

SKILL EMPOWERMENT SOLUTIONS OÜ

CHILD PROTECTION POLICY

Final revised institutional version



Organisation	SKILL EMPOWERMENT SOLUTIONS OÜ
Document title	Child Protection Policy
Document status	Final draft for publication / approval workflow
Approved by Board	17 March 2025
Version	Revised final version
Prepared on	22 April 2026

Finalisation note

<https://drive.google.com/file/d/1H-9Ui0KKtvFrK-dVO3gDMAsAdugH-tlp/view?usp=sharing>

This document is formatted for internal approval, donor review and website publication.

I. INTRODUCTION

Independent, private and non-profit, SKILL EMPOWERMENT SOLUTIONS OÜ respects strict political and religious impartiality and operates in accordance with the principles of neutrality, non-discrimination and transparency, guided by its core values of responsibility, impact, enterprising spirit and inspiration.

SKILL EMPOWERMENT SOLUTIONS OÜ is committed to providing immediate support to people in urgent need while protecting human dignity and co-creating longer-term opportunities for sustainable growth and the fulfilment of human potential. SKILL EMPOWERMENT SOLUTIONS OÜ endeavours to respond to humanitarian and social crises, build resilience, promote inclusive and sustainable development, strengthen effective governance, and support the growth of civil society by investing in people and their potential.

The commitment of SKILL EMPOWERMENT SOLUTIONS OÜ is guided by four core values:

- Responsibility: ensuring the efficient and responsible delivery of assistance with the means and resources entrusted to the organisation.
- Impact: striving to achieve the most sustainable and meaningful impact for the communities and people with whom SKILL EMPOWERMENT SOLUTIONS OÜ engages.
- Enterprising spirit: approaching challenges with initiative, creativity and value-oriented action.
- Inspiration: seeking to inspire others through vision, values, choices, conduct, practice, action and advocacy.

As an NGO operating across different contexts, SKILL EMPOWERMENT SOLUTIONS OÜ recognises that children in the communities with which it works or comes into contact constitute a particularly vulnerable group. They may face heightened risks of violence, neglect, abuse and exploitation, especially in emergency, disaster or fragile settings where their protective environment is weakened.

SKILL EMPOWERMENT SOLUTIONS OÜ further recognises that the goods, services and support provided through its programmes may create an imbalance of power between those employed by, engaged by, or associated with SKILL EMPOWERMENT SOLUTIONS OÜ and programme participants or beneficiaries. SKILL EMPOWERMENT SOLUTIONS OÜ acknowledges that such power imbalances may be abused and is therefore committed to preventing and responding to any form of child ill-treatment, negligence, abuse or exploitation.

This Child Protection Policy demonstrates SKILL EMPOWERMENT SOLUTIONS OÜ's commitment to protecting children through institutional procedures, internal accountability mechanisms and appropriate external coordination. It clarifies what is expected of all persons working for or associated with SKILL EMPOWERMENT SOLUTIONS OÜ and confirms that all forms of violence, abuse, exploitation, negligence or other violations of children's rights are unacceptable and will be sanctioned.

This policy has been developed to ensure that the best interests of the child are systematically taken into account and that child protection is integrated at institutional level and throughout the project cycle.

This policy is based on relevant national laws, international law and recognised international standards, including in particular:

- the United Nations Convention on the Rights of the Child;
- the Universal Declaration of Human Rights;
- the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief;
- the IASC Six Core Principles Relating to Sexual Exploitation and Abuse;

- relevant humanitarian protection standards, including the SPHERE standards and associated protection frameworks.

Activities focused on children are guided by the following principles:

- the best interests of the child;
- non-discrimination;
- respect for children's dignity and evolving capacities;
- freedom of expression;
- respect for children's views in matters affecting them;
- child participation, where safe and appropriate.

For the purpose of this policy, violence against children includes any physical and/or psychological ill-treatment, sexual abuse, neglect, abandonment, negligent treatment or exploitation, including commercial exploitation, which may result in actual or potential harm to the child's health, survival, development or dignity in a context of responsibility, trust or power.

