



Non-Profit Organisation
**INSTITUTE FOR THE PREVENTION
AND TREATMENT OF VIOLENCE
& THE PROMOTION OF GENDER EQUALITY**
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VIA-STOP Child Protection Policy

The Institute for the Prevention & Treatment of Violence and the Promotion of Gender Equality “Via-Stop” was founded in 2008, and it is a Greek non-profit organisation with the primary objective of combating any form of violence, and more specifically:

- Aims to provide assistance, psychological support and therapeutic approaches to all individuals who are subjected to domestic violence
- Becomes the connecting link as needed between victims and social, legal and welfare services and provides strategies and specialised assistance targeted at the victim’s safe exit from the violent environment.
- Creates and implements domestic violence perpetrator programs, including anger management, individual, court-appointed and group therapy sessions aiming at providing peaceful conflict resolution.
- Implements school outreach programs to address students’ perceptions regarding violent behaviours, addressing bullying, domestic violence and all violent behaviours in general. For that expressed purpose, the organisation is implementing prevention and therapeutic programmes,

The organisation is committed to the combat against gender-based violence, and more specifically domestic violence, intimate partner violence, child and elderly abuse and other forms of violence such as school violence. Moreover, acts and works against any discrimination based on any ground such as sex, race, colour, ethnic or social origin, membership of a national minority, disability and sexual orientation for a substantial positive social change.

Via-Stop works with victims of abuse and violence regardless of gender, age and ethnicity, students in all three levels of education, the general population, and offenders of violence. Hence, since children and young people are included among its target groups, Via-Stop has developed a “Child Protection Policy” (CPP) binding for every employee and third party who might work with children.

More specifically:

Who does this policy bind?

Employees of any status, including trainees, interns, volunteers, external partners, and third parties cooperating with Via-Stop, must comply with the “Child Protection Policy” and ensure that no behaviour of violence and harassment against children will occur. Any person wishing to make a complaint against an employee of Via-Stop or a third party may do so to comply with this policy. Disciplinary action will be taken against any employee who violates this policy. Based on the severity of the offence, the disciplinary process may include a verbal or written warning, suspension, dismissal and possible criminal charges, and legal action.

Definitions

Child abuse

Child abuse means all forms of **physical or emotional abuse, sexual abuse, neglect, negligent treatment, trafficking**. Abuse and neglect can occur within the family, in the community or in an institutional setting. The abuser may be someone known to the child or a stranger, and can be an adult, or another child.

Emotional abuse

Emotional abuse is the systematic emotional or psychological ill-treatment of a child as part of the overall relationship between a caregiver and a child. Once-off and occasional difficulties between a parent/carer and child are not considered emotional abuse. Abuse occurs when a child’s basic need for attention, affection, approval, consistency and security are not met, due to incapacity or indifference from their parent or caregiver. Emotional abuse can also occur when

adults responsible for taking care of children are unaware of and unable (for a range of reasons) to meet their children's emotional and developmental needs.

Physical abuse

Physical abuse is when someone deliberately hurts a child physically or puts them at risk of being physically hurt. It may occur as a single incident or as a pattern of incidents. A reasonable concern exists where the child's health and/or development is, may be, or has been damaged as a result of suspected physical abuse. Physical abuse can include physical punishment Beating, slapping, hitting or kicking, pushing, shaking or throwing, pinching, biting, choking or hair-pulling, use of excessive force in handling, suffocation, fabricated/induced illness, female genital mutilation.

Sexual abuse

Sexual abuse occurs when a child is used by another person for his or her gratification or arousal, or for that of others. It includes the child being involved in sexual acts (masturbation, fondling, oral or penetrative sex) or exposing the child to sexual activity directly or through pornography. Child sexual abuse may cover a wide spectrum of abusive activities offline and online.

Examples of child sexual abuse include the following:

- Any sexual act intentionally performed in the presence of a child
- An invitation to sexual touching or intentional touching or molesting of a child's body whether by a person or object for the purpose of sexual arousal or gratification
- Masturbation in the presence of a child or the involvement of a child in an act of masturbation
- Sexual intercourse with a child, whether oral, vaginal or anal
- Sexual exploitation of a child, which includes:
 - Inviting, inducing or coercing a child to engage in prostitution or the production of child pornography
 - Inviting, coercing or inducing a child to participate in, or to observe, any sexual, indecent or obscene act

- Showing sexually explicit material to children, which is often a feature of the 'grooming' process by perpetrators of abuse
- Exposing a child to inappropriate or abusive material through information and communication technology
- Consensual sexual activity involving an adult and an underage person

Neglect or negligent treatment

Neglect and negligent treatment means inattention or omission by a caregiver to provide for the development of the child in education, health, nutrition, shelter and safe living conditions in the context of resources available to the family or caregivers and liable to cause harm to the child's health, physical, mental, spiritual, moral or social development.

