

CHILD PROTECTION POLICY

2023



“American Farm School” - operates General and Vocational High Schools

“American Farm School Postsecondary Educational and Training Association” - operates Perrotis College, the Junior College (I.IEK) and the Center for Lifelong Learning

“Thessaloniki Experiential Schools Association” - operates Pre-K, Kindergarten, Elementary and Middle Schools



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1. Introduction

The American Farm School (AFS) is an independent, not for profit educational institution, incorporated in the State of New York, which has operated since 1904 in Thessaloniki, Greece and serves the needs of the people of Greece and neighboring Balkan countries. AFS prepares graduates to become career professionals in agriculture, life sciences, the environment and the food industry teaching practices that are economically viable, environmentally friendly and socially responsible. The founder of AFS, Dr. John Henry House, was a practical idealist who believed that education should be addressed to the whole person: the mind, the hands and the soul. After more than a century of applying the vision of its founder, AFS remains committed to the dynamic co-existence of theory and practice which have become the trademark of the institution.

The School was recognized by the Greek State in 1918 (Government Gazette no. 7A/1918) as the first US School operating in Greece.

Currently, AFS operates three educational not for profit associations, collectively, the 'Institution', registered separately under Greek law:

- The 'American Farm School', which operates General and Vocational High Schools.
- The 'American Farm School Postsecondary Educational and Training Association', which operates Perrotis College (PC), the Junior College (I.IEK) and the Center for Lifelong Learning.
- The 'Thessaloniki Experiential Schools Association', which operates Pre-K, Kindergarten, Elementary and Middle Schools.

The Institution provides educational programs to over 1.200 students, of which 900 are children aged 2,5 to 18 years old. The institution has a total work force which varies at times but presently does not exceed 400. There are a number of volunteers, members of the Board and supporters of the School.

The Institution complies with all measures and obligations related to the implementation of United Nations Convention on the Rights of the Child, Article 24 of the Charter of Fundamental Rights of the European Union and Greek Law no. 4837/2021 – Government Gazette, no. 178A/2021, no. 4267 – Government Gazette 137A/2014, no. 3860 – Government Gazette 111A/2010, and no. 4020 – Government Gazette 217A/2011.

In all of our programs at the Institution, we are committed to ensuring that each child enjoys the benefit of a protective environment in which their rights are respected. Rules relating to children's rights need to be updated on a regular basis so as to integrate the highest requirements according to international standards and current best practices. In view of this, we have written the «Child Protection Policy» which we wish to see applied to all of our Institution's programs and activities. This policy aims to act as a guide to managing day-to-day activities with children by providing means to

prevent abuse or respond to suspected abuse. Numerous references relating to the area of child protection and support tools complement the guide. Therefore, particular attention is given, for example, to hiring new staff, inclusion of social media and new reporting and communication tools.

An annual plan of action reflecting safeguarding measures within the Departments ensures that the system is implemented properly. The risk of harming children's integrity is very real and this is why we are committed to widely promoting our Child Protection Policy, not only internally but also with partner organizations with whom we cooperate. In case of abuse or suspected abuse, our fundamental principle calls for an immediate and professional response that respects the legislation in force.

The current Child Protection Policy contains a new code of conduct to be signed by all employees, temporary employees or volunteers of the Institution. We firmly believe that the systematic use of this Policy is the best way to ensure that all children receive the necessary protection to which they are entitled.

The Child Protection Policy and its procedures, apply to all operations and activities conducted by, or on behalf of, the Institution. The policy reaffirms and strengthens our commitment as an Institution towards keeping children safe and protecting them from all forms of harm and abuse. This is an issue of critical importance for the American Farm School and Perrotis College and we see the protection of children, the promotion of their wellbeing and upholding children's rights as the foundation of our work.

1.1 Purpose of the Policy

The aim of the policy and procedures is to regulate how we work as an Institution so that our students and the children with which we come into contact (either directly or indirectly) are safeguarded and have their wellbeing promoted, and that our actions, while implementing educational programs or institutional activities, do not cause any harm to children. While the Child Protection Policy aims to be comprehensive, given the diverse range of settings and operations carried out by our Institution, it is likely that there may be circumstances which are not covered or where there is a question about the application of the policy and procedures. In such situations, members of the Arcadia Team, the Head of Human Resources (HR) or the Department Heads/ Principals or Deans should contact the School's Legal Counsel for advice.

1.2 Definition of Protection

"Child Protection is the responsibility taken upon our Institution to make sure our staff, operations, and programs do no harm children; that is that they do not expose children to the risk of harm and abuse, and that any concerns the Institution has about children's safety within the community, are reported to the appropriate authorities".

This includes both preventative actions to minimize the chances of harm occurring, and responsive actions to ensure that incidents which may happen are appropriately handled. Protection implies a

wider duty of care towards children rather than just upholding their right to protection (as defined in the UN Convention on the Rights of the Child, 1989) – but it is primarily concerned with harm and wellbeing, rather than with the promotion and protection of child rights generally.

1.3 Definitions

For the purposes of this policy, and procedures contained within it, the following working definitions are used:

Abuse

Used in its widest sense and includes physical, emotional/psychological and sexual abuse, neglect and negligent treatment, violence and exploitation in all forms.

Emotional Abuse

The persistent emotional ill-treatment of a child such as to cause severe and long lasting effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It can also involve age or developmentally inappropriate expectations being imposed on children, or causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Neglect

The persistent failure to meet the child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development.

Physical Abuse

This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or guardian or carer feigns the symptoms of, or deliberately causes, ill health to a child who they are looking after.

Sexual Abuse

Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening or gives consent. The activities may involve physical contact, including penetrative (e.g., rape) or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Child/Children

Refers to anyone under the age of 18 years old, irrespective of the age of majority in their country, or the country where they are located or living.

Child Protection Incident

Refers to when an allegation is made, even if it is unsubstantiated, that a child is being abused or is likely to be abused.

Partners

There are two clear distinctions between partners:

1. Those who have a contract with our Institution and as such are required to comply with child safeguarding/child protection as a condition of the contract.
2. Those who form part of a consortium or who are associated with the wider child and social protection system. This could include Ministries, Government Departments and Agencies, Statutory Authorities and other organizations including universities and research bodies. In these cases, we should seek to advocate for child safeguarding across their activities and to positively influence their policies and procedures. This might include providing technical support.

Staff

The term staff replies to anyone who works for or on behalf of Institution on a full time or part time basis. As such it includes employed staff, interns, consultants, and members of the Board.

Volunteers

The term volunteers relates to anyone who generously offers their time and services for our not for profit Institution on an unpaid basis.

1.4 Principles underpinning our Child Protection Policy

Our Policy is based upon a number of principles and beliefs, including:

1. All children have equal rights to protection and to have their wellbeing and participation promoted.
2. All actions regarding child safeguarding must be taken in the best interest of children.
3. This includes an understanding that in all our programs and activities we must ensure that we respect children's rights and do not cause harm.
4. Everybody has a responsibility for safeguarding. This policy is mandatory for all those who work for or on behalf of the Institution, including staff, volunteers and partners. Although training, advice and support will be provided, everyone should actively participate so that they can carry out their responsibilities towards safeguarding children.
5. We work in a transparent and open way where child safeguarding is made a priority, recognizing that situations of abuse and harm are able to flourish when staff, volunteers, partners, children, families and community members do not feel able to raise their concerns.
6. All reports of concern regarding the safety and protection of a child will be taken seriously.
7. Where necessary, appropriate steps will be taken to protect the child and to take action against the alleged perpetrator. This may include referrals to law enforcement and child

protection agencies. In relation to allegations against staff, volunteers and partners, action may also include the suspension or termination of engagement or any type of cooperation.

