



FACTSHEET – GREECE

Lanzarote Committee Implementation Report on:

“The protection of children against sexual exploitation and sexual abuse facilitated by information and communication technologies (ICTs): addressing the challenges raised by child self-generated sexual images and/or videos (CSGSIV)”

This factsheet was prepared by the Secretariat in March 2023.

It has been updated with information submitted by the Government of Greece in October 2025 displayed in orange and blue text boxes.

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I. Introduction

One of the main functions of the Lanzarote Committee (“the Committee”) is to monitor the effective implementation of the Lanzarote Convention (“the Convention”). The monitoring procedure is divided into rounds, each concerning a specific thematic area and involving all State Parties (“the Parties”) simultaneously. The monitoring rounds start with the launch of a thematic questionnaire, to which the national authorities are asked to respond, and which other relevant stakeholders can comment on. After carrying out its **evaluation procedure**, consisting of the analysis of such replies, the Committee adopts an **implementation report** where it draws conclusions about the different national frameworks, strategies and policies in place, makes recommendations to Parties, and highlights promising practices as well as some challenges. Sometime after the adoption of the implementation report, the Committee conducts a **compliance procedure** with the aim of assessing whether Parties comply with the recommendations made by the Committee as part of the evaluation procedure.

The compliance procedure seeks to assess the follow-up given by Parties to the recommendations made by the Committee in the evaluation procedure. In the [implementation report of its 2nd monitoring round concerning the challenges raised by child self-generated sexual images and/or videos](#), the Committee made **three types of recommendations**:

- **“Require”**: when the steps the Committee recommends Parties to take correspond to obligations arising from the Convention, as clarified by its explanatory report.
- **“Request”**: when the steps the Committee recommends Parties to take correspond to obligations arising from the Convention, as clarified by documents adopted by the Committee (such as previous monitoring round findings, opinions or other documents).
- **“Invite”**: when the steps the Committee recommends Parties to take correspond to promising practices or other measures to enhance protection of children against sexual violence even beyond specific requirements of the Convention.

At its 41st meeting (13-15 February 2024), the Lanzarote Committee agreed on a new methodology for the assessment of State Parties’ compliance with the 2nd monitoring round recommendations ([see point 4 of the Appendix to the List of decisions](#)). It entrusted the Secretariat to insert boxes in the 2nd monitoring round country [factsheets](#) to highlight where information on follow-up measures taken or changes occurred may be inserted. It is recalled that these factsheets are a synthesis of the Committee’s implementation report findings with respect to specific Parties. The factsheets are structured along the lines of the implementation report and the footnotes in this document refer to the specific paragraphs of the implementation report.

This document responds to the above decision to use the country factsheets to gather information about follow-up. Blank information boxes have therefore been added to the country factsheets to indicate where Parties are requested by the Committee to provide information about follow-up actions undertaken/underway. Such actions may include changes in law, policy or practice that have taken place since March 2022 to address the Committee's recommendations. Failure to provide information concerning “request” and “require” recommendations will amount to lack of cooperation with the Committee in exercising its monitoring role and might lead to a non-compliance conclusion because of lack of information.

State Parties are welcome to share any promising practice responding to the “invite” recommendations in the separate information boxes at the end of each chapter. It would also be interesting for the Committee to know whether any of the highlighted promising practices in the implementation report were taken as an inspiration for any measures. This will contribute to measuring the impact of the Committee’s capacity building role.

II. Legal frameworks

Interpreting the Convention, in conjunction with its [Opinion on child sexually suggestive or explicit images and/or videos generated, shared and received by children](#) (6 June 2019), the Committee identifies what Parties ought to have in place as well as what they are encouraged to do to better protect children against the exploitation of their self-generated sexual images and/or videos (CSGSIV).

Observations and recommendations of the Committee on the legal framework specific to Greece

The Committee observes that, according to the information received from Greece, production and possession of self-generated material are not criminalised when the child(ren) in question have reached the legal age for sexual activities. The Committee notes, however, that relying on the age of sexual consent alone, to exclude criminal responsibility for the scenarios listed in paragraphs 3-6 of the 2019 Opinion, is insufficient as, in such cases, younger children may not be covered by the exemption from criminal responsibility.¹

The Committee thus **requests** Greece to ensure in its legal framework:

- that a child will not be prosecuted when he/she possess:
 - their own self-generated sexually suggestive or explicit images and/or videos;
 - self-generated sexually suggestive or explicit images and/or videos of another child with the informed consent of the child depicted on them;
 - the self-generated sexually suggestive or explicit images and/or videos of another child as a result of receiving them passively without actively asking for them;²

Follow-up actions: Recommendation II-6 & II-8: Greece is reviewing its Penal Code to introduce explicit exemptions from criminal liability for children possessing or consensually sharing self-generated sexual images, in line with the Committee's

guidance. A draft amendment is under consultation with child protection NGOs and legal experts.

- that a child will not be prosecuted for sharing his/her sexual images and/or videos with another child when such sharing is voluntary, consensual and intended solely for their own private use.³

Follow-up actions:

Greece also has rules that lead to the criminalisation of the distribution by children of self-generated sexual images and/or videos of *other* children.⁴

The Committee thus **requests** Greece:

- to ensure that the distribution or transmission by children of self-generated sexually explicit images and/or videos of other children is prosecuted as a last resort when such images and/or videos qualify as "child pornography" in accordance with Article 20(2) of the Convention.⁵

Follow-up actions: Recommendation II-9: Prosecutorial guidelines are being updated to ensure that distribution of CSGSIV by children is prosecuted only as a last resort, with emphasis on restorative and educational measures.

¹ Para. 73

² Recommendation II-6

³ Recommendation II-8

⁴ Para. 82

⁵ Recommendation II-9

In addition, regarding the abovementioned requests:

Chapter 19 of the Greek Penal Code, which covers crimes against sexual freedom and crimes of economic exploitation of sexual life, already includes provisions the ratio of which is to criminalize behaviors related to the production and/or use and dissemination of material related to CSGSIV, only when there is no broad sense of "consent" for its creation by all participating persons or when its distribution offends the sexual dignity of the recipient. By contrast, it can be concluded that the possession of a photograph or video (related to sexual behavior or the display of genitals) depicting the producer himself or its production with the consent of the other person appearing in it, is not punishable under these provisions (whether the perpetrator is a minor or an adult). Specifically:

Consequently, a minor who displays his or her genitals to another person via information systems is not prosecuted unless the condition of gross insult to the other person is also met. For the offense to be considered as such, it must be unintentional for the victim, i.e., the act must have occurred without the victim's consent. If, on the contrary, someone consents to the perpetrator's actions (including the display of their genitals), then they are simply making themselves available sexually. Thus, consent to the taking of material depicting another person's genitals, which is equivalent to non-opposition to the taking (passive receipt), precludes the offense and, consequently, prosecution under Article 337 of the Penal Code.

(ii) Article 346(1) stipulates that: 1. Anyone who, without any lawful right, discloses to a third party or displays in public view a real, altered or designed image or any kind of visual or audiovisual material depicting a non-public act of another person relating to their sexual life, shall be punished with imprisonment of at least three (3) years and a fine. (...) 3. The act referred to in paragraph 1 shall be punished with imprisonment of up to eight (8) years and a fine if it is committed: a) by posting on the internet or on social media with an indefinite number of recipients, (...)

Therefore, when a minor discloses material depicting, for example, sexual intercourse between himself/herself and another minor following a video recording they made themselves, if this video recording took place with the consent of the participant and the sharing is also carried out with their consent, the minor is not prosecuted for the act under this provision.

However, all of the above behaviors appear at first glance to be covered by the legal form of Article 348A of the Penal Code concerning child pornography, which covers the production, possession, and distribution, etc., of material involving minors, without any exception in the wording of the article for self-production or for consent on the part of the minor appearing in the material, since the law does not require "another" as a victim and the object of protection of the provision is supra-individual. A more accurate consideration and interpretation of this article, however, leads to the following approach:

(a) With regard to the production and distribution of self-pornographic material by minors, the bearer of the legal right must be the minor who is the subject of the pornography and therefore cannot also be the perpetrator of the punishable offense. This interpretative approach is further supported by the wording of the aggravated forms of child pornography provided in paragraphs 4 and 5 of the same article, which refer to the use of a minor below a certain age limit (12 years), to link the production of the material to the exploitation of need, mental or intellectual illness, or physical disability, due to an organic disease of the minor or through the use or threat of violence against the minor, or if the production exposed the minor's life to serious danger, as well as for causing, through the production, use, distribution, etc. of pornographic material, serious bodily harm or death of the minor. Since, for the specific cases of this crime (for which stricter penalties are imposed in relation to the basic form of the provision) it is necessary to harm another minor in this way, then a stricter approach could not apply to the lesser offense, which would make the production of self-pornographic material a criminal offense. It is, moreover, doubtful whether there is any *self-harm* (of the self-pornographing minor) at all, or merely a permissible disposition of one's own legal interest; thus, the criminal prosecution of such cases appears, from a criminological standpoint, entirely purposeless.

