

# Child Protection Policy – CERTH

## Introduction

According to 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)<sup>1</sup>, in Article 1 children are defined as “*every human being below the age of eighteen years, unless under the law applicable to the child, majority is attained earlier*”<sup>2</sup>. Across the 54 articles of the 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*”.

## Purpose and Scope

The Centre for Research and Technology Hellas (CERTH) is a leading Research Centre in Greece, combining its unique research facilities and highly qualified research personnel, to transform scientific knowledge into innovative technological applications, aiming to strengthen the national economy and respond to the needs of society at national and international level.

This policy document outlines the Child Protection Policy (CPP) that applies to all the activities of the Centre for Research and Technology Hellas (CERTH) and is binding for all its Institutes, thus being applicable to all staff members, researchers, and administrative personnel. It sets out the Research Centre’s commitment:

- a) to safeguard the safety, protection, welfare and wellbeing of children;
- b) to prevent and minimise 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 CERTH employees and researchers 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 CERTH who will safeguard the purpose and scope of this Child Protection Policy;
- e) to ensure that all the legal obligations related to national, European, and international laws are met (e.g., the Universal Declaration of Human Rights<sup>3</sup>, the European Convention on Human Rights -ECHR<sup>4</sup>, the European Social Charter<sup>5</sup>, the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse - Lanzarote Convention<sup>6</sup>, the Greek Constitution<sup>7</sup>, etc.), making

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<sup>1</sup> [Law 2101/1992 - Government Gazette 192/A/2-12-1992 - Minors \(e-nomothesia.gr\)](#)

<sup>2</sup> [OHCHR | Convention on the Rights of the Child](#)

<sup>3</sup> [Universal Declaration of Human Rights | United Nations](#)

<sup>4</sup> [European Convention on Human Rights \(coe.int\)](#)

<sup>5</sup> [The European Social Charter \(coe.int\)](#)

<sup>6</sup> [Lanzarote Convention \(coe.int\)](#)

<sup>7</sup> [https://www.hellenicparliament.gr/UserFiles/f3c70a23-7696-49db-9148-f24dce6a27c8/001-156\\_aggliko.pdf](https://www.hellenicparliament.gr/UserFiles/f3c70a23-7696-49db-9148-f24dce6a27c8/001-156_aggliko.pdf)

sure that all the appropriate legal actions are being implemented to support and protect children from possible violence, abuse, exploitation, or neglect.

## Definitions

**Child:** Every individual below the age of eighteen (18)<sup>1</sup>

**Child Abuse:** Any (series of) act or omission by a parent or other caregiver that results to physical, sexual, emotional harm or neglect<sup>8</sup>

**Child (sexual) Exploitation:** the act of using a minor/child for profit, labor, sexual gratification, or some other personal or financial advantage<sup>9</sup>.

**Child Protection:** Prevention and response to violence, exploitation, and abuse of children in all contexts<sup>10</sup>

**Child Safeguarding:** To take appropriate measures (both preventative and responsive) to ensure that staff, experts, contracted third parties, 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.<sup>11</sup>

**Ethics Committee or Ethics Body:** An official internal body established through a legitimate and transparent process under the Law. No. 4521/2018. The Ethics Committee/Ethics Body is assigned with specific duties enshrined in the above Law. This body is entitled with the responsibility of ensuring that research in CERTH is carried out in an ethical manner in accordance with national and international law.

## Main Principles and Elements of the CERTH CPP

The main principles of CERTH's CPP can be summarised as:

- The **welfare and best interests** of children will always be of extreme, primary importance and concern by all employees and researchers of CERTH.
- 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 (**non-discrimination and the right to be heard**)
- All children have the right to life and to protection from violence and suicide, with a subsequential right to their physical, mental, spiritual, moral, psychological and social development (**right to life and development**)
- A **do-no-harm policy** and **zero-tolerance** of violence, abuse, exploitation, and neglect of children is adopted, committing on not knowingly engage—directly or indirectly<sup>12</sup>—anyone who poses a risk to children.
- The participation of children to relevant research activities will be aligned with the basic requirements for effective and ethical participation (transparent and informative, voluntary,

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<sup>8</sup> [What is Child Abuse — National Child Abuse Coalition](#)

<sup>9</sup> [Child Exploitation - Definition, Examples, Cases, Processes \(legaldictionary.net\)](#)

<sup>10</sup> [Child Protection Strategy | UNICEF](#)

<sup>11</sup> [16808c8b91 \(coe.int\)](#)

<sup>12</sup> **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 CERTH's activities

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

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.<sup>13</sup> (**Data protection, transparency and accountability**)

The main elements of CERTH's CPP are being outlined under three main pillars:

### **(a) Preparedness, (b) Prevention and (c) Response**

#### **A. PREPAREDNESS**

CERTH 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 to any research activity with children, with all the relevant awareness material, any behaviour guidelines that they need to be taken into consideration, as well as dedicated training not only around CERTH's child protection policy, but also around the relevant legislations. CERTH 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.

#### **B. PREVENTION**

CERTH will:

- Ensure that specific procedures will be in place for the employees/researchers, when they are asked to work with children (e.g., security check through penal record/past criminal convictions, psychological assessment, specific questions/discussion related on child safeguarding during the recruitment interview, reference checks, etc.), promoting in that way their suitability in working with them.
- 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)<sup>14</sup> and the Greek Law no. 4624/2019. It is highlighted that CERTH 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 is familiar with and trusts. These meetings, if 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 in research programs will be kept encrypted.
- 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.

