

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		B: CONFIDENTIAL	Page
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

Child Protection Policy



DIMITRA Educational Consulting, S.A.

170 Farsalon Street, 41335 Larissa

Tel: 2410-554026

Web: www.dimitra.gr , E-mail: contact@dimitra.gr

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	2 / 15
	B: CONFIDENTIAL		
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

Table of Contents

1	Company Information.....	4
2	The DIMITRA Organization	4
3	Commitment and Institutional Framework.....	4
3.1	International and European Context	4
3.2	National Framework	5
4	Purpose and Scope	5
5	Basic Principles	6
6	Definitions and Types of Injury.....	6
6.1	Definitions.....	6
6.2	Types of Harm.....	7
7	Code of Ethics	7
7.1	Obligations	7
7.2	Prohibitions.....	7
8	Digital Security, Images, and Personal Data	8
8.1	Photos and Videos	8
8.2	Online Education and Communication	8
8.3	Personal Data	8
9	Selection and Supervision of Staff and Contractors	8
10	Training and Awareness.....	9
11	Child Protection Officer (CPO)	9
12	Incident reporting and management procedures	10
12.1	Management steps	10
12.2	When a child discloses abuse.....	10
12.3	Confidentiality and Protection of the Reporter	11
13	Disciplinary Consequences	11
14	Informing Service Recipients and Parents	11
15	Integration into the Integrated Management System (ISO)	12
16	Implementation, monitoring, and review	12
16.1	Useful Helplines	12

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	3 / 15
B: CONFIDENTIAL			
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

17	CHANGE LOG.....	13
	Appendix A – Statement of Commitment	14
	Appendix B – Concern Reporting Form (Confidential)	15

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		B: CONFIDENTIAL	Page
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

1 Company Information

Company - Appendix:	DIMITRA Education and Consulting S.A.
Employer Information – Legal Representative	
LAST NAME	PITSOULIS
FIRST NAME	NIKOLAOS
FATHER'S FIRST NAME	GEORGIOS
Tax ID	042246493
Tax Office	LARISSA
ADDRESS	170 Farsalon Street, 41335 Larissa

2 The DIMITRA Organization

DIMITRA Education and Consulting, S.A. (hereinafter “DIMITRA” or “the Organization”) is active in education, training, research, and transnational cooperation, with the aim of contributing to the development of the country’s social, economic, and cultural levels. It has its headquarters in Larissa and branch offices in Athens, Thessaloniki, Volos, and Trikala.

As part of its activities, DIMITRA Educational Consulting S.A. may come into contact with minors, particularly through:

- post-secondary education (SAEK DIMITRA), where students under the age of 18 may be enrolled
- European projects (e.g., Erasmus+), youth exchanges, mobility programs, and transnational initiatives
- national projects, workshops, events, school visits, and career guidance activities
- online education (e-learning platform) and social media.

This Policy expresses the Administration’s commitment to ensuring that every child participating in the Organization’s activities is in a safe, respectful, and non-discriminatory environment.

3 Commitment and Institutional Framework

DIMITRA Educational Consulting S.A. is committed to respecting, protecting, and promoting the rights of every child who participates in its activities, with zero tolerance for any form of abuse, neglect, or exploitation. This Policy is based on the following documents.

3.1 International and European Framework

- UN Convention on the Rights of the Child (CRC, ratified by Law 2101/1992) and General Comments of the Committee on the Rights of the Child;

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
	B: CONFIDENTIAL		Page
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

- European Convention on Human Rights and the Charter of Fundamental Rights of the EU (Article 24);
- Council of Europe Convention on the 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;
- General Data Protection Regulation (EU) 2016/679 (GDPR);
- International Child Safeguarding Standards (Keeping Children Safe) and the safeguarding requirements of European funding programs (e.g., Erasmus+).

3.2 National Framework

- Constitution, Article 21 (protection of childhood);
- Law No. 4837/2021 “Prevention and Response to Cases of Abuse and Neglect of Minors”;
- Law 4267/2014 on combating sexual abuse and exploitation of children;
- the Penal Code (Law No. 4619/2019) and Law No. 3500/2006 on domestic violence;
- Law No. 4624/2019 on the protection of personal data;
- Law No. 4808/2021 and Presidential Decree No. 62/2025 on the elimination of violence and harassment in the workplace.

Law No. 4837/2021 imposes explicit obligations on “Child Protection Agencies” (e.g., daycare centers, K.D.A.P., summer camps, care facilities), as defined in Article 3. DIMITRA as an educational organization, **voluntarily** adopts the same standards (Child Protection Officer, criminal background checks, recording and forwarding of reports) as a minimum level of protection.

4 Purpose and Scope

The purpose of this Policy is to prevent any harm to children during the activities of DIMITRA and to ensure an immediate and appropriate response when concerns arise. Through this Policy, the Organization:

- recognizes every child’s right to safety and protection;
- establishes clear rules of conduct and reporting procedures;
- ensures that every adult acting on its behalf operates transparently and in the best interests of the child.

This Policy applies to **all individuals** who collaborate with DIMITRA, regardless of their relationship to the organization: members of the Board of Directors, administrative staff, trainers and instructors, consultants, volunteers, interns, external collaborators, suppliers, project partners, and visitors. It covers all facilities (Larissa, Athens, Thessaloniki, Volos, Trikala), activities held off-site and abroad, as well as all online communication.

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2022
		Page	6 / 15
	B: CONFIDENTIAL		
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

5 Basic Principles

- α) **Equal treatment.** Rights apply to every child without discrimination based on race, color, gender, language, religion, beliefs, national or social origin, property, disability, sexual orientation, gender identity, or any other status of the child or their parents.
- β) **The best interests of the child.** In every decision concerning a child, the child's best interests are the primary consideration, taking into account the child's age, maturity, family situation, and environment.
- γ) **Right to life and development.** Protection from violence, abuse, exploitation, and neglect, and support for physical, mental, spiritual, and social development.
- δ) **Right to be heard.** Children are informed in a manner appropriate to their age and freely express their views on any matter that concerns them.
- ε) **The “do no harm” principle.** The Organization plans every action to minimize unintended risks to children.
- στ) **Prevention through risk assessment.** Every activity involving minors is assessed in advance for risks, in accordance with the risk management process of the Integrated Management System.
- ζ) **Transparency and accountability.** Every concern is addressed seriously, in a well-documented manner, and without cover-ups.
- η) **Privacy and confidentiality.** Children's data is protected in accordance with the GDPR and the ISO/IEC 27001 and 27701 standards implemented by the Organization.

6 Definitions and Types of Harm

6.1 Definitions

Term	Definition
Child / Minor	Any person under the age of 18 (Article 1 of the CRC).
Youth	Persons aged 15–29, according to the terminology of European youth programs; those under 18 are fully covered by the Policy.
Vulnerable adult	An adult who, due to a disability, illness, or other circumstances, is unable to protect themselves; the Policy applies on a pro rata basis.
Unaccompanied child	A child without parents or another adult who is legally responsible for the child.
Child abuse	Any form of physical or emotional abuse, sexual abuse, neglect, or exploitation (Article 3 of Law 4837/2021).
Child Protection Officer (CPO)	The person designated by Management to coordinate the Policy and handle reports.

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2022 6
		Page	7 / 15
	B: CONFIDENTIAL		
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

6.2 Types of Harm

- **Physical abuse:** any act that causes or may cause physical harm.
- **Sexual abuse:** the involvement of a child in sexual activity, with or without physical contact, including exposure to sexual material.
- **Sexual exploitation:** sexual abuse in exchange for something (money, gifts, shelter, affection, status), usually through manipulation and an imbalance of power.
- **Emotional abuse:** systematic belittling, intimidation, threats, ridicule, isolation, discrimination, or rejection.
- **Bullying and online harm:** school bullying, cyberbullying, online grooming, and the dissemination of personal images.
- **Neglect:** failure to meet basic needs for safety, health, education, or emotional care.
- **Economic exploitation:** the use of a child in work or activities for the benefit of third parties and to the detriment of the child's health, education, or development, including the improper use of students under the age of 18 in internships.

7 Code of Conduct

Every person within the scope of application must sign the Code prior to any contact with minors (Appendix A).

7.1 Obligations

- Comply with Greek, European, and international legislation on child protection, as well as the legislation of each country where an activity is carried out;
- treat every child with respect, as an equal, and within professional boundaries;
- inform children of their rights and where they can turn for help (Ministry of Children and Youth, helplines);
- apply the **two-adult** rule: every activity involving minors is supervised by at least two adults, preferably of different genders, who are visible and present;
- ensure that any physical contact is necessary, appropriate, and culturally acceptable;
- obtain written consent from a parent or guardian for a minor's participation in activities, travel, lodging, or mobility abroad;
- conduct classes in open or visible spaces (e.g., a glass-paned or open door);
- **immediately** report any concerns, suspicions, or complaints to the Ministry of Education (Section 12);
- cooperate with any internal or public investigation.

7.2 Prohibitions

- Remaining alone with a minor in a secluded area or out of sight of others;
- transporting a minor in their personal vehicle or hosting them in their home;
- to communicate with minors outside the Organization's official channels (e.g., private messages, personal social media profiles);

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	8 / 15
	B: CONFIDENTIAL		ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017

- meet with minors outside the Organization's facilities or activities;
- use physical punishment, humiliating language, threats, or intimidation;
- show favoritism or discriminate;
- expose minors to dangerous conditions, alcohol, tobacco, drugs, or inappropriate content;
- give or receive gifts, money, or favors from minors or their families (in accordance with the Anti-Bribery Policy – ISO 37001);
- photograph or videotape minors with personal devices;
- violate children's rights in any way.

8 Digital Security, Images, and Personal Data

8.1 Photos and Videos

- Before any recording, the child's consent and the **written** consent of the parent or guardian must be obtained, with a clear statement of the purpose and the means of publication (website, social media, project publications).
- Consent may be revoked at any time, and the material will be removed without delay.
- The images depict the children with dignity, fully clothed, and in an age-appropriate setting.
- No names, addresses, schools, or other information that could identify the child is published.
- Photographs are taken only with the Agency's equipment; the material is stored in a secure location with restricted access.

8.2 Online Education and Communication

- Communication with minors takes place exclusively through the Organization's corporate accounts and e-learning platform, with notification to a second adult or parent whenever possible.
- Online classes with minors are not conducted on a one-on-one basis without notifying the parent; recording is permitted only with prior consent.
- Students are educated on safe internet use, cyberbullying, and how to report harmful content.

8.3 Personal Data

Data concerning minors is processed in accordance with the GDPR, Law 4624/2019, and the Organization's Privacy Policy. The principles of data minimization and restricted access are applied, and report files (Section 12) constitute **a special category** subject to the strictest security measures of the Information Security Management System (ISO/IEC 27001 and 27701).

9 Selection and Screening of Staff and Contractors

No one is permitted to have contact with minors until the following steps have been completed:

- α) **Statement of Commitment:** signing of the Policy and Code of Conduct (Appendix A).
- β) **A copy of the criminal record** (general use) for those who come into direct or regular contact with minors, and **a sworn statement** that they have not been convicted of offenses against minors,

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	9 / 15
	B: CONFIDENTIAL		ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017

sexual offenses, domestic violence, human trafficking, or drug trafficking (in accordance with Article 7 of Law 4837/2021). The copy must be renewed every **2 years**.

- γ) **An interview** that includes questions regarding child protection and the candidate's understanding of the Policy.
- δ) **Recommendations** from previous employers for positions involving contact with minors.
- ε) Inclusion of the Policy in **job postings, employment contracts, and project contracts**.

Partners and suppliers: Every contract or memorandum of understanding for activities involving minors includes a clause requiring compliance with the Policy (or with an equivalent policy of the partner), minimum safeguards, and the right to terminate the contract in the event of a violation. Compliance is assessed as part of the supplier evaluation process under the Integrated Management System.

Criminal record data is processed solely for this purpose, by an authorized person, and is deleted as soon as it is no longer needed, in accordance with the GDPR.

10 Training and Awareness

Every new staff member or partner who comes into contact with minors receives introductory training on the Policy **within 3 weeks** of assuming their duties and, in any case, before their first activity with minors. The training covers:

- the Code of Conduct and professional boundaries;
- recognizing signs of abuse, neglect, and online harm;
- the proper way to listen to a child who discloses abuse;
- the reporting process and the role of the YPA;
- the safe handling of information and images involving children;
- support services for children and families.

Annual refresher training follows. Participation is recorded in the staff training records of the Integrated Management System (ISO 9001 / ISO 21001), and its effectiveness is evaluated.

11 Child Protection Officer (CPO)

Management appoints a **Child Protection Officer** and a deputy, preferably with a background in psychology, social work, or education. Each branch designates a local contact person who reports to the CPO. The CPO:

- promotes the implementation of the Policy in all units;
- receives, records, and evaluates every report;
- promptly forwards incidents to the competent Juvenile Prosecutor or the police and simultaneously informs Management;
- advises staff on safety issues;
- coordinates training and updates training materials;
- participates in risk assessments for activities involving minors;
- submits **an annual report** to management, which serves as input for management's review.

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	10 / 15
	B: CONFIDENTIAL		ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017

Child Protection Officer	Eleftherios Moschis
Email	moschis@dimitra.gr
Phone	2410 554026 (headquarters, Larissa)

The YPA's contact information is posted in a prominent location at each facility and on the website.

12 Incident Reporting and Management Procedures

Any person who observes, suspects, or is informed that a child is at risk **is required to immediately notify the YPA** on the same day. Certainty is not required; reasonable concern is sufficient. This applies when:

- a child discloses abuse or gives cause for suspicion regarding themselves or another child;
- a parent or other adult expresses concern;
- there is a suspicion that a staff member or partner is harming a child;
- signs of harm are observed, either inside or outside the Organization.

In case of immediate danger: first call **100** (Police) or **166** (EKAV) / **112**, and then notify the YPA.

12.1 Management Steps

- α) **Immediate safety and care:** Remove the child from danger and provide medical or psychosocial support as needed.
- β) **Submit a written report** to the YPA within 24 hours, using the form in Appendix B.
- γ) **Assessment** by the YPA with objectivity and speed; the YPA does not conduct an investigation—that is the responsibility of the authorities.
- δ) **Referral to the authorities:** in every case of suspected abuse, the YPA forwards the report to the competent **Juvenile Prosecutor** or the nearest police authority, and, if necessary, to the municipality's Social Services, while simultaneously informing the Administration.
- ε) **Notification of parents/guardians**, unless this would endanger the child or the investigation (e.g., when the suspect is a family member); in such cases, the competent authorities shall decide.
- στ) **Action plan** by Administration and the Ministry of Education: protective measures, temporary removal of the staff member involved from contact with minors, disciplinary measures, and support for the child.
- ζ) **Documentation and closure:** maintenance of a confidential file and recording of corrective actions (non-compliance and corrective action in accordance with ISO 9001).

12.2 When a Child Discloses Abuse

- Listen calmly, without showing shock or disbelief; allow time and, if necessary, provide an interpreter.
- Do not ask leading questions or “interrogate” the child.
- Reassure the child that it's not their fault and that they did the right thing by speaking up.

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	11 / 15
	B: CONFIDENTIAL		
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

- **Do not promise secrecy:** explain that you need to talk to someone who can help.
- Write down as soon as possible, in the child's own words, everything that was said, when, and where.
- Keep the child informed, as much as possible, about the next steps and the reasons behind them.

12.3 Confidentiality and Protection of the Reporter

Information is shared only with those who need to know. Anyone who reports a concern in good faith is protected from retaliation, even if the concern is not confirmed, in accordance with the Organization's Policy on Combating Violence and Harassment and on the Management of Internal Complaints. Knowingly false reports are subject to disciplinary action.

13 Disciplinary Consequences

Any violation of the Policy is investigated internally and, where a criminal offense is established, referred to the competent authorities. Internal procedures neither suspend nor replace criminal proceedings.

Category	Possible Measures
Staff (employees, instructors)	Temporary removal from duties involving minors, disciplinary measures up to and including termination of the employment contract
Volunteers, interns	Immediate termination of the working relationship
External collaborators, suppliers, partners	Termination of contract or collaboration agreement; exclusion from future collaborations

In the event of termination of collaboration due to a serious violation, DIMITRA may, in accordance with data protection laws, notify entities requesting references, as well as the partners and funders of the relevant project (e.g., National Erasmus+ Unit / IKY).

14 Notification of Beneficiaries and Parents

DIMITRA Educational Consulting S.A. informs minor students, participants, and their parents/guardians about the Policy in a manner appropriate to their age, language, and cultural background, by:

- posting the Policy on the website, alongside the Organization's other policies;
- a child-friendly summary (poster or brochure) at each facility;
- providing information during registration or at the start of each activity, explaining the role of the Ombudsman and how to file a complaint;
- an informational note to parents included with the consent form.

Children may raise concerns or file complaints verbally, in writing, or electronically, and either by name or anonymously.

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	12 / 15
B: CONFIDENTIAL			
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

15 Integration into the Integrated Management System (ISO)

This Policy is part of DIMITRA's Integrated Management System (IMS), as described in the Quality, Information Security, and Business Continuity Policy. The link to each standard:

Standard	Link to the Policy
ISO 21001 (Educational Organizations)	Safe learning environment, attention to the needs of vulnerable learners, complaint management
ISO 29993 (Non-formal and informal learning services)	Informing learners and parents, appropriate staff, safe delivery of training
ISO 9001:2015 (Quality)	Risk assessment, nonconformities and corrective actions, supplier evaluation, management review
ISO/IEC 27001:2022 (Information Security)	Access control to report files, pre-employment and on-the-job security checks for personnel
ISO/IEC 27701:2019 (Privacy)	Lawful processing of minors' data, consent, images
ISO 22301:2019 (Business Continuity)	Continuation of protection and communication with the Data Protection Officer during a crisis
ISO 37001 (Anti-Bribery)	Prohibition of gifts and kickbacks, thorough vetting of business partners, protection of whistleblowers

Compliance with the Policy is verified during **internal audits** conducted by the Internal Audit Department, and the Head of the Internal Audit Department collaborates with the Compliance Officer. Key indicators: percentage of staff with a signed declaration and a valid criminal record check, percentage of trained staff, number of reports and time taken to forward them, actions involving minors with a comprehensive risk assessment.

16 Implementation, Monitoring, and Review

DIMITRA's Management bears ultimate responsibility for the implementation of this Policy. The Policy is reviewed by Management in collaboration with the Data Protection Officer at least **every 2 years**, as well as following any serious incident, change in legislation, or new activity involving minors.

16.1 Useful Helplines

Service	Phone
European emergency number	112
Greek Police	100
National SOS Hotline for Children (The Smile of the Child)	1056
European Helpline for Children and Adolescents	116111

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
			Page
B: CONFIDENTIAL			13 / 15
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

Service	Phone
European Hotline for Missing Children	116000
EKKA Social Assistance Hotline	197
Cybercrime Division	11188
Ombudsman – Children’s Rights Division	800 11 32000

These numbers are verified with each revision of the Policy.

For information regarding this Policy: contact@dimitra.gr

17 CHANGE LOG

Version No.	Date of Issue	Changes and Updates from the Previous Version
1.0	October 29, 2026	First Edition – Effective

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		B: CONFIDENTIAL	Page
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

Appendix A – Statement of Commitment

I, the undersigned, _____, in my capacity as _____ (employee / instructor / volunteer / intern / external collaborator / partner), hereby declare that:

- ☐ I have received, read, and understood the Policy on the Protection of Minors and the Code of Ethics of DIMITRA Education and Consulting S.A.
- ☐ I commit to complying with them in every activity involving minors;
- ☐ I have not been convicted of any offense against minors or sexual freedom, and I am not aware of any reason that would render me unsuitable to work with children;
- ☐ I will immediately notify the Organization of any changes to the above;
- ☐ I am aware that any violation may result in termination of my employment and referral to the appropriate authorities.

Date: _____

Signature: _____

	Child Protection Policy	Code	PPA
		Version	1.0
		Date	10/29/2026
		Page	15 / 15
B: CONFIDENTIAL			
ISO 9001:2015 ISO/IEC 27001:2022 ISO/IEC 27701:2019 ISO 22301:2019 ISO 21001:2021 ISO 29993:2019 ISO 37001:2017			

Appendix B – Concern Reporting Form (Confidential)

Field	To be completed
Full name and title of the reporter	
Reporter's phone number / email	
Relationship to the child	
Child's information (name, age, gender, program/class)	
Date, time, and location of the incident	
When and how the incident came to light	
Description (facts, the child's exact words)	
Reporter's observations (signs, behavior)	
People involved / witnesses	
Actions already taken (e.g., calling 100/166)	
Date of receipt by the YPA	
Forwarded to the District Attorney / Police (date, ref. no.)	

The form is submitted only to the YPA and is kept in a secure file with restricted access.