SKILL EMPOWERMENT SOLUTIONS OÜ is committed to taking concrete measures to prevent the recruitment, engagement or continued involvement of perpetrators of violence against children. If, despite all precautions, any person working with or associated with SKILL EMPOWERMENT SOLUTIONS OÜ violates this policy, SKILL EMPOWERMENT SOLUTIONS OÜ will take appropriate disciplinary, contractual and/or referral action.

A. Policy Statement

SKILL EMPOWERMENT SOLUTIONS OÜ is committed to upholding the highest standards of integrity, responsibility, efficiency and transparency in all its activities. To this end, this Child Protection Policy promotes prevention, supports early identification and reporting, establishes clear investigation procedures, defines internal accountability and referral mechanisms, and sets out sanctions and other consequences in case of violation.

This policy should be read together with the following internal documents and standards:

Internal SKILL EMPOWERMENT SOLUTIONS OÜ Policies and Guidelines

- SKILL EMPOWERMENT SOLUTIONS OÜ Code of Conduct
- SKILL EMPOWERMENT SOLUTIONS OÜ Grievance Policy
- SKILL EMPOWERMENT SOLUTIONS OÜ Policy Against Sexual Exploitation, Abuse and Harassment
- SKILL EMPOWERMENT SOLUTIONS OÜ Gender Policy
- SKILL EMPOWERMENT SOLUTIONS OÜ Conflict of Interest Prevention Policy
- SKILL EMPOWERMENT SOLUTIONS OÜ Data Protection Policy
- SKILL EMPOWERMENT SOLUTIONS OÜ Anti-Fraud, Bribery and Corruption Policy
- SKILL EMPOWERMENT SOLUTIONS OÜ Anti-Terrorism and Anti-Money Laundering Policy
- SKILL EMPOWERMENT SOLUTIONS OÜ Environmental and Social Protection Policy
- relevant internal procedures, manuals, handbooks and charters

International Standards and Commitments

- Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief
- IASC Six Core Principles Relating to Sexual Exploitation and Abuse
- other relevant child safeguarding and humanitarian protection standards

B. SKILL EMPOWERMENT SOLUTIONS OÜ Child Protection Principles

To achieve the above objectives, SKILL EMPOWERMENT SOLUTIONS OÜ is committed to awareness-raising, prevention, reporting, investigation, referral and sanction.

1. Awareness

SKILL EMPOWERMENT SOLUTIONS OÜ will ensure that staff and relevant associated persons are informed of this policy, the Code of Conduct and reporting obligations. Training shall be provided at recruitment and periodically thereafter. Whenever this policy is revised, SKILL EMPOWERMENT SOLUTIONS OÜ shall organise appropriate information and refresher sessions.

Staff directly involved in activities affecting children shall receive additional technical and specialised training, including on prevention of and response to violence against children, safe conduct, child-sensitive communication and the integration of child protection into programme design and implementation.

2. Prevention

SKILL EMPOWERMENT SOLUTIONS OÜ shall seek to prevent the recruitment, contracting or deployment of unsuitable individuals through rigorous selection and due diligence processes, including, where legally and practically possible:

- face-to-face or online interviews;
- verification of experience and references;
- assessment of past conduct and suitability;
- collection of additional documents where a role involves direct contact with children;
- exclusion of persons known to have committed serious crimes against children or other grave offences that indicate an unacceptable risk.

SKILL EMPOWERMENT SOLUTIONS OÜ shall also apply due diligence when selecting partners, subcontractors, consultants and suppliers. Where relevant, contracts shall include ethical clauses and safeguarding obligations, and entities working in direct contact with children shall be required to adhere to this policy or equivalent standards accepted by SKILL EMPOWERMENT SOLUTIONS OÜ.

3. Action in Case of Violation

If conduct violating this policy is reported, SKILL EMPOWERMENT SOLUTIONS OÜ shall undertake a prompt, impartial and confidential assessment and, where appropriate, a thorough investigation. Reports relating to child protection shall be treated as a priority.

If it is established that a person associated with SKILL EMPOWERMENT SOLUTIONS OÜ has committed violence against a child, a criminal act or any act violating children's rights or the principles of this policy, SKILL EMPOWERMENT SOLUTIONS OÜ shall take appropriate disciplinary, contractual and/or referral measures.

