CHILD PROTECTION POLICY (CPP)

Owned by: safeguarding@zelus.gr

Version: 1.0

Date: 02 October 2026

Document Type: Policy Document

Classification Level: Public

Disclaimer:

The contents of this document present the authors' view and are the copyright of ZELUS IKE (ZELUS). Any information contained therein may not be reproduced or copied without permission or license from the proprietor of that information, as listed in this document.

© Copyright ZELUS IKE, 2026

Executive Summary

This document outlines the Zelus' recognition of children's rights as well as the set of guidelines that define any company activities that may involve children.

Table of Contents

1. Preamble 3
1.1. Definitions 3
2. Purpose and Scope 4
3. ROLES AND RESPONSIBILITIES 5
4. SAFE RECRUITMENT, CODE OF CONDUCT AND TRAINING 5
4.1. Safe Recruitment and Vetting 5
4.2. Code of Conduct 6
4.3. Safeguarding Training and Awareness 7
5. CHILD SAFEGUARDING RISK ASSESSMENT AND PREVENTION 7
5.1. Risk Identification and Assessment 7
5.2. Risk Mitigation and Safe Activities 8
5.3. Informed Consent, Child Assent and Safe Participation 8
5.4. Privacy and Data Protection 9
6. REPORTING AND RESPONDING TO SAFEGUARDING CONCERNS 9
6.1. Reporting Safeguarding Concerns 9
6.2. Responding to Safeguarding Concerns 10
7. MONITORING, ACCOUNTABILITY AND POLICY REVIEW 10
7.1. Monitoring and Accountability 10
7.2. Policy Review and Accessibility 10
8. APPROVAL AND ENTRY INTO FORCE 11
9. Appendix 12

1. Preamble

This Policy is guided by the United Nations Convention on the Rights of the Child (UNCRC)[1], the European Convention on Human Rights[2] , the Charter of Fundamental Rights of the European Union[3], and the applicable international, European and national legal frameworks. It is further developed in accordance with the Keeping Children Safe International Child Safeguarding Standards[4], which provide a framework for safeguarding children through organisational policies, personnel responsibilities, procedures and accountability mechanisms.

At the core of this Policy is ZELUS's recognition that every child has the right to protection from all forms of violence, abuse, neglect, exploitation and discrimination, and to participate in activities that respect their dignity, safety, wellbeing and fundamental rights.

ZELUS adopts the following guiding principles:

- **Non-discrimination:** All children are entitled to equal protection, irrespective of their sex, gender, ethnicity, nationality, disability, religion, socioeconomic background, sexual orientation or any other personal characteristic.
- **Best interests of the child:** The best interests of the child shall be a primary consideration in all decisions and activities affecting children.
- **Right to life, survival and development:** ZELUS is committed to safeguarding children's physical and psychological safety, wellbeing and development in all its activities.
- **Respect for children's views:** Children shall be provided with age-appropriate opportunities to express their views, raise concerns and participate in decisions affecting them.
- **Do No Harm:** ZELUS is committed to identifying, preventing and minimising potential risks of harm to children arising from the conduct of its personnel, partners and associates, as well as from its operations, programmes and activities.

These principles shall guide the design, implementation, monitoring and evaluation of all ZELUS activities involving children.

1.1. Definitions

For the purposes of this Policy, the following definitions shall apply:

Child: Any person under the age of eighteen (18) years, in accordance with Article 1 of the United Nations Convention on the Rights of the Child (UNCRC).

Child Safeguarding: The responsibility of ZELUS to ensure that its personnel and associates , operations, programmes and activities do not expose children to harm, abuse or exploitation, and that any concerns regarding children's safety are appropriately identified, reported and addressed.

Child Protection: The measures and actions taken to prevent and respond to violence, abuse, neglect and exploitation affecting individual children who are at risk of, or have experienced, harm.

Harm: Any action or omission that adversely affects, or may adversely affect, a child's physical or psychological health, safety, dignity, wellbeing or development.

Child Abuse: Any form of physical, sexual or emotional abuse, neglect, negligent treatment or exploitation that causes or may cause harm to a child. This includes, but is not limited to:

[1] United Nations, *Convention on the Rights of the Child*, adopted on 20 November 1989, 1577 UNTS 3, available online here https://www.ohchr.org/sites/default/files/crc.pdf
[2] Council of Europe, *Convention for the Protection of Human Rights and Fundamental Freedoms* (European Convention on Human Rights), signed in Rome on 4 November 1950, ETS No. 5,
[3] *Charter of Fundamental Rights of the European Union*, OJ C 326, 26 October 2012, pp. 391–407, available online here https://www.europarl.europa.eu/charter/pdf/text_en.pdf
[4] Keeping Children Safe, International Child Safeguarding Standards, covering four standards: Policy, People, Procedures and Accountability, available online here https://www.keepingchildrensafe.global/wp-content/uploads/2024/08/KCS-ICS-Standards-EN-2024.pdf

- **Physical Abuse:** The actual or potential physical injury of a child resulting from deliberate acts or harmful treatment.
- **Sexual Abuse:** Involving a child in sexual activity that the child does not fully understand, cannot consent to, or that violates applicable laws.
- **Sexual Exploitation:** Any actual or attempted abuse of a child's vulnerability, unequal power or trust for sexual purposes.
- **Emotional or Psychological Abuse:** Persistent or serious behaviour that adversely affects a child's emotional wellbeing or development, including humiliation, intimidation, threats, rejection or discrimination.
- **Neglect:** The persistent or serious failure to meet a child's basic physical or psychological needs, where there is a responsibility to do so.
- **Exploitation:** The use of a child for another person's benefit, including commercial or other forms of exploitation that harm or threaten the child's wellbeing, dignity or development.

Safeguarding Concern: Any suspicion, allegation, disclosure, observation or incident indicating that a child has been harmed or may be at risk of harm, whether within or outside ZELUS's activities.

Informed Consent and Child Assent: The process through which parents or legal guardians provide informed consent, and children receive age-appropriate information and express their voluntary agreement (assent) to participate in an activity, taking into account their age and maturity.

2. Purpose and Scope

ZELUS is committed to safeguarding and promoting the rights, safety, dignity and wellbeing of all children who may come into contact with the organisation through its activities, operations, programmes and partnerships.

The purpose of this Child Protection Policy (hereinafter referred to as the “Policy”) is to establish a clear framework for preventing harm to children and child abuse, identifying and managing child safeguarding risks, and ensuring appropriate and timely responses to child safeguarding concerns arising in connection with ZELUS's activities.

ZELUS adopts a zero-tolerance approach to all forms of child abuse.

Any safeguarding concern, allegation or incident shall be taken seriously and addressed promptly and appropriately, in accordance with this Policy and applicable law.

This Policy applies to all ZELUS personnel, including members of management, employees, trainees, volunteers, consultants, external experts, contractors and other individuals acting on behalf of or representing the organisation, irrespective of their contractual relationship (collectively, “personnel and associates”).

It covers all activities, programmes and projects undertaken by ZELUS that involve or may affect children, whether implemented independently or in cooperation with third parties, including research, educational, training, communication and dissemination activities.

All persons covered by this Policy are required to comply with its principles, rules and procedures and to report any safeguarding concerns in accordance with the established reporting mechanisms.

The Policy applies to relevant conduct both within and outside the workplace, insofar as such conduct is connected with ZELUS's activities or raises concerns regarding an individual's suitability to work with or have contact with children.

3. ROLES AND RESPONSIBILITIES

Child safeguarding is a shared responsibility across ZELUS. All personnel and associates are required to comply with this Policy and contribute to a safe environment for children.

ZELUS Management has overall responsibility for the implementation and monitoring of this Policy, ensuring that appropriate safeguarding measures, resources and training are in place. Management shall designate a Child Safeguarding Focal Point .

Child Safeguarding Focal Point *(Policy Owner)* is responsible for providing guidance on safeguarding matters, receiving and coordinating responses to safeguarding concerns, maintaining confidential records and facilitating reporting or referrals to competent authorities, where required.

Personnel and Associates are required to comply with this Policy and the Code of Conduct, participate in relevant safeguarding training, identify and report safeguarding risks and concerns, and follow the established safeguarding procedures.

Partners and Collaborating Organisations: ZELUS shall ensure that appropriate child safeguarding requirements are communicated to collaborating organisations and, where relevant, incorporated into partnership or cooperation agreements. Such organisations shall be responsible for complying with the safeguarding commitments applicable to their involvement in ZELUS's activities.

4. SAFE RECRUITMENT, CODE OF CONDUCT AND TRAINING

4.1. Safe Recruitment and Vetting

ZELUS is committed to ensuring that individuals engaged in activities involving children are appropriately selected, screened and suitable for their assigned responsibilities.

Recruitment and selection procedures shall incorporate child safeguarding considerations, including:

- Verification of identity, qualifications, professional experience and references, as appropriate to the role.
- Assessment of candidates' suitability to work with children, including safeguarding-related questions during interviews, where relevant.
- Appropriate background checks, including criminal record checks where required or legally permitted, taking into account the nature of the role, the level of contact with children and the associated safeguarding risks.
- Communication of ZELUS's child safeguarding commitments during recruitment and inclusion of relevant safeguarding obligations in employment contracts or other engagement agreements.

All recruitment and vetting procedures shall comply with applicable Greek legislation and data protection requirements, including the GDPR.

4.2. Code of Conduct

ZELUS adopts the following Child Safeguarding Code of Conduct, which applies to all personnel and associates. All persons covered by this Policy are required to acknowledge and comply with these rules when engaging in activities involving children.

Personnel and associates **shall:**

1. Treat all children with dignity, respect and fairness, without discrimination.
2. Act in accordance with the "Do No Harm" principle by taking all reasonable measures to prevent harm to children and avoid exposing them to risks of harm, abuse, neglect or exploitation.
3. Maintain appropriate professional boundaries and ensure that interactions with children take place in safe and appropriate environments.
4. Avoid being alone with a child in isolated or unsupervised settings, unless necessary for legitimate professional or safeguarding purposes and appropriate safeguards are in place.
5. Use respectful, age-appropriate language and behaviour, avoiding any form of intimidation, humiliation, physical or psychological punishment or inappropriate physical contact.or inappropriate physical contact.
6. Maintain confidentiality and protect children's personal data and sensitive information, ensuring that such information is disclosed only to authorised persons on a need-to-know basis, in accordance with applicable data protection laws and safeguarding procedures
7. Respect children's privacy and refrain from taking, recording, publishing or sharing photographs, videos or personal information relating to children without prior appropriate authorisation, the necessary consent or other applicable legal basis, and compliance with relevant safeguarding and data protection requirements.
8. Communicate with children only through appropriate and authorised channels, strictly for purposes related to ZELUS activities.
9. Promote respectful behaviour among children and intervene appropriately in cases of bullying, harassment or other harmful conduct.
10. Promptly report any safeguarding concern, including suspected or actual abuse, exploitation or neglect, in accordance with the established reporting procedures.
11. Comply with and implement applicable safeguarding procedures, including risk assessment and the appropriate handling of safeguarding concerns, in accordance with their roles and responsibilities.

Personnel and associates **shall not:**

1. Engage in any form of physical, sexual or emotional abuse, harassment, exploitation or discriminatory behaviour towards children.
2. Engage in disrespectful, offensive or otherwise inappropriate behaviour towards children, including through words, gestures or actions, or conduct themselves in a manner that sets a negative example for children.
3. Use physical or psychological punishment, threats, degrading treatment or other abusive disciplinary practices.
4. Establish inappropriate personal, intimate or sexual relationships with children.
5. Involve children in ZELUS activities without obtaining the necessary informed consent from their parents or legal guardians, where required, and the children's age-appropriate assent.
6. Communicate privately with children through personal social media accounts or unauthorised communication channels, arrange unauthorised private meetings, or

transport or accompany children outside organised activities without appropriate authorisation and safeguarding measures.
7. Take, publish or share images or information about children without the required permissions or in a manner that could compromise their safety or privacy.
8. Abuse their position of trust or authority over children, including through manipulation, favouritism, inappropriate gifts or the pursuit of personal benefits.
9. Engage in any sexualised or sexually inappropriate behaviour towards children, including through verbal, physical or digital interactions.
10. Ignore, conceal or fail to report safeguarding concerns.

These standards apply to conduct within ZELUS's activities and to conduct outside the workplace, as specified in the Purpose and Scope section of this Policy. Any violation shall be addressed promptly and may result in contractual measures, including termination of engagement and reporting to competent authorities, where required by law.

4.3. Safeguarding Training and Awareness

ZELUS ensures that all personnel and associates receive appropriate information, guidance and training on child safeguarding, proportionate to their roles and responsibilities.

Those involved in activities with children receive safeguarding training before undertaking such responsibilities, followed by additional training whenever necessary.

Training covers, in particular, children's rights, recognition and prevention of abuse and safeguarding risks, appropriate behaviour towards children, reporting and responding to safeguarding concerns, confidentiality and data protection.

Children participating in ZELUS activities, as well as their parents or legal guardians, receive accessible and age-appropriate information about safeguarding measures, expected standards of behaviour and available channels for raising concerns or seeking assistance.

Appropriate records of safeguarding training and awareness activities are maintained.

5. CHILD SAFEGUARDING RISK ASSESSMENT AND PREVENTION

5.1. Risk Identification and Assessment

ZELUS adopts a preventive, risk-based approach to child safeguarding, guided by the “Do No Harm” principle. Every proposed activity, involving or potentially affecting children undergoes a documented safeguarding risk assessment. The assessment considers potential direct and indirect risks to children's safety, dignity, rights and wellbeing, taking into account the nature of the activity, the age and specific needs of the children concerned, physical and digital environments and other significant relevant factors.

The risk assessment process comprises the following steps:

1. Describe the activity and identify the children involved or potentially affected.
2. Identify potential hazards and situations of vulnerability.
3. Determine who may be harmed and how.
4. Assess the likelihood and severity of identified risks.
5. Establish appropriate mitigation measures and assign responsibility for their implementation.
6. Evaluate potential residual risks and determine whether the activity can proceed, requires modification or must be suspended.

7. Monitor the effectiveness of safeguards, document incidents and reassess risks whenever necessary.

Identified risks are classified as low, medium or high, based on their likelihood and potential impact. In particular:

- **Low:** Risks are unlikely to occur and have limited potential impact;
- **Medium:** Risks involve a credible likelihood of harm or potentially significant consequences;
- **High:** Risks involve a high likelihood of serious harm or an unacceptable threat to children's safety or wellbeing.

A low-risk classification does not imply the absence of risk. Activities presenting high residual safeguarding risks are suspended or modified until appropriate mitigation measures reduce the risk level to medium or low.

The person responsible for each activity maintains a documented risk register, monitors the implementation of safeguarding measures and ensures that assessments are reviewed and updated whenever circumstances change or new risks are identified.

5.2. Risk Mitigation and Safe Activities

ZELUS implements appropriate safeguarding measures to prevent or minimise identified risks and ensure that all activities involving children take place in safe and appropriately supervised environments.

Depending on the nature of the activity and the risks identified, these measures include:

- Appropriate supervision by suitably qualified and authorised personnel, taking into account the age, needs and number of participating children.
- Safe and accessible physical or online environments, with appropriate arrangements for access, supervision and communication.
- Clear procedures for managing interactions between adults and children, as well as between children themselves, including the prevention of bullying, harassment and other harmful behaviour.
- Additional safeguards for children who may be particularly vulnerable or require specific support.
- Appropriate arrangements for responding to emergencies, incidents or unexpected safeguarding risks.

ZELUS monitors the effectiveness of these measures throughout its activities and takes corrective action whenever new risks or concerns arise.

5.3. Informed Consent, Child Assent and Safe Participation

ZELUS ensures that children's participation in its activities is informed, voluntary, age-appropriate and respectful of their rights, dignity and evolving capacities.

Prior to participation, ZELUS provides children and their parents or legal guardians with clear and accessible information about the nature and purpose of the activity, the arrangements for participation and any relevant safeguarding measures.

Also, informed consent is obtained from parents or legal guardians, together with the child's age-appropriate assent, taking into account their age and maturity.

Children have the right to decline participation or withdraw from an activity at any time without adverse consequences. Their views, concerns and individual needs are respected throughout their participation.

No child is pressured, directly or indirectly, to disclose personal experiences of violence, abuse or trauma. Facilitators and other responsible personnel take appropriate measures to prevent and address bullying, emotional distress and harmful behaviour between children, ensuring that children can safely disengage from activities and access appropriate support or referral services where necessary.

5.4. Privacy and Data Protection

ZELUS respects children's privacy and protects their personal data in accordance with the General Data Protection Regulation (GDPR)[5] and applicable European and national legislation.

The processing of children's personal data is limited to what is necessary for specified, explicit and legitimate purposes and is carried out on an appropriate legal basis, in accordance with applicable data protection principles and safeguarding requirements. ZELUS applies appropriate data minimisation, access restrictions, secure storage and retention measures, and conducts a Data Protection Impact Assessment (DPIA) where required under applicable data protection legislation. The processing of special categories of personal data and data relating to criminal convictions or offences is subject to the specific legal requirements and safeguards applicable to such data.

Children and their parents or legal guardians receive clear, accessible and age-appropriate information about the collection and use of children's personal data, including photographs, videos and other identifiable material. Where consent is the applicable legal basis, it is obtained in accordance with relevant legal requirements and may be withdrawn at any time.

ZELUS applies appropriate technical and organisational measures to ensure the security and confidentiality of children's personal data and prevent unauthorised access, disclosure or misuse. Safeguarding records are maintained separately from general activity or project files, with access restricted to authorised persons on a need-to-know basis. Personal data may be disclosed to competent authorities or child protection services where legally required or permitted and necessary for safeguarding purposes. Any personal data breach is handled in accordance with applicable GDPR requirements and procedures.

The use and publication of children's photographs, videos and other media content, including on websites and social media, are subject to specific safeguarding precautions to prevent inappropriate representation, unauthorised dissemination, identification or location tracking. Where appropriate, measures such as blurring or masking children's faces and other identifying features are applied to prevent their identification. Identifiable images or information are published only where an appropriate legal basis exists, any required authorisation has been obtained, and publication is consistent with the child's safety, privacy and best interests.

6. REPORTING AND RESPONDING TO SAFEGUARDING CONCERNS

6.1. Reporting Safeguarding Concerns

ZELUS maintains clear, accessible, confidential and child-friendly channels for reporting safeguarding concerns. Any child, parent or legal guardian, personnel member, associate or third party may raise a concern verbally, in writing or through the designated safeguarding contact details.

[5] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), OJ L 119, 4 May 2016, pp. 1–88, available online here https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02016R0679-20160504

All personnel and associates are required to promptly report any suspected or actual abuse, neglect, exploitation or other harmful conduct involving children, whether occurring within ZELUS activities or otherwise coming to their attention in connection with their responsibilities.

Concerns are reported to the Child Safeguarding Focal Point or, where the Focal Point is unavailable or implicated, to the ZELUS management.

6.2. Responding to Safeguarding Concerns

ZELUS takes all safeguarding concerns seriously and responds promptly, prioritising the safety and best interests of the child.

Personnel receiving disclosures listen calmly and respectfully, avoid leading questions or unnecessary questioning, record the child's account as accurately as possible and promptly report the concern without conducting independent investigations.

Where a child faces immediate danger or requires urgent medical assistance, appropriate protective action is taken without delay, including contacting emergency services (112 European emergency number and 100 Greek Police emergency number)) or competent authorities.

The Child Safeguarding Focal Point assesses reported concerns and coordinates appropriate safeguarding measures, including referrals to competent authorities or child protection services where required or justified by the circumstances. Where a concern implicates ZELUS personnel or associates, appropriate precautionary measures are considered to protect the child, without prejudging the allegation. Where the concern involves the Focal Point, ZELUS management assumes responsibility for its handling, as appropriate.

All concerns, decisions, actions taken and referrals are securely documented in a restricted safeguarding incident log and handled confidentially, in accordance with Section 4.4 of this Policy. Information is shared only on a need-to-know basis and where legally permitted or required.

ZELUS cooperates with competent authorities and child protection services and ensures that internal procedures do not delay urgent protective action or legally required reporting. Safeguarding incidents are reviewed to identify necessary improvements to its safeguarding practices.

7. MONITORING, ACCOUNTABILITY AND POLICY REVIEW

7.1. Monitoring and Accountability

ZELUS monitors the implementation and effectiveness of this Policy and ensures that safeguarding responsibilities and procedures are integrated into its activities and operations.

ZELUS management, supported by the Child Safeguarding Focal Point, oversees compliance with the Policy, monitors safeguarding risks and incidents, and ensures that identified shortcomings are addressed through appropriate corrective measures.

7.2. Policy Review and Accessibility

The Policy is reviewed periodically and whenever significant changes in legislation, organisational activities or safeguarding risks occur, or following a serious safeguarding incident. Reviews take into account lessons learned and feedback from personnel and, where appropriate, children and their parents or legal guardians.

The Policy is communicated to all personnel and associates and made publicly available through the ZELUS's website.

8. APPROVAL AND ENTRY INTO FORCE

This Child Protection Policy is approved by ZELUS management and enters into force on the date of its formal adoption. The Policy is binding on all personnel and associates within its scope and remains in effect until amended or replaced.

Date of approval: 2nd October 2026

Approved by: Legal Representative of ZELUS P.C.

Role: Manager and Legal Representative of ZELUS P.C.

CSFP contact: safeguarding@zelus.gr

9. Appendix

The text below needs to be acknowledged by all current and future personnel of ZELUS as well as by the complete management team.

Acknowledgement

I confirm that I have read and understood the ZELUS Child Protection Policy and Code of Conduct and agree to comply with and implement their provisions in accordance with my role and responsibilities. I understand that violations may result in appropriate contractual measures, including termination of employment or engagement, and reporting to competent authorities where required by law.

Name: _____

Role: _____

Signature: _____

Date: _____