

Children Protection Policy




RESPONSIBILITY: Child Protection Officer	
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Introduction

About AKMI

The Institute of Vocational Training AKMI is the largest VET provider in Greece and one of the 7 largest in Europe. It was founded back in 1989 and today is active in 9 cities across Greece (Athens, Piraeus, Thessaloniki, Herakleion, Larissa, Rhodes, Chalkida, Elliniko, Alexandroupoli) representing almost 60% of the total VET sector in the country providing post-secondary education, of EQF levels 3-5. Every year, approximately 18.000 active students are enrolled with the aim of studying one of the 112 specialties, in more than 380 laboratories in 14 different sectors within more than 37.500 m² of infrastructure across the country.

The fields of study in the campuses of Athens are numerous and in all of them, AKMI gives the students tools to collaborate, and problem solve, brainstorm and reflect. Apart from the technical part of learning, experienced educators ensure an inclusive community among the students and cultivate a safe environment, allowing them to open up, discover new directions and ultimately, helping them create a new mindset. Social Inclusion and Gender Gap are important issues for AKMI, which youth can reform and gradually resolve through education.

AKMI S.A. employs approximately 1200 people as permanent staff and collaborates with a multitude of teachers who are entrusted with the delivery of courses to students. The permanent administrative staff of the AKMI institution is 170 professional individuals, expertise to inspire educators and academic staff recognized for their innovative research and teaching standards, thus forming a highly motivated community in the Institute. The qualified educators are 600+ in number having critical and evaluation skills in collaborating with the admin staff for the division of the students into groups and classes according to their qualifications, language knowledge, critical thinking, and mindset. Most of the educators cooperate and manage, in collaboration with the admin office, the total administration of the summer schools, mobility programs, training seminars and lectures, social and cultural events.

Need for Child Protection Policy Formulation

Although ***AKMI serves students who are primarily adults***, we recognize the importance of maintaining high standards of child protection in all our activities as our staff members, students or associates may come into contact with minors through activities such as internships, volunteer work or other partnerships with schools and agencies. In addition, **through our participation in European projects focusing on education and training, we often work with children and young people**, particularly in activities related to education, skills development and social inclusion.

In these cases, it is necessary to have clear guidelines for the protection of children to ensure their safety and compliance with the standards set by national and European legislation.

AKMI's Child Protection Policy aims to ensure that all children who may come into contact with our staff, students and colleagues are protected from all forms of abuse, neglect or exploitation.

Finally, AKMI's Child Protection Policy is aligned with the United Nations Convention on the Rights of the Child (1989), ensuring that the rights and welfare of children are protected at all times. For further information, see Appendix No.5.

Objectives of the Policy

AKMI's Child Protection Policy has as its main purpose to ensure the welfare and safety of children who may come into contact with the activities of the organisation, either through direct involvement of staff and students, or through partnerships with external agencies. The key aims of the policy are:

➤ Information and Education

Ensure that all staff, students and partners of the organisation are fully informed about the basic principles of child protection. This includes providing appropriate training to enable them to recognise signs of abuse or neglect and to understand the importance of child safety and care in all relevant activities.

➤ Clear Reporting Procedures

Establish a clear and understandable procedure for reporting and responding to incidents of child abuse or neglect. This procedure should be known to all staff members and include clear instructions on how to act if they suspect or observe incidents that endanger the safety of children.

➤ Awareness and Prevention

To promote awareness of the risks that children may face in activities related to AKMI, both at the level of everyday contact and in more specific contexts, such as European projects, research projects and volunteer activities. The policy aims to create a safe and secure environment where children's rights and welfare are a priority.

Definitions

(1) A "child" is defined as any person under the age of 18, according to the United Nations Convention on the Rights of the Child (1989).

(2) According to the World Health Organization, "child abuse" or "maltreatment" is "any form of physical and/or emotional abuse, sexual abuse, neglect or negligent treatment or commercial or other exploitation that results in actual or potential harm to the health, survival, development or dignity of the child in a relationship of responsibility, trust or authority.

(3) 'Child protection' is defined as the policies, standards, guidelines and procedures to protect children from intentional and unintentional harm.

(4) "Child participation" states that children and young people have the right to express their views freely and that there is an obligation to listen to children's views and to facilitate their participation in all matters affecting them in the family, schools, local communities, public services, institutions, government policy and judicial processes. World Vision considers the meaningful, safe and appropriate participation of children and young people to be a key strategic priority for ensuring the sustainable well-being of children and creating democratic societies with informed and engaged citizens.

Commitment of AKMI

AKMI is committed to creating and maintaining a safe and secure environment for every child who may come into contact with its activities.

We recognise that the welfare of children is of paramount importance and have developed procedures and policies to ensure that their rights are protected at all levels.

