

Child Safeguarding Policy



Introduction

“Every human being below the age of eighteen years, unless under the law applicable to the child, majority is attained earlier”¹ is defined as a child, according to article 1 of the **United Nations Convention on the Rights of the Child (UNCRC)**, one of the most comprehensive treaties on the rights of the child, which has been ratified in Greece with the Law No. 2101/1992 (Government Gazette 192 / A / 2-12-1992-Ratification of the International Covenant on the Rights of the Child)². In the 54 articles of this Treaty, the legislative, administrative, social and educational responsibilities of the State Parties are clearly outlined; as well as the relevant measures that should be adopted to ensure that all children are “protected against all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members [as well as] from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child”.

As follows is CTI’s Child Safeguarding Policy.

Purpose and Scope

Computer Technology Institute & Press “DIOPHANTUS” – CTI, is a research and technology organization focusing on research and development in Information and Communication

Technologies (ICT). It is the technological pillar of the Greek Ministry of Education and one of the major R&D institutes in Greece.

This policy document outlines the Child Safeguarding Policy (CSP) that applies to all the activities of Computer Technology Institute & Press “DIOPHANTUS” – (CTI) and is applicable to all employees, researchers, Board members, consultants, external contractors, and administrative personnel. It sets out CTI’s dedication and commitment:

- a) to safeguard the safety, protection, welfare and wellbeing of children
- b) to prevent and minimize the risks related to children participation in certain research-related activities (e.g., anonymity breach in reports and publications, abuse of personal rights and dignity, etc.)
- c) to create the relevant awareness raising environment to all CTI employees, researchers and external contractors around children rights, providing simultaneously relevant guidance
- d) to ensure the proper and transparent reporting of any suspicions of harm, violence, abuse, exploitation, and neglect of children, also indicating the people in position of responsibility within CTI who will safeguard the purpose and scope of this Child Safeguarding Policy
- e) to ensure that all the legal obligations related to national, European, and international laws are met (e.g., the

¹ OHCHR | Convention on the Rights of the Child

² Law 2101/1992 - Government Gazette 192/A/2-12-1992 - Minors (e-nomothesia.gr)

Universal Declaration of Human Rights³, the European Convention on Human Rights -ECHR⁴, the European Social Charter⁵, the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse - Lanzarote Convention⁶, the Greek Constitution⁷, etc.), making sure that all the appropriate legal actions are being implemented to support and protect children from possible violence, abuse, exploitation, or neglect

- f) to minimize the potential exposure of children to ICT generated threats like cyberbullying or educational software being use for malicious purposes

Definitions

Child: Every individual below the age of eighteen (18)⁸

Child Abuse: Any (series of) act or omission by a parent or other caregiver that results to physical, sexual, emotional harm or neglect⁹ and/or any form of maltreatment in general by an adult, which is violent or threatening for the child

Child (sexual) Exploitation: the act of using a minor/child for profit, labor, sexual gratification, or some other personal or financial advantage¹⁰.

Child Protection: Prevention and response to violence, exploitation, and abuse of children in all contexts¹¹

Child Safeguarding: To take all appropriate measures (both preventative and responsive) to ensure that employees, researchers, experts, contracted third parties, volunteers, operations, projects, and programs do no harm to children and promote their best interest. This means that children are not exposed to the risk of harm and

abuse and that any concerns the Children’s Rights Division of the Council of Europe has about children’s safety are reported to the appropriate authorities.¹²**Child Safeguarding Officer (CSO):** A senior employ or member of BOD that manages, all aspects related to Child Safeguarding programs and policies. The scope of work includes the elaboration and implementation of an efficient case management system and the organization and planning of all activities related to awareness on protection issues.

Main Elements of CTI’s CSP

The main elements of CTI’s CSP could be summarized as:

- The **welfare and best interests** of children will always be of extreme, primary importance and concern by all employees and researchers of CTI.
- **Non-discrimination and the right to be heard:** All children, despite their age, culture, disability, gender, language, racial origin, socio-economic status, religious beliefs and/or sexual identity have the right to protection from all forms of harm and abuse, being also free to express themselves, their views and their voices on every matter that has an effect on them.
- **Right to life and development:** All children have the right to life and to protection from violence and suicide, with a sub sequential right to their physical, mental, spiritual, moral, psychological and social development
- A **do-no-harm policy** and **zero-tolerance** of violence, abuse, exploitation, and neglect of children is adopted,

³ Universal Declaration of Human Rights | United Nations

⁴ European Convention on Human Rights (coe.int)

⁵ The European Social Charter (coe.int)

⁶ Lanzarote Convention (coe.int)

⁷

https://www.hellenicparliament.gr/UserFiles/f3c70a23-7696-49db-9148-f24dce6a27c8/001-156_aggliko.pdf

⁸ Law 2101/1992 - Government Gazette 192/A/2-12-1992 - Minors (e-nomothesia.gr)

⁹ What is Child Abuse — National Child Abuse Coalition

¹⁰ Child Exploitation - Definition, Examples, Cases, Processes (legaldictionary.net)

¹¹ Child Protection Strategy | UNICEF

¹² 16808c8b91 (coe.int)

committing on not knowingly engage—directly or indirectly¹³—anyone who poses a risk to children.

- The participation of children to relevant research activities shall be aligned with the basic.
- Requirements for effective and ethical participation (transparent and informative, voluntary, respectful, relevant, child-friendly, inclusive, safe, and sensitive to risk, accountable and adapted to training), as outlined in the drafting of the CoE Strategy on the Rights of the Child 2022-2027.¹⁴ (**Data protection, transparency and accountability**)

KEY ELEMENTS of CTI’s CSP

The key elements of CTI’s CSP are:

A. PREPAREDNESS

CTI will ensure that all its employees, researchers and any other stakeholders that may have direct or indirect contact with children, will be provided before engaging themselves in any research activity with children, with all the relevant awareness material, any behavior guidelines that they need to be taken into consideration, as well as dedicated training not only around CTI’s child protection policy, but also around the relevant legislations.