8. No single organization is able to safeguard children by working in isolation, and therefore we will work with other organizations, agencies with a mandate to protect children, such as the Directorates of Education, Social Services of the Municipality and the Regional Government and the Juvenile Prosecutor, and non-government organizations and associations dedicated to the cause of child protection, as necessary and appropriate.
9. We maintain confidentiality and do not disclose personal details of those involved in child protection concerns, including the names of those raising concerns unless it is necessary to pass on information to ensure that a child is protected (for example where a child may need specialist services or where a criminal offense may have been committed).
10. We raise awareness and influence others on the importance of safeguarding children, using our policy and procedures as a way of both highlighting our commitment and also of explaining our values. We will share our policy and procedures with others, and be open to feedback regarding its application and relevance.
11. We work within the framework of international and national laws and policies regarding safeguarding.
12. There is no one specific way of safeguarding children and promoting their rights. Solutions to protecting children need to reflect the culture and operating environment and the nature of activities being undertaken. However, culture can never be used as an excuse for abuse. While our Schools, our College and the HR Department can propose amendments and modifications of the procedures, this must be done within the framework of requirements set down within this policy. It is not acceptable for a reduced level of safeguarding to be offered.

2. Preventative action: Putting the policy into practice

This section of the Policy identifies specific steps and concepts which translate the vision of safeguarding children into action.

The protection of children is a responsibility that extends across all Departments of the organization, and is not limited to just our educational programs and projects addressed to children. It is essential to incorporate the principles of safeguarding and risk reduction in all aspects of our work, including the recruitment of staff or volunteers, partner selection, execution of activities, program development, educational farm units, facilities management departments and fundraising. While the policy specifies certain scenarios that require a risk assessment, such as when conducting activities or evaluating staff member references and police checks, it does not mean that risk management should only be considered during those times. It is crucial to regularly assess safeguarding risks at all levels of the organization.

It is important to keep in mind that children can also be responsible for abuse, even though we typically associate safeguarding concerns with adults mistreating children. This type of abuse often occurs when a child holds a position of power or influence over another child, for instance, if the abusive child is older or if the child being abused is part of a marginalized group. This situation is commonly known as

"bullying." In such cases, it is necessary to take action to support the victimized child, but it is also critical to remember that the perpetrator is also a child. Therefore, any interventions should prioritize the best interests of both children, including how to support the abused child and what measures are required to address the abusive behavior of the other child.

Also, current policy applies in cases where adult students interact with children.

2.1 Human Resources

a. All Adults (including Board Members, faculty and staff, interns, volunteers and consultants)

This section sets out the specific obligations and responsibilities for all adults working for/with the Institution, whether paid or unpaid (volunteers) full or part time.

- The Child Protection Policy applies to all those working for/with the Institution. By agreeing to work for/with the organization, it is implied that the terms and conditions of the Child Protection Policy have been accepted as a condition of involvement.
- All faculty and staff (including consultants and standing volunteers) are required to sign and abide by the Code of Conduct (Appendix 1: Code of Conduct) as a condition of their involvement with the Institution. This sets out specific expectations of acceptable and unacceptable behavior.
- In addition to all staff of the Institution, every person in a governing function within the Institution should sign and abide by the Code of Conduct (Appendix 1: Code of Conduct) the Institution. This recognizes that those in a governing capacity as Members of the Board are expected to set the highest standards of behavior for the Institution.
- All occasional volunteers and visitors (such as guest speakers) are required to sign and abide by the Guide for Occasional Volunteers and Visitors (Appendix 2: Guide for Volunteers and Visitors.) as a condition of their involvement with Institution.
- While orientation on the policy together with any necessary additional training regarding responsibilities and duty of care (particular to specific roles) will be provided, all adults have a personal responsibility to seek further clarification and advice where they are not clear about what is expected of them.
- Breaching the Code of Conduct, Guide for Volunteers and Visitors or contravening the Child Protection Policy may lead to suspension and termination of any type of engagement. This will be determined on a case by case basis, ensuring that applicable legislation is observed and with regard for the privacy and confidentiality of those concerned while any internal investigation is carried out. In addition, after a thorough consideration of the facts, will be decided by the Institution's Administration whether the case needs to be reported to law enforcement authorities in full conformity with the law. In such cases the Administration should always seek and follow advice by the School's Legal Counsel.
- The Child Protection Policy focuses on contact with children taking place during work under the responsibility of the Organization. Nevertheless, conduct outside the work environment of those associated with Institution may also contravene the principles and values of the Child

Protection Policy. If such issues arise, these will be carefully considered and any decisions made will place utmost importance on the child's best interests.

b. Education, Advice & Support

This section sets out the efforts that will be undertaken to support the implementation of the Child Protection Policy.

- Within their probationary period, and no longer than three (3) months after appointment, all staff must be given guidance as to the Child Protection Policy, and their responsibilities towards safeguarding children. Volunteers should also be included in such training.
- Faculty, staff and volunteers must be given the opportunity for regular updates on safeguarding children – either formally, such as through training or supervision, or more informally, for example through discussion at team meetings.
- Depending upon the nature of the work being undertaken, the role of the faculty and staff and their background and experience, additional specialist training regarding child wellbeing, protection and safety should be provided.
- Records must be kept in HR files of all training/guidance meetings conducted – with the date and list of attendees.
- While all adults have a responsibility for safeguarding children, no one should have to do this alone and unsupported. Principals, Deans and Department Heads are responsible for ensuring that faculty and staff and volunteers are supported in their roles in safeguarding children, with Principals of the Schools, the Dean of the College, the Safeguarding Focal Point and the Head of HR being responsible for the implementation of the Child Protection Policy.
- The Child Safeguarding Focal Point is the primary source of advice and support in relation to child safeguarding concerns and the implementation of the Child Protection Policy. The Child Safeguarding Focal Point (Appendix 3: Child Safeguarding Focal Point), in relation to legal issues, is in turn supported by the HR Department and the Legal Counsel of the Institution. Legal advice should be obtained from the relevant supervising authorities by the Principals or the Dean (e.g. Directorate of Education of Eastern Thessaloniki, the Ministry of Education)
- Where support or advice is sought regarding child safeguarding this must be taken seriously. At no time must seeking advice or support be considered indicative of someone lacking capacity or knowledge.
- Where those working for/with the Institution are involved in child protection incidents – either as the subject of an investigation or as a witness – appropriate support must be provided. This may include additional supervision or counselling. (Further guidance on reporting and managing cases of concern and child protection incidents is included later in this policy and procedures).

c. Awareness Raising

This section sets out how awareness will be raised regarding the Child Protection Policy.

- All individuals associated with the Institution, including faculty and staff, volunteers, partners, communities, families, children, and other stakeholders, should be informed of the Child

Protection Policy and instructed on how to report concerns. The methods for sharing this information should be appropriate and easily accessible considering the particular circumstances.

- The Child Protection Policy, including any modifications made in relation to the School/College, should be available in Greek and English and made available in various formats such as posters or booklets with illustrations, depending on the context.
- Special attention should be given to educating children about the policy and providing them with ways to protect themselves. This could involve creating a child-friendly version of the policy in collaboration with children.

d. Safer Recruitment

This section focuses on how those working for/with the Institution are selected (faculty, staff and volunteers). Individuals who have the intent to abuse children often target organizations where they can gain access to them. While no recruitment processes can ever be 100% safe, by having stringent recruitment processes in place, the likelihood of engaging someone who is not suitable to work with children can be dramatically reduced.

- Safer recruitment procedures are essential to ensure that recruitment processes effectively identify individuals who may pose a risk. However, no single check can provide complete assurance, and multiple measures must be implemented to create a safety net.
- Recruitment procedures follow the institute's policies and procedures and are tailored to each job or volunteer task and consider the level of contact with children. These procedures include pre-selection, selection, and post-selection measures to maximize safeguards.
- It is crucial to complete all safer recruitment procedures and background checks, as well as provide guidance on the Child Protection Policy, before commencing work. In exceptional circumstances where there may be a significant delay or the need to start work quickly for operational reasons, additional measures must be put in place to minimize risks to children. These measures could include extra supervision and ensuring faculty and staff members do not work alone.
- All records related to safer recruitment practices, such as references and copies of penal records, should be kept in HR files and maintained in accordance with applicable data protection regulations.

e. Child Safeguarding Focal Point

The Arcadia team acts as Child Safeguarding Focal Point providing advice, support and assistance. It should be understood that the Child Safeguarding Focal Point is not solely responsible for child safeguarding – this responsibility rests with everyone.

The Principal of the School or the Dean of the College, the student who has been the victim in an incident is attending and ultimately the President of the Institution are legally responsible and following legal advice take decisions and act in cases of violations. Our nursery is considered to be a Child Protection Organization, has appointed a Child Protection Officer and is reporting to the National System of Recording and Handling Reports (Law no. 4837/ 2021). The Head of HR is involved in cases

that involve members of faculty of staff. The procedure for responding to reports is described in Chapter 3 of this Policy.

f. Partners

This section considers how to work with partners in order to promote the implementation of the Child Protection Policy. If there is any doubt about how to best implement the Child Safeguarding Policy with partners then our Legal Counsel should be consulted.

- When selecting partners, it is important to consider their suitability and track record in working with children, including whether they have their own child safeguarding policy and procedures. Specific reference to child safeguarding measures should be included in partnership agreements and contracts.
- Partnerships provide an opportunity to raise awareness on the need for institutional policies on child safeguarding, and therefore partners should be given training, guidance, and support on how to develop their Institution's Child Protection Policy. If our Institution is the lead partner, the contract should include a commitment to keeping children safe and reference to the Child Protection Policy. If not, attempts should be made to include safeguarding within the agreement.
- Partnerships depending on their nature often aim to advocate for governments to develop standards of safeguarding, with support for the required resources and expertise to implement such standards. If concerns about child safeguarding arise in relation to a partner, consideration must be given to whether to suspend the partnership. However, a child safeguarding concern raised in relation to a partner does not necessarily mean that the partnership must be terminated automatically. The decision to continue with the partnership must take into account the partner's reaction and commitment to addressing the situation.
- Occasional Volunteers and Visitors who come in contact/communication with children must be made aware of, understand and agree to the terms and conditions of the Institution's Guide for Occasional Volunteers and Visitors (Appendix 2: Guide for Volunteers and Visitors.), before their visit. Faculty and staff members are responsible for ensuring that occasional visitors and volunteers are properly briefed and supervised throughout their activities or visit.
- All volunteers and visitors under no circumstances should they be left unattended with children.

2.2 Media & Communication.

a. Media Materials

This section considers the actions that need to be taken to ensure that safeguarding is included in media activities.

The 10 Ethical Rules regarding the use of images by the Institution must be observed, namely:

1. Respect the Child Protection Policy and its procedures.
2. Make sure that the safety of the child will not be compromised if one disseminates images of his or her home, community or environment.
3. Be accompanied by an employee of the Institution while doing a report (video, photo, etc.).
4. Obtain permission from the child and the person(s) who is(are) legally responsible for them. Use the appropriate consent forms incorporated in the GDPR policy.
5. Ensure that the child does not pose in any inappropriate manner (sexual connotations etc.).
6. Do not take or publish photos of children who are completely naked or dressed inappropriately. Images of children which are exploitative or offensive must not be used.
7. Always respect the children's dignity. Do not represent the children as victims (weak, desperate etc.). Images should present children in a 'positive way'. Similarly, stories about children should aim to report only the positive aspects of children's lives and their strengths.
8. Taking pictures or videos is reserved for strictly professional use. Faculty and staff members, volunteers and visitors are encouraged to 'like' and 'share' photographs published on official AFS and PC websites and social media sites (such as Facebook). In this way, officially approved photographs may be distributed more broadly on personal social media sites. Unofficial photographs can be posted or uploaded on personal pages of teachers, only if they include pictures of their own class and they follow the institutional guidelines (faces of children are not shown, GDPR consent forms are fully respected).
9. Never indicate in the files any information that could endanger the child victim of abuse (title, metadata, captions etc.). When publishing/distributing photos, images, stories etc., personal information must be removed to ensure privacy (i.e. names and addresses must not be included and if necessary other identifying features such as school name should also be omitted).
10. Only use photos available for public use (verified and validated by an official school representative and the person in charge of visual communication).

b. Online Protection and Safety

AFS and PC have their own policies and separate guidance on the use of social media and technology.

- School Officers (Principals, Deans, Department Heads) should ensure that sufficient guidance is provided to faculty, staff members and volunteers about the appropriate use of technology – including internet, mobile phones and social media.
- Filters and blocking software should be installed to ensure that unsuitable/offensive sites cannot be downloaded.
- In the event that offensive material or unsolicited messages/chats are received, these must be passed on to the Child Safeguarding Focal Point or to the Principal of each school who must follow legal advice report to the appropriate authority.
- Faculty staff and volunteers must also report to their Principal, Dean or Department Head, if any offensive material is received or accidentally downloaded.
- In the event that offensive material, such as child pornography, is received or accidentally downloaded and a report is made to law enforcement, the materials must not be sent with the referral. The transmission of images is considered a crime under international. Guidance

should be sought from the law enforcement agency as to how to arrange for images to be transferred appropriately.

- AFS and PC have their own IT rules on the use of computers and other technology. IT equipment is provided for business purposes, and its use is subject to the Child Protection Policy.
- While the privacy of faculty and staff is respected the Head of HR Department may exceptionally grant access to private files, if there is a suspicion of a violation of this policy. This may be, for example, if there is a suspicion that IT equipment has been used to access child pornography online, in violation of the Code of Conduct.
- Any voluntary non-professional access to websites detrimental to the reputation of the Institution (and in violation of the Child Protection Policy) is strictly forbidden and can justify a dismissal with immediate effect. Any unintended access to harmful data should be immediately reported to one's Supervisor to avoid any misunderstanding.

2.3 Program Design and Implementation

Programs and all types of actions across all Institutional Departments, should 'think safeguarding' at all times and across all activities – and not consider safeguarding as a separate activity, but rather a theme that runs through all work.

- Safeguarding must be considered at every stage, from program/project design and must be reviewed regularly as part of the monitoring of the project's implementation.
- In addition to program design, when conducting specific activities, a risk assessment must be undertaken to identify any potential dangers and a plan put in place to minimize these risks.
- If the assessment determines that there are too many risks that cannot be reduced to an acceptable level, the activity should not be carried out.
- Additional guidance may be necessary to ensure that the Child Protection Policy's spirit is followed for specific activities or programs, such as highlighting particular dangers or concerns to faculty, staff, volunteers, partners, children, and communities.
- Before conducting certain special activities such as trips, written permission from the person(s) who is(are) legally responsible for them must be obtained.
- Faculty, staff and volunteers who work with children must receive regular supervision and have the opportunity to participate in discussions about safeguarding issues, such as in meetings, informal discussions, or through case studies.
- Safeguarding must be regularly reviewed during and at the end of activities to learn lessons that can be applied to future activities or to make necessary adjustments to the program. For example, during a summer activities program, debriefing meetings at the end of each day could include a review of safeguarding.
- There is a separate "general guidelines for safeguarding in projects and activities" document available that should be used.

3. Responsive action

3.1 Types of action

A) Direct Observation

1. Teacher tells the Principal/Dean of the School/College.
2. Principal/Dean does an intake with student/collects data.
1. Principal/Dean alerts Doctor/Nurse to examine student to perform physical (body check). Completes report. When Doctor/Nurse deems the necessity the child must be referred to a hospital.
2. Child Study Team (CST) meets to discuss case (Principal/Dean, Arcadia Team member responsible for counseling according to the age of the child).
3. The Principal/Dean alerts the President of the Institution and the Director of the HR.
4. School Legal Counsel is alerted on a case-by-case basis. In cases where staff members or volunteers or board members are involved the General Policy against Harassment and Bullying for Staff and Faculty is activated (Appendix 4: Policy against Harassment and Bullying for Staff and Faculty).
5. Principal/Dean informs the student of an upcoming parent meeting and alerts him/her what will be shared with parents.
6. Principal/Dean schedules parent meeting with Specialist in Mental Health to share observations and data. Follow up summary letter is sent to parents 1-2 days after the parent meeting with school personnel.