Our commitment includes the following:

➤ Responsibility and Information

All employees, students and partners of the organisation understand the importance of protecting children and act with responsibility and respect for their rights. This is achieved through continuous information and awareness-raising about the risks that children may face and the ways in which they should be protected.

➤ Reporting and Response Procedures

AKMI has established clear and accessible procedures for reporting and responding to incidents of abuse or neglect. These procedures are available to all staff members and students and include direct ways to contact the appropriate authorities within the organization. Our aim is to ensure that any incident of abuse is promptly reported and dealt with due seriousness and confidentiality.

➤ Training of Staff and Partners

Staff and partners who may work with or come into contact with minors, such as in traineeships, voluntary activities or in the context of European educational programmes, receive appropriate child protection training. This training shall cover the principles of child protection, how to identify signs of abuse, and the actions to be taken in the event of a complaint. AKMI ensures that the training is ongoing and up-to-date in accordance with national and international guidelines.

➤ Promoting a Culture of Protection

AKMI encourages the creation of a culture of protection and prevention where every member of the community feels comfortable to report concerns and work together to ensure a safe environment. Fostering this culture is vital to proactively managing risks involving children.

Code of Conduct

AKMI's Child Protection Code of Conduct is designed to ensure that all staff members, students and partners behave in a way that protects children and upholds the ethical and legal obligations of the organisation.

<p>(1) Respect and Well-being of Children</p> <p>(A) All employees, students and associates of AKMI must treat children with the utmost respect.</p> <p>(B) Ensure that all interaction with minors takes place in an environment that protects their dignity, safety and well-being.</p> <p>(C) Any form of imposition or exploitation must be avoided.</p> <p>(2) Avoiding Offensive or Abusive Behaviour</p> <p>The use of language or behaviour that is offensive, harassing, abusive or inappropriate for children is expressly prohibited. This includes the use of corporal punishment, verbal abuse, sexually suggestive language or any form of humiliation or threat.</p> <p>(3) Avoiding Private Interaction</p> <p>Private interaction with children should be avoided, except in the presence of another adult or third person. This includes when an employee or student is assigned to accompany or work with a child. In all cases, it must be ensured that interaction is transparent and takes place in an appropriate environment.</p> <p>(4) Information on Suspected Abuse</p> <p>(A) Any suspicion or incident of abuse or neglect shall be reported immediately to the appropriate authorities within the agency as provided for in the Child Protection Policy reporting procedures.</p> <p>(B) All employees and students have a responsibility to act promptly, ensuring confidentiality and protection of those involved.</p> <p>(5) Maintaining Professional Distance</p> <p>It is important to maintain a clear professional distance when interacting with children. Staff and students should avoid creating overly personal relationships with minors that could be misinterpreted or create inappropriate situations.</p> <p>(6) Safe Use of Technology</p> <p>(A) Employees and students must avoid inappropriate use of technology and social media in interactions with children, in accordance with Appendix no. 1.</p> <p>(B) Publishing or sharing photographs, videos or personal data of children without the consent of their parents or guardians is strictly prohibited.</p> <p>(C) In case of interviews with children, in the framework of European programmes or other action, the regulations of Annex no. 2.</p>

(7) Protection of Confidentiality

(A) All information concerning children and their families must be treated in confidence.

(B) Staff and students should not discuss sensitive matters with third parties without proper authorisation or when it is not necessary for the protection of the child.

(8) Encouraging Children's Participation

Children have the right to express their views on issues that affect them, and staff and students should encourage their participation in a safe and appropriate way, ensuring that they are heard and their views are taken into account.

(9) Cooperation with Competent Authorities

In cases where the involvement of external authorities (such as social services or the police) is required, staff and students must cooperate fully and provide all necessary information to protect children.

(10) Training and Information for Staff and Students

(A) AKMI staff and students shall receive appropriate training and information about child protection. This training shall include recognition of key signs of abuse, incident management, and an understanding of the legal and ethical obligations associated with child protection.

(B) AKMI shall ensure that training activities take place regularly and that information is accessible to all staff members and students so that they remain up to date and responsive to developments in child protection.

(C) All employees should adhere to what is stated in Appendix No. 3., on Training and Awareness.

Recruitment and Vetting

➤ Policy Statement on Safe Recruitment

Our organization is fundamentally committed to the safeguarding and protection of all children and young people who engage with our programs, facilities, and personnel. To continuously uphold this commitment, we have established robust and rigorous safe recruitment and vetting procedures. These preventative measures are strictly designed to deter, identify, and reject individuals who may be unsuitable to work with minors or who may pose a risk of harm to children. This policy applies comprehensively to all prospective employees, volunteers, independent contractors, board members, and partner affiliates whose roles involve direct, indirect, or unsupervised contact with children.