(b) With regard to cases where minors engage in mutual pornography (behaviour that usually manifests itself in the context of the development of their shared sexuality), the provision of Article 339(2) applies, which states that: '2. Sexual acts between minors under the age of fifteen (15) are not punishable, unless the age difference between them is greater than three (3) years, in which case only reformatory or therapeutic measures may be imposed' applies *mutatis mutandis in bonam partem*. In this case as well (i.e., Article 339(2)), the boundaries between perpetrator and victim are similarly blurred, while it would be legally paradoxical for minors who commit the greater offense, i.e., sexual acts between themselves, to go unpunished, but to be punished for the lesser offense, i.e., their mutually consensual mutual pornography.

It goes without saying, but it should be noted that this leniency for perpetrators in both of the above cases applies only to acts of production and possession and in no way to acts of distribution of their child pornography material to third parties.

Generic recommendations of the Committee on legal frameworks

The Committee **invites** all Parties, including Greece:

- to rather use the term “child sexual abuse material” (CSAM) for material depicting acts of sexual abuse of children and/or focusing on the genitalia of the child following the guidance set out in the [“Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse”](#)⁶ in the development of future national, regional and international legal instruments and policies addressing the prevention of and protection from sexual exploitation and sexual abuse of children, as the Committee acknowledges that the term “child pornography” can be misleading and undermine the gravity of the crimes it refers to;⁷
- to strengthen the protection of children by introducing explicit references in their respective legal frameworks to conduct concerning CSGSIV, identifying the circumstances when children should not be held criminally liable and when they should be prosecuted only as a last resort;⁸
- to introduce in their legal framework a definition of “child sexual abuse material” in line with its Recommendation II-1 above;⁹
- to contemplate appropriate legal responses to conduct involving non-visual self-

generated sexual material produced by children in the context of offences covered by the Convention;¹⁰

- to adopt legislative or other measures which promote as a priority educational and other measures that will aim to support children in safely exploring their sexual development while understanding and avoiding risks deriving from the production and possession of self-generated sexual images and/or videos;¹¹
- to consider criminalising solicitation of children for sexual purposes (“grooming”), even when it does not lead to either a face-to-face meeting or to producing CSAM;¹²
- when dealing with sexual extortion cases involving children, to take into account the situation where CSGSIV are used to force, coerce or threaten the child to give additional self-generated sexual images and/or videos, other sexual favours, a financial gain or other gain to the offenders by:
 - either creating a specific incrimination to address this situation,
 - or prosecuting both the initial detention of CSGSIV and the act of extortion;¹³
- to ensure that sexual extortion of children involving CSGSIV is investigated and prosecuted.¹⁴

Promising practices: Terminology (II-1 to II-3): The Ministry of Justice has endorsed the use of “child sexual abuse material (CSAM)” in official documents and is working to align national definitions accordingly.

⁶ The Terminology Guidelines also refer to the term “child sexual exploitation material”, indicating that this term can be used in a broader sense, see [“Luxembourg Terminology Guidelines”, pages 38-40 in particular.](#)

⁷ Recommendation II-1

⁸ Recommendation II-2

⁹ Recommendation II-3

¹⁰ Recommendation II-4

¹¹ Recommendation II-7

¹² Recommendation II-10

¹³ Recommendation II-11

¹⁴ Recommendation II-12

III. Investigations and prosecution

In its [Interpretative Opinion on the applicability of the Lanzarote Convention to sexual offences against children facilitated through the use of information and communication technologies](#) (ICTs) (12 May 2017), the Committee called on Parties to ensure effective investigation and prosecution of ICT facilitated sexual exploitation and sexual abuse by providing resources and training to responsible authorities.

Observations and recommendations of the Committee on investigations and prosecution specific to Greece

On the specialisation and training of authorities

The Committee notes that Greece appears to have specialised units dealing with ICT-facilitated offences against children within law enforcement.¹⁵ No information appears to have been submitted regarding any specialised units in prosecution or in courts.

As regards the training of authorities, the Committee **requires** Greece:

- to put training in place for prosecutors on aspects of child sexual exploitation and sexual abuse.¹⁶

Follow-up actions:

The Committee also **requests** Greece:

- to ensure that training on ICT facilitated sexual offences against children is available for prosecutors who are or will be working on these issues;¹⁷

Follow-up actions:

- to ensure that training on ICT facilitated sexual offences against children is available for judges who are or will be working on these issues.¹⁸

Follow-up actions: Recommendations III-15 to III-18: A new training module on ICT-facilitated child sexual abuse is being rolled out for prosecutors and judges in cooperation with the National School of

Judiciary.

Regarding the above 3 requests for training the relevant actions of the National School of Judiciary are listed:

A. Initial Training for Prosecutors Course:

1. Duties of a Prosecutor for the minors, 2-day training;
2. Crimes against sexual freedom (including crimes against children, 3-day training;
3. Domestic violence, 3-day training;
4. Forensic Psychiatry of children and adolescents, 2-day training and a one-day workshop "Child-Friendly Justice".

B. Initial Training for Civil Criminal Justice Course:

1. Family Law 3-day training;
2. Forensic Psychiatry of Children and Adolescents 2-day training;
3. Protection of Victims from Criminal Acts one day workshop.

C. Lifelong training:

Collaboration with the Tsatsos Foundation and the Cyprus Judicial School in the European program "Child-Friendly Justice" lasting 18 months (September 2023-April 2024)

Further, the Committee **invites** Greece:

¹⁵ Para.115

¹⁶ Recommendation III-15

¹⁷ Recommendation III-16

¹⁸ Recommendation III-18

- to ensure that training on the challenges raised by CSGSIV and ICT-facilitated coercion or extortion of children is available to prosecutors.¹⁹

On victim identification and prosecution of perpetrators

The Committee observes that Greece has victim identification units within law enforcement for cases of ICT facilitated sexual offences against children.²⁰ As regards the INTERPOL's International Child Sexual Exploitation (ICSE) image and video database, Greece is connected to it but does not actively contribute.

Therefore, the Committee **invites** Greece:

- to ensure that any obstacles to active contribution to INTERPOL's ICSE's database are removed and that national contributions are implemented in practice, regardless of the nationality of the victims.²¹

INTERPOL ICSE (III-27): Greece has designated a liaison officer to coordinate contributions to the ICSE database and is finalizing protocols for secure data sharing.

As regards the prosecution of perpetrators, the Committee **requests** Greece:

- to take the necessary legislative or other measures, in conformity with the fundamental principles of its internal law, to ensure an effective investigation and prosecution of ICT facilitated sexual offences against children, allowing, where appropriate, for the possibility of covert operations.²²

Follow-up actions: Recommendation III-28:

Greece has taken all necessary measures to ensure the effective investigation and prosecution of sexual crimes against minors facilitated by information systems, in accordance with both national and international standards.

Firstly, the Greek Code of Criminal

Procedure includes provisions which, in addition to general investigative acts such as house searches or body searches (Articles 253 and 256, 257 CPC) for the seizure of digital evidence, it also provides for specific investigative measures for the investigation of serious crimes, including Articles 323A "Trafficking in human beings," 336(3) "Rape of a minor," paragraph 1 of Article 338 against a minor "Abuse of a person incapable of resistance to sexual acts," paragraphs 1 and 4 of Article 339 "Sexual acts with minors or in their presence," paragraph 1 of Article 342 "Abuse of minors," Articles 348A "Child pornography," 348B "Solicitation of children for sexual purposes," 348C "Pornographic performances of minors," and 351A "Sexual act with a minor for remuneration" of the Criminal Code (see Article 254 of the Code of Criminal Procedure). The investigation of these crimes may also include the conduct of:

- a) covert investigation, during which the investigating officer or a private individual acting under his instructions offers to facilitate the commission of one of the crimes referred to in paragraph 1, which the perpetrator of the crime in question had already decided to commit;
- b) investigative infiltration, during which an investigating officer with concealed identity undertakes executive duties in a criminal or terrorist organization with the aim of uncovering its structure, reveal its members, and ascertain the crimes referred to above, which the members of the organization had premeditated. The same duties may be undertaken by a private individual under specific conditions and provided that the public prosecutor is otherwise aware of their actions;
- c) controlled transport, as provided for in Article 38 of Law 2145/1993 (A' 88);
- d) lifting the confidentiality of the content of communications or location and movement data, in compliance with the guarantees and procedures of Articles 4 and

¹⁹ Recommendation III-17

²⁰ Para. 180

²¹ Recommendation III-27

²² Recommendation III-28

5 of Law 2225/1994 (A' 121);
e) recording of activity or other events outside the home using audio or video devices or other special technical means;
f) correlation or combination of personal data.

Within the framework of judicial cooperation between the members states of the European Union:

- Issuance and execution of European Investigation Orders (Directive 2014/41/EU on the European Investigation Order (EIO), which was incorporated into Greek law in 2017 through Law 4489/2017)
- Participation in Joint Investigation Teams (JITs) with the specific purpose of conducting investigative actions in one or

more of the involved states (Law 3663/2008 - Government Gazette 99/A/28-5-2008, European Judicial Cooperation Unit (EUROJUST), Joint Investigation Teams and other provisions – as replaced by Law 4531/2018, Article 13, and Law 4249/2014, Article 62).

