



**CHILD  
SAFEGUARDING**

**POLICY AND PROCEDURE  
DOCUMENT**

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**Association for Struggle against Sexual Violence**  
**Child Safeguarding Policy and Procedure Document**

**CHILD SAFEGUARDING POLICY**

Child Safeguarding Policy is a document that shows the commitment of an institution to provide a favourable environment to protect children from all sorts of violations of their rights and also from the risk of neglect and abuse. The document includes the commitment that children's rights have been guaranteed within the scope of the staff working at the institution and also in the operations conducted, services provided and programs run. The document also involves the responsibility to protect children from all types of risks and to cooperate in order to ensure that, as well as the responsibility to inform the relevant bodies if there is a concern about children's safety and to follow up on the outcomes to minimize the damage.

Despite the fact that the Association for Struggle against Sexual Violence (CŞMD) mainly runs activities for adults; youth and children are amongst the indirect beneficiaries. The programs run by the Association are in direct contact with children and adults who are in contact with the youth, but still the ultimate goal of programs is to protect children and youth from violence. In addition, the Association offers a post-violence and post-abuse support and guidance service, which also includes applications about sexual abuse and dating violence.

Some of the areas that the Association operates in are as follows: having access to children's personal information, their photos and the details of the case, providing a content- and approach-focused support to the institutions and experts who work directly with children and the youth, generating digital information and material for young people, advocacy activities that contribute to policy making that will affect children's and young people's lives. It is through these areas that the Association serves as an indirect area of contact with children and the youth.

In this regard, the Association has decided to prepare the Child Safeguarding Policy and Procedure Document to ensure that its activities, political arguments, services and child and youth representation in the media do not and will not pose a risk for children and that in case of a risk / damage which may appear or be observed during the implementation, there are reporting mechanisms in place to intervene before the damage exacerbates.

This policy document has been prepared after the completion of the Support to Life Association Child Safety Training Program in which the Association participated as the whole team and it was approved by the CŞMD Board of Directors on November 2021.

## OBJECTIVE AND SCOPE

### The objective of the document is:

**a)** to manifest CŞMD's institutional political approach against sexual abuse towards children and against all sorts of child exploitation,

**b)** to make sure that in the execution and development of the Association's child and youth work, participation, accessibility, inclusivity, intersectionality and the child's best interests are overseen for the ultimate good without any discrimination,

**c)** to make a commitment that the Association's staff, operations and programs do not make a violation towards the child and children's rights and that these do not harm the children,

**d)** to act as an intermediary that the Association reports all types of risk it observes within the communities and stakeholders it works with to relevant authorities,

**e)** to present a clear guideline to follow in cases of neglect, abuse or rights violations which may occur within the responsibility of the Association,

**f)** and to determine the responsibilities of the association and the persons, in the process that will be followed in case of a violation of this policy document and of the code of conduct.

The principles and practices in this document encompass all staff of CŞMD, the association's bodies (Board of Directors, members and substitutes of the Audit Committee, members of the association), volunteers actively working at the association and the interns. The staff, volunteers and the Board of CŞMD will get the required trainings (first of which is the training on child safety) to ensure their commitment to act in line with this document and will endeavour to minimize the risks.

The document holds valid for all the activities taking place not only inside the office of the association and within the fields of activity (also including the digital domain), but also between the members of the association (staff, members, volunteers and interns), as well as the acts that take place outside, but are taken to the association itself or the activities of the association and other acts that may have an influence on the working environment.

CŞMD endeavors to make sure that the stakeholders it mediates to bring together with children also comply with this document. Therefore, CŞMD shares this document with its stakeholders and demands them to commit to compliant behaviour. Otherwise, upon reference to the relevant contract and articles of protocol, it discontinues their relationship and cooperation with the stakeholders.

# 2

## MAIN PRINCIPLES

- ⦿ All types of violence against children can be prevented.
- ⦿ Every child is unique in terms of their development, conditions of life, needs and stories.
- ⦿ Children are not objects of the adult world, but the subjects of their own lives.
- ⦿ Children are individuals who have a say over their bodies.
- ⦿ Children have sexual rights such as having access to the right information based on their developmental period, not being exposed to discrimination or violence, autonomy and bodily integrity and privacy.
- ⦿ Institutions who are in direct or indirect contact with children bear responsibility for not hurting them in any way and granting them the abovementioned rights.
- ⦿ It is indispensable that the best interests of the child are observed in all work conducted in the field of child safeguarding.
- ⦿ Institutions are responsible for providing the children they work with safe environments and for supporting them.
- ⦿ If the institutions collaborate with partners, they are obliged to help them ensure the minimum protection requirements.
- ⦿ It should be a priority to promote children's participation in all activities conducted in the field of child safeguarding.
- ⦿ All children have equal rights.

# 3

## MAIN CONCEPTS

### **Child:**

Within the scope of the United Nations Convention on the Rights of the Child and national legislation deriving from it, a child is any person under the age of 18 and children enjoy their exclusive group of rights, i.e. children's rights.

### **Youth:**

Youth is not a universally-accepted period for an age group. Nonetheless, youth is not only defined with an age group, but also with participation to educational, social and economic life. The United Nations defines persons between the ages of 15 and 24 as youth. The European Commission, on the other hand, takes the extended educational periods into account and therefore defines those persons between the ages of 15 and 29 as youth. However, related to the abovementioned reference, persons between the ages of 15 and 18 are also defined as children, thus they have a different status and some limitations might come into play.

### **Best Interests of the Child:**

This concept is frequently mentioned in the Constitution of the Republic of Turkey and in the UN Convention on the Rights of the Child, to which Turkey is a party. It defines guaranteeing children's rights to ensure their wellbeing, development, right to life and safety no matter what through equality, justice, peace, freedom, attention, happiness, love and understanding. According to the concept, public or private institutions, courts, administrative bodies and legislative bodies observe the best interests of the child in all their activities they conduct about children. Decision makers and law makers are obliged to act in line with this principle in their decisions in every situation. In addition, this concept also includes providing children with an environment where they can express themselves without feeling under pressure, prioritizing their needs, protecting them from violence and making regulations so that they have a healthy development. Protection of children under every circumstance is the primary duty of adults.

### **Child's Bodily Autonomy:**

Child's bodily autonomy is a reflection of the child's right to participate, which is one of the main principles of the Convention on the Rights of the Child. Child participation means their having access to the suitable environment and tools so they can present their opinions on matters that are about themselves, and that these opinions are listened to and taken into account by the adults. Children, just like adults, are individuals who have bodily autonomy. It is important that adults working with children emphasize that they respect every response and opinion coming from the children and that if they want to do so, they also have the right not to participate. The emotions, thoughts and choices of children at any age are valuable. Moreover, it is essential not to violate children's personal space and boundaries and to respect their bodily autonomy, while working with children.

### **Child Participation:**

It is one of the four main principles in the Convention on the Rights of the Child. Children's rights to participation such as non-discrimination, supporting their development and prioritizing their best interests regardless of the situation are the most effective ways protect children and to ensure their safety. This right enables children to freely express themselves, to share their views on every subject that is related to them and also to make their needs visible in the decisions taken. Child participation is not only limited to asking children what their views are. It is also necessary to have favourable environments where they can present their views, to create enabling tools, to have adults who listen to them and accept them as interlocutors. Children are experts of the topics that are about themselves. Therefore, it is them who know about their needs the best, it is them who do the best analysis. It is the duty of adults to lend them an ear, to give them room and develop policies and practices that are in line with these needs.

### **Protective-Preventive Approach:**

It is an approach that prioritizes preventing neglect, abuse and violence before they emerge and protecting individuals from the negative consequences of abuse and violence. It is especially used in the fields of health, education and law. It is predominantly only after when cases of sexual abuse and violence already have taken place, when such phenomena make it to the agenda of the society. However, there are many measures that can be taken and programs/ practices that can be developed before violence takes place. These practices may include a large population or they can be planned towards a specific group. Protection and prevention are the duties of policy and system. Creating financial resources for these services and implementing, controlling and reporting these services are the responsibilities of those who develop policies and programs and who are in decision-making positions. A comprehensive and inclusive protective-preventive practice can be attained by a need and risk analysis and by taking the cultural structure into account, as well as the identification of the problem, defining the environmental and institutional resources, interdisciplinary approach and inter-institutional cooperation. However, all professionals should adopt and internalize the protective-preventive approach in order to effectively combat sexual violence.