➤ Application Process and Job Descriptions

Safe recruitment begins at the foundational level of role design and advertisement. All job advertisements, descriptions, and person specifications will contain an explicit statement detailing the organization’s unyielding commitment to child protection and the mandatory requirement for safeguarding compliance. To ensure transparency, we do not accept standalone resumes or CVs in place of official documentation. All applicants must complete a standardized organizational application form. This form requires candidates to provide a comprehensive, chronological employment and education history. Any gaps in employment or education must be thoroughly and satisfactorily explained by the candidate and verified by the hiring committee during the application and interview stages.

➤ **Screening and Interviewing**

Shortlisted candidates will undergo a structured, formal interview process. The interview panel will consist of at least two members, with a minimum of one panelist having completed certified safer recruitment training. The interview will not only assess the candidate’s technical competency for the role but also actively explore their personal values, motives for wanting to work with children, and attitudes toward child safeguarding. Candidates will be presented with scenario-based safeguarding questions to evaluate their judgment, emotional maturity, and understanding of strict professional boundaries.

➤ **Reference Checks**

Prior to any formal offer of employment or engagement, the organization requires a minimum of two satisfactory professional references. One of these references must be from the candidate’s current or most recent employer. Open references or references provided directly by the candidate will not be accepted; the organization will directly contact the referees to ensure authenticity. Referees will be explicitly asked about the candidate’s suitability to work with children, any past disciplinary actions, and whether the referee has any specific concerns regarding the candidate’s conduct around minors. Any evasive, generic, or incomplete responses from referees will be actively followed up and scrutinized by the designated Child Protection Officer.

➤ **Criminal Record Checks and Background Vetting**

An enhanced criminal background check—or the highest level of statutory background clearance available in the respective jurisdiction—is absolutely mandatory for all personnel. For individuals who have lived or worked internationally, equivalent police checks or certificates of good conduct from those specific countries will be strictly required. Under no circumstances will an individual be permitted to commence unsupervised work with children until all criminal record checks have been officially returned, reviewed, and cleared.

Furthermore, vetting is not a singular event; all staff and volunteers are subject to mandatory re-screening and updated background checks at regular intervals to ensure ongoing compliance.

➤ Induction and Probationary Monitoring

Vetting does not conclude once a candidate is hired. All newly appointed personnel must undergo a comprehensive safeguarding induction prior to interacting with children. During their probationary period, new staff will be subject to heightened supervision and continuous assessment to ensure strict adherence to our Child Protection Policy and Code of Conduct.

Complaints and Grievance Mechanisms

➤ Statement of Commitment

AKMI is steadfastly committed to cultivating a transparent, safe, and accountable environment where concerns regarding child safeguarding, policy breaches, and professional misconduct can be reported without fear of reprisal. We recognize that robust, accessible, and trusted grievance mechanisms are essential to the early detection, intervention, and prevention of harm. This policy guarantees that all complaints will be taken seriously, handled with the utmost sensitivity, and addressed promptly through a fair, objective, and survivor-centered process.

➤ Accessible Reporting Channels

To ensure that all stakeholders—including staff, volunteers, children, parents, and community members—can raise concerns easily, we have established multiple, secure channels for reporting. Grievances and safeguarding concerns may be reported verbally or in writing directly to the designated Child Protection Officer (CPO), a line manager, or through our dedicated and secure reporting portal. Where legally permissible and practically feasible, provisions for anonymous reporting are actively maintained. We are committed to ensuring these channels are widely publicized, age-appropriate, and easily understandable for children and vulnerable populations.

➤ Non-Retaliation and Whistleblower Protection

AKMI enforces a strict, zero-tolerance policy against any form of retaliation, harassment, intimidation, or adverse employment action directed at any individual who, in good faith, reports a safeguarding concern, raises a grievance, or participates in an ensuing investigation. We actively protect the rights of whistleblowers. Any personnel found to have retaliated

against a complainant will be subject to immediate and severe disciplinary action, up to and including summary dismissal.

➤ **Initial Response and Risk Assessment**

All complaints and grievances related to child protection will be formally acknowledged within 24 hours of receipt. Upon receiving a report, the Child Protection Officer, in conjunction with the senior leadership team, will conduct an immediate initial risk assessment to determine if any child is in imminent danger. If a child is deemed to be at risk of significant harm, or if a crime is suspected to have been committed, statutory child protection agencies and local law enforcement will be contacted immediately. Statutory reporting will always take precedence over internal investigations.

