



## ESHA Safeguarding Policy

### Introduction

1. Estonian Sexual Health Association (ESHA) believes that everyone we come into contact with has the right to be protected from all forms of harm, abuse, neglect and exploitation, regardless of their age, sex, sexual orientation, gender, gender identity or expression, race, ethnic or national origin, religion or belief, partnership status, pregnancy or parental status, disability, health or any other status. Estonian Sexual Health Association will not tolerate abuse or exploitation by volunteers, trustees, staff<sup>1</sup> or anyone associated with Estonian Sexual Health Association.
2. Estonian Sexual Health Association recognizes that the right to be free from abuse, exploitation and harassment is enshrined in international human rights law namely ICERD, ICCPR, ICESCR, CEDAW, CAT, CRC, CRPD<sup>2</sup>. Estonian Sexual Health Association additionally recognizes that the sexual exploitation and abuse are a form of gender based violence.
3. Estonian Sexual Health Association's commitment to ensuring sexual rights for all includes a commitment to freedom and protection from harm. The focus on youth lays at the core of Estonian Sexual Health Association's work.
4. Estonian Sexual Health Association believes that creating a safe environment for all children, young people and vulnerable adults requires the cooperation of all volunteers, trustees, and staff. It is the responsibility of all to raise any safeguarding concerns they have or that are reported to them.
5. Estonian Sexual Health Association commits to addressing safeguarding throughout its work, through prevention, reporting and response.

---

<sup>1</sup> Staff refers to all paid staff: permanent, fixed term and temporary staff; it includes employees, agency workers, consultants, interns and contractors.

<sup>2</sup> International Convention on the Elimination of All Forms of Racial Discrimination, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, Convention on the Elimination of All Forms of Discrimination against Women, Convention against Torture and Other Cruel, inhuman or Degrading treatment or Punishment, Convention on the Rights of the Child, Convention on the Rights of Persons with Disabilities.



## Purpose and Scope

6. The purpose of this policy is to protect children and vulnerable adults from abuse and exploitation that may be caused due to their coming into contact with ESHA through
  - a. The conduct of volunteers, trustees, staff, partners and anyone associated with ESHA;
  - b. The design and implementation of ESHA's programs and activities.
7. The policy lays out the commitments made by ESHA, and applies to all its volunteers, trustees and staff.
8. Where a concern is about a volunteer who is over 18 and under 25, who has no additional vulnerabilities, a decision will be made in consultation with the volunteer themselves, as to whether the concern would be best addressed with under Safeguarding Policies and procedures or the Involvement and Guidance of Volunteers policy and procedures.
9. ESHA will only engage with other organizations that come in contact with children and vulnerable adults if they agree with and meet the standards and principles of ESHA's Safeguarding Policy and procedures.

## Definition

10. In this policy, safeguarding refers to ESHA's commitments to protect children and vulnerable adults from harm arising from coming into contact with ESHA.
11. This policy also applies to ESHA's beneficiaries<sup>3</sup> due to a recognition that beneficiaries can be exposed to abuse of authority and as such can be considered vulnerable. This does not imply any negative connotation on the beneficiaries themselves but rather ensures that ESHA is comprehensive in its safeguarding duties.
12. Further definitions relating to safeguarding are provided in the glossary below.

## Guiding Principles

13. *Empowerment* – decisions will be survivor (victim) led, with the aim to seek informed consent<sup>4</sup> when the survivor is an adult and obtaining and respecting survivor's views

---

<sup>3</sup> An ESHA beneficiary is someone who receives a service from ESHA or takes part in ESHA activities.

<sup>4</sup> ESHA understands that the rights and protections guaranteed to people under the age of 18, as a matter of international and national law, sometimes differ from the rights of adults. These differences relate to all aspects of human rights but require particular approaches in regard to sexual rights. ESHA begins from the premise that



when they are a child or an adult unable to give informed consent. ESHA will endeavor to ensure its communication is in an appropriate language and format.