II. INTERPRETATION AND APPLICATION

Article 1 - Scope of Application

1. This policy applies to all SKILL EMPOWERMENT SOLUTIONS OÜ staff and governance members.
2. It may also apply to any person employed by or working for an entity that carries out assignments, missions or activities on behalf of SKILL EMPOWERMENT SOLUTIONS OÜ.
3. In particular, this policy applies, where relevant, to implementing partners, suppliers, sub-grantees, consultants, associated entities, stakeholders and beneficiaries in their role as rights-holders and/or potential victims.

Article 2 - Definitions

1. Direct contact with children means being in the physical or virtual presence of one or more children in the course of SKILL EMPOWERMENT SOLUTIONS OÜ's work, whether occasionally or regularly, and whether in the short or long term.

2. Child means any person under 18 years of age, in accordance with the United Nations Convention on the Rights of the Child.

3. Ill-treatment, abuse, exploitation or negligence includes all forms of physical and/or psychological abuse, sexual abuse, neglect, negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in a relationship of responsibility, trust or power. This includes in particular:

- i. Physical abuse
- ii. Sexual abuse
- iii. Commercial or other exploitation
- iv. Sexual exploitation
- v. Emotional maltreatment
- vi. Neglect and negligent treatment
- vii. Child labour, including work that interferes with education, development, dignity or safety.

4. SKILL EMPOWERMENT SOLUTIONS OÜ staff means any person employed by SKILL EMPOWERMENT SOLUTIONS OÜ and/or one of its sister organisations and/or one of the member organisations of the SKILL EMPOWERMENT SOLUTIONS OÜ network, including interns.

5. Governance refers to any person elected or appointed to participate in the managerial or administrative bodies of SKILL EMPOWERMENT SOLUTIONS OÜ and/or related network entities, including board and supervisory members.

6. Implementing partners are partners to whom implementation of one or more projects or activities has been delegated and for whom a budget has been allocated.

7. Stakeholders are individuals or groups who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit from SKILL EMPOWERMENT SOLUTIONS OÜ's actions, programmes or activities.

8. Associated entities are legal persons under private or public law playing an active role in implementation without direct responsibility for budget management.

9. Beneficiaries are persons benefiting directly or indirectly from SKILL EMPOWERMENT SOLUTIONS OÜ programmes.

10. Sub-grantee means an individual or group, with or without legal personality, receiving funds to carry out a project or activity.

11. Supplier means any third party directly or indirectly providing goods and/or services to SKILL EMPOWERMENT SOLUTIONS OÜ.

12. Consultant means any third party directly or indirectly providing advisory or consultancy services to SKILL EMPOWERMENT SOLUTIONS OÜ.

Article 3 - Information, Publication and Adherence to the Policy

1. This policy is issued under the authority of SKILL EMPOWERMENT SOLUTIONS OÜ. All persons referred to in Article 1 must be aware of, understand and comply with its provisions and any subsequent amendments. When unsure how to proceed, they must seek guidance from a competent person, notably their line manager or designated focal point.

2. SKILL EMPOWERMENT SOLUTIONS OÜ shall make this Child Protection Policy publicly available online on its official website so that staff, partners, beneficiaries, children, caregivers, stakeholders and the general public can access it. The online version shall remain up to date and accessible at: [INSERT PUBLIC WEB LINK].

3. SKILL EMPOWERMENT SOLUTIONS OÜ shall also make reasonable efforts to ensure that the policy is communicated internally and, where necessary, made available in formats or languages appropriate to the persons concerned.

4. SKILL EMPOWERMENT SOLUTIONS OÜ staff and any other relevant entities involved in recruitment, contracting or supervision must ensure that the persons concerned are informed of this policy and commit to respecting it in full.

5. Staff with managerial responsibilities must ensure compliance with this policy among those under their supervision and must take or propose appropriate measures in response to any breach.

6. This policy shall form part of the working conditions of SKILL EMPOWERMENT SOLUTIONS OÜ staff and of the conditions governing the missions or services of the other entities referred to in Article 1, from the moment they certify that they have read and accepted it.