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<sup>13</sup> [CoE Child Safeguarding and Wellbeing Protocol 20May \(ministryofjustice.gr\)](#)

<sup>14</sup> [EUR-Lex - 32016R0679 - EN - EUR-Lex \(europa.eu\)](#)

## C. RESPONSE

CERTH and more in particular the Scientific Responsible per project will be responsible:

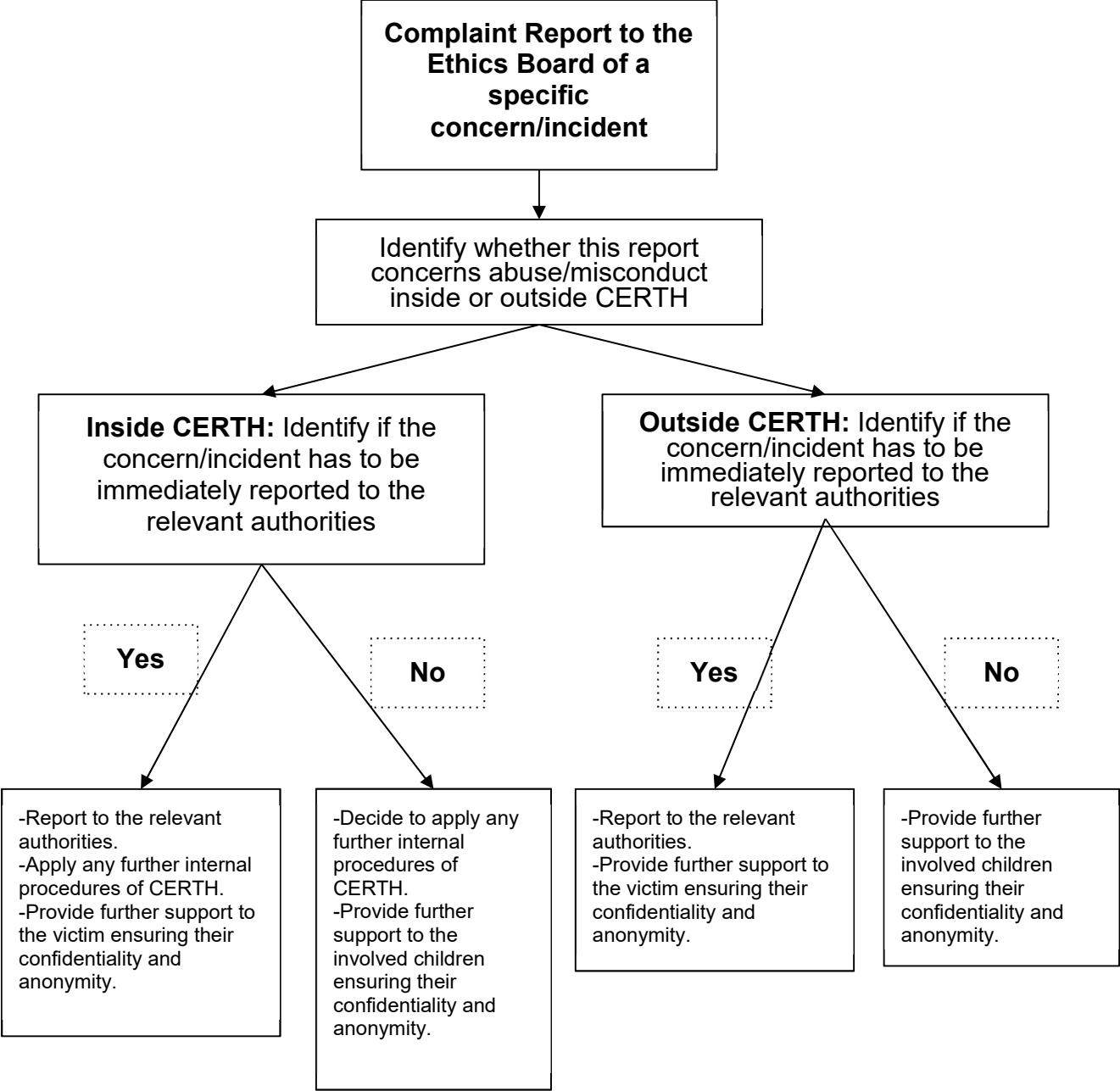
- to monitor the right implementation of the developed CPP policy ensuring that all CERTH employees/researchers related to the respective project, fully understand and respect it (*along with the Ethics Board*);
- to carry out an internal investigation in case of accusation of abuse (*along with the Legal Department*);
- to notify 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;
- to propose the suspension of a staff member suspected of any kind of abuse, taking also further disciplinary actions in case the legal investigation found this individual guilty;
- to keep written records (in a secure place) of all reported misconducts and/or incidental findings along with the exact followed procedure and the final conclusions;

In addition, CERTH (Involving Ethics Board, Legal Department, Researchers in relevant activities) aims:

- to perform an internal yearly review and evaluation on the effectiveness and response of the CPP 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 CERTH employees/researchers around the CPP 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 by staff members (Appendix A provides a general example of the steps needed to be followed);
- to provide an incident reporting form (Appendix B) which will be uploaded on a dedicated page of the CERTH's website, where it will be easily accessible by everyone.

# APPENDICES

## Appendix A: Reporting Procedure



## Appendix B: 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 organisation 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 it happen?
  
3. Where did it happen?
  
4. Is the victim at direct risk/harm (now or in the future)?
  
5. Were there any other witnesses?
  
6. Please provide any further details that may be important for the report:

Date:

Signature:

Name and Signature of the person who receives the report: