

# CHILD PROTECTION POLICY (CPP)

Ver. 01/14.08.2025

English

Effective Date: 14.08.2025

Adopted by **MITTETULUNDUSUHING PEIPSI KOOSTOO KESKUS (PEIPSI CTC)**

PIC 983196269, Registration Number: 80101672, established in PUIESTEE 71A, TARTU 51009, Estonia, represented by Margit Säre – Chairwoman

Approved by: Margit Säre  
(Chairwoman, PEIPSI CTC)

Signature



## 1. Purpose and Scope

This Child Protection Policy (CPP) outlines PEIPSI CTC's commitment to safeguarding all children involved in any project or initiative of the organization from harm, abuse, and exploitation. It has been developed in line with international standards, European Union laws, and Estonian national legislation on child protection. The policy's purpose is to ensure that **every child's rights, safety, and dignity are respected** during all of the organization's activities.

The scope of this Policy extends to **all personnel** associated with PEIPSI CTC under any project. This includes employees, volunteers, contractors, partners, and any other representatives who interact with children or young people through project activities. All such persons are required to **adhere to this Policy and its procedures**. The Policy applies in all settings of any project – whether events, workshops, interviews, online interactions, or any other engagement involving minors.

## 2. Legal Framework and Principles

PEIPSI CTC's CPP is grounded in key **international and EU child protection instruments**. It upholds the principles of the United Nations Convention on the Rights of the Child (UNCRC) and complies with EU law, including the EU Charter of Fundamental Rights (Art. 24 on children's rights) and relevant directives such as **Directive 2011/93/EU** on combating sexual abuse and exploitation of children, and **Directive 2012/29/EU** on victims' rights. These frameworks emphasize that the **best interests of the child** are paramount and that children must be protected from all forms of violence.

This Policy also aligns with Estonian national legislation. In particular, it reflects the requirements of the Child Protection Act (Lastekaitse seadus); GDPR as per Personal Data Protection Act (Isikuandmete kaitse seadus) and related laws. Under Estonian law, a "child" is any person under 18 years of age, and all children have the right to protection from abuse, neglect, exploitation, and any actions that may harm their health, development or dignity. The Policy incorporates these national legal standards to ensure compliance with local obligations.

**Key Principles:** The implementation of this Policy is guided by fundamental principles of child safeguarding:

- **Zero Tolerance for Abuse:** Any form of child abuse or exploitation is unacceptable. All concerns will be taken seriously and addressed promptly.
- **Child-Centered Approach:** The child's welfare and best interests are the primary consideration in all actions. Children have the right to be heard, and their views respected in accordance with their age and maturity.
- **Confidentiality and Privacy:** Child protection matters are handled with discretion. Personal data of children is protected in line with GDPR (EU Regulation 2016/679) and Estonian law, ensuring confidentiality and privacy.

- **Accountability:** All representatives of the project are accountable for upholding this Policy. Breaches of the Policy or Code of Conduct will result in disciplinary action and, where appropriate, legal consequences.

### 3. Definitions

For the purposes of this Policy, the following definitions apply:

- **Child:** Any person below 18 years of age. (In line with Article 1 of the UNCRC and Estonian Child Protection Act.)
- **Child Abuse:** Any form of physical, emotional, or sexual mistreatment of a child, including neglect or exploitation, that **harms or poses a risk of harm** to the child's health, survival, development or dignity. This encompasses: physical abuse (inflicting bodily harm or pain), emotional/psychological abuse (causing mental distress through threats, humiliation, bullying, etc.), sexual abuse (involving a child in sexual activities, including grooming or pornography), **neglect** (failing to provide for a child's basic needs), and commercial or other exploitation (using a child for labor, profit, sexual services, trafficking, etc.).
- **Child Protection:** The set of policies, measures and practices designed to prevent and respond to abuse, neglect, exploitation or violence against children. Child protection involves ensuring children's safety, well-being, and rights are safeguarded – within the family, institution, or any environment – and that **appropriate action is taken** whenever a child is in danger.

### 4. Prevention Measures

PEIPSI CTC is dedicated to creating a safe environment for children in all project activities. To prevent abuse and ensure children's well-being, the organization implements the following measures:

- **Safe Recruitment and Screening:** Staff and volunteers who will work with children are carefully selected. Background checks (including verifying absence of criminal record for offenses against children) may be conducted as allowed by law. All personnel must formally agree to abide by this Child Protection Policy and the Code of Conduct before involvement.
- **Training and Awareness:** All project staff and volunteers receive guidance or training on child protection principles, how to recognize signs of child abuse, and the procedures for reporting concerns. The CPP is circulated and explained so that everyone understands their responsibilities.
- **Safe Program Design:** Activities involving children are planned with risk mitigation in mind. Adequate supervision ratios are maintained (ensuring an appropriate number of adults present relative to children). Activities take place in child-friendly spaces and, when possible, with parental consent and knowledge. Transportation, filming, or any activity with minors follows safety guidelines (e.g. no adult should be alone with a child out of sight of others).
- **Communications and Media:** When collecting stories, photos, or videos as part of any project, the dignity and rights of children are respected. **Informed consent** of the child and parent/guardian is obtained before using any child's image or personal story. Children's identity and personal data are protected in publications (no personal details will be disclosed without permission). Content portraying children will be used ethically and never in a way that is exploitative or harmful.
- **Partnerships:** If the project engages external organizations or contractors to work with children, PEIPSI CTC will brief them on this Policy and ensure they commit to child protection standards. Any partner must agree to adhere to equivalent child safeguarding measures.

### 5. Reporting and Response

Despite preventive measures, incidents or suspicions of child abuse may occur. PEIPSI CTC has established a clear **reporting mechanism** to ensure any concerns are addressed swiftly and appropriately. **All project personnel are obliged to report** any child protection concerns, whether the alleged harm is by a staff member, another child, a family/community member, or any other person. The following procedure must be followed for reporting and responding to child protection issues:

**Reporting Procedure:** If a staff member or volunteer **suspects or becomes aware of** any child being abused or at risk:

- 1. Ensure Immediate Safety:** If the child is in immediate danger or needs urgent medical care, the first priority is to ensure the child's safety – e.g. separate the child from the source of harm and seek medical help or call emergency services (tel. 112 in Estonia) if required.
- 2. Report to Safeguarding Focal Point:** Contact the designated Safeguarding Focal Point (see Section 6 for contact) as soon as possible, ideally **within the same day** of the incident or disclosure. This can be done verbally initially, but must be followed by a written report using the Incident Reporting Form (Annex 2) within 24 hours.
- 3. Preserve Evidence:** Avoid probing the child with leading questions, but do listen and reassure them. Do not conduct an investigation yourself – just gather the essential facts. Preserve any evidence (if applicable) and keep detailed notes of what was observed or disclosed, including dates, times, names of people involved, and exactly what was said by whom.
- 4. Confidentiality:** Share information **only with those who need to know** – namely the Safeguarding Focal Point and relevant authorities. Do not discuss the matter broadly to protect the privacy and rights of the child and others involved.
- 5. External Notification:** The Safeguarding Focal Point will assess the report and take necessary action. In accordance with Estonian law, serious allegations or suspicions of child abuse **must be reported to the appropriate authorities**. This may include notifying the local Child Protection Department, or the Police/Prosecutor's Office, depending on the case. The Focal Point will ordinarily make this referral without delay (within 24 hours of receiving the report) if the situation warrants.
- 6. Support to the Child:** The organization will ensure that the affected child receives appropriate support. This may involve psychological support or counseling, medical assistance, or other care as needed. The child's **best interests and well-being** will remain central throughout the process.
- 7. Internal Follow-up:** If the alleged perpetrator is associated with the project (e.g. staff or volunteer), PEIPSI CTC will take immediate steps to prevent further contact between that individual and children (such as suspension from duties) while the investigation is ongoing. Disciplinary proceedings will be initiated according to organizational rules, up to and including termination of engagement if the allegations are substantiated. The organization will cooperate fully with law enforcement or child protection authorities in any investigation.
- 8. Documentation:** All reports and actions taken must be documented. The Safeguarding Focal Point will maintain a confidential register of incidents and outcomes. After resolution, an internal review will be conducted to learn from the incident and strengthen prevention if necessary.

