

## **RE: Follow-up on the Committee of the Parties' Supervision of Estonia**

Dear Sir / Madame,

Thank you for the opportunity to give feedback on behalf of the Chancellor of Justice to the Estonian authorities' submission on the recommendations on implementation of the Istanbul Convention.

On several issues, rather than having additional information to provide, we have suggestions of what might be relevant for the Estonian authorities to specify in their submission.

### *Mental health support*

In the submission, it is mentioned several times that victims of domestic and sexual violence, including children, are entitled to mental health support. At the same time, there is widespread evidence that [access to mental health](#) specialists, especially for [children](#), is limited. Thus, it would be good to have more information whether and how the general shortage of mental health aid is affecting the victims of gender-based violence and what measures are in place to guarantee timely mental health support to victims.

### *Intersectional discrimination*

Recently, there was a [case](#) where allegedly a shelter for women refused to admit a victim of sexual violence who had previously used alcohol and drugs. It might be an indication that the authorities need to invest more in measures in support of victims with addiction issues (see also the baseline evaluation report pp 20 and 21).

### *Data collection*

In recent times, there has been [public discussion](#) that the statistics on hate crimes does not include information to which vulnerable grounds the crimes related to. The authorities have explained that collecting data on the grounds of hate crime has required time-consuming case-by-case analysis. However, avenues towards more automated data collection have not been explored in public.

In addition to the data on victim support services in the STAR-database mentioned in the authorities' submission, we're glad to report that main information is publicly available also in the [yearbook](#) of Social Insurance Board.

### *Composition of the intimate partner violence expert group*

The expert group includes representatives from four ministries but not the Ministry of Economic Affairs and Communication (MEAC) which is since 2025 [responsible](#) for promotion and coordination of gender equality. It would be worthwhile to understand whether inclusion of the MEAC has been considered and for what reasons not executed.

In the submission it is mentioned that the role of the Ministry of Education and Research in the Violence Prevention Agreement relates to detecting intimate partner violence and supporting children in kindergartens and schools. However, the submission does not mention what is the role of the ministry in preventing violence, f.ex through educational programs.

#### *Independent monitoring body*

We agree with the authorities' submission that rather than creating an additional institution, it could be reviewed whether existing framework needs supplementing and funding correspondingly.

#### *Financial resources*

The submission states that there are specific funds allocated at the local level. However, the explanation that follows concerns only state funds and services on regional level. It would be relevant for the authorities to describe what are the dedicated funds for violence prevention and combatting in the municipalities – are these funds derived from state or municipal budget, what (services) are the funds intended for and what is their extent. It would also be good to have some indication whether the funds are comparable across the 79 municipalities in Estonia, as there is [evidence](#) that the quality of social work and availability of social services differs in different municipalities.

For example, Social Insurance Board [supervision](#) of child protection work with families experiencing domestic violence, revealed several shortcomings. In several municipalities, child protection workers lacked the required qualifications, and significant deficiencies were observed in assessing and documenting the child's need for assistance. 315 legal violations were identified, most of which concerned clarifying the child's views, implementing network-based work, and the insufficient use of the MARAC model in handling domestic violence cases.

#### *Immediate response*

The authorities' submission marks that measures have been taken to ensure evidence collection to lessen reliance on victim's testimony. However, in the following specification no explanation is given as to how this is done. The assessment of the implementation of the recommendations would benefit from additional information on this matter.

#### *Updates*

The case analysis "The authorities' handling of fatal domestic violence cases" is now available on the [website](#) of the Ministry of Interior. The analysis of 25 fatal domestic violence (2019–2023) highlights recurring risk factors such as alcohol abuse, prior family violence, and mental health issues. While authorities show willingness to cooperate, responses are often reactive and victim-dependent, with gaps in risk assessment and inter-agency coordination. Strengthening prevention, systematic risk management, MARAC use, and victim-centred approaches is essential to reduce the risk of fatal outcomes.

The [amendment](#) to the Law Enforcement Act extending the emergency barring order to 72 hours was [passed](#) in the Riigikogu (the Parliament) and promulgated by the President in March 2026. The amending law still needs publishing in the State Gazette to come into force.

Hopefully the comments made are of assistance and relevance for GREVIO to assess Estonia's implementation of previous recommendations.

With kind regards,  
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