

**Comments submitted by Estonia
on GREVIO's first thematic evaluation:**

**Building trust by delivering support, protection and
justice**

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Comments submitted by the Estonian authorities on GREVIO's first thematic evaluation report on the implementation of the Council of Europe convention on preventing and combating violence against women and domestic violence

1. Introduction

The Estonian authorities wish to express our sincere gratitude to the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) and the Secretariat for the professional and constructive dialogue conducted throughout the evaluation procedure.

The final evaluation report has been thoroughly examined in close co-ordination with all relevant national authorities and partner institutions. The Estonian authorities highly appreciate GREVIO's expert analysis, which serves as a valuable framework for strengthening national policies and measures to prevent and combat violence against women and domestic violence.

We also would like to extend our gratitude to the GREVIO's delegation visiting Estonia from 27 to 31 October 2025 and its fruitful discussions and constructive exchanges during the meetings with national authorities, non-governmental organisations and others. We highly appreciate the constructive dialogue and close cooperation during the evaluation.

2. General Observations

The Estonian authorities welcome the final report and note with gratitude the willingness of GREVIO to understand the measures taken in Estonia to implement the Convention and that these steps taken in the action against violence against women and domestic violence have been acknowledged in the report.

At the same time, to ensure full factual precision and provide a complete picture of ongoing reforms, the Estonian authorities submit the following targeted comments.

3. Specific Comments by Chapter

Chapter I – Emerging Trends in the Areas of Violence against Women and Domestic Violence

Increased awareness of sexual harassment and sectoral responses

3. *[...] To this end, the Estonian Olympic Committee adopted a Code of Ethics for sports coaches, which includes provisions on sexual harassment. This body equally introduced mandatory training programmes for coaches and, most recently, adopted the Estonian Sports Ethics Rules, which stipulate that all participants in sport must refrain from sexual harassment. [...]*

Code of Ethics for sports coaches was adopted on the 4th of November 2019 by the Estonian Olympic Committee's Coaches' professional qualification committee. Since 19th of November 2019, it is officially part of the Professional Qualification Standard for Coaches. Estonian Centre for Integrity in Sports was created by the Estonian Olympic Committee with the support

of the Ministry of Culture in 2019 on the basis of the Estonian Anti-Doping Agency. The aim of the Foundation is to promote non-discriminatory, ethical and fair sport in Estonia, including contributing to:

- (a) the prevention of doping;
- (b) the prevention of manipulation of sports competitions;
- (c) the prevention of discrimination, abuse, harassment, etc. in sports;
- (d) ensuring the safety of participants in sports competitions;
- (e) other problems in sports that threaten the integrity of sports.

They offered training programs to the coaches. Estonian Olympic Committee adopted Estonian Sport Ethic Rules in 2024 and they enter in force on 1st of July 2026. They aim is to harmonies the sport ethic rules across all Estonian Sports.

In the area of child protection, continued efforts have been made to strengthen the prevention of and response to sexual harassment and other forms of violence against children. Particular emphasis has been placed on increasing children's ability to recognize sexual harassment and other forms of sexual violence, understand their rights and available support services, and seek help at an early stage. In this regard, the national 24/7 Child Helpline (Lasteabi 116 111) plays an important role by providing children, young people and adults with confidential counselling and a channel for reporting concerns related to violence against children, including sexual harassment and sexual abuse. Furthermore, regular awareness-raising activities are carried out in schools to improve children's understanding of different forms of violence, including sexual violence and sexual harassment, strengthen their ability to recognize abusive behaviour and encourage them to seek help and report incidents. Specialists working with children are trained by Estonian Social Insurance Board through workshops, e-courses, tools, and guidelines to report more often.

The growing gender gap: the surge in harmful gender stereotypes among young people

4. *Recent research in Estonia indicates a worrying trend in the normalisation of misogyny and stereotypical gender roles among young people. Indeed, this issue has also been pinpointed as a pressing challenge by the authorities and civil society. [...]*

This is one aspect of the [IEA 2022 ICCS](#) survey of 8th grade students (15 years old) that needs to be viewed in the context of assessing democratic values. These trends are part of broader societal changes. It appears that Estonia is not alone in experiencing this decline in trust in democracy, as similar trends are evident across Europe. According to the report 2022 boys do not have a favorable attitude towards gender equality and the role of women in politics (almost half (49%) of boys think that men are better suited to the position of political leader than women (10% of girls also think so) and almost a quarter (24%) of boys agreed that women should stay out of politics, only 4% of girls agreed). Personal responsibility is not recognized in terms of environmental education and sustainable development, global citizen identity. Despite the high level of knowledge, the indicators of the participation activity of Estonian youth (in-school participation, expected future voter turnout, interest in politics) are rather poor in international comparison.

Chapter II – Changes in definitions, comprehensive and co-ordinated policies, funding and data collection in the areas of violence against women and domestic violence

D. Data collection

3. Social services

39. [...] Data collected through the STAR system are published regularly in the Social Insurance Board's annual reports.