➤ **Formal Investigation Process**

For concerns that do not require immediate statutory intervention, or once clearance has been given by external authorities, a formal and impartial internal investigation will be initiated. The investigation will be conducted by trained, designated personnel who have no conflict of interest regarding the complaint. The process will ensure that all parties are treated fairly and are given the opportunity to present their account of events. The investigation will conclude with a formal written report detailing findings, risk evaluations, and actionable recommendations for disciplinary, restorative, or corrective measures.

➤ **Confidentiality and Information Sharing**

Confidentiality is a critical cornerstone of our grievance mechanism. Information pertaining to a complaint, the identity of the complainant, the child involved, and the subject of the complaint will be strictly managed on a "need-to-know" basis. Case details will only be shared with internal personnel directly involved in the investigation, or with external statutory authorities as required by law. Unauthorized breaches of confidentiality by any staff member will be treated as a severe disciplinary offense.

➤ **Support and Follow-Up**

The organization recognizes that the process of reporting and investigating child protection concerns can be deeply distressing. We are committed to facilitating appropriate pastoral, psychological, and practical support to victims, complainants, and their families throughout and after the process. Following the conclusion of any grievance procedure, continuous monitoring and follow-up will be conducted to ensure that the environment remains safe and that all implemented corrective actions are highly effective.

Role and Responsibilities of the Child Protection Officer

➤ Designation and Authority

AKMI shall appoint a formally designated Child Protection Officer (CPO) who will serve as the primary lead for all matters relating to safeguarding and child welfare. The CPO must be a senior member of staff, possessing the necessary authority, time, and resources to effectively champion safeguarding practices and intervene in organizational processes when child safety is at stake. The organization will also appoint a Deputy CPO to ensure continuous coverage during absences. The identity, role, and contact information of the CPO and Deputy CPO will be prominently displayed and made readily available to all staff, volunteers, children, and parents.

➤ Policy Development and Implementation

The CPO is fundamentally responsible for the continuous review, development, and implementation of this Child Protection Policy and its associated procedures. This includes conducting an annual audit of the policy to ensure it remains compliant with local legislation, statutory guidance, and international safeguarding standards. The CPO will work collaboratively with the senior leadership team and board of directors to ensure that a culture of safe practice is embedded across all departments and programs.

➤ Training and Capacity Building

A core responsibility of the CPO is to ensure that all personnel are adequately equipped to recognize, respond to, and report safeguarding concerns. The CPO will design, coordinate, and oversee the delivery of mandatory, comprehensive child protection training for all new hires during their induction, as well as regular refresher training for existing staff. Furthermore, the CPO will provide specialized guidance and resources regarding professional boundaries, recognizing the signs of abuse, and understanding low-level concerns.

➤ Managing Reports and Investigations

The CPO serves as the central point of contact for receiving and processing all internal and external child protection concerns, allegations, and grievances. Upon receiving a report, the CPO is responsible for immediately conducting a preliminary risk assessment to ensure the safety of the child. The CPO will act as the designated liaison with external statutory child protection agencies, law enforcement, and local authorities, managing all external referrals in a timely and legally compliant manner. For internal matters not reaching the statutory threshold, the CPO will coordinate internal investigations alongside Human Resources.

➤ Record Keeping and Data Management

The CPO must maintain accurate, highly secure, and confidential records of all safeguarding concerns, reports, internal investigations, and actions taken. These records must be stored separately from standard personnel or student files and managed in strict accordance with relevant data protection legislation. The CPO will regularly analyze these records to identify organizational trends, potential systemic risks, or patterns of behavior that require proactive intervention.

➤ **Advice, Support, and Advocacy**

Beyond administrative and investigative duties, the CPO acts as an expert advisor and advocate for child safety within the organization. They will provide ongoing pastoral and procedural support to staff members who have reported concerns or are dealing with complex safeguarding situations. Additionally, the CPO will ensure that the voices and perspectives of children are actively considered in the development of safety protocols and organizational risk assessments.

Abuse Reporting Procedure

AKMI has established clear and rigorous reporting procedures in the event of a suspected or actual incident of child abuse or neglect. These procedures are designed to ensure child protection, confidentiality and a prompt response to any incident.

All employees, students and partners have the obligation to act promptly and responsibly in accordance with the following guidelines:

1. Direct Report

When a AKMI employee, student or partner suspects or observes an incident of child abuse or neglect, he or she should immediately report the incident to the appropriate AKMI authorities, such as the child protection department or the agency's child protection officer. The report shall be made immediately, without delay, and shall include all relevant information. Alongside the internal report, it is appropriate to refer to the National Helplines, listed in Annex No. 4.

2. Documentation

Any incident or suspicion of abuse must be carefully documented. The documentation shall include a detailed description of the incident, the names of the persons involved, the time and location of the incident, and any relevant information that may be helpful to the investigation. The documentation must be accurate and kept confidential.