Trafficking

Trafficking is where children and young people tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for: sexual exploitation, benefit fraud, forced marriage, domestic slavery like cleaning, cooking and childcare, forced labour in factories or agriculture, committing crimes, like begging, theft, working on cannabis farms or moving drugs.

Human Resources

Via-Stop applies the highest standards for human resources and recruitment to protect the people we work with against exploitation and abuse.

This includes:

Safe recruitment - references and screening of candidates with an emphasis on an impeccable track record when carrying out their work in accordance with the Code of Conduct and Ethics.

During the induction all potential staff and partners will be introduced to the Code of Conduct and Ethics, and to Reporting/Complaints Policy on CPP. All employees are obligated to read, understand and sign Via-Stop for the CPP and the Code of Conduct and Ethics.

Awareness activities

To ensure that all employees (of any status) and third parties are aligned with the provisions of the CPP and the Code of Conduct and Ethics, training sessions for all engaged and supervision sessions for the employees will be organized on a regular basis. The supervision sessions for employees will take place every month, and training sessions on the CPP, the Code of Conduct and Ethics, and any potential developments in the legal and policy frame, for instance, on the child protection field and reporting mechanisms, on a national, European or international level will be organized twice a year.

Legal framework

Via-Stop CPP embeds the provisions of the national, and European-international legal frame for the protection of children, a code of ethics and conduct for employees who may come into contact or work with children, reporting procedures based on the provisions of the national legislation.

More specifically,

- **Law 2101/1992** on the Ratification of the Convention on the Rights of the Child
- **Law 3625/2007**, which ratified the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography
- **Law 3727/2008** : Ratification and Implementation of the Council of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention)
- **Directive 2011/93/EU** on combating the sexual abuse and sexual exploitation of children and child pornography Accordingly, **Directive 2011/93/EU** of the European Parliament and of the Council (**Law 4267/2014**) on combating the sexual abuse and sexual exploitation of

children and child pornography has been incorporated, the implementation of which, also for our country, is still an issue. As online sexual victimization is a predominantly transnational phenomenon, it requires the corresponding actions of transnational cooperation in order to combat it effectively

- **Directive 2012/29/EU** on the protection of victims' rights of particular importance is **Law 4478/2017**. In addition to the broad definition of victim, specific measures are introduced to protect and support the victim at all stages of the criminal proceedings even after the end of the criminal proceedings. With an emphasis on victims' rights to adequate information, support and protection in all contacts with their first contact, child victims are treated with respect and sensitivity as particularly vulnerable victims.

Recent amendments to the Penal Code and the Criminal Procedure Code, **Law 4855/2021**, introduced new provisions for the protection of the juvenile victims of crimes against personal and sexual freedom:

- Prosecution of offences against sexual freedom against of minors under 15 years of age
- Priority in the interrogation and trial of cases against sexual liberty sexual freedom against minors (possibility of the Prosecutor of the Supreme Court)
- Life imprisonment for rape of a minor (exclusive provision of sentence)
- Restoration of incest as a felony
- Punishment of sexual acts with minors (seduction) as a felony in all its forms (Article 339 PC).
- Increasing the starting point of the statute of limitations for the crime from the age of majority of the minor (one year for a misdemeanour and three years for a felony)
- Increase in the limit of conditional dismissal for life imprisonment (serving 4/5 of the sentence from 3/5 previously)

- Stay in a penitentiary equal to 3/5 of the sentence (actual 3/5 of the sentence, up from 2/5 previously)
- In the case of a life sentence, from 16 years to 18 years (actual serving)
- Increased penalties for abuse of persons incapable of resisting of persons incapable of resisting sexual acts due to mental or physical disability (Article 338 PC)
- **Law 4837/2021.** Prevention and treatment of cases of abuse and neglect of minors, the "Kipseli" programme for the improvement of the quality of services provided in infant, nursery and childcare centres, provisions for the promotion of fostering and adoption, "Personal Assistant for Persons with Disabilities" and other provisions.
- **Law 5090/2024:** 'Interventions in the Criminal Code and the Code of Criminal Procedure for the acceleration and qualitative upgrading of criminal proceedings - Modernization of the legislative framework for preventing and combating domestic violence' and concern amendments to **Law 3500/2006**. Concerning the children the amendments are:
 - In the event of physical or psychological violence against a minor, the Court may order any appropriate measure, in particular to deprive one parent of the exercise of parental authority in whole or in part and entrust it exclusively to the other, or to entrust the actual care of the child or even the custody of the child in whole or in part to a third party, or even to appoint a guardian.
 - Provision is made for victims of domestic violence in relation to individual assessment of victims and management of the risk of recurrence of violence and secondary victimisation.
 - In case of committing domestic bodily harm in front of a minor family member, the perpetrator shall be punished with a minimum of two (2) years imprisonment. If this act is likely to cause the victim danger to his/her life or serious bodily harm, he/she shall be punished with a minimum of three (3) years imprisonment.