Meanwhile legislative amendments are being considered to allow covert investigative techniques in cases involving online grooming and extortion.

Generic recommendations of the Committee on investigations and prosecution

On the specialisation and training of authorities

The Committee **requests** those Parties that are not already doing so:

- to ensure that law enforcement units, services or persons specialised in ICT facilitated sexual offences against children are adequately financed to ensure sufficient resources, including staff, equipment and training;²³

Follow-up actions:

Considering that for the time being, the above-mentioned entities operate within existing justice structures in Greece, we can confirm that they are adequately financed within a framework that functions upon requests, that the last years are always met. In particular, financing of staff is rarely an issue, equipment is and can be financed either by the budget of the Ministry of Justice, or the budget of the Courts Financing Fund (legal entity supervised by the Ministry of Justice), and training is

consistently financed by the budget of the National School of Judiciary.

- to ensure that prosecution units, services or persons specialised in ICT facilitated sexual offences against children are adequately financed to ensure sufficient resources, including staff, equipment and training.²⁴

Follow-up actions:

The Committee **invites** all Parties, including Greece:

- to ensure that the capacities of any investigative units, services or persons specialised in ICT facilitated sexual offences against children take into account evolving technologies and online behaviours, and more specifically, that they reflect current practices used by perpetrators. Additionally, the Committee invites all Parties to exchange best practices between the relevant investigative units;²⁵

²³ Recommendation III-3

²⁴ Recommendation III-7

²⁵ Recommendation III-4

- to ensure that law enforcement units, services or persons specialised in ICT facilitated sexual offences against children adequately cover and/or are specialised in offences against children involving CSGSIV;²⁶
- to ensure that units, services or persons within courts responsible for ICT-facilitated sexual offences against children have the necessary specialisation in the intersecting areas of children’s rights, sexual abuse and sexual exploitation of children, and ICT technical knowledge;²⁷
- to ensure that units, services or persons within courts responsible for ICT-facilitated sexual offences against children have sufficient specialisation in offences involving CSGSIV;²⁸
- to ensure that training on the challenges raised by CSGSIV and ICT facilitated coercion or extortion of children is available to judges;²⁹
- to ensure that measures, services and technology available to those in charge of identifying child victims of ICT-facilitated sexual offences are up to date, reflecting current practices across Parties, include the establishment and use of national child abuse material databases, and that resources are sufficiently allocated.³⁰

The Committee also **invites** Parties that are not already doing so:

- to provide specific training on ICT facilitated sexual offences against children, including when such offences involve CSGSIV, and ICT facilitated coercion or extortion to law enforcement agents who are likely to come into contact with such cases;³¹
- to offer joint (or “joined-up”) training for professionals, and particularly law enforcement, prosecutors and judges, involved in legal proceedings involving ICT-

facilitated child sexual exploitation and sexual abuse, in order to ensure consistency at all stages;³²

- to ensure that training on ICT-facilitated sexual offences against children for law-enforcement, prosecutors and judges contains a practical element, involving simulated or real cases.³³

On victim and perpetrator identification, data retention and expeditious proceedings

The Committee **invites** all Parties:

- to engage in and strengthen inter-Party cooperation for the purpose of identifying child victims of ICT facilitated sexual offences, including, where appropriate, by providing access to each other’s databases or shared databases;³⁴
- to engage in and strengthen inter-Party cooperation for the purpose of identifying perpetrators of ICT facilitated sexual offences against children, including, where appropriate, by providing access to each other’s databases or shared databases containing information on such perpetrators;³⁵
- to ensure that investigations and criminal proceedings in ICT facilitated sexual offences against children are treated as priority and carried out without any unjustified delay;³⁶
- to take the necessary legislative or other measures to ensure that preservation of specified stored computer data in connection with a specific criminal investigation or proceedings is made possible, fully upholding the rights of the parties involved;³⁷
- to take the necessary legislative or other measures to ensure that the investment in human, financial and physical resources is sufficient to have data generated by ICTs analysed in a timely manner so that

²⁶ Recommendation III-5

²⁷ Recommendation III-9

²⁸ Recommendation III-10

²⁹ Recommendation III-19

³⁰ Recommendation III-24

³¹ Recommendation III-14

³² Recommendation III-20

³³ Recommendation III-21

³⁴ Recommendation III-25

³⁵ Recommendation III-29

³⁶ Recommendation III-30

³⁷ Recommendation III-31

investigations are carried out without any unjustified delay.³⁸

Promising practices:

³⁸ Recommendation III-32

IV. Jurisdiction rules

Due to their online component, offences related to conducts involving CSGSIV have an inherently international aspect. As the prosecution of offences related to this material may involve more than one jurisdiction, the report analyses the jurisdictional rules in place in the Parties, enabling the determination of which Party may prosecute a particular case and under what conditions.

Observations and recommendations of the Committee on jurisdiction rules specific to Greece

Jurisdiction in cases of child sexual exploitation and abuse facilitated by ICTs committed on the territory of a Party: the territoriality principle (Article 25(1) (a-c))

Greece did not submit information as to whether it applies this principle.

- The Committee thus **requests** Greece to take the necessary legislative or other measures to establish jurisdiction over transnational cases of child sexual exploitation and abuse facilitated by ICTs, when one of the constituent elements of the offence has taken place in its territory.³⁹

Follow-up actions:

Jurisdiction based on nationality and residency (Article 25(1)(d), (e))

Greece informed that it can prosecute offences committed abroad by its nationals.⁴⁰ It also appears that Greece has jurisdiction over offences committed by persons having habitual residence in its territory.

Jurisdiction not subordinated to the condition that prosecution can only be initiated following a report from the victim or denunciation from the State where the offence was committed (Article 25(6))

Greece did not submit information as to whether it applies this condition.

- The Committee thus **requires** Parties that are not already doing so,

including Greece, to remove the requirement that prosecution can only be initiated following a report from the victim or a denunciation from the State of the place where the offence was committed for offences of sexual abuse (Article 18), offences concerning child prostitution (Article 19), the production of “child pornography” (Article 20(1)(a)) and offences concerning the participation of a child in pornographic performances (Article 21), when committed by one of its nationals or by a person who has his or her habitual residence in its territory.⁴¹

Follow-up actions: Recommendation IV-1 & IV-5: Greece is preparing legislative clarifications to ensure jurisdiction over transnational ICT facilitated offences, even without victim complaint or foreign denunciation.

Jurisdiction not subordinated to the condition that the acts are criminalised at the place where they were performed (Article 25(4)): the dual criminality principle

The Committee observes that the criminal laws of Greece have a clause which provides for the possibility of derogating from the general rules on jurisdiction based on international instruments. Thus, the Greek penal laws apply to Greeks and foreign nationals, irrespective of the laws of the place where the crime was committed, for acts committed abroad that are criminalised by international conventions that are signed and ratified by the Greek State.⁴²

³⁹ Recommendation IV-1

⁴⁰ Para. 215

⁴¹ Recommendation IV-5

⁴² Para. 227

Jurisdiction in cases of child sexual exploitation and abuse facilitated by ICTs committed against nationals or habitual residents of a Party: the passive personality principle (Art. 25(2))

Greece did not submit information as to whether it applies this principle.

Therefore the Committee **requests** Parties that are not already doing so, including Greece, to:

- Endeavour to take the necessary legislative or other measures to establish jurisdiction over any offence established in accordance with the Convention where the offence is committed against one of its nationals or a person who has his or her habitual residence in its territory.⁴³

Follow-up actions: Recommendation IV-9: The Ministry of Justice is assessing the feasibility of extending passive personality jurisdiction to cover Greek nationals and residents victimized abroad.

Greece uses the principle of territoriality in relation to the enforcement of Greek criminal laws. The principle of territoriality is fundamental to Greek Criminal Law and refers to the fact that Greek Criminal jurisdiction applies to all crimes committed within Greek territory, regardless of the nationality of the perpetrator or the victim. This is stated in Article 5 of the Greek Penal Code.

In order to determine whether a crime has been committed domestically or abroad -and thus to define the applicability of Greek criminal law - it is important to identify the place or places where the act was committed, (Article 16 of the Penal Code). Accordingly, under the principle of territoriality, in cases involving criminal acts with cross-border elements, if Greece is among the places where the crime was committed, Article 5 of the Penal Codes applies without the need to examine any other conditions. It is further noted that in the case of a continuing offense (which is often encountered in the distribution of child

pornography material due to the ease of access to information systems from any location inside or outside Greece), the place of commission includes any location where any part of the offense occurred. This means both the place where the conduct occurred in whole or in part, and the place where the result of each partial act was manifested. Therefore, if even a single part of the act was committed within Greece, then Greece is considered the place of commission of the crime in its entirety. This is because the theory of unity treats the criminal act as a single, indivisible whole (Supreme Court Decision 1177/2019).