3. Confidentiality

Reporting an incident of abuse or neglect must be done in complete confidentiality. Information relating to the incident should not be disclosed to persons not directly involved

in the investigation or decision-making process. Such information shall be handled with care to protect the dignity and privacy of the child and those involved.

4. Child Protection

The safety and well-being of the child is the absolute priority. In situations where there is imminent danger to the child, immediate action must be taken to ensure the child's safety, such as removing the child from dangerous situations. AKMI will work with the relevant authorities, such as the police or social services, to provide protection for the child.

5. Information to Competent Authorities

In serious cases of abuse or neglect, AKMI is obliged to inform the competent authorities, such as the police or social services, in accordance with national legislation. The information provided must be accurate and complete to enable the authorities to investigate the situation and take the necessary action.

6. Support for the parties involved

AKMI will provide appropriate support to children who may have suffered abuse or neglect and their families. Support may include counselling, psychological support or referral to specialist services. AKMI will work with specialists to ensure that those involved receive the necessary help.

7. Dealing with Complaints Internally

AKMI will investigate internally any allegations of abuse or neglect and will take the necessary steps to ensure that such incidents are not repeated. This may include disciplinary action against those involved, changing procedures or strengthening safeguarding measures.

8. Training for Reporting

All employees and students will receive training on the procedure for reporting incidents of abuse. This training will include clear instructions on how to recognize abuse or neglect and how to proceed with prompt and proper reporting in accordance with the organization's established procedures.

Monitoring and Evaluation of this Policy

Monitoring and evaluation of the AKMI Child Protection Policy are vital processes to ensure its continued effectiveness and proper implementation by all parties involved. The policy will be subject to ongoing scrutiny and will be regularly reviewed to meet evolving requirements and challenges in the field of child protection. The monitoring and evaluation procedures include the following:

➤ Annual Policy Review

The policy will be reviewed at least once a year by an appropriate committee or department of AKMI to ensure that it remains consistent with new legal, institutional and social requirements for the protection of children. During the review, it will be assessed whether the policy is being properly implemented and whether it needs to be amended to meet new challenges or emerging needs.

➤ Feedback collection

The review process will be based, among other things, on gathering feedback from AKMI staff, students and partners. Through questionnaires, interviews or other forms of consultation, problems or weaknesses in the implementation of the policy and suggestions for improvement will be identified.

➤ Compliance Assessment

AKMI staff, students and partners will be regularly evaluated on their compliance with the principles and guidelines of the policy. The evaluation will include checks on adherence to reporting procedures, implementation of ethical standards, and participation in child protection training programs.

➤ Dealing with infringements

If violations of the policy are identified, either through assessments or reports, AKMI will take appropriate action. Violations may be addressed in a variety of ways, depending on their severity, including disciplinary action, further training, or legal intervention where appropriate.

➤ Reports and Report

AKMI will produce annual reports that will include an account of the implementation of the policy. These reports will document the effectiveness of the policy, the steps taken to address problems and any adjustments made during the year. The reports will be submitted to the management of the organisation and to competent authorities as required.

➤ Continuous Improvement

Policy evaluation will not be limited to annual reviews, but will be based on a continuous improvement approach. Any new evidence arising from feedback, changes in legislation or findings from internal or external audits will be taken into account to improve the policy and its procedures.

➤ Education after Evaluation

Based on the results of the evaluations, additional training will be provided to staff and students to address any gaps in the implementation of the policy. This training will be adapted to new needs arising from the evaluation.

This policy has been reviewed and approved by:

Theodore Grassos
Director of Internationalisation



Annexes

1. Use of media and publication of images

With regard to the media and the use of images (including photographs and recordings) of children, the following procedures/standards should be applied in all cases:

- At a minimum, verbal consent of the children and/or their parent or guardian must be obtained and documented and it must be explained how the photograph or video will be used. Informed consent means that children are informed of how AKMI may use the information or image/video and that they are under no obligation to agree to its use. They will also be assured that locations and other identifying information that could lead to the children's whereabouts will be changed. They should be asked if they consent to their first name being shared in the information or image/video. Written consent should be obtained where possible (see consent forms in Annex 2).
- Ensure that photographs, films, videos, etc. present children with dignity and respect and not in a vulnerable or submissive way.
- Ensure that the images are honest representations of situations and events.
- Ensure that the identity of children depicted in photographs or electronic images is not revealed.
- Ensure that these records are stored securely and that access is restricted to appropriate personnel as necessary.