7. SKILL EMPOWERMENT SOLUTIONS OÜ shall review the provisions of this policy at regular intervals.

Article 4 - Purpose of the Policy

- 1. establish mechanisms for child protection and the prevention of child ill-treatment, abuse, exploitation and negligence within SKILL EMPOWERMENT SOLUTIONS OÜ and among associated persons and entities;
- 2. define the standards of conduct expected from all persons covered by this policy;
- 3. inform third parties of the conduct they are entitled to expect from SKILL EMPOWERMENT SOLUTIONS OÜ staff and associated entities;
- 4. ensure that concerns are reported, managed, referred and, where necessary, escalated in a timely and child-sensitive manner.

III. GENERAL PRINCIPLES

Article 5 - Neutrality

SKILL EMPOWERMENT SOLUTIONS OÜ staff and the other entities referred to in Article 1 must perform their duties in a neutral and apolitical manner, in accordance with the law, legitimate instructions and applicable ethical rules.

Article 6 - Impartiality

In the exercise of their roles, SKILL EMPOWERMENT SOLUTIONS OÜ staff and other covered entities must act impartially, taking into account only relevant and lawful considerations.

Article 7 - Confidence of Stakeholders

All persons covered by this policy must conduct themselves at all times in a way that upholds SKILL EMPOWERMENT SOLUTIONS OÜ's values of integrity, impartiality and efficiency and strengthens the confidence of stakeholders.

Article 8 - Hierarchical Responsibility

SKILL EMPOWERMENT SOLUTIONS OÜ staff report to their immediate line manager and/or the head of their functional department, unless otherwise provided by law or internal rules.

Article 9 - Confidentiality

All information and documents obtained in the course of duties shall be processed with the necessary confidentiality, subject to applicable legal and safeguarding obligations.

Article 10 - Protection of Privacy

All necessary measures shall be taken to respect the privacy of SKILL EMPOWERMENT SOLUTIONS OÜ staff and of the other persons referred to in Article 1. Information related to reports or concerns shall be handled confidentially, unless disclosure is required by law or necessary to protect a child.

Article 11 - Information Held

1. Information shall be disclosed only in accordance with applicable rules, data protection requirements and SKILL EMPOWERMENT SOLUTIONS OÜ procedures.
2. Appropriate measures shall be taken to ensure the security and confidentiality of information.
3. Persons covered by this policy must not seek access to information that is inappropriate for them to have, nor misuse information acquired in the course of their duties.
4. They must not withhold information that should be lawfully shared for safeguarding purposes, nor circulate information they know or reasonably believe to be inaccurate or misleading.

Article 12 - Responsibility of Line Managers

1. Staff responsible for supervising or managing others must do so in accordance with SKILL EMPOWERMENT SOLUTIONS OÜ's policies and objectives and must respond to acts or omissions that violate those policies.
2. They must take due diligence measures to prevent child ill-treatment, abuse, exploitation or negligence by persons under their supervision, including by ensuring training, awareness, safe conduct and example-setting.

IV. CHILD PROTECTION MECHANISM

Article 13 - Importance of Prevention

1. SKILL EMPOWERMENT SOLUTIONS OÜ staff and the other entities referred to in Article 1 shall be sensitised to children's rights and to the obligations arising under this policy.
2. Staff in direct contact with children are entitled to receive specialised training on child protection, prevention and response, and safeguarding integration in programmes.
3. All covered persons shall actively protect children through vigilance, prevention, reporting and appropriate response.

Article 14 - Prevention and Identification Mechanisms

1. SKILL EMPOWERMENT SOLUTIONS OÜ has established mechanisms to prevent and identify child protection concerns, including:
 - signature and enforcement of the Code of Conduct;
 - the SKILL EMPOWERMENT SOLUTIONS OÜ Feedback Mechanism (SEFM), as a communication channel for complaints and concerns;
 - the SKILL EMPOWERMENT SOLUTIONS OÜ Transparency Line, as a dedicated reporting mechanism;
 - training and awareness sessions, particularly for those exposed to work involving children or vulnerable groups;

- continuous identification of risk factors throughout the project cycle;
- partner due diligence procedures, including review of ethical commitments and past conduct.

2. SKILL EMPOWERMENT SOLUTIONS OÜ staff responsible for recruiting, monitoring or directing others must take all reasonable measures to prevent the hiring or deployment of unsuitable individuals in direct contact with children.