B) Student Initiated

1. Student tells the teacher/school personnel.
2. Teacher/School personnel alerts Principal/Dean of the School/College.
3. Principal/Dean does an intake with student/collects data.
4. Principal/Dean alerts Doctor/Nurse to examine student to perform physical (body check). Completes report. When Doctor/Nurse deems the necessity the child must be referred to a hospital.
5. Child Study Team (CST) meets to discuss case (Principal/Dean, Arcadia Team member responsible for counseling according to the age of the child).
6. Principal/Dean informs the student of an upcoming parent meeting and alerts him/her what will be shared with parents.
7. School Legal Counsel is alerted on a case-by-case basis. In cases where staff members or volunteers or board members are involved the General Policy against Harassment and Bullying for Staff and Faculty is activated (Appendix 4: Policy against Harassment and Bullying for Staff and Faculty).
8. Principal/Dean informs the student of an upcoming parent meeting and alerts him/her what will be shared with parents.
9. Principal/Dean schedules parent meeting with Specialist in Mental Health to share observations and data.
10. Follow up summary letter is sent to parents 1-2 days after the parent meeting with School personnel.

C) Student reports abuse by a family member

1. Student tells the teacher/School personnel.
2. Teacher/School personnel alerts Principal/Dean.
3. Principal receives advice from Legal Counsel and calls the Juvenile Prosecutor's office.

If a child talks to you about abuse, it's important to:

- Listen carefully to what they are saying.
- Let them know they have done the right thing by telling you.
- Tell them it's not their fault.
- Say you will take them seriously.
- Don't confront the alleged abuser.
- Explain what you will do next.
- Report to the immediate supervisor/CST member what the child has told you as soon as possible.

3.2 Reporting Concerns & Child Protection Incidents.

This section covers the case where a concern is reported that the Child Protection Policy is not being implemented or a child protection incident is reported (i.e. where a child may be or is at risk of abuse and actions may be necessary to ensure that the child is protected).

Concerns and reports may be received from a number of sources – including staff, volunteers, partners, children and families/community members. All concerns and reports must be taken seriously.

All reports must be passed to the Child Safeguarding Focal Point or the Principal / Dean or HR. In cases where the Child Safeguarding Focal Point staff or a Principal / Dean are involved then the report must pass directly to the Head of HR.

Schools should develop a reporting framework/ flowchart which identifies how concerns and reports should be managed. The main point of referral should be the Child Safeguarding Focal Point or the Principal / Dean of the child's School. This is to ensure that reports are managed in a systematic way, and lessons are learned in terms of the implementation of the policy. This does not mean that the Child Safeguarding Focal Point is responsible for action – but they should be involved in the process.

Decisions about child protection incidents must not be made by individual workers in isolation. However, in exceptional circumstances – such as a life threatening situation – faculty, staff or volunteers may take whatever action they deem necessary to protect a child at immediate risk, but this must be reported as soon as possible to the Principal / Dean.

Local contacts with child protection agencies and law enforcement should be identified in advance to enable a referral to an outside agency if required to protect the child. Contact details should be retained so a referral can be made quickly and efficiently.

- Consideration on whether to refer a child to an outside agency for protection must always be made within the Greek legal framework and with consideration for the best interests and wishes of the child.
- When concerns are raised or reports made, importance must be placed on CONFIDENTIALITY, both of the referrer and also the child(ren)/adults involved. Information must be shared strictly on a need to know basis as necessary to ensure the child is kept safe and appropriate assistance is given.
- Where concerns are raised by faculty, staff and volunteers about other staff, volunteers and partners, even if these are not substantiated, providing there was no malicious intent, no punitive action will be taken against the person raising the concern or making the report.
- Referrals to local child protection agencies/police should be done in the prescribed manner (for example, there may be a particular format for reporting). Where the referral is made verbally it must also be confirmed in writing.
- Written records of all reports received (even if the report is vague) must be kept and maintained in a secure and confidential location by the Child Safeguarding Focal Point. When the report relates to a concern about faculty, staff, volunteers, partners or a significant stakeholder then a copy of the complete file is also kept by the Head of HR.
- Written and audio records from interviews during an investigation are kept in a secure, confidential password protected database kept by the Head of HR. The number of cases are shared with the Chair in a bi-annual report according to the Policy against Bullying and Harassment has no mention to identifying facts.

3.2 Accountability, Monitoring & Review

This section details how the implementation of the Child Protection Policy will be monitored, and how the policy will be reviewed.

- Everyone has a responsibility for ensuring that the Child Safeguarding Policy is implemented as set out in the policy and procedures outlined in this document and as may be adapted to suit local conditions.
- The Safeguarding Focal Point and the Head of HR, by mandate from the President and according to this Policy, has overall responsibility for the implementation of the Child Protection Policy across the campus. Principals, Deans and Department Heads are responsible for determining policy and good practice and for implementation of the policy in all activities related to their areas of organizational responsibility (i.e. Schools, College, Departments).
- Annually, Schools shall conduct a self-assessment of safeguarding and the implementation of the Child Protection Policy, with the aim of helping themselves track their progress in safeguarding, recording good practices and also identifying areas for action.
- Based on the self-assessment, an annual plan of action will be developed to address any gaps in policy implementation and to mitigate any risks identified.
- Both the self-assessments and the development of action plans will be coordinated by the Academic Coordinator, so that information from all schools can be assessed at the Institutional level.

- This policy will be reviewed on a regular basis, but not more often than every five years, except in cases where changes in legislation or organizational structure in the Institution demands an update. Such reviews will also include the views of children, their families as well as other local stakeholders, where possible.
- This policy and its implementation is subject to monitoring and review the Chair of Board of Trustees with the support of the School's Legal Counsel and the Legal Committee of the Board.

Appendix 1: Code of Conduct

The Code of Conduct must be signed by all members of faculty and staff and standing volunteers BEFORE commencing duties.

The American Farm School and Perrotis College (collectively called the Institution) considers all forms of abuse towards children to be unacceptable, and recognizes that it has a duty to safeguard children – that is to keep them safe, promote their wellbeing and protect them from abuse and harm. Neglect, physical, psychological/emotional and sexual violence are the main forms of abuse.

Our Child Protection Policy and Procedures set out the measures we will take to safeguard children. This includes proactive actions to prevent situations of abuse and harm occurring and reactive actions to respond to situations where a child is, or may be, suffering abuse. A child is any human under the age of 18 as stipulated by the UN Convention on the Rights of the Child, 1989. As part of our Child Protection Policy, it is a requirement that all staff (including employees, consultants and interns), whether full or part time, agree to abide by the Child Protection Policy and specifically to agree to work in accordance with this Code of Conduct which sets out responsibilities for safeguarding children and expected behavior of staff. THIS IS A MANDATORY REQUIREMENT. Any form of unacceptable behavior which breaches this Code of Conduct must be reported. In the case of situations which are not covered by the Code of Conduct, AFS expects its representatives to apply common sense whilst focusing on the “child’s best interests”.

The Institution respects the Convention on the Rights of the Child and the following five principles:

- I. **Children’s rights:** All members of staff of the Institution must respect and promote children’s rights. Above all, they must protect the right of each child to live in safety, without risk of abuse or exploitation and must act, at all times, in the child’s best interests.
- II. **Zero tolerance:** The Institution will not tolerate any form of abuse and will take all necessary measures to implement the Child Protection Policy.
- III. **Risk management:** The Institution ensures that risks are identified and minimized from the planning stage through to the implementation stage of activities.
- IV. **Everyone’s responsibility:** The successful implementation of the Child Protection Policy is based on the individual and shared responsibility of all representatives of the Institution including staff. The Institution will seek to ensure that partner organizations’ programs also comply with international safeguarding standards.
- V. **The duty of notification:** any suspected violation or any actual violation of the current Code of Conduct must be reported immediately to the supervisor or the Head of Human Resources (HR). Confidentiality will be maintained throughout the entire procedure.