2. Interviewing children

When conducting interviews with children, the following basic principles should be followed:

- Informed consent: includes an explanation of the topics likely to be covered in the interview and whether notes/recording of the interview will be taken, as well as clarification of the child's right to withdraw consent at any time. The interviewer should review whether the child has understood the consent at the start of the interview.
- Providing support: during the interview, it is suggested that someone else be present with whom the child is familiar, if the child wishes. Where possible, the child should be able to choose who supports him/her during the interview.
- Respecting the right to No: before the interview begins, it should be made clear to the child that he or she must speak if he or she feels comfortable giving the interview and that he or she can stop and withdraw consent at any point.
- Gender: the different needs of boys and girls and whether they would be more comfortable talking to a man or a woman should be taken into account.

3. Education and Awareness Raising

AKMI is committed to providing ongoing child protection training and awareness to all staff members, students and associates. This training is designed to equip participants with the knowledge and skills necessary to deal with child protection related situations responsibly and effectively. Specifically, the education and awareness initiatives include the following:

- **Understanding of Obligations and Responsibilities:** Staff and students will be trained to have a full understanding of their obligations in situations where they come into contact with minors, either through educational activities or through collaborative projects. This training will focus on their responsibility to provide a safe environment and to act immediately in cases of suspected abuse or neglect.
- **Recognising Signs of Abuse and Neglect:** Training participants will learn to recognize the basic signs of abuse or neglect, such as physical signs, behavioral changes, or other troubling signs. They will become familiar with the different forms of abuse (physical, emotional, sexual) and neglect, and the steps to take to report them immediately and responsibly to the appropriate authorities within the organisation.
- **Incident Response and Management:** The training will include instruction on how to respond to and manage incidents of abuse or neglect. This includes the need to maintain confidentiality, reporting the incident to the appropriate agencies and providing support to children who may need assistance. Staff and students will learn how to handle sensitive situations with care and sensitivity.
- **Sequence of Ethical Principles:** Participants will learn about the ethical principles to follow in their interactions with children. This includes avoiding inappropriate behaviors, respecting children's personal space, and ensuring a safe and supervised environment. Training will emphasise the importance of maintaining a professional distance and avoiding any form of harassment or exploitation.
- **Specific Tools and Resources:** AKMI will provide access to training materials and resources that will allow participants to expand their knowledge of child protection. This may include online tutorials, manuals, presentations and other resources that will be available for study and continuing education.

4. Data Protection and Confidentiality

4.1. Statement of Principle and Legal Compliance

AKMI recognizes the highly sensitive nature of information pertaining to child protection and is committed to processing all personal data in strict accordance with the General Data Protection Regulation (GDPR) and applicable national data protection laws (e.g., the Data Protection Act 2018). However, it is a foundational principle of this policy that data protection legislation is not a barrier to safeguarding children. The protection, safety, and welfare of the child will always take absolute precedence.

4.2. Lawful Basis for Processing Safeguarding Data

Under the GDPR, the organization must have a valid lawful basis to process personal data. For standard child protection records, our lawful basis is the fulfillment of a **legal obligation** and the pursuit of our **legitimate interests** in providing a safe environment.

Because safeguarding reports often contain "special category data" (e.g., information about health, race, or criminal allegations), we process this data under the GDPR provisions for **vital interests** (where processing is necessary to protect someone's life) and **substantial public interest** (specifically for statutory and government purposes relating to safeguarding children and individuals at risk). Consent is generally *not* relied upon as the lawful basis for processing safeguarding data, as it can be withdrawn.

4.3. Information Sharing and GDPR Exemptions

Staff must never allow concerns regarding data protection to delay or prevent the sharing of vital safeguarding information. Where there is a reasonable belief that a child is suffering, or is at risk of suffering, significant harm, the organization has a duty to share relevant information with statutory child protection agencies, local authorities, and law enforcement. Under GDPR, sharing data to safeguard a child is legally justified and does not require the consent of the data subject (the child, parent, or accused individual). All external referrals and the rationale for information sharing will be meticulously documented by the Child Protection Officer (CPO).

4.4. Data Minimization and Secure Storage

In line with GDPR principles, the organization will only collect and process personal data that is strictly necessary for safeguarding purposes (Data Minimization).

- **Separation of Records:** Safeguarding records must be kept entirely separate from standard personnel, volunteer, or student files.
- **Security:** Physical records must be stored in secure, locked receptacles accessible only to authorized personnel. Digital records must be heavily encrypted, password-protected, and housed on secure servers with strict access controls and audit logs. Access is strictly restricted on a "need-to-know" basis. Unauthorized disclosure is a breach of both this policy and GDPR, constituting gross misconduct.