### **Comprehensive Sexuality Education:**

Comprehensive sexuality education plays a significant role in making sure children and young people have access to accurate information suitable for their developmental period and that they enjoy their sexual rights such as freedom from discrimination and violence, autonomy and bodily integrity, privacy. It is a cascaded, comprehensive, finding-based, developmental age-appropriate educational model that involves the cognitive, emotional, physical and social aspects of sexuality. It is not only limited to sexual health and development. It is also effective in preventing dating violence, sexual abuse and peer violence thanks to its comprehensive content on gender, personal boundaries, the concept of consent and safe relationships. Having access to comprehensive sexuality education is a right.

## **Sexual Abuse:**

Sexual abuse means sexual exploitation of individuals defined as children in international conventions and national legal texts (every person under the age of 18 is a child), by a person who is responsible for themselves from an age and developmental level perspective and with whom they are in a trust or power relationship. It should not be confused with peer-to-peer, curiosity-oriented sexual play and consent-based behaviours. In cases where the perpetrator of the abusive behaviour is not an adult but another child, it should be kept in mind that the perpetrator is also a child under the age of 18, that they may have been exposed to abuse themselves or that they may be still exposed to abuse. In that case, both children should be supported by a mental health professional, taking their well-being into account.

## **Children in the Judicial System:**

This is an overarching concept that focuses on the fact that the rights of all children should be protected within the judicial system. Although concepts such as “juvenile pushed to crime”, “child victim” and “child witness” are included in the national legislation, these concepts are not used from a perspective that protects the best interests of the child, and that the approach to the rights of the child changes as different ways of positioning in the judicial system change. The association prefers to use the concept in order to prevent this approach particularly and not to discriminate the children and to ensure that they have access to the judicial support mechanisms they need.

## **Abuse of Children Through Marriage:**

According to the national legislation, the legal age of marriage as a rule is 18. Forced early marriage of children outside this age constitutes the basis of their abuse through marriage. In the adult-centric world, children’s will is ignored in almost every matter. However, when it comes to an official institution like marriage, that puts people under severe consequences, children are married off, assuming that they do have the will. In order to bring the act of abuse to the forefront, the Association prefers to use this term instead of other terms, such as early forced marriages or child brides.

## **Adultcentrism:**

Adultcentrism is the tendency to be biased towards children and their problems, from a perspective that sees adulthood as intrinsically superior. It hinders from carrying out effective practices with children. As a result of adultcentric prejudice, children are scaled according to adult standards. A child’s point of view is refused via internalized stereotypes and assumptions. Some of the negative impacts of adultcentricism are non-communication with children, making wrong judgements about children’s intentions and motivations, abuse of power to limit children’s own inner worlds and to weaken their power.



### **Dating violence:**

These are damaging types of behaviour where one of the partners -or both of them- tries to win power and control over the other one, in an emotional, romantic, sexual relationship or when the relationship comes to an end. In literature, the term "dating violence" is widely used, but there are also other concepts like "lover's violence", "romantic partner violence", "intimate partner violence", "relational violence", "intra-relational violence" which can be used to refer to this type of violence.

### **Peer Violence / School Bullying:**

The term "Peer violence / school bullying" encompasses various behaviours amongst students such as intimidation, harassment, abuse and victimization. It consists of repeated physical or psychological aggression over long periods of time and has different consequences that are equally alarming for all students involved in these behaviours. It is observed that school bullying is experienced more frequently in children and youth who feel that their identity is not recognized in family and school environment, who are discriminated against, and who do not receive adequate adult guidance and training on their personal boundary training. To prevent and control school violence, providing support to the child in conflict management and empathy areas and educating school components to take a survivor-focused role when they witness violence can be effective strategies.

# 4

## MAIN POLITICAL APPROACHES

### Association's Approach to Sexual Abuse Towards Children and Youth

Sexual abuse is a form of sexual violence. Sexual abuse, like all other acts of violence, is not about sexuality, but about power and hierarchy. The person who sexually abuses a child commits the act of violence by abuse because children are physically, emotionally, cognitively and experientially weaker. Contrary to popular belief, the child's powerless position is based not only on the physical differences, but more on the emotional, cognitive differences as well as the value differences the society refers to the child. In societies where children are not seen as individuals, where children's rights are not delivered, where there is no access to comprehensive sexuality education, where children do not have a say, and where adults have an intensive authority over children, children have a higher rate of being exposed to abuse, especially by the people close to them.

When people discuss the issue of sexual abuse in Turkey, they leave out matters like children's rights and child participation. This is partly because of cultural reasons: Adults have an intensive authority over children, children are not seen as individuals, children are expected to show adults conditional respect and obedience, the family is deemed sacred and comes above all values, there is a lack of information and wrong beliefs about sexual abuse. There are also other structural reasons, like not having access to regular and right-based education and awareness raising efforts such as comprehensive sexuality education. These compound the violations of boundaries towards children's bodies and sexual abuse crimes and make them invisible. Sexual abuse is only spoken about when the violent behaviours already have emerged and when children have been harmed. A protective and preventive approach against sexual abuse is not yet turned into a perspective in public institutions and the preventive measures are insufficient. The implementation of post-abuse support services offered by the relevant ministries and the approach of administrative staff are far from being rights-based or preventive. The children may be exposed to secondary trauma or their disclosure may not be taken seriously.

On the other hand, children's rights violations are quite common in the media. There is almost no research or study for children with disabilities. The area of special education, like other fields, involves only very limited sexual development and education. Subjects like children's sexual development, communication, personal boundaries, concept of consent, children's bodily autonomy can only be worked on at schools via school counselors. School counselors have limitations in accessing facilitating resources and materials. Incidents of sexual abuse of adolescents are even more invisible because of the perception of adolescents in society and it is even deemed acceptable by saying "The adolescent consented to it" very often. This perspective paves the way for adolescents' abuse through marriage and for school dropouts. Discrimination and violence LGBTI+ children experience in school and family dilemma increase the adolescent suicide rates.

The Association lists reasons of sexual abuse of children as follows:

☛ **Perception of Children in Society**

- Constructed power difference between the child and the adult, ageism, adult-oriented social structure
- Not seeing children as individuals with rights, discrimination
- Pacification, objectification, silencing of children by adults
- Not giving children the right to speak, not believing their word
- Failure to ensure child participation

☛ **Lack of Protective-Preventive Efforts**

- Absence of comprehensive sexuality education
- Lack of family counseling centers and parent support programs
- Inadequacy of youth counseling and support centers

☛ **Social Perception of Sexual Abuse**

- Approach to sexual abuse, false beliefs generated in society
- Language used in the media, victim accusation
- Lack of consent culture
- Sexism

☛ **Problems in the Judicial System**

- Deficiencies in the Child Protection Law
- Focusing on punishment rather than prevention
- Impunity
- Lack of post-abuse support systems
- Secondary traumas inflicted on children in the judicial system

The Association works towards the elimination of all these problems while struggling against abuse. It also emphasizes at every opportunity that the responsibility of struggling against sexual abuse belongs to adults, not to children.

## Association's Approach to Dating Violence

Although the concept of dating violence is becoming more and more visible in Turkey, it is not sufficiently talked about in the relevant platforms within the context of safe relationships and sexual health. Due to conservative policies, concept of dating is associated with "immorality" and this is what prevents dating violence studies from being publicized and from being turned into protective preventive activities at schools in Turkey. Instead of reducing and preventing dating violence, we see implementation of policies such as the removal of dating, early marriages or reducing the age of consent. Although high school counselors and psychological counselors are aware of the dating violence cases among young people, they cannot find adequate resources to develop and implement the protective-preventive approach about the subject. The number of young people who have access to comprehensive sexuality education in the formal education system is limited to private schools and is quite low. While news about young people murdered by their partners are covered in the media more frequently and cause reactions, still the mainstream media perspective that blames the victims and normalizes violence in relationships persists. Due to gender inequality and prejudice, it is more difficult for young women and LGBTI+ youth to express the violence they experience in dating relationships.

## Association's Approach to Child Perpetrators

Association for Struggle Against Sexual Violence (CŞMD) accepts that child perpetrators are also survivors, given the current legal system. In other words, it envisages striving for the operation of state mechanisms in the judicial system to meet the needs of children in cases where court files have children on both sides. Children's access to the support they need takes particularly the victim children into consideration, and moves forward from a place that also protects the child perpetrator. Here, the main aspect is to prevent the prioritization of punishment and to ensure children to have access to support and to leave the judicial system with the least damage. It is clear that the existing injustice cannot be eradicated by depriving children of their freedoms. The Association has a protective-preventive focused approach, not a punishment-based approach. The Association adopts the principle that every situation involving a child is unique and therefore should be assessed within that particular context.