BY SIGNING THE CODE OF CONDUCT, I explicitly agree that:

I will always:

- Treat children with respect and equally, regardless of their age, sex, language, religion, opinion or nationality, ethnic or social origin, status, class, caste, sexual orientation, or any other personal characteristics.
- Help children to take part in decisions which concern them according to their age and their level of maturity.
- Maintain a culture of communication and create trust with the children and their families, communities, other staff and volunteers and representatives of partner organizations so that concerns may be shared and discussed.
- Use non-violent and positive behavior methods when supervising children.
- Encourage children and communities to speak openly about their interactions with adults and with each other.
- Inform children and communities of their right to report any worrying situations and how they can raise a concern.
- Empower children so that they are in a position to better protect themselves.
- Make sure that another adult is present or try to be visible when I am in contact with a child (This point applies to professionals not authorized through their role to have one to one contact with the children. It does not apply to teachers, tutors, counselors and student life staff members).
- Try to preserve the child's autonomy and make sure that I do not do things that a child can do for herself/himself.
- Plan activities and organize the facilities in such a way so as to minimize the risk of harm taking into account the age and development of the child.
- Ensure that information concerning children, families and communities remains confidential.
- Behave in a way that sets a good example (avoid smoking, showing disrespect towards colleagues, etc.).
- Taking pictures or videos is reserved for strictly professional use. Faculty and staff members, volunteers and visitors are encouraged to "like" and "share"; photographs published on official AFS and PC websites and social media sites (such as Facebook). In this way, officially approved photographs may be distributed more broadly on personal social media sites. Unofficial photographs can be posted or uploaded on personal pages of teachers, only if they include pictures of their own class and they follow the institutional guidelines (faces of children are not shown, GDPR consent forms are fully respected).
- Ensure that the child does not pose in a degrading manner or in a way that may be interpreted by others as having sexual connotations.
- Raise any concerns and queries concerning the Child Protection Policy with my Supervisor or the Child Safeguarding Focal Point.

- Immediately report any suspicions or allegations, which goes against the principles of the Child Protection Policy and Code of Conduct including any form of child abuse – even if the information or allegation is vague, to the Child Safeguarding Focal Point or the Principal / Dean or HR. In cases where these points are involved then the report must pass to the Head of HR.

I will never:

- Engage in any form of sexual relations with anyone under 18 years old, regardless of the legal age of sexual consent, the law and local customs. Mistaking a child's age is not a defense.
- Exchange money, job, goods or services for sexual favors or subject the child to any other kind of humiliating, degrading or abusive behavior.
- Touch children or use language or make suggestions in an inappropriate manner, to provoke, harass or degrade the child or show disrespect.
- Exploit a child for labor.
- Discriminate against, or treat children unequally or unfairly.
- Invite a child or their relatives to my home or develop a relationship with a child and/or their family which may be considered outside normal professional boundaries.
- Work with or transport a child alone without the prior authorization of my Supervisor, unless absolutely necessary for the safety of the child.
- Be under the influence of drugs or alcohol while working with children.
- Take photos or videos of students for use that is not strictly professional unless the School Principal or the Department of Communication gives permission.
- Watch, publish, produce, or share pornography showing children, and/or show pornographic material to children.
- Show the faces of children who are exploited sexually, victims of trafficking, abuse, in conflict with the law, linked to armed groups or who can easily be located even if their identity has been modified.
- Take or publish photos of children entirely naked or dressed in a manner which is not adapted to the situation in which they are represented.
- Represent children as victims (weak, powerless, unassisted, desperate, etc.).
- Publish a story or image which may endanger the child, their family or community.
- Use photos which have not been checked and approved by my Director/Principal/Dean and/or Communications Team or post unofficial pictures or information about children on personal websites or social networks (such as Facebook), except if it is pictures of their my own class and they follow the institutional guidelines (faces of children are not shown, GDPR consent forms are fully respected).
- Maintain contact with children and their families via social networks, unless a specific School or College project requires me to do so and I have been given express permission.
- Close my eyes to, ignore or fail to report any concern, suspected violation or violation of the Child Protection Policy and the Code of Conduct to the Child Safeguarding Focal Point.

I understand that, in the event of suspicions or allegations of my violation of the Code of Conduct:

AFS will take any action they deem necessary, which may include, but is not limited to:

- Providing assistance for the victim and taking immediate steps to protect and support the child.
- Attempting to establish the facts in the most objective manner possible (the presumption of innocence prevails) while protecting the reputation and confidentiality of the adults involved.
- Undertaking disciplinary actions, which may result in my suspension or termination of contract.
- Initiating judicial proceedings and/or reporting to the competent authorities any violation of the Code of Conduct which may breach national legislation.
- Taking appropriate measures in order to ensure that such incidents do not occur again, for example, informing other organizations which may apply for professional references regarding the termination of contract due to violation of the principles of the protection of children (within the legislative framework applicable to the protection of information).

Declaration of commitment

I, the undersigned,

Declare I have received, read and understood the Institutional Child Protection Policy and I commit to know and agree to work in accordance with it.

Furthermore, I declare that I have no criminal records regarding an offense towards a child (which I have not previously declared) and nor do I know of any reason why anyone would deem me unsuitable to work with children.

Dateat

Signature

Appendix 2: Guide for Volunteers and Visitors.

Children have a right to protection and we at the American Farm School (AFS) and Perrotis College (PC) - collectively called the Institution - have an obligation to make sure that we safeguard the children we serve – that is to keep children safe, promote their wellbeing and uphold their rights to protection. It is the responsibility of all institutional faculty and staff members, sponsors, volunteers, contractors, suppliers, donors, journalists, consultants, supporters (visitors) to protect children “from all forms of physical and mental violence, injury or abuse” (UN Convention on the Rights of the Child – Article 19).

For this reason we have policies and systems in place to prevent abuse and harm and to safeguard children (detailed in our Child Protection Policy). These measures also protect volunteers and visitors from actions that could be misconstrued and lead to false or malicious accusations. Visits to our Schools, College and our community in general are opportunities to contribute or see our work first-hand. Similarly, volunteering for AFS or PC is a great opportunity to directly support our Institutional Educational mission.

We would like you to enjoy your volunteer work/visit and at the same time help us to keep children safe by introducing to you the key elements of our policy that affect you as a volunteer or visitor. If you have any questions you should refer to your main point of contact within AFS or PC (as all our staff are trained in safeguarding) or to the AFS Child Safeguarding Focal Point (phone number 00302310492847, ttasio@afs.edu.gr, etsagk@afs.edu.gr, kstama@afs.edu.gr, dkaryo@afs.edu.gr). You can also request to see a full copy of our Child Protection Policy.

What is child safeguarding?

Child safeguarding is the obligation placed upon organizations who work with children to keep safe, children that they come into contact with through their work – either directly or indirectly. This includes both having preventative procedures in place to minimize the chances of an incident occurring and responsive systems to respond if an incident occurs. Specifically, in safeguarding, we are particularly concerned with ensuring that children are kept safe from abuse (physical, emotional, sexual and neglect) and are protected. Our policy clearly states that all children have equal rights to protection when in contact with adults.

Children are protected only when open and honest environments are created and exist in projects, partner organizations and activities.

Communications and child safeguarding

To ensure we minimize the risk that harmful relationships develop, correspondence between visitors and children is discouraged, and should the need arise it should be sent via AFS for monitoring rather than directly to the child. Volunteers must not develop special relationships with children and encourage these to develop outside of the normal school environment. Visitors must not exchange contact details when meeting children and young people.

All volunteering opportunities and visits to projects must be arranged officially, with the permission of the Institutional Representative.

Photographs, video and other images – Good Practice

Only use photos available for public use (verified and validated by an official Institutional representative or the person in charge of visual communication).

Guidance on Responsible Behavior

This information is designed to protect children first and foremost but also to minimize the risk to visitors of being wrongly accused of inappropriate behavior or abuse. By agreeing to be an occasional volunteer or a visitor you are agreeing to abide by this guidance on the understanding that if you do not adhere to it your volunteering experience will be terminated or the visit ended.

As an AFS/PC volunteer or visitor I will:

- Always arrange my volunteering/visit through my AFS/PC supervisor.
- Follow the directions and instructions of the staff assigned to supervise my work or accompany me on the visit.
- Treat children, their families and communities with equality and respect their privacy and not showing favoritism towards a particular child.
- Take photographs, videos and images in line with the good practice outlined in this guide.
- Discuss any concerns I have regarding the wellbeing of a child with an AFS / PC staff member/ Child Safeguarding Focal Point.
- Ask the AFS or PC staff member when I am not sure of what is acceptable behavior.

I will never:

- Use language, make suggestions or offer advice that is inappropriate, offensive or abusive.
- Behave physically in a manner which is inappropriate or sexually provocative. For example: fondle, hold, hug, kiss or touch children in an inappropriate way.
- Do things for children of a personal nature that they can do for themselves.
- Condone or participate in behavior with children which is illegal, unsafe or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade children or engage in any form of emotional abuse or physically hit a child.
- Discriminate against, show preferential treatment to, or favor particular children to the exclusion of others.
- Develop physical and/or sexual relations with children or their family members.
- Develop relationships with children which could in any way be deemed exploitative or abusive.
- Spend time alone with children away from others.
- Exchange personal contact details with children.
- Arrange to stay overnight with a child or their family.
- Introduce other visitors to the community without prior clearance from AFS/PC.

- Return to the AFS community without going through the standard visit process with AFS.

I confirm that I have read and understood the Guide for occasional volunteers and visitors, and agree to abide by its contents.

Date at

Name and Signature

Appendix 3: Child Safeguarding Focal Point

Roles and Responsibilities of the Child Safeguarding Focal Point:

To support the Institution with the day to day implementation of the Child Safeguarding Policy – with the support of the School's Legal Counsel and the HR department.

Specific duties include :

- To act as the point of contact in relation advice, support and assistance. Child Safeguarding Focal Point is not solely responsible for child safeguarding – this responsibility rests with everyone.
- To ensure that faculty, staff and partners are aware of the Child Safeguarding Policy and their responsibilities under it (for example by providing training and guidance).
- To advise and support faculty, staff and partners with the implementation of the safeguarding policy – including risk assessments.
- Establish links with local specialist child welfare, health and law enforcement contacts in order to have information available if an incident occurs and/or external advice is needed.
- Ensure that the safeguarding policy and our commitment to children's rights is made known to children, families and communities who work with AFS / PC, and that the policy is accessible.
- Ensure that the name and contact details of the Child Safeguarding Focal Point are made available so that people know how to raise a concern/where to seek advice.
- To act as a point of contact for concerns regarding child protection incidents and to raise those concerns to the Head of HR and Principal/Dean as appropriate.
- Keep an accurate record of any incidents.

Suggested Skills and Characteristics :

- Have knowledge and experience about child safeguarding and child protection.
- Be approachable, with good communication skills with adults and children.
- Be able to keep calm when a concern is raised, especially if a child needs assistance.
- Be able to work with others to ensure that the policy is implemented, and respond where a child protection incident occurs.
- Commitment to safeguarding children and upholding their rights – together with the ability to advocate for and defend safeguarding.
- Training and presentation skills.
- Be able to keep information confidential.

Appendix 4: Policy against Harassment and Bullying for Staff and Faculty

Policy for the prevention and combat of violence, bullying and harassment at the workplace for faculty and staff (Greece)

Amended in February, 2022

The American Farm School (AFS) is an independent, not for profit educational institution, incorporated in the State of New York, which has operated since 1904 in Thessaloniki, Greece and serves the needs of the people of Greece and neighboring Balkan countries. AFS prepares graduates to become career professionals in agriculture, life sciences, the environment and the food industry teaching practices that are economically viable, environmentally friendly and socially responsible. The founder of AFS, Dr. John Henry House, was a practical idealist who believed that education should be addressed to the whole person: the mind, the hands and the soul. After more than a century of applying the vision of its founder, AFS remains committed to the dynamic co-existence of theory and practice which have become the trademark of the institution.

The School was recognized by the Greek State in 1918 (Government Gazette no. 7A/1918) as the first US School operating in Greece.

Currently, AFS operates three educational not for profit associations, collectively, the 'Institution', registered separately under Greek law:

- The 'American Farm School', which operates General and Vocational High Schools.
- The 'American Farm School Postsecondary Educational and Training Association', which operates Perrotis College, the Junior College (I.IEK) and the Center for Lifelong Learning.
- The 'Thessaloniki Experiential Schools Association', which operates Pre-K, Kindergarten, Elementary and Middle Schools.

The Institution has a total work force which varies at times but presently does not exceed 350. All employment contracts are governed by Greek labor law. The Institution also maintains an office in the State of New York and has a small work force of US based employees. A separate anti-harassment policy applies to employees in the New York office.

The Institution complies with all measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and the handling of all forms of violence and harassment, including gender based violence and harassment and sexual harassment.

This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 which provide "In-house policies to combat violence and harassment" and "In-house policies for the management of internal complaints" and their applicable regulatory legislation and concerns the persons of par. 1 of article 3 of law 4808/2021, i.e. all employees regardless of their contractual status, including those employed under an employment contract, independent services, employed through third party service providers, as well as persons attending training, including trainees and apprentices, volunteers, employees whose employment has been terminated, as well as jobseekers.

Purpose and Objectives

The aim of this policy is to ensure that the Institution provides a safe work environment that respects, promotes and safeguards human dignity and the right of every person to a world of work without violence, bullying and harassment and that does not tolerate any type of such behavior, under any form and from no one.

The objectives of the policy are stated below:

- to prevent and combat violence and harassment at the workplace, within the meaning of articles 3 & 4 of Law 4808/2021, including gender based violence and harassment and sexual harassment.
- to have zero tolerance and to eliminate any conduct that directly or indirectly affects a person's employment or education, unreasonably interferes with a person's work or educational performance, or creates an intimidating, hostile or offensive working or learning environment;
- to ensure a supportive climate that discourages bullying and harassment and encourages reporting such behavior; and
- to provide staff, faculty and students with options to respond to harassment and bullying.

Definitions

The policy covers workplace harassment, violence or bullying at the workplace.

Violence and harassment are defined as behaviors, acts, practices or threats that aim, lead or may lead to physical, psychological, sexual or financial harm, as well as any unwanted behavior, related to age, race, appearance/skin color, racial or ethnic origin, sex, gender identity or characteristics, sexual orientation, marital or social status, pregnancy, maternity, religion or belief, disability or other long term condition with the purpose or effect of offending or violating the dignity of an individual (e.g. by victimizing, humiliating, undermining, manipulating and/or threatening this individual) and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

Any instruction for special treatment on any of the abovementioned grounds is also classified as discrimination and is prohibited under the applicable legislation.

When harassment, violence or bullying involves any form of unwanted verbal, non-verbal, psychological or physical conduct of a sexual nature (such as sexual advances, requests for sexual favors etc.), with the purpose or effect of offending or violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment, it is defined as sexual harassment. (Greek Law3896/2010).

Sexual harassment, as well as any less favorable treatment based on a person's rejection of such unwanted and offensive behavior, is also prohibited under the applicable anti-discrimination legislation. Penal sanctions may also be available by virtue of Article 337 of Greek Penal Code, against

anyone performing gestures of a sexual nature, or soliciting the performance of sexual acts from (1) a person dependent on him/her in the context of an employment relationship or (2) a person in need of work.

Examples of sexual harassment are:

- repeated and unwelcome sexually-oriented comments, bullying, teasing or joking, asking intrusive questions, or unwelcome flirting;
- displaying objects or pictures, including electronic images, which are sexual in nature and which create a hostile or offensive work, education, or living environment;
- whistling at an individual who walks by or inappropriate staring;
- inappropriate touching, unwanted sexual advances, unwanted invitations of a sexual nature.

The list of examples is not exhaustive.

Harassment, violence and bullying are considered forms of inappropriate behavior. Appropriate measures will be enforced against individuals who engage in harassment or bullying and against supervisory and managerial personnel who knowingly allow such behavior to occur or to continue, or fail to report such behavior of which they are aware.

This policy also covers any case in which a member of staff or faculty harasses or bullies a student, a visitor to campus and/or any other individual having any interaction with a member of staff or faculty in relation to the Institution's affairs.

Additionally, the Institution recognizes that power imbalances can exist and can create the appearance of impropriety even in consensual relationships between supervisors and those whom they supervise. Accordingly, the Institution strongly discourages romantic or sexual relationships between employees with supervisory responsibilities and the employees whom they supervise or oversee. For the purposes of this policy, supervisory responsibilities include, but are not limited to, giving work assignments, directing performance, reviewing performance, disciplining, recommending promotions or raises in pay, approving leave, and scheduling hours of work. This policy also strongly discourages relationships between board members and employees when the board member's duties, including committee work, involve direct oversight over that employee, or involve making determinations about the employee's terms and conditions of employment (for example, through service on a compensation committee). If a board member enters into a romantic or sexual relationship with an employee, he or she must promptly disclose the relationship to both the Board Chair (and if the Board Chair has entered into the relationship, then he or she must promptly disclose to the Chair of the Audit Committee), avoid any oversight roles over the employee, and abstain from any votes concerning the terms and conditions of that employee's employment specifically (excluding votes that involve employees collectively). If two employees are involved in a romantic or sexual relationship, and a re-assignment results in one having supervisory responsibility over the other, the employees must immediately inform the Head of Human Resources of the relationship.