- The threshold of the sentence (at least six months) has been increased in the case of committing an intra-family offence of sexual dignity, either at the expense of or in front of a minor.

Child Safeguarding Code of Conduct and Ethics for all staff , board members, interns, trainees, volunteers engaged with Via-Stop and third Partners

Do's	• Act in accordance with Via-Stop child safety and wellbeing policies and procedures at all times. • Behave respectfully, courteously and ethically towards children and their families and towards other staff. • Listen and respond to the views and concerns of children, particularly if they communicate (verbally or non-verbally) that they do not feel safe or well. • Promote the human rights, safety and wellbeing of all children in Via-Stop. • Demonstrate appropriate personal and professional boundaries. • Consider and respect the diverse backgrounds and needs of children. • Create an environment that promotes and enables children's participation and is welcoming, culturally safe and inclusive for all children and their families. • Involve children in making decisions about activities, policies and processes that concern them wherever possible. • Contribute, where appropriate, to Via-Stop policies, discussions, learning and reviews about child safety and wellbeing. • Identify and mitigate risks to children's safety and wellbeing as required by Via-Stop risk assessment and management policy or process. • Respond to any concerns or complaints of child harm or abuse promptly and in line with Via-Stop policy and procedure for receiving and responding to complaints. • Report all suspected or disclosed child harm or abuse as required by national legal frame and by Via-Stop policy and procedure on internal and external reporting. • Comply with Via-Stop protocols on communicating with children. • Comply with the national legal framework as well as with the international and European as it has been transported to national legislation and Via-Stop policies and procedures on record keeping and information sharing.
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Don'ts	Engage in any unlawful activity with or in relation to a child. • Engage in any activity that is likely to physically, sexually or emotionally harm a child. • Unlawfully discriminate against any child or their family members. • Be alone with a child unnecessarily. • Arrange personal contact, including online contact, with children I am working with for a purpose unrelated to Via-Stop activities. • Disclose personal or sensitive information about a child, including images of a child, unless the child and their parent or legal guardian consent or unless I am required to do so by Via-Stop policy and procedure on reporting. • Use inappropriate language in the presence of children, or show or provide children with access to inappropriate images or material. • Work with children while under the influence of alcohol or prohibited drugs. • Ignore or disregard any suspected or disclosed child harm or abuse.
Actions when the Code of Conduct has been breached	Act to prioritise the best interests of children. • Take actions promptly to ensure that children are safe. • Promptly report any concerns to my manager, Via-Stop Child Safety Officer, the Chief Executive Officer or another manager or leader in Via-Stop • Follow Via-Stop policies and procedures for receiving and responding to complaints and concerns. • Comply with national legislative requirements on reporting

Reporting

Any person (e.g. child, young person, parent, employee, intern, third party, volunteer) can make a report concerning child-safety-related misconduct and/or child abuse.

All employees, no matter the work status, volunteers and third parties (partners) have a duty of care to protect children and young people from harm and a moral, legal and ethical duty to effectively respond to and report all concerns, allegations or complaints of child-safety related misconduct and/or child abuse.

It is a requirement of the CPP that Via-Stop employees, volunteers and third parties make a report if they have formed a reasonable belief that a child or young person has experienced abuse, is experiencing abuse or is at risk of

harm (even if others do not hold a reasonable belief or do not believe a report should be made).

Not reporting child safety concerns, complaints or allegations or preventing, influencing or coercing a person from making a report is a breach of the Child Protection Policy” and may result in disciplinary action and/or possible legal action.

It is important to note that:

- All allegations and complaints from any part will be examined thoroughly and will take the legal route if there are violations of child protection legislation,
- Legal action cannot be taken against a person if a report is made in good faith (e.g. When there is a reasonable belief that abuse may be occurring) in compliance with the expectations set out in the safeguarding children and young people policy.
- Victimising or harassing behaviour toward a person who has made a report is unacceptable and may result in disciplinary action.
- Support will be provided to all parties involved in relation to any child safety concerns, allegations or complaints.
 - All reports shall be treated with confidentiality.