**Important:** Retaliation against anyone who reports a concern in good faith is strictly prohibited. Likewise, malicious or knowingly false allegations are also a serious breach of the Policy.

---

## 6. Key Contacts for Child Protection

For questions, advice, or to report a child protection concern within any project of the organization, the primary contact point is the designated **Safeguarding Focal Point** at PEIPSI CTC. Additionally, national authorities in Estonia are available to respond to child protection issues. Key contacts are listed below:

### **Safeguarding Focal Point (PEIPSI CTC):**

*Mrs. Margit Säre, Chairwoman.*

Tel: +3725088409, Email: [margitsare@gmail.com](mailto:margitsare@gmail.com).

### **National Child Protection Authority:**

*Estonian Social Insurance Board (Sotsiaalkindlustusamet, Laste heaolu osakond) /*

Tel: +372 612 1360. Email: [info@sotsiaalkindlustusamet.ee](mailto:info@sotsiaalkindlustusamet.ee).

(The State Agency oversees child protection nationwide and can direct urgent interventions. Additionally, the National Child Helpline 116 111 is available 24/7 for counseling and reporting concerns.)

**Police:** In emergencies or if a child is in immediate danger, contact the police by dialing 112. The police in Estonia have specialized units for minors and will coordinate with child protection services as needed.

---

## 7. Implementation, Monitoring, and Review

This Child Protection Policy becomes effective once approved by the President of PEIPSI CTC and the management of the organization. All employees and associates of PEIPSI CTC participating in any project will be required to **formally acknowledge** this Policy (for example, by signing a declaration of commitment or the Code of Conduct in Annex 1). The Policy will be made publicly available, including on PEIPSI CTC's website and any related project website, to demonstrate transparency and accountability.

The implementation of the Policy will be monitored by the Safeguarding Focal Point. Regular checks and discussions will be conducted to ensure compliance (e.g. verifying that training has occurred, that procedures are followed, and that any incidents are handled as per policy). Any challenges or lessons learned in applying the Policy will be documented and addressed.

This Policy will be **reviewed at least annually**, or earlier if there are changes in applicable law or if monitoring indicates a need for revision. Updates or revisions must be approved by the organization's leadership. All staff will be informed of any changes, and the revised policy will be re-issued and acknowledged by personnel. By implementing this Policy, PEIPSI CTC aims to create a strong safeguarding culture and ensure that the organization's projects provide a safe and enriching experience for all children and young people involved.

---

#### **Annex 1: Child Protection Code of Conduct**

---

All employees, volunteers, and associates of PEIPSI CTC must adhere to the following Code of Conduct when interacting with children. This Code of Conduct forms an integral part of the Child Protection Policy and is aimed at preventing misbehavior and promoting a child-safe environment. By signing this Code, individuals affirm their commitment to uphold the highest standards of behavior.

##### **Acceptable Behaviour – You MUST:**

- Treat children with respect, **dignity, and kindness**. Value their ideas and opinions.
- Ensure that all interactions with children are appropriate and take place in open or visible environments. Whenever possible, have another adult present or in sight when working with children.
- **Listen to children** and allow them to ask questions and express their views. Pay attention to any signs that a child may be upset or in distress.
- Use positive language and encouragement. Be patient and supportive; provide praise and feedback rather than criticism.
- Maintain professional boundaries at all times. Be a positive role model in conduct, dress, and manners.
- Obtain consent from a child and their parent/guardian before any one-on-one interaction (such as interviews or mentoring), and keep such meetings transparent (e.g. in a public space or with door open).
- Immediately report any suspicious behavior or allegations of abuse as per the reporting procedures in this Policy.
- Comply with all screening and vetting requirements and participate in training on child protection as required.
- **Protect privacy:** Keep all information about children (personal data, stories, images) confidential and handle it in accordance with data protection rules and this Policy.
- If uncertain about something that concerns child safety, seek guidance from the Safeguarding Focal Point.