CTI will maintain a dedicated space to its webpage, easily accessible by everyone, where all the relevant material will be uploaded, being regularly updated, and reviewed. In addition, a thorough risk assessment, tailor-made to each program and activity will be performed by the scientific responsible before the initiation of each

activity/program, so as to identify any potential risks, developing in parallel certain mitigation strategies to reduce and manage risks to children as well as adapt the relevant material. For this purpose a risk assessment and risk management template will be elaborated for use by the scientific responsible.

B. PREVENTION

CTI shall:

- Ensure that specific procedures will be in place for the employees/researchers, when they are asked to work with children (e.g. specific questions/discussion related to child safeguarding during the recruitment interview, reference checks, etc.), promoting in that way their suitability in working with them.¹⁵
- Ensure that any direct or indirect participation of children in the relevant research activities and the subsequent personal data processing will be conducted under the relevant General Data Protection Regulation (Regulation (EU) 2016/679)¹⁶ and the Greek Law no. 4624/2019. It is highlighted that CTI does not subject children to a decision based solely on automated processing, including profiling, which has a legal or similarly significant effect on them, nor uses their personal data for marketing purposes.
- Ensure that there will be a minimum of two researchers/employees present in any physical/ virtual meetings with children, and if possible, another individual with whom the child trusts and is familiar with. These meetings, if

¹³ **Directly**: to have a physical/virtual presence and/or contact (regular, occasional, short and/or long term) along with child/children in the context of CTI’s activities

Indirectly: to have access to information on child/children (e.g., photos, videos, personal data etc.) in the context of CTI’s activities

¹⁴ [CoE Child Safeguarding and Wellbeing Protocol_20May \(ministryofjustice.gr\)](#)

¹⁵ CTI mainly uses active education personnel (e.g. schoolteachers/high schoolteachers) that have been screened, in accordance to Civil Service Code, for penal record/past criminal convictions and psychological status.

¹⁶ [EUR-Lex - 32016R0679 - EN - EUR-Lex \(europa.eu\)](#)

physical, will be held at a place where the child feels safe and sound. In addition, during these meetings all adult participants will pay attention to their appearance, language, actions, and general behaviour, demonstrating the proper respect for children's rights.

- Establish and maintain a secure digital environment where all the digital records of children participation (a.k.a., all data and metadata identifying their digital presence) in research programs will be kept secured.
- Ensure that all the online and offline material produced under the research auspices will be free of any type of discrimination.
- Ensure that upon explicit consent all images that contain children will portray them in a dignified and respectful way.

C. RESPONSE

CTI and in particular the per project Scientific Responsible will be responsible and accountable:

- to monitor the right implementation of the developed CSP policy ensuring that all CTI employees & researchers related to the respective project, fully understand and respect it (supported in that by the Child Safeguarding Officer (CSO) and the Board of Directors).
- to assist in an internal investigation in case of accusation of abuse (along with the Child Safeguarding Officer and the Legal Department).
- to provide necessary information and details to the CSO, so that the relevant law enforcement agencies as well as the child-responsible departments of the relevant authorities in any misconduct reports or in case of incidental findings during the research activities, are duly notified by him/her.
- to propose to the Head of the BoD the probable suspension of a employ /researcher suspected of any kind of

abuse, taking also further disciplinary actions in case the legal investigation found this individual guilty.

- to forward without any unnecessary delay all written records of all reported misconducts and/or incidental findings along with the exact followed procedure and the final conclusions, to the CSO for safe keeping and further processing.

Finally, in addition, to the three above mentioned, key elements, CTI (involving Board of Directors, Legal Department, Researchers in relevant activities and CSO) aims:

- to perform an internal yearly review and evaluation on the effectiveness and response of the CSP policy. The latter will be approved in case of need for updated version, by the Board of Directors, in accordance with changes in legislation and guidance on the protection of children.
- to provide training and further awareness raising actions, whenever needed, to the CTI employees/researchers around the CSP and the relevant procedures, when they are involved in projects which necessitate cooperation with children.
- to develop, maintain and properly review an appropriate, accessible and safe reporting process of concerns, suspicions or allegations with regard to child safeguarding and/or misconducts employees, researchers or any other person related to a CTI project.
- to provide, an incident reporting form (Appendix) which will be uploaded on a dedicated page of the CTI's website, where it will be easily accessible by everyone. The CSO will examine and handle incident reports. Escalation to the BoD and/or to the relevant authorities will take place, if needed, according to CSO judgement.

Appendix: Complaints/Incident Reporting Form

Please be kind enough to complete all sections, as detailed as possible, in any case you suspect a child might be involved in an at-risk situation. All information included in this report will be kept strictly confidential and will be further assessed by the relevant body inside our organization for further disciplinary actions.

Personal Details:

- A. Name and Surname:
- B. Address:
- C. Telephone:
- D. e-mail:

Details of the victim (under strict consent and permission):

- A. Name and Surname:
- B. Age:
- C. Contact details of their guardian:
- D. Additional information that may be important for the report:

Complaint/Incident information:

1. Please indicate the nature of the complaint/incident:
2. When did the event happen?
3. Where did it happen (provide location)?
4. Is the child, related to the event, at direct risk/harm (now or in the future)?
5. Were there any other witnesses (if so please provide details)?
6. Please provide any further details that you believe that may be important for this report:

Date:

Signature:

Name and Signature of the person who receives the report: