



Child Protection Policy of the Civil Non-Profit Company Homo Digitalis

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A.Introduction

Homo Digitalis focuses its efforts on promoting and defending Human Rights in the modern digital age in Greece, through three pillars of action: a) Awareness-raising, b) Policy co-creation, and c) Strategic legal interventions.

Through our activities, we aim to strengthen the protection of fundamental rights and freedoms for all people—both in the digital and physical world—particularly when new technologies are used by private or public actors.

Indicatively, Homo Digitalis has previously been involved in cases and initiatives related to a wide spectrum of digital rights, such as respect for privacy, protection of personal data, intellectual property, freedom of expression and access to information, non-discrimination, the right to assembly, cybersecurity, net neutrality, free/open-source software, and competition law, among others.

While implementing actions under the above pillars, Homo Digitalis representatives may come into contact with children. This policy defines the framework and procedures that safeguard the protection and best interests of children and prevent the risk of exposing them to any form of abuse.

B.Terms

-**"Bullying"**: Intentionally harmful and typically repetitive behavior over a period of time, where it is difficult for the victims to defend themselves. It may take many forms, including physical harm (e.g.,



hitting, theft), verbal abuse (e.g., racist or homophobic remarks, threats, name-calling), and emotional abuse (e.g., peer group exclusion).

- "Child": Any person under the age of 18 (as defined by the UN Convention on the Rights of the Child), regardless of whether national laws recognize adulthood at an earlier age. The terms *child* and *minor* are used interchangeably. This definition also includes *unaccompanied minors*, meaning children who arrive in Greece without an adult responsible for their care under Greek law or who become unaccompanied after arrival.

- "Child abuse": All forms of physical or emotional mistreatment, sexual abuse, neglect, negligent treatment, or exploitation for commercial or other purposes.

- "Child protection": Protecting children from violence, abuse, neglect, abandonment, and exploitation—both within and outside the family—and promoting their rights, in accordance with the Greek Constitution, the EU Charter of Fundamental Rights, the UNCRC (ratified by Law 2101/1992), and the International Covenant on Civil and Political Rights (ratified by Law 2462/1997).

- "Commercial exploitation": The exploitation of a child in labor or other activities for the benefit of third parties, with damage to the child's physical or mental health, education, or moral and socio-emotional development.

- "Contact with children":

- *Direct contact* refers to physical interaction and face-to-face communication with children.
- *Indirect contact* includes access to children's information and personal data, such as case files, names, addresses, photographs, family background, religious habits, or beliefs.

- "Neglect": Persistent failure to meet a child's basic physical and/or psychological needs, which may result in serious harm to their physical or mental development.



-**"Physical abuse"**: Actual or suspected physical injury inflicted by another person, whether adult or child. Includes hitting, shaking, poisoning, suffocating, or burning. It may also involve fabricating symptoms or inducing illness in a child.

-**"Psychological/emotional abuse"**: Persistent emotional maltreatment causing severe and lasting effects on a child's development. Includes conveying to a child that they are worthless, unloved, inadequate, or only valued when meeting others' needs, and setting inappropriate expectations. It may also involve frightening or corrupting children. Emotional abuse is present in all types of abuse, even if not the primary form.

-**"Sexual abuse"**: Forcing or encouraging a child to take part in sexual activities they do not fully understand and cannot consent to. This may include rape, oral sex, penetrative or non-penetrative acts (e.g., masturbation, kissing, touching), exposing children to sexual images or content, and encouraging sexually inappropriate behavior.

C.Purpose

This policy aims to protect the rights and best interests of children who participate in activities related to Homo Digitalis' three areas of operation.

Specifically, it sets out obligations for all personnel involved with Homo Digitalis—such as permanent staff, external collaborators, and volunteers—who may have direct or indirect contact with children during the organization's projects and programs.

D.Code of Ethics & Conduct

Homo Digitalis aligns itself with the four core principles of the United Nations Convention on the Rights of the Child and ensures respect for all children's rights, as interpreted by the UN Committee on the Rights of the Child. These principles are:



1. The best interests of the child must be a primary consideration.
2. The right to life and survival must be protected.
3. Children's opinions must be heard and respected on all matters affecting them.
4. Children must be protected and cared for at all times in every appropriate way.

The organization also adheres to the Council of Europe's Strategy for the Rights of the Child (2022–2027), which addresses modern challenges and the special needs of children. This strategy is based on six priority areas:

1. Protection from all forms of violence.
2. Equal opportunities and social inclusion for all children.
3. Safe access to and use of digital technologies.
4. Child-friendly justice.
5. The right of the child to be heard.
6. Protection of children's rights during crises or emergencies.

Within this framework, all Homo Digitalis representatives are bound to comply with the organization's Child Protection Policy and uphold the following principles:

(1) Respect and Equality Without Discrimination:

All children will be treated with absolute respect regardless of race, color, gender, language, religion, beliefs, origin, economic status, health, disability, or other characteristics. Discrimination, humiliation, and emotional abuse are strictly prohibited. Cultural differences will be respected, and no personal ideologies will be imposed.

(2) Privacy and Data Protection: Children's privacy and personal data are to be fully respected. Special care must be taken during data processing, especially as children may not be fully aware of the risks. All data handling complies with the EU GDPR (2016/679) and Greek Law 4624/2019. Anonymity is prioritized using appropriate technical and organizational safeguards.

(3)Immediate Response to Abuse or Policy Breaches:

All incidents or concerns regarding abuse or policy violations—whether legal or ethical—must be reported immediately. No information shall be concealed or overlooked. All necessary legal actions will be taken if child exploitation or abuse is suspected.

(4)Care, Protection & Empowerment: All actions will aim at promoting a child’s best interests, ensuring a safe and supportive environment, and providing access to high-quality educational materials on digital rights. All efforts will be made to protect children from any form of bullying, exploitation, neglect, or abuse.

(5)Active Participation: Children are encouraged to participate actively in awareness-raising activities that concern them, with age-appropriate information and support. Creative, interactive methods—such as play and storytelling—are used to help them develop critical thinking and understand their rights in both digital and physical spaces.

E. Implementation Procedures

Ongoing monitoring of this policy is essential to prevent, detect, and respond to child protection risks. Two main mechanisms are in place:

(1)Prevention & Deterrence: All individuals representing Homo Digitalis in activities involving children undergo interviews focused on child protection to assess their awareness and competence. They also receive tailored training appropriate to their role. Employees sign contractual agreements, and volunteers sign a binding Declaration of Commitment (Annex A).

(2)Reporting & Response: The Board of Directors of Homo Digitalis is the designated authority responsible for implementing the Child Protection Policy. It monitors its application, collaborates with relevant authorities and partners, and maintains ongoing communication with those managing child-focused projects. In cases of reported abuse or neglect, it informs appropriate authorities and may propose removal of any accused person from relevant activities.



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The Board also safeguards all complaint records and manages the official reporting process (Annex B).

F. Sanctions – Consequences

Violation of this Child Protection Policy, including the intentional concealment, distortion, or falsification of complaint-related information, results in termination of cooperation with Homo Digitalis.



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ANNEX A – Declaration of Commitment to the Child Protection Policy

Homo Digitalis is committed to protecting children by all available means in any relevant awareness-raising activity. The Child Protection Policy, supervised by the Board of Directors, is attached and available on the organization's website.

By signing below, I declare that I accept and commit to upholding this Policy, ensuring the protection and anonymity of children, and respecting their rights and privacy during my involvement with Homo Digitalis activities. This declaration forms an integral part of my compliance with the Policy.

Location:

Date:

Name and Signature of Declarant:



ANNEX B – Reporting Procedure and Information

Homo Digitalis takes all child protection violations seriously. All concerns—regardless of source—are treated with respect and confidentiality. Priority and seriousness are given due to the vulnerable nature of children.

Anyone involved in Homo Digitalis activities, or any third party, must notify the Board of Directors **in writing** upon witnessing or receiving information about a violation of the Policy.

Reports can be submitted via:

- The contact form on the Homo Digitalis website, [available here](#),
- Email: info@homodigitalis.gr

Reports should include:

1. Reporter's identity and contact details,
2. Nature of the incident (e.g., risk, harm, abuse, neglect),
3. Time and place of occurrence,
4. Any additional relevant details.