3. SKILL EMPOWERMENT SOLUTIONS OÜ shall not knowingly allow a partner, subcontractor, consultant or other associated person to work in direct contact with children if that person has been convicted of, or is lawfully known to have committed, child abuse, child exploitation, serious violence or other conduct indicating an unacceptable risk to children.

4. As soon as SKILL EMPOWERMENT SOLUTIONS OÜ becomes aware that a person presents such a risk, that person shall be prevented from having direct contact with children within the framework of SKILL EMPOWERMENT SOLUTIONS OÜ programmes.

5. Any partner or subcontractor in direct contact with children must certify that they have read and comply with this policy or with equivalent child safeguarding standards accepted by SKILL EMPOWERMENT SOLUTIONS OÜ.

Article 15 - Prohibition of All Forms of Child Ill-Treatment or Negligence

It is strictly prohibited for SKILL EMPOWERMENT SOLUTIONS OÜ staff and all other entities referred to in Article 1, directly or indirectly, voluntarily or involuntarily, to participate in, organise, facilitate, tolerate or benefit from any form of child ill-treatment, abuse, exploitation or negligence as defined in this policy.

Article 16 - Specific Behavioural Standards for Staff Working with Children

In addition to the standards set out in the Code of Conduct and this policy, staff working with children must:

- treat all children with dignity and respect;
- refrain from using inappropriate, harassing, abusive, sexually provocative, degrading or culturally inappropriate language or behaviour;
- never encourage or engage children in sexual activity or any form of exploitative relationship;
- wherever possible, ensure that another adult is present when working directly with children;
- not invite unaccompanied children into private residences unless they are at immediate risk of injury or physical danger;
- not sleep in the vicinity of unsupervised children unless absolutely necessary and properly authorised;
- never use computers, phones, cameras, video equipment or social media to exploit, harass or expose children to harm, or to access child exploitation material;
- not use corporal punishment;
- not employ children in work that is inappropriate to their age or stage of development, interferes with education or recreation, or exposes them to risk;
- comply with all applicable local legislation, including child labour laws;
- immediately report concerns, suspicions, allegations, charges, convictions or findings relating to child exploitation, abuse or non-compliance with this policy;
- remain aware of and avoid conduct that could reasonably be perceived as exploitative, abusive or otherwise inappropriate.

Article 17 - Behaviour to Be Followed in Case of Child Ill-Treatment or Negligence

1. If SKILL EMPOWERMENT SOLUTIONS OÜ staff witness, suspect or receive information about conduct that may amount to child ill-treatment, abuse, exploitation or negligence, they must

immediately report it through the SKILL EMPOWERMENT SOLUTIONS OÜ Transparency Line: [<http://eu-skillempowerment.com/#contact>] or [happykidstr@gmail.com], in accordance with Article 19.

2. Staff may, where safe and appropriate, intervene to stop the behaviour and protect the child, provided that doing so does not increase risk.
3. Where possible, staff should note the date, time, location, nature of the concern and the names of any witnesses.
4. In all cases, the matter shall be handled confidentially and forwarded without delay to the competent internal function in accordance with this policy.
5. If a stakeholder witnesses, suffers or suspects a violation of this policy, that person may report through the SKILL EMPOWERMENT SOLUTIONS OÜ Transparency Line or the SKILL EMPOWERMENT SOLUTIONS OÜ Feedback Mechanism in accordance with Article 20.

Article 18 - Photographs and Images of Children

1. Taking and distributing pictures of children is not permitted for SKILL EMPOWERMENT SOLUTIONS OÜ staff in the course of their professional duties unless duly authorised.
2. Only persons expressly authorised by the Country Director or the SKILL EMPOWERMENT SOLUTIONS OÜ Communication Department may take photographs or videos of children in connection with SKILL EMPOWERMENT SOLUTIONS OÜ programmes.
3. Authorised persons must:
 - comply with local practices and restrictions;
 - obtain the child's express consent where appropriate and the written consent of the parent or legal guardian before photographing or filming identifiable children;
 - explain the purpose and intended use of the images;
 - ensure that children are portrayed in a dignified, respectful and non-stigmatising manner;
 - ensure that images are honest representations of context and reality;
 - ensure that file names, metadata, captions and descriptions do not reveal identifying information that could put a child at risk.
4. No identifiable images of children shall be published online, including on social media, websites or other digital channels, without the formal approval of the SKILL EMPOWERMENT SOLUTIONS OÜ Communication Department and the required supporting consent documentation.
5. The use and publication of any photo or image of a child, whether in print or online, shall be made only by or with the explicit approval of the SKILL EMPOWERMENT SOLUTIONS OÜ Communication Department and in compliance with this policy.

