

Brussels, 16 September 2024

Directive on combating sexual abuse and sexual exploitation of children and child sexual abuse material. Recast - 2024/0035(COD)

Dear Member of the European Parliament,

The Standing Committee of European Doctors (CPME), a European not-for profit association representing national medical associations across Europe, giving voice to over 1.7 million doctors, would like to draw your attention to the **questions that the wording of Article 17(3)** of the ongoing *proposal for a Directive of the European Parliament and of the Council on combating the sexual abuse and sexual exploitation of children and child sexual abuse material and replacing Council Framework Decision 2004/68/JHA (recast), 2024/0035(COD)* **can raise at national level for the medical profession.**

Article 17(3) of the Regulation foresees that: *“Member States shall ensure that at least professionals working in close contact with children in the child protection, education, childcare and healthcare sectors are obliged to report to the competent authorities if they have reasonable grounds for believing that an offence punishable under this Directive has been committed or is likely to be committed.”*

A preliminary discussion among CPME members showed that reporting rules vary in Europe. **Different regimes** apply as they consider multiple dimensions, such as the best interest of the child, the trust in the patient-doctor relationship and the key ethical principles of patient confidentiality and professional secrecy. As a result, **in some countries reporting is mandatory for the medical profession, while in others it is not, even though it may be highly recommended to report. CPME is interested in learning how these differences are being considered in legislative negotiations.**

In addition, it would be interesting to discuss, **if there is reporting action by the medical profession, how it could be integrated into the electronic health record in an efficient and secure way.** We therefore ask you to please address the points raised above in the coming negotiations.

We remain at your disposal if you have any questions.

Yours sincerely,



Dr Christiaan Keijzer
CPME President