However, if a consensual relationship develops, the Institution may permit the persons involved to work with the Human Resources Department to find a workable solution that eliminates the potential

for conflicts and favoritism. Workable solutions may include, for example, department transfers, schedule changes, relocation, supervisory changes, or separation of employment.

Prevention and combat of violence and harassment at the workplace

A) The Institution conducts a study to assess risks and record measures taken against violence and harassment, including sexual harassment.

B) Measures to prevent, control and address the risks of violence and harassment.

The Institution makes every effort to prevent, control, limit and address these risks, as well as to monitor such incidents or behaviors. Preventative actions and measures include:

- dissemination of this policy to students, faculty and staff and inclusion in applicable handbooks;
- addition of the present policy to any long-term agreement with contractors;
- publication of this policy on the Institution's website in order to inform any visitor or other party who has or will have any relation or connection with the Institution;
- provision of access to updates and information to staff and all members of the community in accessible formats, as appropriate, on the risks of violence and harassment, on sound behavioral patterns (e.g. avoiding addictions), and on issues concerning vulnerable groups of workers and members of the community, as well as related prevention and protection measures. In addition, posting a poster and a brochure on the Institution's website and in prominent places on campus with the details of the competent bodies to which any affected person can apply (the appropriate person/office within the Institution, the Hellenic Labor Inspectorate – S.E.P. and the independent authority of the Greek Ombudsman). Also, informing staff about the S.E.P. complaint line through the citizen service line 1555 and the SOS line 15900 for immediate psychological support and counseling of female victims of gender-based violence;
- training and education for all educational, administrative and technical staff on issues related to the creation of a working environment and a community protected from all forms of harassment, violence or bullying. Every member of faculty and staff will be trained once annually and all new members of faculty and staff will undertake the training before they begin their service;
- requiring that all faculty and staff review this policy on an annual basis and sign an acknowledgement indicating that they have reviewed, understand, and agree to comply with, its terms. These acknowledgments will be retained by HR;
- taking technical measures, such as the installation of an emergency alarm, improvement of lighting etc.;
- provision of guidance and support to victims of violence and harassment or victims of domestic violence in their effort to feel included in workplace, and
- the regular evaluation of the effectiveness of the implemented preventive and response measures and the revision/updating of the risk assessment study and the designed measures.

Responsibilities of Institution's Community Members

Staff and faculty have the following responsibilities:

- To treat all individuals, students, and colleagues with utmost respect, always considering how their actions may be perceived by others;
- To refrain from physical violence or using offensive language, including towards students and other faculty and staff;
- To report any incident of bullying or harassment or violence of which they are aware that involves a student. Staff and faculty are also encouraged and expected to report other incidents of bullying or harassment of which they are aware, and supervisors have an obligation to do so, as set forth below;
- To make reports of bullying and sexual harassment in good faith. It is important to note that while staff and faculty may be subject to appropriate action for making a knowingly false report, no measures will be taken against any individual who makes a good faith report, even if the report is ultimately determined to not rise to the level of a policy violation or is otherwise unsubstantiated. Complaints made in bad faith may subject the complainant to appropriate action; and
- Not to retaliate against anyone who makes a report: Retaliation against individuals who complain of harassment or bullying or who testify or assist in any investigation or proceeding involving harassment or bullying is unlawful and strictly prohibited.

Supervisors, Department Heads & Directors, (including Principals, Deans, the President and any other senior administrators) have the following responsibilities:

- To encourage respectful behavior and safekeeping of a work climate where respect for human dignity, cooperation and mutual assistance are core values;
- To assist and support members of staff and faculty who may have been subjected to bullying or harassment, generally through referrals to the HR office;
- To organize specialized staff meetings to discuss relevant issues and address potential risks in a timely manner;
- To not retaliate against any person who reports bullying or harassment;
- To not threaten or imply that an individual's submission to or rejection of a sexual advance or harassment will in any way influence any decision regarding that individual's employment, performance evaluation, advancement, compensation, assignments, discharge, or any other term or condition of employment; and
- To report all incidents of which he/she becomes aware (regardless of the manner in which he/she becomes aware) to the HR office immediately irrespectively of the seriousness of the incident and the status of the victim (faculty, staff, student, etc.). Even in circumstances where a victim may not want to report the incident, the Institution may be required, by law, to act.

The Head of Human Resources is the person of reference for reporting ("liaison") and for guiding and informing employees about prevention and dealing with violence and harassment at work. In this context, the Head is responsible to:

- Provide training/counseling opportunities to staff and faculty members;
- Provide support for targets of harassment, violence and bullying, and to victims of domestic violence;

- Address allegations of harassment or bullying of a student by a faculty or staff member with due consideration to the inherent power imbalance between faculty and/or staff and students and the age and vulnerability of students;
- Encourage targeted staff or faculty to report unwelcome behavior;
- Put in place harassment procedures, as appropriate;
- Provide information for the rights and obligations of employees and the employer, as well as persons exercising the managerial right or representing the employer, to the extent and the degree of their own responsibility, in the event of occurrence or reporting or filing complaints about such incidents, and for the relevant procedure;
- Maintain a confidential record of all reported harassment and bullying allegations made in good faith;
- Immediately report allegations of violations of this policy orally and in writing to President, provided that if an alleged violation involves the President, such report will instead be made to the Chair of the Board;
- May consult with outside counsel, as needed, and
- Promptly report certain allegations of violations of this policy to the President and the Chair of the Board, and give a quarterly report to the President and the Chair of the Board describing all allegations of harassment, violence or bullying, including the ultimate resolution of such allegations (described further below).

Reporting/Complaint Procedures

Those who have been subjected to harassment or bullying are urged and expected to report the relevant facts promptly. Employees and faculty should ordinarily direct such reports to the HR office or, alternatively, to the President, who will in turn, apprise the HR office of such complaints. Employees should choose whichever reporting avenue they feel more comfortable with under the circumstances. However, reports alleging harassment, violence or bullying by a member of the Board of Trustees or an officer of the Institution, including the President, or the immediate family members of such persons holding faculty or staff positions, should be made to the Chair of the Board, and reports alleging harassment, violence or bullying by the Chair of the Board (or his or her immediate family members) should be made to the Chair of the Audit Committee. Reports may be made orally or in writing. The name, title and phone number of the individual to be reached for oral reports in each different case will be circulated to staff and faculty members, when the policy is distributed by the HR office. This table with the contact details of the persons responsible for receiving oral complaints will be updated as needed. The form for submitting a written complaint can be obtained from the HR office. Individuals are encouraged, but not required, to use this complaint form. In accordance with this policy, students report harassment and bullying allegations against a faculty or staff member to the highest-ranking faculty member (Principal, Dean) of their School or of the College except if the report involves the highest-ranking faculty member, in which case they have to make their report to Human Resources or the President.

If a report of a bullying, violence or harassment incident involves a student and an adult, the individual to whom the student disclosed, such as an advisor, teacher, student life staff member, Coordinator, Director or Dean should inform the HR office and President. For purposes of providing interim support

and facilitating the investigation, the HR office will, in turn, inform the highest-ranking member of faculty of the unit the student is attending, unless such member of faculty is allegedly involved in the incident or making such a report would otherwise compromise the investigation.

In cases involving (1) allegations of physical assault, including sexual touching; (2) any alleged violation of this policy committed by a faculty or staff member against a student; or (3) other matters of sufficient severity to warrant the prompt attention of the Institution's leadership, the President will make an immediate report to the Chair of the Board. Additionally, on a quarterly basis, the Head of Human Resources will give a report to the President and the Chair of the Board describing all allegations of harassment, violence or bullying, including the ultimate resolution of all such allegations.