Article 19 - Obligation to Report for SKILL EMPOWERMENT SOLUTIONS OÜ Staff

1. SKILL EMPOWERMENT SOLUTIONS OÜ intends to ensure an appropriate response to any suspected or actual child ill-treatment, abuse, exploitation or negligence.
2. Any SKILL EMPOWERMENT SOLUTIONS OÜ staff member who witnesses, suspects or becomes aware of possible child protection concerns or conduct that may violate this policy must report it immediately through the SKILL EMPOWERMENT SOLUTIONS OÜ Transparency Line.
3. If reporting through the Transparency Line is not possible, staff must report via the designated safeguarding email address or other officially approved alternative reporting channel.
4. Staff may use the Security Incident Reporting format or another officially designated reporting template where applicable.

5. SKILL EMPOWERMENT SOLUTIONS OÜ shall ensure that any staff member who reports a concern in good faith and on reasonable grounds does not suffer retaliation, disadvantage or harm as a result.
6. Deliberate misuse of reporting mechanisms, including knowingly false allegations made in bad faith, may lead to sanctions.

Article 20 - Reporting by Stakeholders

1. SKILL EMPOWERMENT SOLUTIONS OÜ wishes to support and protect any person who witnesses or experiences violations of this policy. Any stakeholder who is a witness or victim may report through the SKILL EMPOWERMENT SOLUTIONS OÜ Feedback Mechanism (SEFM), the SKILL EMPOWERMENT SOLUTIONS OÜ Transparency Line, or another officially communicated safeguarding channel.
2. SKILL EMPOWERMENT SOLUTIONS OÜ shall ensure that stakeholders reporting concerns in good faith and on reasonable grounds do not suffer retaliation or harm as a result.
3. Information on how to report shall be communicated in an accessible manner to relevant participants, beneficiaries and communities.

Article 21 - Internal Assessment and Investigation Following a Report

1. Upon receipt of a report, SKILL EMPOWERMENT SOLUTIONS OÜ shall acknowledge receipt as soon as reasonably possible and undertake an initial review.
2. The initial review shall determine, to the extent possible at that stage:
 - whether there is an immediate risk to the child;
 - whether urgent protective action is required;
 - whether the matter appears to fall within the scope of this policy;
 - whether external reporting obligations may arise under national law.
3. Reports received through the Transparency Line or designated safeguarding channels shall be managed from SKILL EMPOWERMENT SOLUTIONS OÜ headquarters, with the involvement of the relevant Country Director where appropriate, unless that person is implicated in the concern.
4. The SKILL EMPOWERMENT SOLUTIONS OÜ Investigation Unit shall be responsible for the assessment and investigation of alerts, subject to Article 23.
5. All persons involved must cooperate with the process, preserve relevant information and maintain confidentiality.

Article 22 - Non-Judicial Referral Pathway and Case Management

1. Where a child protection concern does not require immediate judicial or law enforcement action, SKILL EMPOWERMENT SOLUTIONS OÜ shall follow a non-judicial referral pathway guided by the best interests of the child, confidentiality, proportionality, do-no-harm principles and applicable law.
2. The non-judicial referral pathway shall include, as relevant:
 - receipt of the concern through an authorised reporting channel;
 - immediate acknowledgement and initial safety/risk screening;
 - transmission of the concern to the SKILL EMPOWERMENT SOLUTIONS OÜ Investigation Unit and Human Resources Department;
 - notification of the Country Director or other appropriate senior manager, unless implicated;
 - designation of a responsible internal case handler or safeguarding focal person;
 - referral, where appropriate, to internal or external support services.
3. Depending on the nature of the concern and the child's needs, referral may include:

- child safeguarding focal points;
- social welfare or child protection services;
- health services;
- psychosocial or mental health support;
- education protection actors;
- specialised support providers;
- other competent child protection bodies permitted under national law.