Article 6 of the Greek Penal Code regulates the exceptions to the principle of territoriality regarding criminal law and allows the application of Greek criminal law to offenses committed outside Greek territory under certain conditions. Specifically, it is stated: "1. Greek criminal laws also apply to acts classified by them as felonies or misdemeanors, committed abroad by a Greek national, if the act, in its specific characteristics, is also punishable under the laws of the country in which it was committed, or if it was committed in a politically unorganized (lawless) country.

(...) 3. In cases of misdemeanors, even if prosecuted ex officio, the provisions of the previous paragraphs apply only if there is a complaint from the victim or a request by the government of the country where the misdemeanor was committed."

From the text of the provision itself, it is clear that in addition to the requirement of dual criminality, the conditions of a victim's complaint or a government request for prosecution apply only when a Greek national commits a misdemeanor abroad. If the offense is classified as a felony under Greek law, neither a complaint from the victim nor a request from the foreign government is required for prosecution under Greek criminal law. It should be noted that the majority of offenses against minors involving sexual acts or sexual exploitation, as well as possession and

⁴³ Recommendation IV-9

distribution of child pornography material, are generally considered felonies, depending on the age of the minor. However, there are also offenses against minors—clearly of lesser gravity compared to felonies—that are classified as misdemeanors. Examples: (I) The production of child pornography material is a felony when it involves a minor under the age of 12 (Art. 348A, para. 4), (II) The distribution of such material is a felony when committed professionally, regardless of the minor's age (Art. 348A, para. 3), (III) Inducing a minor to participate in pornographic performances is a felony if the minor is under 14, and a misdemeanor if the minor is older than 14, (IV) Pimping (forcing or luring a minor into prostitution) is a felony when the victim is a minor (Art. 349, paras. 1–2).

It is further noted that, according to Article 7 of

the Greek Penal Code, Greek criminal laws also apply to foreign nationals for acts committed abroad, classified as felonies or misdemeanors under Greek law, if the act is directed against a Greek citizen and is also punishable under the laws of the country where it was committed. In the case of misdemeanors committed abroad by a foreign national against a Greek citizen, prosecution requires either a complaint by the victim, or a request by the government of the country where the offense took place (Article 7, paragraph 3 of the Penal Code). An exception to this rule exists: no such conditions (victim complaint or government request) are required for the application of Greek criminal law when special provisions or international treaties signed and ratified by the Greek State expressly provide for the application of Greek criminal law (Article 8, item xi).

Generic recommendations of the Committee on jurisdiction rules

The Committee **invites** those Parties that are not already doing so:

- to remove the requirement for dual criminality for offences of possessing, offering, distributing, transmitting, procuring child pornography, and the fact of knowingly gaining access to child pornography through ICTs,

when CSGSIV are involved when committed by one of their nationals;⁴⁴

- to remove the requirement for dual criminality for offences concerning solicitation of children for sexual purposes (Article 23) when committed by one of their nationals.⁴⁵

Promising practices:

⁴⁴ Recommendation IV-7

⁴⁵ Recommendation IV-8

V. International cooperation

The implementation report also analyses cooperation practices and examples of coordinated international responses, not only in the fight against sexual exploitation and abuse of children, but also in areas related to the prevention, protection and assistance of child victims and persons related to them.

Observations and recommendations of the Committee on international cooperation specific to Greece

The Committee notes that INHOPE, WeProtect Global Alliance, ECPAT, and EMPACT (European Multidisciplinary Platform Against Criminal Threats) carry out projects in Greece to prevent and combat sexual abuse and sexual exploitation of children.⁴⁶ As regards international police cooperation, law

enforcement representatives from Greece attend the Europol's central training course "Combatting the Sexual Exploitation of Children on the Internet" (COSEC) and the Europol-Interpol-Cepol co-organised training course on victim identification (VID training course).⁴⁷

Generic recommendations of the Committee on international cooperation

The Committee **requests** all Parties to extend their international cooperation with other Parties to improve the effective implementation of the Convention.⁴⁸

Follow-up actions: Recommendation V-3: Greece continues to participate in Europol and Interpol initiatives and has recently joined a regional task force on online child exploitation.

The Committee also **invites** all Parties, including Greece:

- to consistently analyse the possibilities to expand international cooperation with countries which are not Parties to the Convention to disseminate the standards of the Convention;⁴⁹
- to assess on a regular basis the difficulties that they face when dealing with international cooperation and remedy them;⁵⁰
- to assess, strengthen and develop international cooperation between the Parties of the Convention for the purpose of preventing and combating sexual exploitation

and sexual abuse of children in matters related to CSGSIV;⁵¹

- to consistently analyse the possibilities to expand international cooperation with countries which are not Parties to the Convention to disseminate the standards of the Convention for the purpose of preventing and combating sexual exploitation and sexual abuse of children in matters related to CSGSIV;⁵²
- to strengthen cooperation with relevant intergovernmental bodies, and with transnational networks and other international organisations and initiatives due to their capacity to mobilisation, their world-wide scope, and their flexibility to work, for the purpose of preventing and combating sexual exploitation and sexual abuse of children in matters related to CSGSIV;⁵³
- to consider requesting the establishment of cooperation projects managed by the Council of Europe to assist them in their efforts to preventing and combating sexual exploitation and sexual abuse of children in matters related to CSGSIV;⁵⁴
- to support regional and international

⁴⁶ Para. 255

⁴⁷ Para. 259

⁴⁸ Recommendation V-3

⁴⁹ Recommendation V-4

⁵⁰ Recommendation V-5

⁵¹ Recommendation V-6

⁵² Recommendation V-7

⁵³ Recommendation V-8

⁵⁴ Recommendation V-9

capacity building efforts to improve policy and operational measures including the pooling and sharing of successful education and awareness-raising tools for the purpose of preventing and combating sexual exploitation and sexual abuse of children in matters related to CSGSIV;⁵⁵

- to assess, develop and strengthen cooperation between them to protect and provide assistance to victims in matters related to CSGSIV;⁵⁶
- to regularly analyse the possibilities to expand international cooperation with countries which are not Parties to the Convention to disseminate the standards of the Convention, for the purpose of protecting and providing assistance to victims in matters related to CSGSIV;⁵⁷
- to assess, develop and strengthen cooperation with relevant intergovernmental bodies, transnational networks and other international organisations and initiatives due to their capacity to mobilisation, their world-wide scope, and their flexibility to work for the purpose of protecting and providing assistance to victims in matters related to CSGSIV;⁵⁸
- to maintain and develop efforts to strengthen international cooperation in investigation and proceedings concerning the offences established in accordance with the Convention,

in particular in the area of police cooperation, namely ensuring that their law-enforcement agencies can connect and contribute to the Europol and Interpol databases, and develop the areas of data, training, vetting, and selection, in matters related to CSGSIV;⁵⁹

- to analyse the possibilities to expand international cooperation with countries which are not Parties to the Convention, on investigation and proceedings concerning the offences established in accordance with the Convention, in matters related to CSGSIV;⁶⁰
- to further maintain and develop efforts to strengthen international cooperation in investigation and proceedings concerning the offences established in accordance with the Convention, with countries which are not Parties to the Convention, in particular in the area of police cooperation, namely ensuring that their law-enforcement agencies can connect and contribute to the Europol and Interpol databases, and develop the areas of collecting data, training, vetting, and selection in matters related to CSGSIV;⁶¹
- to integrate, where appropriate, prevention and the fight against sexual exploitation and sexual abuse of children in matters related to CSGSIV, in assistance programmes for development provided for the benefit of third States.⁶²

Promising practices: Recommendations V-4 to V-16: Greece is exploring bilateral agreements with non-Party states and supports the Council of Europe's capacity-building efforts.

⁵⁵ Recommendation V-10

⁵⁶ Recommendation V-11

⁵⁷ Recommendation V-12

⁵⁸ Recommendation V-13

⁵⁹ Recommendation V-14

⁶⁰ Recommendation V-15

⁶¹ Recommendation V-16

⁶² Recommendation V-19

VI. Assistance to victims

This chapter provides a comparative study of national mechanisms and measures for assisting child victims of sexual exploitation and abuse, particularly where this results from the CSGSIV.

Observations and recommendations of the Committee on assistance to victims specific to Greece

The Committee notes that in Greece, helplines for children are accessible 24 hours a day, 7 days a week.⁶³ Greece also has measures in

place on assistance to child victims of sexual violence.⁶⁴

Generic recommendations of the Committee on assistance to victims

The Committee **invites** Parties that are not already doing so:

- to promote awareness raising or specialised training for professionals who provide advice to children through telephone or internet helplines on ICT facilitated sexual exploitation and abuse of children – including the risks associated with CSGSIV – and on how to provide appropriate support to victims and to those who wish to help them;⁶⁵
- to ensure that the assistance measures referred to in Recommendation VI-3 are

available to child victims of sexual exploitation and abuse facilitated by ICTs, including offences due to the production, possession, distribution or transmission of CSGSIV.⁶⁶

Promising practices: Recommendation VI-2 & VI-4:

1. National helplines have integrated training on CSGSIV-related trauma. A new protocol ensures referral to specialized psychological support services.
2. Within the remit of the National Centre for Social Solidarity (EKKA), as a public body responsible for providing psychosocial support and other protection services to vulnerable groups of people, there are two 24/7 hotlines operating for persons in need; the National Emergency Social Helpline “197” and the National Child Protection Helpline “1107”.

In the context of an EEA-grants funded project (2014-2021), the National Child Protection Line had been staffed with social workers, psychologists and interpreters (Arabic, Farsi, Urdu). The project, launched in February 2022 and completed within 2023, was intended to:

- a. increase the team’s capacity to respond to requests for assistance or support from unaccompanied/separated children who are at risk,
- b. facilitate communication and access to information for unaccompanied/separated children,
- c. ensure their well-being,
- d. promote inclusion and non-discrimination, and

⁶³ Para. 280

⁶⁴ Para. 287

⁶⁵ Recommendation VI-2

⁶⁶ Recommendation VI-4

e. promote and maintain cooperation with the General Secretariat for Vulnerable Persons and Institutional Protection.

For more information, please refer [here](#).

3. Operation of special Digital Platform for addressing intra-school violence and bullying phenomena (<https://stop-bullying.gov.gr/>)

To address school violence and bullying, a special digital platform has been created for submitting complaints. Students and parents, as well as those who have custody of students, have access to this platform, and they can submit reports.

Also, a specific Protocol for the Management of School Violence and Bullying is defined for the purpose of examining reports and submitting proposals for addressing incidents of school violence -Law 5029/2023 (GG A 55).

Recipients - responsible recipients at the school unit level of reports of bullying and intra-school violence incidents submitted digitally are the Principal or Head of the school unit and one (1) teacher designated by him/her for this purpose.

In each Education Directorate, a four-member "Action Group for the Prevention and Combating of Intra-School Violence and Bullying" is established, consisting of: a) the Director of Education, who is replaced by the Head of the Department of Educational Affairs of the relevant Education Directorate; b) one (1) Educational Advisor, with his/her deputy; c) one (1) psychologist of a school unit or the Center for Interdisciplinary Assessment, Counseling and Support 16 (KEDASY) of the Education Directorate with his/her deputy; d) one (1) social worker of a school unit or KEDASY of the Education Directorate with his/her deputy.

The responsibilities and duties of the responsible report recipients in the school unit and the four-member action groups in the Education Directorates are defined in the Ministerial Decision 36421/GD4/8.4.2024 (GG B 2177).

4. The law 4478/2017 provides for the function of the Independent Offices for the Protection of Minor Victims – the “Child’s House” – as autonomous regional services of the Ministry of Justice. Their mandate involves the individual assessment of minor victims to determine specific protection needs. These Offices provide general support services to minor victims and assist preliminary investigation, investigative, prosecutorial and judicial authorities in the proper examination of minor victims, in accordance with the applicable legal provisions.

Moreover, the perceptual capacity and mental state of minor victims are evaluated by specialized personnel, while appropriate conditions and facilities are arranged for the examination of minor victims by the aforementioned authorities, equipped with modern technical means to record the minor’s testimony through electronic audiovisual devices.

Within the framework of Child-Friendly Justice, the protection of minor victims and the prevention of their re-victimization through judicial examination in a suitably designed, child-friendly environment by specialized professionals is our primary concern.

Currently, the Child’s Houses operate in Athens, Piraeus and Thessaloniki, while efforts are underway to establish Child’s Houses in Patras and Heraklion, Crete.

It is noted that Article 54 of Law 5197/2025 provides for the possibility of establishing Independent Offices for the Protection of Minor Victims "Child' s House" in each appellate district.

VII. Civil society involvement and cooperation

Civil society's involvement in protecting children against sexual exploitation and sexual abuse is crucial and acknowledged by the Convention. Projects and programmes carried out by civil society, as well as cooperation between the competent state authorities and civil society, cover a wide range of issues.

Observations and recommendations of the Committee on civil society involvement and cooperation specific to Greece

The Committee observes that the existing civil society projects in Greece – whether or not carried out in cooperation with the State - aiming at preventing abuses related to the sharing of CSGSIV take the form of educational activities.⁶⁷

- The Committee **requires** Greece to involve civil society bodies in the implementation of preventive measures in the field of sexual exploitation and abuse of children.⁶⁸

Follow-up actions:

1. Law 4837/2021 establishes a series of measures aimed at preventing and addressing the phenomenon of child abuse. In particular, according to art. 5 there is provision for the appointment of a Minor Protection Officer responsible for implementing these measures.

The provision applies also to all Child Protection Units operated by private non-profit legal entities.

2. In the context of the Hellenic NRM (National Referral Mechanism for the Protection of Human Trafficking Victims) operation, the National Centre for Social Solidarity (EKKA), acting as the operating authority, has been participating in several projects in order to strengthen the NRM capacity and promote victim protection, including child victims of all forms of exploitation:

- "Albania and Greece, supporting an effective transnational referral mechanism and cross border child protection for victims and possible victims of trafficking" is a project implemented by Terre des Hommes Albania and Terre des Hommes Hellas, in collaboration with the Office of the National Anti-trafficking Coordinator (ONAC), Albania, and the ONR and EKKA, Greece, funded by the Permanent Representation of France at UN Office in Vienna. In the context of the 2006 Bilateral Agreement on the protection and assistance of child victims of human trafficking signed between the Government of the Hellenic Republic and the Council of Ministers of the Republic of Albania), the project aimed to A) strengthen the capacity of service providers and governmental institutions to ensure that human trafficking victims and potential victims have access to comprehensive prevention and protection through functional national and transnational coordination mechanisms for identification and case management in Albania and Greece, and B) promote better collaboration and coordination for early identification and assistance to victims.

For further information, please refer [here](#).

- "Service Coordination for Victims of Trafficking in South an East Balkans" is a project implemented by ARSIS – Association for the Social Support of Youth and EKKA, Greece, and the State Agency for Child Protection and INGO A21, Bulgaria. The

⁶⁷ Para. 323

⁶⁸ Recommendation VII-1. Examples of projects and/or

programmes will enable assessment of follow-up to this recommendation.

project aims to improve services provided to human trafficking victims by strengthening the mechanism for locating and assisting trafficked persons from Bulgaria and Romania, mainly women and children, and promoting cooperation between authorities (country of origin-destination country).

For further information, please refer [here](#).

3. The National Emergency Response Mechanism (NERM), operating under the General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP), was launched in 2021 and institutionalized in 2022. NERM is mandated to identify and provide immediate accommodation to unaccompanied children experiencing homelessness or living in precarious conditions, who are at heightened risk of exploitation or abuse. It establishes a comprehensive safety net and a multi-sectoral protection framework that prioritizes the most vulnerable, ensuring that no child remains “invisible” to the protection system. Through coordinated referral pathways, children are promptly transferred to emergency shelters where they receive holistic care — psychosocial, legal, and material — from specialized professionals. In close cooperation with civil society organizations, NERM also implements proactive outreach and street work activities to trace unaccompanied children outside the formal system, enabling timely intervention and safeguarding their fundamental rights. The NERM includes a hotline that assists in identifying and locating children in need: 15107 -free of charge, 0030 –

2132128888 and 0030 – 6942773030 (WhatsApp & Viber) which is available in six languages and operates:

Monday - Friday 08:00 - 22:00

Saturday 11:00 - 19:00

The hotline does not operate on national holidays and public holidays.

https://migration.gov.gr/wp-content/uploads/2025/10/SGVP_Statistics-October_GR.pdf

- It also **requests** Greece to encourage the financing of projects and programmes carried out by civil society aiming at preventing and protecting children from sexual exploitation and sexual abuse.⁶⁹

Follow-up actions: Recommendations VII-1 & VII-2:

1. Greece has funded civil society projects such as “Behind the Screen” and “Real Life Story Friends by Request” in partnership with “The Smile of the Child.” These initiatives are now part of a national awareness campaign.

2. The operation of NERM is funded by the migration and home affairs funds of the Ministry of Migration & Asylum of the Hellenic Republic, as well, co-funded by the European Commission and the Directorate-General for Migration and Home Affairs (DG HOME).

⁶⁹ Recommendation VII-2. Examples of projects and/or programmes will enable assessment of follow-up to this

recommendation.

Generic recommendations of the Committee on civil society involvement and cooperation

The Committee **invites** all Parties, including Greece:

- to expand cooperation with civil society to better prevent sexual exploitation and sexual abuse of children, including when facilitated by ICTs and the challenges raised by the exploitation of CSGSIV;⁷⁰
- to ensure that the forms of cooperation that take place with civil society in the field of prevention and protection of children against sexual exploitation and abuse are of a sustainable nature;⁷¹

- to support civil society to carry out projects and programmes that include the issue of CSGSIV;⁷²
- to encourage the participation of children, according to their evolving capacity, in the development and implementation of state policies, programmes or other initiatives and to seek children's views at the stage of drafting new legislation concerning the fight against sexual exploitation and sexual abuse of children, including when facilitated by ICTs and as regards CSGSIV.⁷³

Promising practices: Since its 2019 launch, the Hellenic NRM (National Referral Mechanism for the Protection of Human Trafficking Victims), administered by the National Centre for Social Solidarity (EKKA) and supervised by the Office of National Rapporteur Against Human Trafficking (ONR), has expanded its impact through significant developments and established its role as a good practice towards **prevention, victim protection** and **partnership**; in terms of the latter, the EKKA/NRM team has coordinated a number of **working groups**, with the involvement of both the competent state authorities and *civil society*, with the objective to:

1. report both good practices, gaps and challenges, by receiving direct feedback from field professionals working with human trafficking victims,
2. develop the existing NRM tools,
3. enhance the collaboration amongst the NRM participating actors, and
4. monitor and evaluate the NRM operation on a national level.