##### **Unacceptable Behaviour – You MUST NOT:**

- **Never abuse or exploit a child** in any way – this includes not hitting or physically harming, not humiliating, not harassing, and not engaging in sexual or inappropriate conduct of any kind.
- Do not develop close personal relationships with children that could be seen as exploitative or sexual. **Never initiate romantic or sexual contact** with a child, or behave in a manner that could be misconstrued as such. This includes inappropriate gestures, language, or physical contact.
- Do not spend time alone with a child out of public view, except if absolutely necessary for the child's welfare (and with consent and transparency). Avoid taking a child to your home or visiting a child's home alone.

- Do not give gifts or money to individual children without organizational approval, as this can be misinterpreted (any support to beneficiaries should be part of official project activities). Similarly, do not accept expensive gifts from children or their families.
- Do not take photographs or videos of children without consent from the child and guardian, and do not share or publish any images or information that could identify a child without permission. Never view, share, or circulate child pornography – this is illegal and strictly prohibited.
- Do not use language or make suggestions in front of children that are sexual, derogatory, or inappropriate. Refrain from any form of bullying or discrimination towards, or in the presence of, children (including based on gender, race, ethnicity, disability, etc.).
- Do not touch a child in an inappropriate or culturally insensitive manner. Any physical contact should be only if necessary (e.g. comforting a distressed child with a pat on shoulder) and in a safe, open setting.
- Do not ignore or dismiss a child's concerns or allegations of abuse. Always take any report from a child seriously and follow the reporting procedures.
- Do not drink alcohol, use drugs, or be under the influence while responsible for children, and do not provide any such substances to minors.
- Never retaliate against or discourage a child or colleague from reporting concerns. Every person has a duty to enable safe reporting.

**By signing this Code of Conduct, I acknowledge that:**

- I have read and understood the Child Protection Policy and Code of Conduct of PEIPSI CTC.
- I agree to abide by the rules and standards described, and I understand my duty to protect children's safety and rights.
- I understand that any breach of this Code or the Policy may result in disciplinary and/or legal action

**Name:** Margit Säre

**Role:** Chairwoman

**Date:** 14 august 2025

**Signature:** .....

*M Säre*

**Annex 2: Incident Reporting Form (Template)**

In case of a child protection incident or concern, the following form should be completed by the person reporting the issue (staff, volunteer, etc.) and submitted to the Safeguarding Focal Point. This template ensures that all relevant information is captured for proper action.

**Date of Report:** .....

**Name of Person Reporting:**

..... (Position/Role: .....)

**Contact information:** (phone/email) .....

**Child's Name:** .....

**Age:** ..... **Sex:** .....

**Parent/Guardian Name (if known):** .....

**Contact:** .....

**Description of Incident/Concern:** (Include when and where it happened, who was involved, what was observed or said. Attach extra pages if needed.)

**Immediate actions taken:** (e.g. medical care provided, child removed from danger, etc.)

.....

**Were authorities contacted?** (Police/Child Protection Services) **Yes/No** – If yes, date/time and person spoken to: .....

**Names of any witnesses:** ..... (Contact info: .....)

**Additional information or observations:** .....

**Reported to (Safeguarding Focal Point):** .....

**Date:** .....

**Follow-up actions by Safeguarding Focal Point:** (to be filled by Safeguarding Focal Point – e.g. referred to authorities, support provided to child, outcome, etc.)

**Signature of Person Reporting:** ..... **Date:** .....

**Signature of Safeguarding Focal Point:** .....

**Date:** .....