# 5

## RELEVANT REFERENCES

### **Responsibilities of Adults in Preventing Sexual Abuse and Children's Bodily Autonomy**

*Association for Struggle Against Sexual Violence*

[https://cinselsiddetlemucadele.org/wp-content/uploads/2021/10/Responsibilities\\_of\\_Adults\\_in\\_Struggle\\_Against\\_Sexual\\_Abuse.pdf](https://cinselsiddetlemucadele.org/wp-content/uploads/2021/10/Responsibilities_of_Adults_in_Struggle_Against_Sexual_Abuse.pdf)

### **Policy Document on Child Participation**

*Partnership Network for Prevention of Violence against Children*

<http://www.cocugasiddetionluyoruz.net/agin-yayinlari/cocuga-karsi-siddeti-onlemek-icin-ortaklik-agi-cocuk-katilimi-politika-belgesi>

### **Policy Document on Child Protection**

*Partnership Network for Prevention of Violence against Children*

<http://www.cocugasiddetionluyoruz.net/agin-yayinlari/cocuga-karsi-siddeti-onlemek-icin-ortaklik-agi-cocuk-koruma-politika-belgesi>

# CHILD SAFEGUARDING PROCEDURES

## PEOPLE IN CHARGE

### **Child Safeguarding Focal Person:**

The Child Safeguarding Focal Person is designated as someone who is responsible for the implementation of CŞMD's Child Safeguarding Policy and Procedure Document. This person should be knowledgeable about child safety, have the institutional memory and be accessible. In this context, they are expected to be aware of the functioning of the processes in the institution and of the recent developments in the field. The focal person communicates with their counterparts in the network of CŞMD and other institutions it is in contact with, so as to develop policies and procedures. They are responsible for convening the Child Safeguarding Commission and for making necessary arrangements so that the policy document is updated at least every 2 years or as needed within the framework of the existing conditions, new organizational structure, new program/projects. The focal person is in charge of the email address administration where notifications and complaints are received.

### **Child Safeguarding Commission:**

The recipient of the notification and complaint emails is the Child Safeguarding Commission. Child Safeguarding Commission is composed of the Child Safeguarding Focal Person, legal advisor of the association, one Board member and one Coordination Team member. The Commission convenes within 5 (five) working days after they receive the notification and communicates the outcome of the evaluation to relevant persons so they can take action. Child Safeguarding Commission is obliged to report the incident they have been notified about and also the process following the evaluation. The commission is also obliged to make sure that the report reaches the Coordination Team. Moreover, it fulfills the required responsibilities for the regular updating of the Child Safeguarding Policy and Directive document. In cases where the focal person has left work, the commission takes over their responsibility until a new focal person is appointed.

### **Coordination Team:**

They are personally responsible for the association components' access to the policy document, for raising awareness about the issue and for the implementation of the document. They are also responsible for collecting and archiving signed policy documents and reports of the Board of Directors, the Commission and the Ethics Committee.

### **Board of Directors:**

The Board of Directors is in charge of policy implementation and of the supervision of the operation of all stages, including the reporting, examination and sanction mechanisms, in cases of incompliance with rules and regulations. It is also responsible for communicating with the Ethics Committee and for following up the implementation of recommendations.

### **Ethics Committee:**

The Ethics Committee is responsible for conducting the investigation in which the notification they have received will be evaluated in cases of a policy violation. Following the investigation, the Ethics Committee presents their recommendation to the Board of Directors. The Ethics Committee is elected by the members of the Child Safeguarding Commission. Consisting of 3 full and 3 substitute members, the Committee takes office for 3 years.

## PROTECTION AND PREVENTION PROCEDURES

### Recruitment and Human Resources Procedures:

An important selection criterion in the recruitment process is the person's perception of a child. The CVs are assessed within this Policy from a child safety perspective. During the interviews, the child's perception of the person to be recruited is evaluated with various questions. During the recruitment process, criminal records are requested from the individuals and recruitment is not carried out without the examination of the criminal record. In cases where there is a criminal record, supporting questions help additional evaluation. In reference interviews, an evaluation is made by asking questions that will determine the person's perception of the child.