To date, on a monthly basis, the EKKA/NRM team has been coordinating **a working group meeting with the participation of legal professionals** (incl. NGO staff and public officials) working with human trafficking victims, with the objective to discuss good practices, detect gaps in legal services and organise advocacy interventions with regard to criminal proceedings for relevant cases.

During 2024, the National Center for Social Solidarity (EKKA), of the Ministry of Social Cohesion and Family, under the auspices of ONR, has launched a new working group, focused on the creation and establishment of a Survivors' Body [according to the good practice of a National Survivors of trafficking Advisory Council (NSTAC) promoted by OSCE/ODHIR], through the **integration and inclusion of survivors of human trafficking** in the network for the protection of human trafficking victims in Greece and the NRM. Main goal for this body of survivors is to be developed by their own vision, actions and needs, with the cooperation and support of multi-agency and multidisciplinary NRM stakeholders.

- A core value of the NRM operation reflected in the **EKKA/NRM capacity building activities for field professionals** is the promotion of intersectional collaboration through encouraging participation of different actors in each training session, so as to promote harmonised practices and mutual learning

⁷⁰ Recommendation VII-3.

⁷¹ Recommendation VII-4.

⁷² Recommendation VII-5.

⁷³ Recommendations VII-6, VII-7.

from one another, a smooth cooperation and the creation of a communication pathway among various agencies and civil society organisations, with the aim to achieve a holistic approach for combatting human trafficking in all of its forms.

VIII. Promoting awareness of the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves

The Articles 5, 6 and 8 of the Convention establish that States Parties should take the necessary measures to prevent all forms of child sexual exploitation and abuse and to protect children from their effects. Awareness-raising is one type of preventive measure.

Generic recommendations of the Committee on promoting awareness of the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves

The Committee **invites** all Parties, including Greece:

- to ensure that explanations of the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves, with or without coercion, are included in the awareness-raising campaigns that they promote or conduct, whatever the target audience;⁷⁴
- to ensure that awareness-raising for children about the risks that they face when generating and/or sharing sexual images and/or videos of themselves takes place early enough, before they reach their teens, and that it is “adapted to their evolving capacity” or, in other words, their age and degree of maturity;⁷⁵
- to use unchanged, wherever possible, the awareness-raising tools, materials and activities mentioned in this report or else to adapt them to their national contexts and their own languages and, if necessary, develop new ones, concentrating on videos and distribution through social media;⁷⁶
- to have available awareness-raising tools, materials, and activities suitable for children with disabilities;⁷⁷
- to ensure that awareness-raising for children regarding the risks of sexual exploitation and sexual abuse that they face when generating and/or sharing sexual images and/or videos of themselves is led first and foremost by their peers;⁷⁸

- to promote themselves and to encourage the information and communication of the technology sector, the media, and other professionals to raise awareness among children, their parents, persons having regular contact with children, and the general public about the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves and about the preventive measures that can be taken;⁷⁹
- to step-up awareness-raising for parents and persons with parental authority about the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves and about the preventive measures that can be taken;⁸⁰
- to promote or conduct awareness-raising campaigns for the general public providing information about the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves and about the preventive measures that can be taken;⁸¹
- to take the necessary measures to ensure co-ordination between the agencies responsible for raising awareness of the risks of sexual exploitation and sexual abuse faced by children generating and/or sharing sexual images and/or videos of themselves.⁸²

⁷⁴ Recommendation VIII-1.

⁷⁵ Recommendation VIII-2.

⁷⁶ Recommendation VIII-3.

⁷⁷ Recommendation VIII-4.

⁷⁸ Recommendation VIII-5.

⁷⁹ Recommendation VIII-6.

⁸⁰ Recommendation VIII-7.

⁸¹ Recommendation VIII-8.

⁸² Recommendation VIII-9.

Promising practices: Recommendation VIII-1 to VIII-9:

1. School activities within the context of school life

School activities are considered to be all planned and appropriately designed school activities that complement and enrich the curriculum. They take place during school hours, inside and/or outside of school and in collaboration with other schools and/or other bodies.

These actions are interdisciplinary/cross-thematic, experiential in nature and encourage exploration. They aim to enrich the content of the curricula, to develop the abilities and skills of students, to cultivate aesthetics, to express creativity, to collaborate, to develop autonomy and responsibility, and to raise awareness of issues concerning the natural and man-made environment. School activities contribute to the development of democratic ethos, the opening of the school to the local community and perform a compensatory role by providing the opportunity for all students to participate in activities that broaden their horizons. (Article 16 of Presidential Decree 79/2017 (109A') provides that the school may program and design actions that complement and enrich the curricula in all subjects).

2. Greece has launched a peer-led campaign on TikTok and Instagram targeting teens, with adapted content for children with disabilities.

3. The Ministry of Migration and Asylum and in particular the Reception and Identification Service (RIS) in cooperation with United Nations Agencies, namely United Nations High Commissioner for Refugees (UNHCR) and International Organization for Migration (IOM), the European Union Agency for Asylum (EUAA), along with the support of several Non-Governmental Organizations is conducting Focus Groups Discussions (FGDs), information and raising awareness sessions with asylum seekers and refugees, children and adults, who are residing within the regional services of RIS. More specifically, the above-mentioned sessions are focused on several topics such as:

Gender Based Violence (GBV): Types of GBV, indicators of GBV, awareness raising on sexual exploitation and domestic violence, legal framework, available services that can support survivors of GBV, gender stereotypes. To be noted that men are also participating as part of gender sensitization.

Trafficking in Human Beings: Informational sessions are taking place, where children (including unaccompanied children), women and men are participating to be informed on the phenomenon of trafficking in human beings.

Prevention from Sexual Exploitation and Abuse (PSEA): UNHCR has implemented in the regional services operating at the borders of the country informational sessions to women, men and children (including unaccompanied children).

Access to education: Multiple sessions, in cooperation with the Ministry of Education and Religious Affairs and Sports and NGOs, took place with parents and students within the regional services of RIS concerning the importance of attending school, bullying in the school system, the rights of children attending the Greek public school system, but also the obligatory enrolment and participation of children in the public educational system.

Child Protection: Info sessions took place with regards to interculturality, the rights of the children, neglect, the types of abuse of children, including sexual abuse.

IX. Education for children

While the protection of child victims and the prosecution of offenders are key elements in the fight against the sexual exploitation and sexual abuse of children, preventing them from occurring in the first place is paramount. Informing children about the risks of sexual exploitation and sexual abuse and how to protect themselves is the cornerstone of prevention.

Observations and recommendations of the Committee on education for children specific to Greece

The Committee notes that in Greece, although the national curriculum does not contain explicit references to CSGSIV, non-formal educational activities target this topic.⁸³

As regards provision of information in collaboration with parents, the project “Next to the parents” addresses the dangers arising from the use of the internet, for parents through case studies. It also showcases how parents can protect their children.⁸⁴

Generic recommendations of the Committee on education for children

- The Committee **requires** all Parties, including Greece, to ensure that all children at primary and secondary level receive information about the risks of child sexual exploitation and sexual abuse facilitated by ICTs. Organising lectures and/or activities on this topic should not be left to the discretion of schools or teachers.⁸⁵

Follow-up actions: Recommendation IX-3:

1. As of 2024, all primary and secondary schools are required to include digital safety and CSGSIV awareness in their curriculum, supported by teacher training and Ministry-approved materials.

2. Skills Workshops

(a) According to Law 4807/2021 (GG A 96), art. 52, part 6, "Institutional framework for teleworking, provisions for public sector human resources and other urgent regulations":

The teaching unit entitled "Skills Workshops" is introduced into the curriculum and weekly timetable of all types of school units of compulsory education, kindergartens, primary schools and high schools with the aim of enhancing

the cultivation of soft skills, life skills and technology and science skills in students.

By decision of the Minister of Education and Religious Affairs, which is issued following a recommendation from the Institute of Educational Policy, the number, duration and content of the thematic cycles of the teaching unit and the individual thematic units of each of the thematic cycles are defined, the number and specialties of teachers assigned to teach the thematic cycles and modules, the method of student assessment and any other relevant matter, including the organization and implementation of relevant training and support activities for teachers.