14. *Prevention* – It is better to take action before harm occurs. ESHA recognizes the key role that prevention has in safeguarding and will ensure it develops and provides safe services which keep people safe from abuse and exploitation. This includes applying a safeguarding lens to promotional communications and fundraising activities and providing training and support in recognizing abuse.
15. *Protection* – Abusive behavior in any environment is never accepted. ESHA Board, collaborative partners and other partners will provide services in a manner that does not diminish their safeguarding responsibilities. ESHA will have clear channels to enable reporting in a confidential and anonymous (if required) basis. ESHA will respond appropriately to safeguarding concerns and provide support and representation to survivors (victims).
16. *Partnership* – ESHA delivers its services through collaborative partners and recognizes that local communities have a part to play in preventing, detecting and reporting neglect and abuse. In the spirit of ensuring safeguarding competency throughout all of ESHA, ESHA will monitor that its collaborative partners adhere to safeguarding standards and may need to intervene where these fall below an acceptable standard.
17. *Proportionality* – ESHA recognizes that life is not risk free. ESHA will support activities across its Board, collaborative partners and other partners that identify risks, and mitigate against them, but are not unduly risk averse. ESHA will ensure its responses are proportionate to the circumstances of any incident and the wishes of the survivor (victim), and constitute the least intrusive response appropriate.
18. *Accountability* – ESHA will act with integrity, follow due process and be transparent and accountable. ESHA will include anonymous safeguarding data in its annual reporting. ESHA acknowledges that, whilst everyone has responsibility for safeguarding, the Board and Executive Director are ultimately accountable for ensuring a safeguarding culture exists at ESHA.

## Implementation

19. It shall be the responsibility of the board and Directors to ensure that this policy is implemented, monitored and reviewed accordingly.

---

persons under the age of 18 are rights holders, and that at different points within the spectrum of infancy, childhood, and adolescence, certain rights and protections will have greater or lesser relevance.

---



20. ESHA will assign the role of child protection officer to one of its staff members. This person will ensure that staff know about the standards and will act as a go-to person for any concerns on child safeguarding.

ESHA must:

- i. Be aware of its responsibilities for safeguarding children, vulnerable adults and beneficiaries.
- ii. Be up to date on local child protection and safeguarding vulnerable adults' legislation and responsibilities.
- iii. Ensure adherence with the IPPF'S Safeguarding Incident Reporting Procedure.
- iv. Ensure all breaches of the Safeguarding Policy are dealt with appropriately and recorded and stored securely with restricted access.

## Prevention

21. ESHA must:

- a. Ensure all staff has access to, are familiar with, and know their responsibilities within this Policy.
- b. Ensure all staff has read, understood and adhere to the Code of Conduct.
- c. Design and undertake all its programs and activities in a way that protects children, vulnerable adults and beneficiaries, from any risk of harm that may arise from their coming into contact with ESHA. This includes the way in which information about individuals in programs is gathered and communicated, and using risk assessments.
- d. Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel. (ESHA's Employment Principles).
- e. Ensure staff receive training on safeguarding at a level commensurate with their role in the organization but that at a minimum to ensure that all volunteers, trustees and staff are aware that abuse is not tolerated, and that all concerns will be recorded and heard.
- f. Ensure managers and supervisors are accountable for ensuring that the safeguarding policy and procedures are fully embedded within their areas of responsibility.
- g. Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of this Policy.
- h. Report any concerns or suspicions regarding safeguarding violations by any staff member or associated personnel to the IPPF Global Incident Reporting Unit.



## Reporting

22. ESHA must:

- a. Ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available and promoted to staff and the communities we work with.  
Three options to report safeguarding concerns:
  - for anonymous complaints through ESHA's internet counseling system ([https://www.amor.ee/http://amor.ee/kysi\\_nou1](https://www.amor.ee/http://amor.ee/kysi_nou1))
  - for non-anonymous concerns/complaints to the child protection officer/Executive Director
  - IPPF SafeReport in general (<https://www.ippf.org/ippfsafereport>)
- b. Ensure all are aware of additional measures required where a concern is about a child or vulnerable adult.
- c. Provide protection to any volunteer, trustee and staff reporting concerns or complaints in line with whistleblowing principles contained in the Workplace policy.

## Response

23. ESHA must:

- a. Follow up on safeguarding reports and concerns promptly and according to this policy and ESHA procedures, and local legal and statutory obligations.
- b. Apply appropriate disciplinary measures to staff found in breach of either this policy or the Code of Conduct.
- c. Ensure that responses are survivor focused, keeping the needs of the survivor at the forefront of any investigation process.
- d. Offer support to survivors (victims) of harm caused by staff or anyone associated with ESHA, regardless of whether a formal investigation is carried out. An up to date list of local organizations and contacts offering support must be available. This list should include but is not limited to information about legal, counselling, medical and psychosocial support. Decisions regarding support will be led by the survivor (victim).
- e. Ensure that appropriate confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the incident and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times, in line with ESHA Confidentiality and Information Sharing Policy. Confidentiality should prioritize the survivor rather than the alleged perpetrator and should not be used as an excuse for not responding to a concern.



- f. Ensure quarterly safeguarding updates are given to the Global Incident Reporting Unit and boards where applicable.
- g. Ensure regular review and learning from safeguarding incidents.

24. This policy shall be reviewed every year.

**Associated policies:**

Volunteers Policy  
Workplace Policy  
Employment Principles  
Confidentiality Policy