The selection and recruitment process (further detailed in the CŞMD Human Resources Policy Document) aims to recruit reliable and qualified individuals, especially if they are going to work directly with children. Qualified staff, who are aware of and can manage situations that pose a risk to children, design and supervise all activities involving children. The Human Resources Policy Document and its annexes are shared with the persons and they are asked to make a commitment to act in line with it. CŞMD Child Safeguarding Code of Conduct (ANNEX-1) is added to the employment contract to be made with individuals. Volunteers make a commitment to comply with the code of conduct during the volunteering application. Within the scope of the orientation program by CŞMD, persons receive a training on child safety. In the Human Resources Policy Document, arrangements are made for employees with children in a way that ensures the rights of children. Association's new recruits read and sign "Child Safeguarding Code of Conduct", a part of the specific regulation of that department (unit).

### Procurement, Logistics and Contracts:

The association promotes child-focused institutions in procurement and cooperation processes; it does not purchase services/products from institutions or individuals where children are abused and neglected; it does not accept grants or donations from them. The employee of association who makes the purchase and establishes cooperation shows due care in this matter. If the procuring/cooperating (spending) association employee cannot resolve the concern that the child's best interests were not protected during the process, then an application is made to the Child Safeguarding Commission. This clause is added to the Finance Document.

In the event that there is a public lawsuit filed against the institution or the person regarding the purchase/cooperating institution or person, while the relevant procurement process or cooperation is in progress, CŞMD terminates the contract unilaterally in accordance with the relevant article of the contract made with the parties. Articles regarding termination are specified in the contract in detail. This termination means that the existing obligations in the contract are eliminated due to the violation of the contract clause. Existing receivables and debts, if any, until the termination date of the contract are mutually eliminated and a protocol is prepared.

The parties signing the contract declare and commit that they will protect the best interests of the child. The parties exercise due care to protect children from sexual abuse and all kinds of exploitation. CŞMD has the right to terminate the contract unilaterally, with the person or institutions who provide services or exercise collaboration, regardless of the quality of the product/service received from the person or institution, if they do not exercise due care. The parties take the progress payments up to the date of violation of this article into account.

## Communication and Media:

In its communication activities, CŞMD adopts rights-based communication principles and rights-based journalism principles in its relations with the media. It serves the best interests of the child and respects their right to private life and privacy. CŞMD never adopts an approach that emphasizes the victimhood of children and that besmirches their reputation in any way in its communication and media activities and stands by the rights-based language and framework in the content it generates. The use of children's photographs in a way to serve the adult perception would create an understanding that would aggravate the objectifying of children and would negatively influence the healing process after sexual abuse. This is why drawings and illustrations are preferred in terms of visual content prepared. In the announcements, children's photos are not used. CŞMD does not spread negative cases as examples. It does not reconstruct violence. People and institutions such as a photographer or a journalist, who participate in the activities with children, regardless of their membership to CŞMD, are expected to obey these rules. For that purpose, the Policy Text and the Code of Conduct are shared with these people before the event and it is a prerequisite that they commit to comply.

Whether it is by employees, external experts or visitors, in cases where children's images, views and products will be used as a communication tool, participation of children in the consent process is ensured and an **Informed Consent Form (ANNEX-1)** is obtained from their guardians.

## Protection of Children-Related Information:

CŞMD pays attention to the privacy in all its activities. Accordingly, it requires that all types of personal information, photos and videos of children should be secured. Although this is regulated with the structure of each program and organization that CŞMD works with, still, as a principle, information about children is stored in physical or digital environments, using necessary security measures. People other than the limited number of adults who are included in the activities carried out with the child are not permitted to have access to the information. The association updates its protection tools with regular workshops and expert support on secure archiving and digital security. It also develops the institutional structure to standardize data security measures for each project and program. Children's personal information is not shared with grantor or donor persons and institutions.

## Safe and Accessible Programming:

CŞMD assumes responsibility to ensure that all programs, services and activities are safe for children. For this purpose, it programs all its activities, from the simplest to the most comprehensive, in such a way that it focuses on the safety of children in the planning-implementation- evaluation processes. Within the scope of the programs, instead of having an approach that exacerbates ageism or aggravates the power difference between the adult and the child or one that depicts children as subjects who are weak, needy and rights-deprived; it adopts and emphasizes an approach where children are deemed as individuals who have their rights. Program content includes every child, in a way that includes the diversity in gender identity, sexual orientation, health/disability, ethnicity, age or class. Discrimination is not permitted. Child protection and child participation chapters are definitely included in content.



CŞMD takes the main component of safe programming, i.e. the risk analysis process, as a chapter in its annual risk analysis meetings. It undertakes the steps necessary to reduce the risks revealed with the analysis. It develops alternative strategies or contingency plans for the on-going risks. It integrates processes which are not thought of as linked to children but that indeed are relevant on the child protection focus and it includes these in the overall risk analysis study.

Protocols are signed with the stakeholders within the scope of training programs conducted by CŞMD. Cases shared and data gathered during the program activities are kept confidential.

## 2 CHILD SAFEGUARDING CODE OF CONDUCT

**CŞMD Child Safeguarding Code of Conduct (ANNEX-2)** includes behaviours that all people in direct or indirect contact with children should and should not do, in order not to harm them in any way and in order to ensure that children are safe and supported. The Code of Conduct was prepared based on the fundamental principles of the Policy Document and forms the standards of the reporting mechanism which will be mentioned below. Before starting their work, CŞMD staff, members, volunteers, Board of Directors and other bodies are obliged to accept these rules, sign the document and commit to the Code of Conduct. It is the responsibility of CŞMD to make sure that the people/institutions directly working as part of its activities, children it works with and the adults around them are knowledgeable about the Code of Conduct. Target group and relevant persons help promote the familiarity of the notification e-mail address and its function. For this purpose, various visual materials are provided, including the child-friendly versions of the document.

## 3 PROCEDURES ON REPORTING AND RESPONSE

CŞMD supports people who voice their concern about the well-being of children, follows up on all sort of examination conducted or collaborates with the people who run the examination and implements appropriate corrective action to prevent such an act from happening again. In responding to all questions, complaints and notifications on child safety, CŞMD Child Safeguarding Procedures on Reporting and Response are implemented. In case of an incident or a concern, CŞMD carries out the whole process with confidentiality and within the information of only the required people and departments and in a transparent manner.

People who have witnessed or have indirectly come to the information that the Policy document and the Code of Conduct are violated or those who believe that the association's efforts pose a risk for child safety, can file a complaint and report in written form to the following address: **[cocukguvenligi@cinselsiddetlemucadele.org](mailto:cocukguvenligi@cinselsiddetlemucadele.org)**

Children's focal person is in charge of the follow-up of the e-mail address. Child Safeguarding Commission is in charge of evaluating the reporting. It is sufficient to convey the information and suspect that one has to report, there is no need for a preliminary examination or investigation.

### **Reported notifications should always include the following:**

- ✓ Date, time and place of the incident (When and where?)
- ✓ Type of incident (abuse, discrimination, violating behaviour, etc.) (What happened?)
- ✓ Essence of incident (Who was involved in the incident, and how?)

When a notification reaches the Child Safeguarding Commission, the Commission convenes in 3 (three) working days at the latest and evaluates the situation. It contacts the Coordination Team to undertake the necessary action or measures. If a member of the Commission is the subject of the reported incident, then that person does not take part in the evaluation phase and is excluded from the process. While making their decision, the Commission may consult the views of the Coordination Team or the Board of Directors, if there is a need. In cases where a deeper investigation is required, the notification is conveyed to the Ethics Committee. After the due interviews are made and the examinations are finalized, the person or persons who caused the violation may be warned only, or they may be referred to take child safety training again, or their relation with the institution may be terminated completely. The entire notification and examination process is reported in writing by the commission and presented to the coordination team.

In cases where the subject of the reporting is not a member of the association but a stakeholder, Child Safeguarding Commission provides the counseling and supervision needed by the members of the association to address their concerns. For incidents involving stakeholders, a written report of the written notification and evaluation must be prepared and submitted to the Coordination Team.

Whoever the subject of reporting may be, in cases requiring a notification, the member of the Board of Directors of the association, supported by the legal advisor, forwards the notification without any delay to the responsible institutions and organizations. If it is the child who made the reporting, the child is informed urgently once the process gets started about the matter and also once the outcome is finalized.

**Personal questions and reporting about incidents violating child safety that fall outside of the Association activities are not within the scope of this document and e-mail address.**

## **4 ACCOUNTABILITY AND MONITORING**

Child Safeguarding Policy and Procedures Document is a living document. This means that as part of CŞMD activities, the principle and procedures put forth in the policy document are monitored at regular intervals and necessary revisions are made. Taking the feedback from association members and stakeholders into account, the Child Safeguarding Commission monitors and reviews implementation of CŞMD Child Safeguarding Policy, Child Safeguarding Code of Conduct and all related procedures. The Policy document is updated at least once every 2 years or as needed depending on the new conditions, the new organisational structure and new programs/projects.

# 5 ANNEXES

## ANNEX-1: Informed Consent Form

### INFORMED CONSENT FORM SAMPLE – FOR ADULTS

I give consent for \_\_\_\_\_ (child’s first name and last name), who is under my guardianship, to participate in the activity entitled \_\_\_\_\_ (name of the project / activity) of Association for Struggle Against Sexual Violence. I understand and give my consent that within the framework of this activity, photos/videos can be shot which also involve my child, my child may be asked for their opinions, both visual and verbal data can be used in the subject-related printed and electronic publications of the Association -including on their webpages. It is to my knowledge that I can withdraw my given consent for my child’s participation in the study, and/or their visual or view being taken and being used, if I see it inappropriate for them.

I know the personal data of my child and their family and the data gathered throughout the study will be secured throughout the process and that my child’s safety will be protected through the Child Safeguarding Policy and Code of Conduct of CŞMD and if I am concerned about the presence of any violation, I know how to use the Procedure on Reporting and Response.

I have understood everything written in this document.

**First name-Last name of the Legal Guardian:**

**Contact Information:**

**Address:**

**Date:**

**Signature:**

## ANNEX-2: Child Safeguarding Code of Conduct

- ▷ No form of discrimination against children (verbal or actual) is accepted.
- ▷ Equal opportunity is ensured in work involving children. Inclusivity and accessibility are pursued in the content generated.
- ▷ Children cannot be differentiated based on their gender identity, sexual orientation or gender expression. Children cannot be forced to conform to the given gender roles by gender assignment.
- ▷ It is known that the children are unique in terms of development, living conditions and needs, and the perception of the child is fostered in this direction. Generalization is avoided.
- ▷ A positive, constructive and empowering language is used when working with or for children.
- ▷ The child's right to privacy and personal data (name, photo, story, etc.) are respected and protected. Children's photos are not used in the publications generated and in social media posts, and the content used cannot be disseminated.
- ▷ Children are not forced into any action that they do not want to say or do.
- ▷ An aggressive, humiliating or threatening language is not used in communicating with children.
- ▷ Abusive personal relationships with children, including conversations, correspondence and behaviours with a sexual and romantic content, are unacceptable.
- ▷ Personal communication with children met within the scope of CŞMD's activities, including social media, is not maintained outside the scope of the association's activity.
- ▷ CŞMD staff do not stay alone with children within the scope of association activities (seminars, workshops, etc.) without the presence of another adult in charge. If the child requests individual counseling, at least two people can provide guidance by listening to the need.
- ▷ There is no contact or touch that ignores children's bodily autonomy or that is not required by the activity or work, and that is not based on approval.

- ▷ Children cannot be humiliated in a way as to make them feel less valuable and shamed (teasing, nicknames, etc.) because of their thoughts, emotions, bodies, gender or choices.
- ▷ Relationships based on emotional, physical, economic and sexual exploitation are not established with children.
- ▷ The adult does not use the child as a tool for their own or for the institution's benefit.
- ▷ Children's views are respected and it is ensured that children participate meaningfully in decision-making mechanisms, especially in decisions based on children's well-being.
- ▷ The adult does not guide the child through their own values and experiences, but offers the child options that they can choose. Children's informed consent is obtained about where, how and for how long the content will be used before their photos and videos are taken, and it is ensured that an agreement is reached for the future use of their photos and videos. When necessary, it is ensured that their guardians sign the informed consent form.
- ▷ It is ensured that a culture of open communication and a safe space are created where children can freely express and discuss their own safety-related situation and concerns.
- ▷ The power of children is recognized. Their rights, what is appropriate and inappropriate, and what they can do if there is a problem are discussed together with the children.
- ▷ What children say, including their questions and demands, is not ignored.
- ▷ For children in the judicial system, accusative language is avoided, the victim is not blamed and the rights of the child in this context are protected.
- ▷ It is known that there is a notification obligation in crimes related to children and due action is taken without delay.

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Association for  
**Struggle** against  
**Sexual Violence**