(b). In Ministerial Decision No. 94236/GD4/29-7-2021 (GG B'3567) "Curriculum Framework for Skills Workshops of all types of school units, Kindergartens, Primary Schools and High Schools" it is stated that:

The purpose of the "Skills Workshops" is to enhance the cultivation of soft skills, life skills, and technology and science skills in students. The program and educational material of the "Skills Workshops" is grouped into four (4) Thematic Units. The

⁸³ Para. 384

⁸⁴ Para. 403

⁸⁵ Recommendation IX-3

Thematic Units arise from the Global Sustainable Development Indicators (environment, well-being, security, civil society, modern technology and entrepreneurship). The program is mandatory for the topics mentioned in each grade and level and more specifically for this document the 1st Thematic Unit concerns. I LIVE BETTER – I LIVE WELL, subsection 3. I know my body - Sexual Education, for the 3rd, 6th grades of Primary School.

The Committee **invites** all Parties, including Greece:

- to address in educational contexts the issue of the risks of child sexual exploitation and sexual abuse facilitated by ICTs, including as regards CSGSIV;⁸⁶
- to ensure that information on the risks of child sexual exploitation and sexual abuse facilitated by ICTs, including as regards CSGSIV, is provided to children during both primary and secondary education (whether as part of the national curricula or in the context of non-

formal education for children at these levels);⁸⁷

- to consistently involve children in the development of internet safety awareness programmes;⁸⁸
- to ensure that there is a standing national internet safety resource, with an ongoing programme of activities;⁸⁹
- to provide information to children on child sexual exploitation and sexual abuse, facilitated by ICTs, including as regards CSGSIV, in their national curriculum or other non-formal educational contexts, in a form which is adapted to the evolving capacity of the children and therefore which is appropriate for their age and maturity;⁹⁰
- to provide information to children on the risks of child sexual exploitation and abuse facilitated by ICTs, including CSGSIV, within a more general context of sexuality education;⁹¹
- to ensure that parents, caregivers, and educators are involved, where appropriate, in the provision of information to children on the risks of child sexual exploitation and sexual abuse facilitated by ICTs, in particular as regards CSGSIV.⁹²

⁸⁶ Recommendation IX-1

⁸⁷ Recommendation IX-2

⁸⁸ Recommendation IX-4

⁸⁹ Recommendation IX-5

⁹⁰ Recommendation IX-6

⁹¹ Recommendation IX-7

⁹² Recommendation IX-8

Promising practices

The Greek NGO 'The Smile of the Child' shared details of the projects they implement in schools in Greece based on a Memorandum of Understanding with Ministry of Education, Research and Religious Affairs. At primary education, the "Real Life Story-Friends by Request" project is experiential. It describes the story of a student, who communicates via the internet with someone, who pretends to be of the same age with her. The girl exchanges photos with him but later he uses them to intimidate her. In secondary education, two projects are implemented, i.e. "Behind the screen" and "Stories from the Internet". In both, visualized stories are used to inform students of internet safety.

Promising practices:

General Secretariat for Vulnerable Persons and Institutional Protection (Ministry of Migration and Asylum) designs and implements actions to prevent trafficking in human beings through awareness raising seminars. A series of **pilot workshops on healthy relationships** and raising awareness on the grooming phenomenon were conducted across various shelters **for unaccompanied girls** with the support of experts. These workshops focused on recognizing respectful relationships, online dangers, and empowering minor girls to create safety plans in case of risk. 55 girls from Somalia, DRC, Sierra Leone, Syria and India attended the workshops. These workshops proved valuable in raising awareness among unaccompanied minor girls, equipping them with critical knowledge on personal safety, healthy relationships, and online risks. Future sessions should continue addressing these topics while ensuring all participants fully understand the concepts discussed.

In the framework of the European project "Building Futures, Sharing Good Practices: Migrant Children's Transition to Adulthood (UAM Futures)", funded under AMIF-2020-AG-CALL-06, and implemented by the Council of Europe (France) in cooperation with the Special Secretariat for the Protection of Unaccompanied Minors (Greece), ALLILEGGIE SOLIDARITYNOW (Greece), Fundación CEPAIM Acción Integral con Migrantes (Spain), and Stichting NIDOS (Netherlands), **a comprehensive life skills training guide** was developed as part of the toolkit supporting unaccompanied migrant children's transition to adulthood. The module entitled "Bridge to Autonomy – Life Skills Training Guide" constitutes one of four modules within this toolkit and is available in both Greek and English. Among its chapters, "**Safety and Avoidance of Exploitation**" and "**Sexual and Reproductive Health and Rights**" specifically addresses the protection of children against sexual exploitation and sexual abuse facilitated by information and communication technologies. The guide serves as a practical educational tool for trainers and educators working in accommodation centers for unaccompanied minors. Through capacity-building sessions, educators are trained to use the material to raise awareness, strengthen digital literacy, and promote safe online behavior among minors, thereby contributing to their protection from online sexual exploitation and abuse and supporting their autonomous and informed transition to adulthood.

X. Higher education curriculum and continuous training

Persons who have regular contact with children in the education, health and social protection sectors and areas related to sport, culture and leisure are at the forefront of the prevention of sexual exploitation and sexual abuse of children, as they have the most interaction with children under their supervision in these different settings. However, they may not be adequately equipped to inform children about their rights, to detect situations where a child is at risk of sexual exploitation or sexual abuse and to respond appropriately. It is therefore of crucial importance that they are well informed about the risks of sexual exploitation and sexual abuse of children, both during their education and continuously during their careers, to enable them to adapt to emerging trends and risks in the fight against sexual exploitation and sexual abuse of children, including when facilitated by ICTs.

Observations and recommendations of the Committee on higher education curriculum and continuous training specific to Greece

- The Committee **requests** Greece to ensure that the persons who have regular contacts with children (i.e. in the education, health and social protection, sectors and in areas relating to sport, culture and leisure activities), have an adequate knowledge of sexual exploitation and sexual abuse of children, including when facilitated by ICTs, for example through education or continuous training.⁹³

Follow-up actions:

1. The National Centre for Public Administration and Local Government through the Training Institute (INEP) is the national body for planning and conducting educational actions in public servants.

In particular, INEP has elaborated and conducts horizontal educational actions aiming at the awareness and training of public servants regarding the prevention, identification and management of incidents of child abuse, as well as the strengthening of the child protection framework, through the following programs:

- Identification and management of incidents of child abuse and neglect
- Violation of the rights of the child: Phenomenology and the framework of child protection
- Prevention, recognition and management of incidents of sexual abuse of minors

- Prevention, recognition and management of incidents of intra-school violence and bullying

These actions are part of the continuous training of public administration officials involved in the fields of child protection, social care, education and mental health, contributing to the promotion of the objectives of the Lanzarote Convention.

2. To ensure holistic support for vulnerable groups within the reception and asylum system, continuous training for RIS staff — both in the field and at central level — is essential. In cooperation with the EU Agency for Asylum, international and non-governmental organizations, RIS delivers training courses on topics such as Trafficking in Human Beings, Gender-Based Violence, Child Protection, Prevention of Sexual Exploitation and Abuse (PSEA), and the identification and support of vulnerable individuals.

Indicatively, the following trainings have been delivered in this context, from 2024 to the present: Reception of Vulnerable Persons: Identification of Vulnerability and Provision of Initial Support (Blocks A & B) for 82 staff members; Gender-Based Violence (GBV) for 315 staff members, including 57 trainers; Trafficking in Human Beings for

⁹³ Recommendation X-1

150 staff members; Prevention of Sexual Exploitation and Abuse (PSEA) for 170 staff members, including 19 trainers; Child Protection for 907 staff members, including 62 trainers; and Sexual Orientation, Gender Identity, Gender Expression, and Sex Characteristics (SOGIESC) for 34 staff members.

It also **requires** Greece:

- to ensure that teaching or training on the rights of children and their protection for persons who have regular contacts with children (i.e. in the education, health and social protection sectors and in areas relating to sport, culture and leisure activities) is not optional;⁹⁴

Follow-up actions: The National Centre for Public Administration and Local Government through the National School of Public Administration and Local Government (ESDDA), as an institutional body for the education and training of future public administration servants, actively contributes to the promotion of the principles and actions promoted by the Lanzarote Commission of the Council of Europe, which monitors the implementation of the Convention on the Protection of Children against Sexual Exploitation and Abuse.

Through its educational program, targeted training and special awareness-raising actions, the ESDDA contributes substantially to the prevention, protection and institutional protection against the sexual exploitation and abuse of children, fully aligned with the spirit and objectives of the Lanzarote Convention.

The contribution of ESDDA falls into two main areas:

- a. Educational and training role

The Curriculum of the 10th Educational Series, which is implemented between 1/5/2024-31/12/2025, incorporates thematic units that strengthen prevention, protection and institutional responsibility against all forms of violence and abuse, especially against minors and vulnerable groups. Specifically:

The section "Protection of Rights, Inclusion and Contribution of Public Administration" cultivates administrative skills for the defence of fundamental rights, including those of children.

The sections "Inclusion Policies for Vulnerable Population Groups", "Promotion of Equality and Protection from Discrimination, Harassment, Abuse", and "Ethics and Ethics in Public Administration" enhance sensitivity, prevention and accountability towards abuse phenomena.

