protection Act, everyone who becomes aware of a child in need of assistance must notify, without delay, the local municipality (child protection worker) or the child helpline 116 111; a child in danger must be reported immediately to the emergency number 112. EHRC's DSL acts as the organisation's contact person for this purpose, but the individual duty to report remains with each person and must not be delayed where a child is at risk.
- 3) When raising a concern, record and pass on what you have seen or heard as factually as possible, including dates, times and the words used, without asking the child leading questions and without promising confidentiality that cannot be kept. Do not attempt to investigate, and do not confront the person the concern is about.
- 4) If a concern involves possible child sexual abuse, it is referred to the Children's House (Lastemaja), the specialist service that provides a child-friendly, coordinated response; suspected online abuse or grooming can also be reported to the web constable (veebikonstaabel). See Section 8.

Section 6.3: Responding to a concern

- 1) This Policy does not create a separate complaints procedure. Where a concern amounts to a complaint against an associated person, it is handled under the complaints procedure in Section 5 of the [PSEAH Guide](#), which applies in full. This Policy adds only the child-specific steps that the [PSEAH Guide](#) does not cover, namely external statutory notification to the authorities and referral to specialist child-protection services.
- 2) EHRC responds to every concern in a prompt, child-centred and confidential way. The steps are:
 - a) Ensure immediate safety. If a child is in danger, call 112 at once and take reasonable steps to keep the child safe.
 - b) Record. Write down the facts as soon as possible and pass them to the DSL the same day.
 - c) Assess and notify. The DSL assesses the concern and makes, or ensures, the statutory notification to the authorities where the threshold is met, without delay where a child is at risk.
 - d) Manage the internal dimension. Where a concern is about an associated person, that person's contact with children is suspended pending the outcome, the matter is handled under the complaints procedure in Section 5 of the [PSEAH Guide](#), and the Director and Supervisory Board are informed. The funder is notified where the concern arises in project activities, respecting the confidentiality of those involved.
 - e) Support. The child and, where appropriate, the family are offered support and referred to the services in Section 8, following the child-centred approach.
 - f) Record and learn. The concern, decisions and outcome are recorded in the confidential safeguarding log, and lessons are drawn to improve prevention.
- 3) Confidentiality is maintained throughout. Information about a child and about the parties involved is shared only with those who need it to protect the child or to carry out the procedure, and special categories of personal data are handled in accordance with the Personal Data Protection Act, as set out in Section 4(6) of the [PSEAH Guide](#). Safeguarding records are stored securely with access

limited to the DSL, are retained only for as long as necessary — as a general rule until the child concerned reaches the age of 25 — and are then securely deleted, unless a longer retention period is required by law. The identity of a person who reports a concern is protected as provided by law. Retaliation against anyone who raises a genuine concern is not tolerated.

Section 6.4: Integration into EHRC's systems

1) Safeguarding is embedded across EHRC's operations:

- a) Recruitment — as set out in Section 5.3 (safer recruitment, vetting, self-declaration).
- b) Project management — through risk assessment and mitigation at design and throughout delivery (Section 6.1), and safeguarding as a standing point in project monitoring.
- c) Procurement — tenders and contracts for services that involve contact with children include safeguarding requirements as a condition of award.
- d) Partnerships — partnership, subcontracting and service agreements require the partner to comply with this Policy or with equivalent safeguarding measures, and to report safeguarding concerns to EHRC; failure to do so is grounds for termination, consistent with Section 3(6) of the [PSEAH Guide](#).

Section 7: Accountability, monitoring and review

- 1) Monitoring implementation. The DSL monitors whether the Policy and its procedures are actually applied — including completion of vetting, signed Codes of Conduct, training records, and completed risk assessments — and maintains a confidential safeguarding incident log.
- 2) Reporting progress and lessons learnt. The DSL reports at least annually to the Supervisory Board on implementation, on any incidents (in anonymised form) and on lessons learnt, and reports to funders on safeguarding where required by the terms of a project. Safeguarding is a standing item at the annual strategic seminar.
- 3) Regular review. The Policy is reviewed at least every two years, and additionally after any serious incident or relevant change in the law or in EHRC's activities. The Supervisory Board approves material changes, and the version table is updated.
- 4) Independent evaluation or audit. EHRC arranges a periodic independent evaluation or audit of its safeguarding arrangements — as a general rule at least every three years, or as a funder requires — and acts on the recommendations, reporting the outcome to the Supervisory Board.

Section 8: Where to get help

The following contacts are used to report concerns about children and to obtain support. They complement the general assistance list in Section 6 of the [PSEAH Guide](#).

Service	How to contact	When to contact
Emergency number	112	A child is in immediate danger; life or health is at risk.

Service	How to contact	When to contact
Child Helpline (Lasteabi)	116 111 (24/7, free, anonymous, multilingual); lasteabi.ee	To notify of a child in need of assistance and to seek advice.
Local municipality child protection worker	Municipality of the child's residence (lastekaitsetöötaja)	To notify of a child in need of assistance (Child Protection Act § 27).
Children's House (Lastemaja)	116 111 or info@lastemaja.ee	Suspected child sexual abuse; coordinated legal, medical and psychosocial support.
Web constable (veebikonstaabel)	Estonian Police and Border Guard Board online	Suspected online abuse, grooming or harassment of a child.
Victim Support (Ohvriabi)	116 006	Psychosocial support for a child or family affected by harm.
Social Insurance Board (Sotsiaalkindlustusamet)	Child protection unit	Coordination and specialist advice on child protection.

Annex A: Code of Conduct — acknowledgement

I confirm that I have received, read and understood the Estonian Human Rights Centre's Child Safeguarding Policy, including the Code of Conduct in Section 5.4. I agree to be bound by it. I understand that I must report any concern about a child's safety immediately, that I must not attempt to investigate a concern myself, and that a breach may lead to disciplinary measures up to and including termination of employment or cooperation, in addition to any report to the authorities.

I confirm that I am not subject to any restriction on working with children under the Child Protection Act, and that no safeguarding or child-protection investigation relating to me is pending or unresolved.

Name	
Role / relationship to EHRC	
Signature	
Date	

Annex B: Child safeguarding risk assessment (template)

Complete for any activity or project that may involve contact with children. Integrate with the project risk analysis under Section 3.1 of the [PSEAH Guide](#). Sign-off by the DSL is required before the activity begins.

Risk area	Risk identified	Likelihood / impact	Mitigation measure
Nature, setting and duration of contact			
Age and vulnerability of children involved			
One-to-one / unobserved contact			
Online activities and communications			
Photography, filming and use of images			
Travel and overnight arrangements			
Third parties, partners and venues			
Handling of children's personal data			

Assessed by: _____ Date: _____

DSL sign-off: _____ Date: _____ Review date: _____

Annex C: Child safeguarding concern — report form

This form is one way to record and pass on a concern — you are welcome to use it, but you do not have to. You can also simply tell or write what happened in your own words, however feels easiest. If you do use the form, note the facts only and do not investigate. If a child is in immediate danger, call 112 first. Pass the concern to the DSL the same day.

Your name and contact (may be left blank if reporting anonymously)	
Your role / relationship to EHRC	
Child concerned (name/age if known)	
What happened — facts, in the words used, where and when	
Who else was present / any witnesses	
Immediate action already taken	
Date and time of this report	

For DSL use — assessment, statutory notification made (to whom / when), internal action, funder notified, support offered, outcome and lessons:

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