4. SKILL EMPOWERMENT SOLUTIONS OÜ shall ensure that referral decisions are documented, that roles and responsibilities are clear, and that the child or caregiver is informed, where safe and appropriate, of the available support pathway.

5. SKILL EMPOWERMENT SOLUTIONS OÜ shall monitor, to the extent reasonably possible, whether the child has been safely connected to the relevant support service, while respecting confidentiality, data protection and the child's best interests.

6. Nothing in this Article prevents SKILL EMPOWERMENT SOLUTIONS OÜ from referring the matter to competent public authorities whenever required by law, whenever there is an immediate risk to the child, or whenever the seriousness of the facts makes such referral necessary.

Article 23 - Investigation Following Stakeholder Reports

1. Where a concern is reported by a stakeholder, SKILL EMPOWERMENT SOLUTIONS OÜ shall provide an acknowledgement through the relevant complaints, feedback or safeguarding mechanism as soon as reasonably possible.

2. The response shall, where appropriate:

- explain the next steps of the process;
- request further clarification where needed;
- identify available support or referral options, subject to confidentiality and safety considerations.

3. SKILL EMPOWERMENT SOLUTIONS OÜ staff and other relevant entities must cooperate with any assessment or investigation, retain relevant records and preserve confidentiality.

Article 24 - Investigating Authority

1. The SKILL EMPOWERMENT SOLUTIONS OÜ Investigation Unit at headquarters is responsible for investigating child protection concerns falling within the scope of this policy.

2. SKILL EMPOWERMENT SOLUTIONS OÜ reserves the right to entrust all or part of the investigation process to an external entity where this is necessary to ensure independence, expertise or impartiality.

Article 25 - Sanctions and Referral to Competent Authorities

1. Disciplinary sanctions: a violation of this policy, including conduct that breaches the SKILL EMPOWERMENT SOLUTIONS OÜ Code of Conduct, may result in disciplinary measures ranging from a warning to termination of the employment contract for serious misconduct, without notice and without compensation, subject to applicable law.

2. Contractual and other sanctions: SKILL EMPOWERMENT SOLUTIONS OÜ reserves the right to apply the full range of contractual remedies, including suspension, exclusion or termination of any partnership, service agreement, grant or other contractual relationship, where an entity referred to in Article 1 breaches this policy.

3. Reporting to competent authorities: SKILL EMPOWERMENT SOLUTIONS OÜ may report facts constituting child abuse, exploitation, negligence or other serious safeguarding violations to the

competent administrative, child protection, prosecution or judicial authorities, depending on the applicable legal framework, the seriousness of the facts and the level of risk to the child.

V. IMPLEMENTATION OF THE POLICY

Article 26 - Implementation, Oversight and Review

1. The Human Resources Department is responsible for the oversight of this Child Protection Policy and for supporting its implementation within SKILL EMPOWERMENT SOLUTIONS OÜ, in coordination with the Investigation Unit, management and other relevant departments.
2. The Human Resources Department shall ensure oversight of:
 - policy dissemination and staff awareness;
 - training and induction measures;
 - adherence and documentation;
 - reporting and referral follow-up;
 - periodic review and updating of the policy;
 - coordination with other relevant internal policies and procedures.
3. SKILL EMPOWERMENT SOLUTIONS OÜ shall take reasonable steps to ensure that this policy is embedded in recruitment, contracting, induction, supervision, programme delivery, communications and complaints handling.
4. This Child Protection Policy entered into force following approval by the SKILL EMPOWERMENT SOLUTIONS OÜ Board on 17 March 2025.

Article 27 - Adherence to the Policy

SKILL EMPOWERMENT SOLUTIONS OÜ staff and the other entities referred to in Article 1 shall certify their adherence to this policy by signing the SKILL EMPOWERMENT SOLUTIONS OÜ Policy Acceptance Form and/or the relevant employment contract, service agreement, grant agreement or other applicable contractual document.



Director 22.04.2026