4.5. Storage Limitation and Data Retention

Safeguarding records are subject to specific and extended retention schedules that supersede standard GDPR erasure requests. Details of any low-level concerns, formal allegations, investigations, and their outcomes will be retained securely for the period mandated by local

statutory safeguarding guidance. This often extends well beyond the individual's employment or the child's involvement with the organization (e.g., indefinitely in cases of substantiated abuse, or until an accused staff member reaches normal retirement age). Records deemed to have no historical safeguarding value upon regular review will be permanently and securely destroyed.

4.6. Rights of the Data Subject (Subject Access Requests)

Under the GDPR, individuals have the right to request access to personal data held about them via a Subject Access Request (SAR). While the organization respects this right, we will strictly apply relevant safeguarding exemptions. The organization reserves the legal right to redact, restrict, or entirely withhold information if disclosing it would:



- Place a child at risk of serious harm or retaliation.
- Compromise an ongoing criminal, statutory, or internal investigation.
- Breach the confidentiality or anonymity of a whistleblower or third-party witness.

All SARs involving child protection data will be carefully reviewed by the CPO and legal counsel prior to any disclosure.

5. National helplines and useful websites

Greek Police	100
National Helpline for SOS Children	1056
National Child Protection Hotline	1107
Directorate for Cybercrime	11188 ccu@cybercrimeunit.gov.gr www.cyberkid.gr www.cyberalert.gr/feelsafe
Helpline of the Hellenic Internet Safety Centre	210 6007686 http://www.help-line.gr
Children's Advocate's line	800 11 32 000
SafeLine	2811 391615 https://www.safeline.gr
Together for the Child	115 25
European Missing Children Hotline	116000

6. The International Convention on the Rights of the Child

<p>1</p>  <p>DEFINITION OF A CHILD</p>	<p>2</p>  <p>NO DISCRIMINATION</p>	<p>3</p>  <p>BEST INTERESTS OF THE CHILD</p>	<p>4</p>  <p>MAKING RIGHTS REAL</p>	<p>5</p>  <p>FAMILY GUIDANCE AS CHILDREN DEVELOP</p>	<p>6</p>  <p>LIFE, SURVIVAL AND DEVELOPMENT</p>	<p>7</p>  <p>NAME AND NATIONALITY</p>
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HOW THE CONVENTION WORKS

CONVENTION ON THE RIGHTS OF THE CHILD



THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD – THE CHILDREN’S VERSION

The United Nations Convention on the Rights of the Child is an important agreement by countries who have promised to protect children’s rights.

The Convention on the Rights of the Child explains who children are, all their rights, and the responsibilities of governments. All the rights are connected, they are all equally important and they cannot be taken away from children.

This text is supported by the Committee on the Rights of the Child.





DEFINITION OF A CHILD

A child is any person under the age of 18.



NO DISCRIMINATION

All children have all these rights, no matter who they are, where they live, what language they speak, what their religion is, what they think, what they look like, if they are a boy or girl, if they have a disability, if they are rich or poor, and no matter who their parents or families are or what their parents or families believe or do. No child should be treated unfairly for any reason.



BEST INTERESTS OF THE CHILD

When adults make decisions, they should think about how their decisions will affect children. All adults should do what is best for children. Governments should make sure children are protected and looked after by their parents, or by other people when this is needed. Governments should make sure that people and places responsible for looking after children are doing a good job.



MAKING RIGHTS REAL

Governments must do all they can to make sure that every child in their countries can enjoy all the rights in this Convention.



FAMILY GUIDANCE AS CHILDREN DEVELOP

Governments should let families and communities guide their children so that, as they grow up, they learn to use their rights in the best way. The more children grow, the less guidance they will need.



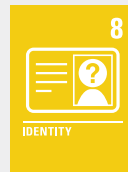
LIFE, SURVIVAL AND DEVELOPMENT

Every child has the right to be alive. Governments must make sure that children survive and develop in the best possible way.



NAME AND NATIONALITY

Children must be registered when they are born and given a name which is officially recognized by the government. Children must have a nationality (belong to a country). Whenever possible, children should know their parents and be looked after by them.



IDENTITY

Children have the right to their own identity – an official record of who they are which includes their name, nationality and family relations. No one should take this away from them, but if this happens, governments must help children to quickly get their identity back.



KEEPING FAMILIES TOGETHER

Children should not be separated from their parents unless they are not being properly looked after – for example, if a parent hurts or does not take care of a child. Children whose parents don't live together should stay in contact with both parents unless this might harm the child.



CONTACT WITH PARENTS ACROSS COUNTRIES

If a child lives in a different country than their parents, governments must let the child and parents travel so that they can stay in contact and be together.



PROTECTION FROM KIDNAPPING

Governments must stop children being taken out of the country when this is against the law – for example, being kidnapped by someone or held abroad by a parent when the other parent does not agree.