Responses & Resolution

All incidents reported will be dealt with promptly and with appropriate sensitivity. To ensure the safety and well-being of involved parties, and without regard to possible fault or blame, the Head of HR will speak with all involved parties about the availability of supportive measures, and determine what supportive measures, if any, should be provided. Supportive measures may include, but are not limited to:

- referral to counseling
- change to staff/faculty member's or student's working or housing assignments
- voluntary leaves of absence
- extensions of academic or job-related deadlines

Additionally, in order to protect parties and the Institution's community, the Head of HR will conduct a preliminary assessment of the allegations, and following legal advice, will determine whether it is appropriate and legally permissible to implement interim measures. Interim measures are temporary measures to promote safety, and are not intended to be punitive. Such measures include, but are not limited to:

- a directive limiting or prohibiting contact between the complainant and respondent
- temporary exclusion from certain areas of the Institution's property
- temporary assignment of an employee to a different unit/department
- changes in academic/course schedules or in work schedules
- limiting participation in certain events, gatherings, or activities

A formal or informal resolution process will follow. In conducting all cases, the Institution will strive to keep the identity of individuals making reports as confidential as possible (it being conveyed to complainants that there are no guarantees or promises of absolute confidentiality) and all parties involved will be treated fairly and equally during the procedure. The contents of any reports made shall remain strictly confidential and access shall be restricted only to the persons who have received the reports in accordance with the reporting procedures above and to the authorized personnel and officers of the Institution handling the incident or involved in the investigation as necessary. The Institution prioritizes the protection of the personal data of its community members and is dedicated to always handling it with transparency and in accordance with the applicable privacy legislation. In order to safeguard the fairness of all investigative procedures and the rights and interests of the

involved parties, the Institution and all involved parties shall adhere to the data protection legislation, especially to the principles of transparency, necessity and proportionality which may involve exceptions to the regular handling of our community's personal data as outlined in the Institution's general data protection policies, employee notices and similar documents, as utilized from time to time.

- **Right to information and access:** To protect the privacy rights of complainants, the alleged wrongdoer's rights to be informed about their personal data being processed in connection with an investigation under this policy and to have access to personal data related to the investigation, may be restricted to the extent permitted under the applicable data protection legislation. Divulging certain information shared about the incident could lead to the identification of the complainant and could pose risks of retaliation, discrimination and adverse treatment. The Head of HR shall determine, with the advice of the Data Protection Officer and legal counsel, if and what information can be provided to the alleged wrongdoer as regards the investigation after balancing the latter's rights and interests with the rights and interests of the complainant. Information can also be disclosed at the behest or with the explicit consent of the complainant.
- **Right to deletion and rectification:** The rights of deletion and rectification of recorded personal data of the alleged wrongdoer shall also be suspended in the course of report investigations and resolution procedures, as their exercise would undeniably jeopardize the integrity of the procedure. The complainant may request to rectify data contained in the report insofar as to clarify or add information regarding the incident.
- **Data retention:** All data pertaining to the reporting of the incident and the consequent steps of investigation shall be retained until the incident's final resolution. If the report is substantiated, the contents of the report shall be retained for as long as it is necessary for the Institution to protect its legitimate interests, defend its rights before the Courts of law and comply with its legal obligations. If the report is found to be unsubstantiated, then all related data shall be encrypted and all personally identifying information redacted (subject to subsequent retrieval, if a legal basis to retrieve such information arises) immediately after the final decision. After the deletion of the personal data once retention is no longer necessary to protect the Institution's legitimate interests, defend its rights before Courts of law, and comply with its legal obligations, the Institution may keep only anonymized records of the reports for statistical and/or historical purposes.
- **Disclosure of the final resolution:** The final resolution and any imposed measures, as well as the rationale behind them, shall be duly disclosed to the complainant at the end of the procedure. The wrongdoer's or alleged wrongdoer's right to object to the processing of their personal data shall not be applicable as regards the disclosure of the resolution.

Informal resolution will occur when the Head of Human Resources in cases involving a member of staff or the relevant School Principal or Dean in cases involving a student or a member of faculty following consultation with the Head of HR or/legal counsel determines—after consideration of factors such as the severity of the allegations, the safety and best interests of the Institution's community, and the wishes of the involved parties—that formal resolution is unnecessary. Informal resolution can take a number of forms, but generally includes mediation between the parties to determine whether an

agreement can be reached on an appropriate resolution. If an agreement cannot be reached through informal resolution, including as to any remedial measures, the matter will proceed to formal resolution.

In cases in which informal resolution is inappropriate or fails to resolve the allegations, formal resolution will take place. Formal investigations are carried out by an ad hoc Compliance Committee formed by the President.

The Compliance Committee is comprised of three (3) to five (5) members. In incidents involving a staff member (teaching staff not included), the Committee consists of (1) the Head of Human Resources, (2) the Institution's In-House Legal Counsel (if such a position exists and if legal privileges of the Institution are not jeopardized by his participation) and staff member(s) appointed by the President. If even one of the persons involved is a member of the Workers and Employees Union of the American Farm School of Thessaloniki, a representative of the Board of the Union will participate in the Committee. When the incident involves a teacher or pupil / student the Committee includes the Principal of the relevant school or the Dean of Perrotis College in addition to the Head of Human Resources and the Legal Counsel. If even one of the persons involved is a member of the Northern Greece Private Schools Teachers Association – Branch of the American Farm School, one of the members of the Committee will be a representative of the Local Executive Committee of the Branch. When the incident involves a non-teaching staff member and a teaching staff member or pupil / student, the composition of the Committee is adjusted accordingly. If any of the foregoing individuals have an actual or apparent conflict of interest, as determined by the President, the President will replace them with someone with appropriate training who has no such conflict of interest. The Compliance Committee may appoint an investigator, if necessary. Notwithstanding the foregoing, if the allegations involve the President or immediate members of his/her family holding faculty or staff positions, the resolution of the allegation will instead be carried out by the Board, a duly appointed committee thereof, or investigator(s) appointed by the Board (or committee thereof).

At the conclusion of the investigation, the Committee (by majority vote) or single decision maker, as applicable, will determine whether a violation of this policy has occurred. Except in cases involving the President or immediate members of his/her family holding faculty or staff positions, the President will determine the appropriate measure, if any. In cases involving the President or immediate members of his/her family holding faculty or staff positions, the Board or a duly appointed committee thereof will make such a determination.

Possible measures that may be imposed upon a finding of a policy violation include the following, and will depend on factors including but not limited to the severity of the offense and any prior misconduct, as well as any rights and obligations applicable to faculty by law:

- A verbal or written warning
- Obligation to undergo training
- Change of position, schedule, form or place of employment
- Termination of contract subject to the prohibition of abuse of the right of article 281 of the Civil Code (law 4808)

The President (or the Board, as applicable) will also determine (after consulting with legal counsel in the event such measures would be taken unilaterally and without the consent of the applicable employee), whether it is appropriate to implement remedial measures to protect victims of violence, bullying or harassment and the Institution's community as a whole. Remedial measures may include, but are not limited to:

- Referral to counseling
- Change to the staff/faculty member's or student's working or housing assignments
- A directive limiting or prohibiting contact between the complainant and respondent
- Implementing additional security measures.

The Principal of the applicable school will report serious incidents involving primary or secondary education faculty to the Greek Ministry of Education, in accordance with Greek law. The faculty member may be subsequently called in by the Disciplinary Committee of the Ministry.

The Institution is committed to comply with the obligation to prohibit retaliation, in accordance with article 13 of law 4808/2021 and the provisions of labor law.

In the event that a person is the victim of an incident of violence and harassment while trying to find employment, during the employment relationship or even after the employment contract under which the incident is reported to have occurred, beyond the right to complain within the Institution and in accordance with this policy, the person has: a) the right to judicial protection, b) file a complaint and request for the solution of a labor dispute with the Hellenic Labor Inspectorate and c) file a report with the Greek Ombudsman.

The Institution also cares for the protection of employment and the support of staff who are victims of domestic violence by providing special leave, if necessary or adopting flexible working arrangements upon the employees' request, in order to support them in remaining employed and feeling included in the workplace after such incidents, especially whenever minors or children with disabilities or serious illnesses are involved.

Each employee will receive a copy of document in English and Greek including the complaint form.