It is also important to notice, that Barnahus collects administrative data on its clients, including whether the child is a victim or witness, the child's age, sex, preferred language of communication, repeat referrals to Barnahus, municipality of residence, and the referring authority. Information is also collected on the alleged perpetrator, including the relationship between the child and the alleged perpetrator and whether the alleged perpetrator is an adult or a minor. These data support service planning, monitoring of referral patterns and evidence-based development of child protection responses.

Chapter III – Analysis of the implementation of selected provisions in priority areas in the fields of prevention, protection and prosecution

A. Prevention

1. General obligations

51. GREVIO further notes the need to design targeted awareness-raising campaigns to address violence against women exposed to intersectional discrimination, such as women with lower levels of education and women with disabilities, as their increased exposure to gender-based violence has been identified by the national relationship survey. [...]

Estonian Chamber of Disabled People published a new video clip in February 2026, “Abuse in Care Relationships”, as part of the informal care project. It sheds light on a topic that is often left unspoken, whether involving an older family member or a person with disabilities. The video covers different forms of abuse, ranging from physical violence and financial exploitation to emotional intimidation and neglect. It is intended for people in need of support, caregivers and family members, helping them to recognise abuse and encouraging them to seek help. It includes Estonian subtitles and is also available with sign language interpretation.

2. Education

59. [...] Such harmonisation efforts are equally needed to ensure that Russian-speaking students receive the same amount of sexuality education as their Estonian-speaking peers, an issue also raised in the baseline evaluation report. [...]

It is important to notice, that all Estonian schools have been working on the same national curriculum since 1996. In 2022, the transition to Estonian-language education began, i.e. schools are no longer divided based on the language of instruction.

62. GREVO strongly encourages the Estonian authorities to:
a. ensure that all the topics covered in Article 14, paragraph 1, of the Istanbul Convention – gender equality, non-stereotyped gender roles, mutual respect, non-violent conflict resolution, gender-based violence and the right to personal integrity – as well as the importance of freely given consent, including in sexual relations, and the harmful effects of violent pornography are effectively taught in practice across the

country, supported with adequate teaching materials and delivered by teachers with appropriate training, adapted to the age and evolving capacity of learners;
b. monitor to what extent these subjects are taught in schools in practice.

In this regard, the Child Well-being Department of the Social Insurance Board has continued its efforts to strengthen the systematic integration of topics related to the recognition of different forms of violence, including sexual violence and sexual harassment, and help-seeking into primary education. This work includes the development of age-appropriate educational materials, awareness-raising activities and continued cooperation with educational institutions to support the effective delivery of these topics in schools. These efforts aim to improve children's ability to recognise abusive behaviour, understand the importance of consent and personal integrity, identify trusted adults and available support services, and seek help at an early stage.

Topics like gender equality, non-stereotyped gender roles, mutual respect, non-violent conflict resolution, gender-based violence and the right to personal integrity are included in the national curriculum and would be addressed in a consistent manner, according to the age of the students, in social studies subjects at all school levels. Universal human and social values are in the general part of the curriculum and are considered by all subject areas.

3. Training of professionals

75. Referring to the findings of the GREVIO baseline evaluation report and in view of persistent gaps in professional training, GREVIO urges the Estonian authorities to introduce systematic and mandatory initial and in-service trauma-informed training, supported by protocols and guidelines, on all the forms of violence covered by the Istanbul Convention, including their digital dimensions, for victim support workers, social welfare and child-protection professionals in local authorities, police officers, medical and healthcare providers, teachers and justice system professionals, including judges, prosecutors, lawyers and court-appointed experts.

In this regard, the Child Well-being Department of the Social Insurance Board has continued to support the integration of child protection and early identification of violence-related topics into the training of relevant professionals. The Department provides educational materials and methodological support to educational institutions to strengthen professionals' skills in recognising children in need of assistance, including children affected by domestic violence, and responding appropriately. The Department also continues cooperation with higher education institutions to support the integration of these topics into relevant curricula.

B. Protection and support

2. General support services

a. Social services

97. [...] One area of particular concern for GREVIO is the limited availability of victim support services for women who speak languages other than Estonian, English or Russian, and, to some extent, Ukrainian, following the large-scale arrival of refugees from Ukraine since 2022. [...]

In November and December 2025, the Social Insurance Board provided women's support centres with an additional 20% in funding to help them respond to the needs of Ukrainian war

refugees and other women and children from different linguistic and cultural backgrounds. The funding was used mainly to strengthen child-friendly support, improve premises and provide staff training. It also enabled centres to update IT and translation tools, supporting safer data handling, video counselling, multilingual communication and co-operation with partner services. In addition, in December 2025, women's support centres and victim support services carried out a study visit to Lithuania to learn from organisations supporting victims of violence against women, including women with a migration background.

3. Support for victims of sexual violence

117. GREVIO notes that the provision of psychological support is one area where services for victims of sexual violence could be further enhanced. After immediate and short-term psychological counselling at the sexual assault centre, victims requiring longer-term care are referred to psychologists and counsellors contracted by victim support services. Information obtained by GREVIO indicates that these professionals often lack the specialised training needed to adequately support victims of sexual violence. [...]