Children's photographs/videos and information

Via-Stop adopts the principles of UNICEF¹ regarding the filming, photo shooting, or recording of children and young people in Via-Stop premises or locations of intervention, with respect to their safety, dignity, and rights.

- Do no harm to any child; avoid questions, attitudes or comments that are judgmental, insensitive to cultural values, place a child in danger or expose a child to humiliation, or reactivate a child's pain and grief from traumatic events.

¹ UNICEF. PHOTOGRAPHING AND FILMING CHILDREN ETHICALLY. <https://www.unicef.org/romania/media/7441/file/Photographing%20and%20filming%20children%20ethically.pdf>
<https://www.unicef.org/ukraine/en/media/28186/file>

- Do not discriminate in choosing children to interview because of sex, race, age, religion, status, educational background or physical abilities.
- No staging: Do not ask children to tell a story or take an action that is not part of their history.
- Obtain permission from the child and their guardian for all interviews and videotaping through informed written consent from the child (older than 14 years old) and a parent or guardian of the child (younger than 14 years old) before photographing or filming a child. An explanation of how the photograph or film will be used must be provided
- Ensure photographs, films, and videos present children in a dignified and respectful manner, not as vulnerable or submissive. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure fair and non-stereotypical visibility of girls, boys, women and men from diverse groups in a way that not only depicts their equal representation but also doesn't perpetuate gender stereotypes and allows boys, girls, men and women to be presented on equal footing and in their diverse roles.
- Ensure file labels, metadata, and text descriptions do not reveal identifying information about a child when sending images electronically or publishing images of any form.

Ethics

In Via-Stop, we follow and adopt the **GDPR** legal provisions relating to children's consent, as issued and monitored by the Hellenic Data Protection Authority, as well as the principles of "**Do no harm**," "**Integrity**," "**Be Open and Honest Regarding Our Work**," "**Informed Consent**," and "**Protection and preservation of any record**."

The principle of “Do no harm” means the obligation not to inflict harm intentionally but rather provide benefits to persons, in this case, children, and contribute to their welfare.

The principle of integrity requires any professional working with children to be clear and open about their work’s purpose, methods, outcomes, and sponsors.

The principle of informed consent: Professionals working with children must obtain the voluntary and informed consent of children, in this case, following the requirements of **Law 4624/2019** regarding the GDPR Directive. More details are in the following box.

Consent

The basis for the processing of personal data of children can be any of the legal bases provided for in the GDPR.

Where processing is based on consent, the professional who seeks consent must ensure that the child has been informed and understands what he or she is consenting to, otherwise the consent is 'invalid' as the obligation to provide clear information has not been complied with. For this reason, the language must be simple, clear and understandable to a child.

In particular, in relation to the offer of ICT directly to the child, the GDPR sets age limits for the valid submission of a child's consent. Thus, children over the age of 16 are entitled to validly submit their consent, whereas for children under the age of 16, consent is given by the person having parental responsibility, i.e. the parent or guardian.

In principle, automatic decision-making is prohibited if such decisions have a legal effect on children or significantly affect them.

Where a profile is drawn up for children, the controller should provide clear information regarding the processing of their data. Under no circumstances should he or she take advantage of the lack of understanding or the weak position of children in general.

Profiling of children for marketing purposes is prohibited. The controller must respect the child's absolute right to object to such an action by the controller related to direct

The principle of “Protection and preservation of any record” shall mean that all signed consent forms, reports, and information related to child and youth protection must be kept securely and protected and marked as confidential. Regarding confidentiality, professionals are responsible for using appropriate methods to ensure the confidentiality and security of notes,

recordings, data and the identities of participants. The circulation of any form of data will be marked as confidential in all means of communication, whether offline or online.

Sanctions

Anyone found to have committed violence and harassment will be subject to disciplinary action, which may include verbal or written warning, suspension, or suspension or dismissal. For serious incidents such as physical or sexual assault that could constitute a criminal offence, Via-Stop will also refer the matter to the police and the competent authority for investigation and action.

Declaration of Commitment to the Child Protection Policy of the PLAN B Association

I, _____ , have read and understood the standards and guidelines provided in the Child Protection Policy.

I agree with the principles outlined in this document and acknowledge the importance of implementing and promoting the policies and practices for child protection contained in this document in my capacity as an employee / volunteer / collaborator / member of the board / partner / service provider for the duration of my work or association with the PLAN B Association.

_____ (Name)

_____ (Job Title/Role)

_____ (Signature)

_____ (Date)