RESPECT FOR CHILDREN'S VIEWS

Children have the right to give their opinions freely on issues that affect them. Adults should listen and take children seriously.



SHARING THOUGHTS FREELY

Children have the right to share freely with others what they learn, think and feel, by talking, drawing, writing or in any other way unless it harms other people.



FREEDOM OF THOUGHT AND RELIGION

Children can choose their own thoughts, opinions and religion, but this should not stop other people from enjoying their rights. Parents can guide children so that as they grow up, they learn to properly use this right.



SETTING UP OR JOINING GROUPS

Children can join or set up groups or organisations, and they can meet with others, as long as this does not harm other people.



PROTECTION OF PRIVACY

Every child has the right to privacy. The law must protect children's privacy, family, home, communications and reputation (or good name) from any attack.



ACCESS TO INFORMATION

Children have the right to get information from the Internet, radio, television, newspapers, books and other sources. Adults should make sure the information they are getting is not harmful. Governments should encourage the media to share information from lots of different sources, in languages that all children can understand.



RESPONSIBILITY OF PARENTS

Parents are the main people responsible for bringing up a child. When the child does not have any parents, another adult will have this responsibility and they are called a "guardian". Parents and guardians should always consider what is best for that child. Governments should help them. Where a child has both parents, both of them should be responsible for bringing up the child.



PROTECTION FROM VIOLENCE

Governments must protect children from violence, abuse and being neglected by anyone who looks after them.



CHILDREN WITHOUT FAMILIES

Every child who cannot be looked after by their own family has the right to be looked after properly by people who respect the child's religion, culture, language and other aspects of their life.



CHILDREN WHO ARE ADOPTED

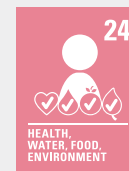
When children are adopted, the most important thing is to do what is best for them. If a child cannot be properly looked after in their own country – for example by living with another family – then they might be adopted in another country.



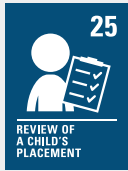
Children who move from their home country to another country as refugees (because it was not safe for them to stay there) should get help and protection and have the same rights as children born in that country.



Every child with a disability should enjoy the best possible life in society. Governments should remove all obstacles for children with disabilities to become independent and to participate actively in the community.



Children have the right to the best health care possible, clean water to drink, healthy food and a clean and safe environment to live in. All adults and children should have information about how to stay safe and healthy.



Every child who has been placed somewhere away from home - for their care, protection or health - should have their situation checked regularly to see if everything is going well and if this is still the best place for the child to be.



Governments should provide money or other support to help children from poor families.



Children have the right to food, clothing and a safe place to live so they can develop in the best possible way. The government should help families and children who cannot afford this.



Every child has the right to an education. Primary education should be free. Secondary and higher education should be available to every child. Children should be encouraged to go to school to the highest level possible. Discipline in schools should respect children's rights and never use violence.



Children's education should help them fully develop their personalities, talents and abilities. It should teach them to understand their own rights, and to respect other people's rights, cultures and differences. It should help them to live peacefully and protect the environment.



Children have the right to use their own language, culture and religion - even if these are not shared by most people in the country where they live.



Every child has the right to rest, relax, play and to take part in cultural and creative activities.



Children have the right to be protected from doing work that is dangerous or bad for their education, health or development. If children work, they have the right to be safe and paid fairly.



Governments must protect children from taking, making, carrying or selling harmful drugs.



The government should protect children from sexual exploitation (being taken advantage of) and sexual abuse, including by people forcing children to have sex for money, or making sexual pictures or films of them.



Governments must make sure that children are not kidnapped or sold, or taken to other countries or places to be exploited (taken advantage of).



Children have the right to be protected from all other kinds of exploitation (being taken advantage of), even if these are not specifically mentioned in this Convention.



Children who are accused of breaking the law should not be killed, tortured, treated cruelly, put in prison forever, or put in prison with adults. Prison should always be the last choice and only for the shortest possible time. Children in prison should have legal help and be able to stay in contact with their family.



Children have the right to be protected during war. No child under 15 can join the army or take part in war.



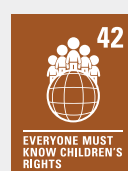
Children have the right to get help if they have been hurt, neglected, treated badly or affected by war, so they can get back their health and dignity.



Children accused of breaking the law have the right to legal help and fair treatment. There should be lots of solutions to help these children become good members of their communities. Prison should only be the last choice.



If the laws of a country protect children's rights better than this Convention, then those laws should be used.



Governments should actively tell children and adults about this Convention so that everyone knows about children's rights.



These articles explain how governments, the United Nations - including the Committee on the Rights of the Child and UNICEF - and other organisations work to make sure all children enjoy all their rights.