Child Protection Policy (2026)

Applicable to:	All KEAN Staff, KEAN Experts, Research Associates and KEAN Volunteers, ***External Staff'***
Reviewed:	Annually

Child Protection Policy

Introduction

As a non-governmental organization, whose work is underpinned by the United Nations Convention on the Rights of the Child (UNCRC), KEAN is committed to ensuring the fulfilment of children's rights including their rights to protection. KEAN is committed to protecting children from harm and ensuring that children's right to protection under Article 19 of the UNCRC is fully realised. We take seriously our responsibility to promote child safe practices and protect children from harm, abuse, neglect and exploitation in any form. In addition, we will take positive action to prevent all kinds of child abuse and all KEAN Staff, KEAN Experts and Research Associates, and KEAN volunteers are committed to fight for children rights and are guided by the principle of 'the best interests of the child'.

Safeguarding and protecting children's rights is a core principle of KEAN and we are all committed to protecting children from harm, abuse, neglect and exploitation. KEAN is committed to following and implementing the United Nations Convention on the Rights of the Child (1989), which is the most important text on children's rights, ratified by 194 countries. It was ratified by Greece on December 2, 1992 under Law 2101/92 as the "United Nations Convention on the Rights of the Child" (hereinafter referred to as the UNCRC) and is a national law with increased formal validity, ie it takes precedence in the event of a contrary provision of law.

The child is now recognized as a subject of law recognizing the individual, political, economic, social and educational rights which are distinguished in (*Greek Ministry of Justice)*:

- Protection, benefits and participation rights.
- Protection rights (against all forms of abuse, exploitation, discrimination, etc.)
- Benefit rights (in education, health, welfare, entertainment, etc.)
- Participation rights (right to express an opinion, information, leisure time, etc.).

Knowledge and acceptance of Child Protection Policy is a prerequisite for the recruitment of KEAN employees, who are committed to behaving respectfully and in harmony with KEAN's Child Protection Policy.

A. Definitions under the Child Protection Policy

1. In line with the UNCRC, for the purposes of this policy, ***a Child*** is defined as any person under the age of 18 years (UNCRC Article 1).

2. An ***unaccompanied minor***/ **unaccompanied child** is a person who is under the age of eighteen, unless, and who is "separated from both parents and is not being cared for by an adult who by law or custom has responsibility to do so (UNHCR). *Unaccompanied minors come to the EU* to escape from wars and conflicts, poverty or natural catastrophes, discrimination or persecution or serious harm, i.e. international protection (asylum); in the expectation of a better life, following economic and aspirational reasons; to join family members; as victims of trafficking in human beings destined for exploitation, such as sexual exploitation and forced labour or services. (*European Commission).*

3. ***Child abuse*** is defined as all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child and includes any actions that result in actual or potential harm to a child. Child abuse may be a deliberate act or it may be failing to act to prevent harm. Child abuse consists of anything which individuals, institutions or processes do or fail to do, intentionally or unintentionally, which harms a child or damages their well-being, dignity and prospect of safe and healthy development into adulthood. The term "child abuse" includes physical, emotional and sexual abuse, and neglect (UNHCR).

4. ***Child protection*** is defined in this policy as the responsibilities and preventative and responsive measures and activities that KEAN undertakes to protect children ensuring that no child is subject to child abuse as a result of their association with us, their contact with KEAN Staff, KEAN Experts and Research Associates, or KEAN

volunteers, including our projects and programs.

In addition, it incorporates our responsibility to ensure that where there are concerns over a child's welfare or where a child has been subject to child abuse, actions are taken to address this; concerns are reported and responded to appropriately and in line with relevant global and local procedures; and incidents are analysed so as to ensure continued learning and growth in the field of organisational child protection.

5. ***'KEAN staff'*** refers to individuals who receive a regular salary for work in any part of KEAN, including all Country (Greece) Offices and Offices abroad.

6. ***'KEAN experts and research associates'*** refers to a range of paid individuals with scientific expertise who have committed to work with KEAN in our projects and programs in Greece and internationally.

7. ***'KEAN volunteers'*** refers to a range of persons who are working voluntarily in our project and programs and may come into contact with children as part of the program/project activities.

8. ***Social Service Manager (SSM)'*** α team member appointed by the Board to take responsibility for all aspects of the Safeguarding and Child Protection Policy and its implementation.

9. ***'External Staff'*** refers to a range of external experts, such as journalists, video reporters, etc. who work with KEAN in our projects and programs in Greece and internationally (involved in any activities with children).

B. Scope of the Child Protection Policy

The Child Protection Policy applies to all KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff who must comply with its requirements and understand the sanctions that may be applied for breaches of the policy. It is

intended that this policy will set a minimum global standard for all KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers, External Staff, Country (Greece) Offices and Offices abroad.

C. Principles

This policy is informed by a set of principles that are derived from the UNCRC and include the following:

1. All children have equal rights to be protected from abuse and exploitation.

2. Each child has a fundamental right to life, survival and development. KEAN's child-centred community development approach provides a basis for ensuring the realisation of children's rights to be protected from harmful influences, abuse and exploitation.

3. All children should be encouraged to fulfil their potential, and inequality and discrimination should be challenged.

4. Children will be assured the right to express their views freely and this will be given 'due weight' in accordance with their age and level of maturity. We will not discriminate against the child. The child will be treated with respect irrespective of gender, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual preference and gender identity, family, socio-economic and cultural background, or any history of conflict with the law.

5. All KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers, External Staff, Country (Greece) Offices and Offices abroad have a responsibility to support the care and protection of children.

6. The document for the CPP is posted online on the official page of KEAN, it will be attached to each project of KEAN that will involve children (also will be provided to all partners in each project), so that every child and family has access to it.

7. KEAN has particular responsibilities to children who come into contact with us. No child must come to harm as a result of their engagement with KEAN as a participant in

a KEAN program or as part of any KEAN awareness-raising or public campaign.

8. These particular responsibilities extend to those individuals or organisations, who are associated with KEAN. Therefore, **everyone** working for or associated with KEAN's work must be aware of and adhere to the provisions of this policy.

D. KEAN's vision for Child Protection

KEAN creates safe environments for children in all aspects of its work and program implementation, where children are respected, protected and empowered, as their capacities evolve to contribute actively to the development of Child protection measures within KEAN.

This policy aims to ensure that KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff as appropriate to their engagement with KEAN, are skilled, confident, understand, accept and are well supported in meeting their child protection responsibilities and engage positively with children and communities in ways that enhance the achievement of KEAN's overall program goals and commitments.

E. Responsibilities

Everyone who works with and engages with KEAN has a responsibility to ensure that all children are protected. The responsibilities detailed below are mandatory for those who fall within the scope of the policy.

KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff must:

1. Never abuse and/or exploit a child or act/behave in any way that places a child at risk of harm.

2. Inform the responsible services (Child Protection Department by region), when thy

receive a report of violence.

3. Document any information/ alert relating to abuse in a form and enter it in a common register. The information documented in the case is kept in strict confidence, which will be violated only if it is in the best interests of the child.

4. Report any child abuse and child protection concerns they have in accordance with applicable local office procedures and this policy.

5. Respond to a child who may have been abused or exploited in accordance with applicable local office procedures and this policy.

6. Cooperate fully and confidentially in any investigation of concerns or allegations of child abuse.

7. Contribute to building an environment where children are respected and encouraged to discuss their concerns and rights.

8. Always treat children in a manner which is respectful of their rights, integrity and dignity, considers their best interests and does not expose them to, or place them at risk of, harm. For example: when taking images/pictures during visits, interacting with children or generating stories of children, ensure that this is done in a manner consistent with the appropriate KEAN policies and procedures.

9. Never ask for or accept personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype etc) from any child or family associated or formerly associated with KEAN's work or share their own personal contact details with such individuals. [For KEAN Staff, the exception is where this has been **explicitly authorised** for business purposes in a manner which is in line with KEAN policies and procedures, has the consent of the child's parents or guardian and is supervised by the relevant line or supervising manager].

10. Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard KEAN policies and procedures and/or has the explicit consent of KEAN. Media include paper, photographs and social media.

11. Never make any contact with a child or family members associated with KEAN's work that is not supervised by a (or another) member of KEAN Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails and letters.

KEAN Staff should:

12. Comply with the behaviour detailed in KEAN's Code of Conduct.

13. All KEAN staff must ensure that, whilst engaged with KEAN, KEAN Experts and Research Associates sign up to either KEAN's Code of Conduct or to guidance on appropriate behaviour towards children that is appropriate to their engagement with KEAN and is developed by a KEAN employee using the Code of Conduct as a guide.

14. All KEAN staff must ensure that KEAN employees who have reported Child protection concerns or are accused of Child abuse are given appropriate care, support and protection in dealing with all aspects of the case including any safety concerns and potential reprisals which may arise from the incident or from the reporting of such concerns.

F. Incident identification and reporting guidelines

The guidance provides the framework and mechanism for incident identification and reporting. The way to remember the procedure for Child Protection incidents, suspicions, concerns or disclosures is the 5R's: Recognise, Respond, Record, Report, and Refer.

Recognise

Child abuse occurs when adults inflict or fail to stop physical, psychological or other harm occurring to children. Abuse can be categorised as:

Emotional Abuse: It is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children, or preventing the

child participating in normal social interaction. Also, it may involve the child seeing or hearing the ill-treatment of another, or causing children to frequently feel frightened or in danger, or the exploitation or corruption of children.

Physical Abuse: It may involve hitting, poisoning, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child, including by fabricating the symptoms of, or deliberately causing illness in a child.

Sexual Abuse: It involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways

Neglect: It is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's health or development, such as failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child Sexual Exploitation: It is a type of sexual abuse in which children are exploited for money, power or status.

These can occur individually or together, and the perpetrator of abuse is most often someone known to the child, for example, a member of school staff or a family member.

If anyone hears, or suspects, that a child is being abused or is at risk of being abused, even if the truth of the disclosure is uncertain, he/she must respond in accordance with these procedures and report it to the Social Service Manager.

Respond

For disclosures or allegations, the person reporting the abuse should not be interrogated at first, but what they have to say is accepted, and reassurance that the person reporting the abuse has done the right thing should be offered.

Record

Careful notes of what was said by both the Social Service Manager and the person reporting should be kept. Recording should be kept factual, with no reference to subjective opinions.

Report

All KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff should report any incident within 24 hours of the initial suspicion or disclosure. It is the duty of any member of KEAN team who finds out about a possible case of abuse to report it to the Social Service Manager. It is not a person's duty to decide whether or not a suspicion or allegation is true.

Refer

With the exception of when a child is in immediate danger when the emergency services must be contacted, it is the Social Service Manager's responsibility to act immediately on receipt of a report, and definitely within 24 hours of receiving it. Referrals should be made in line with the relevant law and guidance in the country in which the abuse is said to have taken place. In addition, if the potential abuser is employed by an organization registered in another country, it may be necessary to inform the authorities in that country as well. Any allegation involving a Greek national (whether it occurred in this country or overseas) should be reported to the Greek police.

G. Implementation, Monitoring and Sanctions

The Board of KEAN is accountable for this policy and responsible for its implementation.
The Social Services Manager is responsible for the implementation of CPP and the person in charge of the communication with children, parents and their legal representatives.
If the person who reports seeks information for additional support and consultation, the social service manager is responsible for providing guidelines and contacts.

The monitoring of adherence to this policy is made through the **mandatory** tracking of the Child Protection Policy Implementation Standards and KEAN's Code of Conduct by all

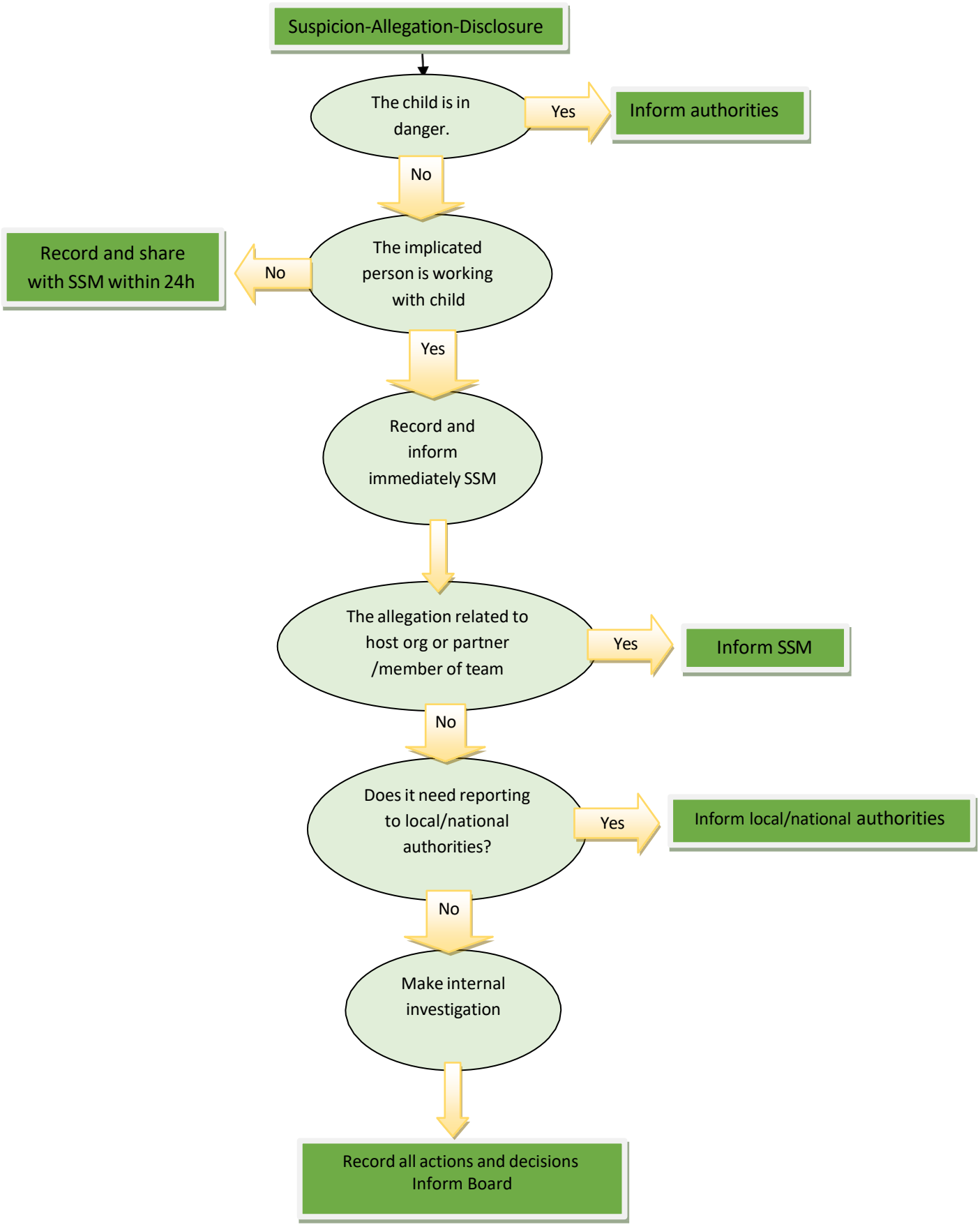
parts of KEAN.

Breaches of this policy and failure to comply with these responsibilities may incur the following sanctions**:**

- For KEAN Staff - disciplinary action leading to possible dismissal.
- For KEAN Experts and Research Associates, Volunteers and External Staff - up to and including termination of all relations including contractual and partnership agreements with KEAN.
- Where relevant - appropriate legal or other such actions.

Where concerns exist about the conduct of KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff in relation to Child protection and/or where there has been a breach of the Child Protection Policy, this will be investigated under this policy by consideration of referral to statutory authorities for criminal investigation under the law of the country in which they work; and/or by KEAN in accordance with disciplinary procedures. This may result in disciplinary action for KEAN Staff.

Child Protection Reporting Process



H. Selection and Training of Staff

When there is a vacancy in KEAN, an advertisement and/or a call is published, containing a description of the organisation, a job description, selection criteria and necessary documents.

• Selection by documents - CV, cover letter, recommendations and certificates, and criminal record certificate.

• After the selection by documents, the selected candidates are invited for an interview. The interview includes questions aimed at exploring the candidate's professional experience and his/her experience in communicating with children.

• The selected candidate is provided with a copy of the Child protection policy and he/she signs a declaration certifying that he/she has read, understood and undertaken to comply with it.

• Each newly appointed staff member undergoes training in a pre-designed program, which aims to acquaint him/her with the vision, goals and organisation of work in the association, as well as policies and procedures regarding child protection.

• Each employee also receives continuing training for recognising the signs of violence and taking measures to protect children.

• When the organisation involves volunteers, applicants participate in the same procedure.

• The members of the Board of Managers and the General Assembly of the association are promptly informed about the policy of Opportunity and Protection Association in relation to child protection. They receive a copy of the Child protection policy and sign a declaration certifying that they have read, understood and undertaken to comply with it.

• Individuals employed as independent contractors receive a copy of the Child protection policy and sign a declaration certifying that they have read, understood and will comply with it.

I. Personal Conduct

KEAN does not dictate the belief and value systems by which KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this policy will be considered a violation of this policy.

KEAN Staff, KEAN Experts and Research Associates, KEAN volunteers and External Staff are required to bear in mind the principles of the Child Protection Policy, and heighten their awareness of how their behaviour may be perceived both at work and outside work.

F. General Data Protection Regulation policy

All children data (such as names, addresses, CVs, etc.) will be processed pursuant to Regulation (EC) No 45/2001 on the protection of individuals with regard to the processing of personal data by the EU institutions and bodies and on the free movement of such data. Any personal data requested will only be used for the intended purpose, i.e. the processing of data in accordance with the specifications of the project requirements, the management of the administrative and financial aspects of the project if eligible and the dissemination of results through appropriate EU tools.

All sensitive data (psychological evaluation, social history, medical history etc) are kept in a safe space, protected by password in case of digital data and locked in case of physical information (such as medical examinations). Sensitive data of children (including pictures, videos, and interviews) are collected ONLY with informed consent of children, their parents or legal guardians. The data will be collected following all will be protected and will not be published without their informed consent.

This policy has been reviewed and approved by:

Stavros Milionis (signed):

President of Management Board of NGO KEAN