- to ensure that the persons who have regular contacts with children are equipped to identify any situation of sexual exploitation and sexual abuse of children:
 - in the education sector
 - in the health sector
 - in the social protection sector
 - in areas relating to sport, culture and leisure activities;⁹⁵

Follow-up actions: Since 2023, the National Centre for Social Solidarity (EKKA), as the competent authority for Child Protection against all forms of abuse, including sexual abuse, has organized and conducted training sessions for teachers and parents in schools.

In addition, introductory online training seminars have been implemented for Child Protection Officers (CPOs). These professionals work in the fields of education and social protection. The seminars were addressed not only to CPOs but also to other staff of child protection structures, as defined in paragraph (d) of Article 3 of Law 3748/2021.

⁹⁴ Recommendation X-4

⁹⁵ Recommendation X-5

The seminars were held both in the morning and afternoon to ensure the widest possible participation of professionals.

A total of 53 training seminars were conducted through the e-presence online platform, with 1,099 participants in total.

The thematic areas of the seminars included:

Institutional Framework – Conceptual Definition – Forms and Indicators of Child Abuse.

- to ensure that the persons who have regular contacts with children are informed of the possibility for them to report to the services responsible for child protection any situation where they have “reasonable grounds” for believing that a child is a victim of sexual exploitation and sexual abuse of children:
 - in the education sector
 - in the health sector
 - in the social protection sector
 - in areas relating to sport, culture and leisure activities;⁹⁶

Follow-up actions:

Since 2023, the National Centre for Social Solidarity (EKKA), as the competent authority for Child Protection against all forms of abuse, including sexual abuse, has organized and conducted training sessions for teachers and parents in schools.

In addition, introductory online training seminars have been implemented for Child Protection Officers (CPOs). These professionals work in the fields of education and social protection. The seminars were addressed not only to CPOs but also to other staff of child protection structures, as defined in paragraph (d) of Article 3 of Law 3748/2021.

The seminars were held both in the morning and afternoon to ensure the widest possible

participation of professionals.

A total of 53 training seminars were conducted through the e-presence online platform, with 1,099 participants in total.

The thematic areas of the seminars included:

Reporting Procedure – National System for the Recording and Monitoring of Reports of Child Abuse Incidents (Law 4837/2021)

- to encourage awareness of the protection and rights of children among persons who have regular contacts with children in the education, health, social protection, judicial and law-enforcement sectors and in areas relating to sport, culture and leisure activities.⁹⁷

Follow-up actions: Recommendations X-1 to X-7: Continuous training on child protection and ICT risks is now mandatory for professionals in education, health, and social services. Reporting obligations have been clarified through circulars and e-learning modules.

Within the framework of the National Action Plan for the Protection of Children from Sexual Violence and Exploitation, ESDAA held a lecture on June 28, 2023, with guest speaker Dr. Christina Antonopoulou, on the topic: "Child protection from sexual violence and exploitation". The lecture was addressed to the students of the School and aimed to inform and raise their awareness of the importance of prevention, early detection and administrative response to incidents of sexual violence against children. This initiative highlights the commitment of the ECHR to contribute in practice to the implementation of the national and international commitments arising from the Lanzarote Convention, by strengthening the training and awareness-raising of future public officials.

⁹⁶ Recommendation X-6

⁹⁷ Recommendation X-7

Generic recommendations of the Committee on higher education curriculum and continuous training

The Committee **invites** all Parties, including Greece:

- to ensure that the persons who have regular contacts with children (i.e. in the education, health and social protection, sectors and in areas relating to sport, culture and leisure activities), have an adequate knowledge of the risks associated with CSGSIV, for example through education or continuous training;⁹⁸
- to ensure that all the sectors where professionals work in contact with children, including when working on a voluntary basis, have adequate knowledge of sexual exploitation and sexual abuse of children, including when facilitated by ICTs and with specific reference to the risks associated with CSGSIV.⁹⁹

Promising practices: The staff of the Department for the Monitoring of Child Abuse Reports and the Department of Foster Care and Adoption, as well as other departments of the National Centre for Social Solidarity (EKKA), participated as trainers in the following activities:

- a) The awareness-raising conference titled “Prevention of Child Abuse and Development of Child Protection Networks”.
- b) The training workshop for child protection professionals held in Chios (November).
- c) The three-day training programme in Ioannina (October) titled “Building a Safe Tomorrow: Education and Innovation for Child Protection – Empowering Professionals”, co-organised by the Region of Epirus, the Ministry of Social Cohesion and Family, EKKA, the Municipality of Ioannina, and the Hellenic Association of Social Workers – Epirus Branch.
- d) A two-day training programme in Tripoli (November), co-organised by the Region of Peloponnese, the Ministry of Social Cohesion and Family, EKKA, and the Regional Observatory for Social Inclusion of the Region of Peloponnese.

Furthermore, EKKA’s staff participated in the 1st Conference (April) titled “Violence Against Minors: Interpretative Approaches, Prevention, and Interventions”, co-organised by the Society for the Mental Health of Children and Adolescents (E.PSY.Y.P.E.), the Laboratory of Counselling, Psychosocial Support and Community Interventions (E.SY.PSY.KOP), the Department of Social Work of the University of West Attica, the Institute of Child Health (I.Y.P.), the National Centre for Social Solidarity (E.K.K.A.), and the ELIZA Society (Against Child Abuse).

In addition, they participated as key speakers in the experiential workshop for parents and teachers held at the 12th Primary School of Ilioupoli (February), titled “Building Bridges to Address School Violence: An Interactive Workshop for Parents and Teachers.”

Also, there are ongoing trainings held by E.K.K.A addressed to Minors Protection Teams of the Municipalities as well as the Minors Protection Officers working in child protection units, in terms of the protection of minors, the recording of the reports and the investigation of any report of possible abuse/neglect against minors.

Last but not least, there are in person trainings by EKKA, addressed to professionals working in child

⁹⁸ Recommendation X-2

⁹⁹ Recommendation X-3

protection units located in regions about the adoption/foster care and emergency foster care due to child abuse, child poverty and social exclusion as well as child abuse management.

XI. Research

Effective prevention mechanisms and responses to tackle sexual exploitation and abuse of children require an understanding of the issues at stake, as well as knowledge of the prevalence and characteristics of the phenomenon. Accurate and precise information may be necessary to develop quality and targeted policies and measures. The gathering of information and understanding of the phenomenon is particularly important in the context of sexual exploitation and sexual abuse facilitated by ICTs, in light of their rapid development and increased use.

Observations and recommendations of the Committee on research specific to Greece

The Committee notes that Greece has participated for at least one year in the EU Kids Online surveys.¹⁰⁰ Information is, however, lacking to determine which body was in charge of supporting and/or carrying out research.¹⁰¹

Generic recommendations of the Committee on research

The Committee **invites** all Parties that are not already doing so:

- to collect data and undertake research at the national and local level, for the purpose of observing and evaluating the phenomenon of CSGSIV;¹⁰²
- to take the necessary legislative or other measures to set up or designate mechanisms for data collection or focal points at the national or local levels and in collaboration with civil society, for the purpose of observing and evaluating the phenomenon of sexual exploitation and sexual abuse of children, including on the issues arising from CSGSIV, with due respect for the requirements of personal data protection.¹⁰³
- to ensure that data on the phenomenon of CSGSIV and the risks associated with it is regularly collected and research on the issue is regularly undertaken;¹⁰⁴
- to build on the findings from existing research on CSGSIV, when available, to ensure that policies and measures are best developed and appropriately targeted to tackle the issues raised by CSGSIV.¹⁰⁵

Recommendation XI-1 to XI-4:

Greece has rejoined the EU Kids Online survey and is funding a national study on the prevalence of CSGSIV-related incidents, led by the Hellenic Data Protection Authority in collaboration with academia.

Promising practices:

1. Greece highlights the integration of civil society-led experiential learning programs into public education, and the establishment of a cross-sectoral task force on online child protection as promising practices inspired by the Committee's recommendations.
2. At the National Centre for Social Solidarity (E.K.K.A.), based on the Law 4837/2021, Article 9, the National System for Recording and Monitoring Reports of Child Abuse Incidents has been

¹⁰⁰ Para. 440

¹⁰¹ Para. 458

¹⁰² Recommendation XI-1

¹⁰³ Recommendation XI-4

¹⁰⁴ Recommendation XI-2

¹⁰⁵ Recommendation XI-3

established and it is in operation. This system serves as the coordinating mechanism for the recording and monitoring of all reports of possible child abuse incidents submitted by Child Protection Agencies and any other entity providing services to minors.

In the framework of this National System, a platform (Information System) has been developed, where all possible cases of child abuse will be recorded and their progress monitored. The aim is to depict the phenomenon at both national and local level, to identify weaknesses and gaps in the management process, as well as to assess the effectiveness of policies addressing the issue.

Specifically, the platform supports:

- The entry of data and the creation of a database
- The monitoring of the progress of reports referring to possible child abuse incidents
- The extraction of relevant statistical data and reports
- The monitoring of the implementation of related policies
- The evaluation of the effectiveness of relevant interventions
- The coordination and immediate intervention of the competent services involved

There is also provision for annual evaluation reports.

The system is under construction: <https://mila.gov.gr/>