Estonia acknowledges that effective support for victims of sexual violence requires specialised competencies at different levels of service provision. Victim support workers provide psychosocial counselling, while psychologists and psychotherapists offer specialised psychological support. However, existing professional qualifications and training do not always ensure sufficient preparedness to address the specific and complex needs of victims of sexual violence. Strengthening competencies related to sexual violence, including trauma-informed approaches and specialised psychosocial support skills, therefore remains an important area for further development among victim support professionals, as well as among contracted psychological service providers. To support this development, additional training opportunities on psychological trauma, intimate partner violence and sexual violence are available to victim support professionals, contracted service providers and other interested professionals through accessible online learning programmes. Estonia recognises the importance of continuing to strengthen specialised competencies among service providers who support victims of sexual violence, including through targeted training, supervision and peer support mechanisms. Continued progress in this area requires sustainable investment to ensure the availability of qualified, long-term psychological support for victims of sexual violence.

C. Substantive law

2. Prohibition of mandatory alternative dispute resolution processes or sentencing

128. In its baseline evaluation, GREVIO had noted the safeguards incorporated into the mediation procedure in criminal proceedings, such as the requirement of the injured party's consent and its application being limited to minor offences committed by first-time offenders. At the same time, it had highlighted the risks associated with such alternative dispute resolution mechanisms in cases of domestic violence, including intimidation and unequal power dynamics and had, therefore, welcomed plans by the Social Insurance Board to develop guidelines for victim support specialists on conducting mediation procedures in cases of domestic violence and violence against women and to provide training in this regard. [...]

We would like to clarify that guidance for handling intimate partner violence cases in restorative justice was initially developed as a working version and is now being finalised as

part of a comprehensive restorative justice service guideline. In parallel, Estonia has piloted restorative justice models with a strong emphasis on careful case selection, risk assessment, informed consent and safety safeguards in violence-related cases.

131. GREVIO encourages the Estonian authorities to ensure that safeguards are effectively incorporated and applied in cases of mediation and or restorative justice processes in criminal proceedings related to domestic violence, including by issuing relevant guidelines. [...]

Estonia applies a cautious approach to restorative justice in violence cases in criminal proceedings, with suitability assessment and power imbalance considerations as key safeguards. Continuous training and cooperation with prosecutors have supported competence-building and safe implementation in practice.

132. With reference to the findings issued in its baseline evaluation report, GREVIO strongly encourages the Estonian authorities to ensure that family mediation in parental separation proceedings is initiated and conducted with prior, proactive screening for any history of domestic violence, as well as a thorough understanding of power imbalances in such cases and the frequent use of family law proceedings as a means of post-separation abuse.

An assessment precedes the provision of the state family mediation service. In cases involving domestic violence, it is important for the parent to understand how the family mediation service is conducted and how support, such as victim support can be provided if needed. The most crucial factor in the decision to use the service is the parent's willingness or consent. The family mediator handling such a special case must have completed the relevant training and will receive preliminary information about the case.

D. Investigation, prosecution, procedural law and protective measures

2. Risk assessment and risk management

154. A study conducted in 2024 on the authorities' handling of fatal domestic violence cases revealed the need to further strengthen the risk-assessment system. According to the study, in 25 domestic violence cases that resulted in the death of the victim between 2019 and 2023, several victims had prior contact with the police, victim support services or local social welfare authorities, and perpetrators had prior convictions.¹⁴⁰ Inconsistencies were identified in MARAC operations across Estonia, particularly regarding the participation of local authorities and the workload of victim support workers, who take the lead in MARAC formations. These inconsistencies have led to insufficient recognition of risk factors in some cases. In addition, less visible forms of violence, such as coercive control and psychological abuse, were found to be frequently underestimated despite their link with the escalation of violence.

It is important to note that in 2022, victim support prepared guidelines as an introduction to and support for carrying out risk assessments in cases of domestic violence (<https://www.sotsiaalkindlustusamet.ee/sites/default/files/documents/2024-06/Riskihindamine%20l%C3%A4hisuhtev%C3%A4givalla%20juhtumites.pdf>). At the end of 2025, the Social Insurance Board initiated a comparative analysis of evidence-based domestic violence risk assessment tools in order to map and identify the most suitable methods for supporting desistance from violence and protecting victims. The aim of the analysis was to

assess risk assessment tools used in Estonia and elsewhere in Europe. The full report is available on the Social Insurance Board's website (https://sotsiaalkindlustusamet.ee/sites/default/files/documents/2026-02/Perevagivalla-riskihindamisvahendite-vordlev-analuus_lopparuanne_12022026.pdf).

4. Conclusion

The Estonian authorities reiterate their sincere appreciation to GREVIO for its thorough assessment and valuable recommendations. Estonia remains firmly committed to the full implementation of the Istanbul Convention and looks forward to continuing its fruitful co-operation with GREVIO and the Council of Europe.