



**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**

The Child Safeguarding Policy is a document that shows the commitment of an institution to provide a favorable environment to protect children from all sorts of violations of their rights and 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 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 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.

Although the Association for the Struggle Against Sexual Violence (CŞMD) mainly runs activities for adults, youth and children are among the indirect beneficiaries. The programs run by the Association are in direct contact with children and adults who are in contact with the youth; still, the ultimate goal of the 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 is also for sexual abuse and dating violence.

The Association creates an indirect contact area with children and young people through activities such as access to children's personal information, photographs, and case details, supporting institutions and experts working directly with children and young people in terms of content and approach, producing digital information and materials for young people, and contributing to the production of policies that will affect the lives of children and young people through advocacy activities.

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 to children. Additionally, in case of a risk or damage that may arise 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 a whole team, and it was approved by the CŞMD Board in November 2021. The document was reviewed in 2024 and entered into force again in November 2024 with the necessary updates. We would like to thank İnter Dayanışma for their contribution and support during the update process.

## OBJECTIVE AND SCOPE

### The objective of the document is:

- a)** to manifest CŞMD's institutional political approach against sexual abuse towards children and all forms of child exploitation,
- b)** to ensure 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 commit that the Association's staff, operations, and programs do not violate children's rights and that these do not harm the children,
- d)** to act as an intermediary, 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 that may occur within the Association's responsibilities,
- f)** and to determine the responsibilities of the Association and individuals involved in the process to be followed in the event of a violation of this policy document and of the code of conduct.

The principles and practices in this document cover all staff of CŞMD, the Association's bodies (Board, members and substitutes of the Audit Committee, Youth Advisory Board and members of the Association), volunteers actively working with the association, and interns. The staff, volunteers, and Board of CŞMD will receive necessary training (the first of which is on child safety) to ensure their commitment to act in accordance with this document and will endeavor to minimize risks.

The document is valid for all activities taking place not only inside the office of the association and within its fields of activity (including the digital domain), but also among the members of the association (staff, members, volunteers, and interns). This includes actions that occur externally but are related to the association or its activities, as well as any actions that may interfere with the working environment.

CŞMD endeavors to ensure that the stakeholders it mediates to bring together with children also comply with this document. Therefore, CŞMD shares this document with its stakeholders and requires them to commit to compliant behavior. Otherwise, referring to the relevant contract and articles of protocol, it will discontinue its relationship and cooperation with those stakeholders.

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## MAIN PRINCIPLES

- ⦿ All types of violence against children can be prevented.
- ⦿ Every child is unique in terms of their development, life conditions, needs, and stories.
- ⦿ Children are not objects of the adult world; they are the subjects of their own lives.
- ⦿ Children are individuals who have a say over their bodies.
- ⦿ Children have sexual rights, including access to appropriate information based on their developmental stage, protection from discrimination or violence, and rights to autonomy, bodily integrity, and privacy.
- ⦿ The sexual development of every child/adolescent is both similar and diverse. The right of children/adolescents to grow up in a safe environment and the right to information should be given high priority, taking into account the diversity of gender, sexual orientation, gender identity, and gender expression.
- ⦿ Institutions that are in direct or indirect contact with children bear the responsibility to ensure they are not harmed in any way and to uphold the aforementioned rights.
- ⦿ It is essential that the best interests of the child are prioritized in all work conducted in the field of child safeguarding.
- ⦿ Institutions are responsible for providing safe environments for the children they work with and for supporting them.
- ⦿ If institutions collaborate with partners, they are obliged to help ensure minimum protection requirements.
- ⦿ Promoting children's participation in all activities related to child safeguarding should be a priority.
- ⦿ All children have equal rights.

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## 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 defined as any person under the age of 18. Children enjoy their exclusive group of rights, known as children's rights.

### Youth:

Youth is not universally defined as a specific age group. However, it encompasses not only an age range but also participation in educational, social, and economic life. The United Nations defines youth as individuals between the ages of 15 and 24 as youth. Conversely, The European Commission considers extended educational periods and defines youth as those between the ages of 15 and 29. It is important to note that individuals aged 15 to 18 are also classified as children, which gives them a different status and may impose certain limitations.

### Best Interests of the Child:

This concept is frequently referenced in the Constitution of the Republic of Turkey and the UN Convention on the Rights of the Child, to which Turkey is a party. It emphasizes the importance of guaranteeing children's rights to ensure their well-being, development, right to life, and safety through principles of equality, justice, peace, freedom, attention, happiness, love, and understanding. According to this concept, public or private institutions, courts, administrative bodies, and legislative bodies must prioritize the best interests of the child in all their activities related to children. Decision-makers and lawmakers are obligated to act under this principle in all situations. Additionally, this concept includes providing children with an environment where they can express themselves freely without feeling under pressure, prioritizing their needs, protecting them from violence, and implementing regulations that promote healthy development. The protection of children in all circumstances is the primary duty of adults.

### 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, support for their development, and prioritization of their best interests - are the most effective ways to protect children and ensure their safety. This right enables children to freely express themselves, to share their views on every matter related to them, and to make their needs visible in the decision-making processes. Child participation is not limited to simply asking children for their opinions; it also requires creating favorable environments where they can present their views, developing enabling tools, and ensuring that adults listen to them and accept them as interlocutors. Children are the experts on matters that concern them, and they know their needs best. Therefore, adults need to lend an ear, provide space for children's voices, and develop policies and practices that align with those needs.

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

A child's bodily autonomy is a reflection of the child's right to participation, which is one of the fundamental principles of the Convention on the Rights of the Child. Child participation means that children have access to suitable environments and tools to express their views on matters that concern them and that these views are heard and taken into account by adults. Just like adults, children are individuals who have bodily autonomy. A child's bodily autonomy is related to the concepts of participation, consent, and personal boundaries. It encompasses the right of children to access information regarding their bodies, to express their opinions, to make decisions, to define their boundaries, and to communicate those boundaries to others. Additionally, it emphasizes the importance of reminding adults that children's bodies are their own, private, and valuable, thus highlighting a rights-based approach to combating sexual abuse. The Association conducts a prevention program using and promoting this concept.

### **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 cases of sexual abuse and violence have already taken place that such phenomena make it to the societal agenda. However, many measures can be taken and programs/practices can be developed before violence occurs. These practices may include addressing a large population, or they can be planned for a specific group. Protection and prevention are the duties of policy and the 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 are in decision-making positions. A comprehensive and inclusive protective-preventive practice can be attained by conducting a need and risk analysis and by taking the cultural structure into account, identifying the problem, defining the environmental and institutional resources, and promoting an interdisciplinary approach and inter-institutional cooperation. However, all professionals should adopt and internalize the protective-preventive approach to effectively combat sexual violence.

### **Comprehensive Sexuality Education:**

Comprehensive sexuality education plays a significant role in ensuring that 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, and privacy. It is a cascading, comprehensive, evidence-based, developmentally 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 fundamental right.

## Sexual Abuse:

Exploiting a child, causing harm to a child, and/or exerting control over a child's body through sexuality is defined as using sexuality inappropriately. It is an umbrella concept encompassing all actions, attempts, and means, whether or not they involve contact. Sexual abuse is not the fault of the child, regardless of who perpetrates it. No behavior by the child can justify sexual abuse. It should not be confused with peer-to-peer, curiosity-oriented sexual play and consent-based behaviors. In cases where the perpetrator of the abusive behavior 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 and that they may have been exposed to abuse themselves or may still be experiencing 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 national legislation, these concepts are not used from a perspective that protects the best interests of the child. Moreover, the approach to the rights of the child changes as different positions in the judicial system change. The Association prefers to use this concept to prevent this approach, particularly to avoid discriminating against children and to ensure that they have access to the judicial support mechanisms they need.

## Materials Related to the Sexual Abuse of Children:

Pornography is sexually explicit materials produced with the participation of adults, with their consent, intended for the adult world and its perceptions. When it comes to children, the production and distribution of such content is not pornography but a crime. The term "child pornography" is used by those who commit this crime and should not be considered legitimate language by law enforcement, the judiciary, the public, or the media. The combination of the words "child" and "pornography" normalizes this type of abuse by trivializing it as a genre of pornography. The use of children in the production of any sexually explicit material is one of the forms of sexual abuse against children; it is also a form of sexual and commercial exploitation of the child. The association promotes the use of this concept to specifically highlight abuse and exploitation, making visible the harm these types of violence inflicted on children.

## Abuse of Children Through Marriage:

According to 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 wills are ignored in almost every matter. However, when it comes to an official institution like marriage, which puts people under severe consequences, children are married off, assuming that they have the will. 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".



### **Adult-Centrism / Adulthood:**

The power and authority that adults have over children. This approach views the child not as an individual but as an extension of the adult, a product owned by the adult, a tool, and an object. It is among the reasons for discrimination against children and violations of their bodily autonomy. In short, it involves placing the adult at the center of everything and acting on the assumption that one is an adult. The association aims to question and transform this power dynamic between children and adults based on the principle of intersectionality.

### **Dating violence:**

These are damaging types of behavior where one of the partners -or both of them- tries to win power and control over the other in an emotional, romantic, or 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", and "intra-relational violence" that can be used to refer to this type of violence. The Association conducts youth work and a prevention program titled "What's Up What's Not?!" to promote the prevalence of safe relationships among young people and to reduce dating violence.

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

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

## Intersex:

Intersex is an umbrella term used to describe a range of natural bodily diversities and is the expansion of the letter “I” at the end of the LGBTI+ acronym. It is used for people with various gender characteristics that do not fully conform to or fit into society’s and medicine’s definitions of male or female. These diversities can exist in internal or external genitalia, secondary sexual characteristics (such as voice and hair texture), hormone systems, chromosomes, or any combination of these. There is no single type of intersex body. These diversities that do not fit into the binary gender category can sometimes be visibly apparent at birth, sometimes emerge during puberty, and may not always be physically visible. Especially in cases of visible differences at birth, irreversible interventions are often performed on the bodies of intersex infants and children. Although these interventions are no longer accepted in some countries, they are still valid in others. Gender assignment surgeries performed on intersex children are a serious violation of the children’s bodily autonomy and an example of sexual violence. The incorrect or inadequate information provided by medical professionals or health-care workers to parents also fuels this violation and violence. Unnecessarily repetitive genital examinations, genital mutilation, unauthorized imaging of the child during medical processes, unauthorized (or manipulated) touching of the body, attempts to construct a gender identity without consulting the child, and all interventions aimed at making a young child suitable for heterosexual cisnormative sexual relationships in adulthood constitute an attack on bodily integrity and are characterized as sexual violence. These processes can also lead the child to develop the belief that there is something wrong or shameful about their own body and the misconception that their body is a domain that others have rights over. This can leave the child vulnerable to sexual violence outside of medical processes. Intersex is a bodily diversity. Being intersex is not a disability or a long-term physical disorder. Most intersex individuals do not have physical issues, and medical intervention is not necessary. There is nothing wrong with intersex children. The real harm to intersex children comes from this perspective, misinformation, and unauthorized medical interventions. For more detailed information, visit: <https://interdayanisma.org>

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## MAIN POLITICAL APPROACHES

### Association's Approach to Sexual Abuse Toward 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 through abuse because children are physically, emotionally, cognitively, and experientially weaker. Contrary to popular belief, the child's powerless position is based not only on physical differences but more on emotional and cognitive differences, as well as the value differences that society assigns to the child. In societies where victim-blaming is common, children are not seen as individuals, where children's rights are not upheld, where there is no access to comprehensive sexuality education, where children do not have a voice, and where adults hold significant authority over children, there is a higher rate of abuse, especially by those close to them.

When people discuss the issue of sexual abuse in Turkey, they often leave out matters such as children's rights and child participation. This is partly due to cultural reasons: Adults hold significant 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 placed above all values, and there is a lack of information and prevalent beliefs about sexual abuse. There are also other structural reasons, such as the lack of access to regular and rights-based education and awareness-raising efforts, including comprehensive sexuality education. These factors compound the violations of boundaries concerning children's bodies and sexual abuse crimes, making them invisible. Sexual abuse is only addressed after violent behaviors have already emerged and when children have been harmed. A protective and preventive approach to sexual abuse has not yet become a priority 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. Consequently, children may be exposed to secondary trauma, or their disclosures may not be taken seriously.

On the other hand, violations of children's rights are quite common in the media. There is almost no research or studies focused on children with disabilities. The area of special education, like other fields, includes only very limited discussions on sexual development and education. Subjects such as children's sexual development, communication, personal boundaries, the concept of consent, and children's bodily autonomy can only be addressed in schools through school counselors. However, school counselors face limitations in accessing facilitating resources and materials. Incidents of sexual abuse involving adolescents are even more invisible due to societal perceptions of adolescents, and it is often deemed acceptable to say, "The adolescent consented to it". This perspective paves the way for the abuse of adolescents through marriage and contributes to school dropouts. The discrimination and violence that children experience in schools and within their families increase the rates of adolescent suicide. Additionally, intersex babies are subjected to non-consensual gender assignment surgeries and, later in their lives, to various forms of sexual violence and violations of rights such as forced marriage.

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

☛ **Perception of Children in Society**

- Constructed power differences between children and adults, ageism, and an adult-oriented social structure
- Not recognizing children as individuals with rights; discrimination against them
- Pacification, objectification, and silencing of children by adults
- Not granting children the right to speak; not believing their words
- 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**

- Misguided approaches to sexual abuse and false beliefs generated in society
- Language used in the media and victim-blaming
- Lack of consent culture
- Sexism

☛ **Problems in the Judicial System**

- Deficiencies in the Child Protection Law
- Focus on punishment rather than prevention
- Impunity for perpetrators
- Lack of post-abuse support systems
- Secondary trauma inflicted on children within the judicial system

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

## Association's Approach to Dating Violence

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

## Association's Approach to Child Perpetrators

The Association for Struggle Against Sexual Violence (CŞMD) acknowledges that child perpetrators are also survivors within the context of the current legal system. In other words, it advocates for the judicial system to function in a way that meets the needs of children when court cases involve children on both sides. The support provided prioritizes the needs of the victimized child while also offering protection to the child perpetrator. The primary focus here is to avoid prioritizing punishment and instead ensure that children have access to the necessary support and can exit the judicial system with minimal harm. The existing injustices cannot be addressed by depriving children of their freedoms. The Association adopts a protective-preventive focused approach rather than a punishment-based one, adhering to the principle that every situation involving a child is unique and should therefore be assessed within its specific context.

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## 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/2024/09/CBSH-rv3-en-2024.pdf>

### **Child Sexual Abuse Article Series**

*Association for Struggle Against Sexual Violence*

<https://cinselsiddetlemucadele.org/en/article-series>

### **İnter Dayanışma - The Meeting Point for Intersex People in Turkey**

<https://interdayanisma.org>

# CHILD SAFEGUARDING PROCEDURES

## PEOPLE IN CHARGE

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

The Child Safeguarding Focal Person is designated as the individual responsible for implementing CŞMD's Child Safeguarding Policy and Procedures. This person should be well-informed about child safety, possess institutional knowledge, and be readily accessible. In this role, they are expected to understand the institution's processes and stay up-to-date with developments in the field. The focal person liaises with counterparts in CŞMD's network and other affiliated institutions to develop and refine policies and procedures. They are also responsible for convening the Child Safeguarding Commission and making the necessary updates to the policy document, ensuring it is revised at least every three years or as required by current conditions, organizational structures, or new programs/projects. Additionally, the focal person manages the designated email address through which notifications and complaints are received.

### **Child Safeguarding Commission:**

The recipient of the notification and complaint emails is the Child Safeguarding Commission. The Child Safeguarding Commission is composed of the Child Safeguarding Focal Person, the Association's legal advisor, one Board member, and one Coordination Team member. The Commission convenes within 5 (five) working days of receiving a notification and communicates the outcome of the evaluation to relevant individuals to initiate appropriate actions. The Child Safeguarding Commission is required to report both the incident received and the subsequent evaluation process. It also ensures that this report reaches the Coordination Team. Furthermore, the Commission is responsible for the regular updating of the Child Safeguarding Policy and Directive document. In cases where the focal person has left their position, the Commission assumes their responsibilities until a new focal person is appointed.

### **Coordination Team:**

The team is personally responsible for ensuring that all components of the Association have access to the policy document, raising awareness about its importance, and overseeing its implementation. They are also responsible for collecting and archiving signed policy documents as well as reports from the Board of Directors, the Commission, and the Ethics Committee. In organizational structures where there is no coordination team, the coordinating person or the board of directors takes over this responsibility.

### **Board of Directors:**

The Board of Directors is responsible for overseeing the implementation of the policy and supervising all operational stages, including reporting, investigation, and sanction mechanisms in cases of non-compliance with established rules and regulations. Additionally, it is accountable for communicating with the Ethics Committee and ensuring the follow-up on the implementation of its recommendations.

### **Ethics Committee:**

The Ethics Committee is responsible for conducting investigations in cases of reported policy violations. Upon completing an investigation, the Committee submits its recommendations to the Board of Directors. The Ethics Committee is elected by the members of the Child Safeguarding Commission and is composed of 3 full members and 3 alternate members, with each term lasting 3 years. 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 criterion in the recruitment process is the candidate's understanding of children's rights and child safeguarding. CVs are reviewed from a child safety perspective within the scope of this Policy. During interviews, candidates are asked questions that assess their perception of children and commitment to child safety. Criminal background checks are required for all candidates, and recruitment is not finalized without reviewing this record. If a criminal record exists, additional evaluative questions are asked to further assess suitability. In reference checks, questions are also asked to determine the candidate's perception of children. The selection and recruitment process, detailed in the CŞMD Human Resources Policy Document, aims to hire reliable and qualified individuals, especially for roles directly involving children. Qualified staff who are aware of and can handle situations that may pose risks to children design and oversee all activities involving children. The Human Resources Policy Document and its annexes are shared with new hires, who are required to commit to these guidelines. The CŞMD Child Safeguarding Code of Conduct (ANNEX-2) is attached to each employment contract. Volunteers also sign a commitment to follow the code of conduct as part of their application. During the CŞMD orientation program, new personnel receive training on child safety. In the Human Resources Policy Document, specific provisions are made to ensure the rights of employees' children are protected. New hires are required to read and sign the "Child Safeguarding Code of Conduct", as part of the department's (unit's) specific regulations.

### Procurement, Logistics and Contracts:

The Association prioritizes child-centered institutions in its procurement and partnership processes. It does not purchase services or products from entities where children may be at risk of abuse and neglect and does not accept grants or donations from such organizations. Employees responsible for procurement and partnerships exercise due diligence in upholding these standards. If a staff member involved in procurement or partnership cannot ensure that the best interests of children are protected, they must report their concerns to the Child Safeguarding Commission. This policy is included as a clause in the Finance Document.

In the event of a public lawsuit filed against the institution or an individual involved in the procurement or partnership process, while the relevant procurement or cooperation is ongoing, CŞMD reserves the right to unilaterally terminate the contract by the pertinent article outlined in the agreement with the parties involved. The contract includes detailed provisions regarding termination. This termination results in the nullification of existing obligations outlined in the contract due to the breach of its terms. Any outstanding receivables and debts up to the contract's termination date will be mutually settled.

The parties signing the contract declare and commit to protecting the best interests of the child. They shall exercise due diligence to safeguard children from sexual abuse and all forms of exploitation. CŞMD reserves the right to unilaterally terminate the contract with any individual or institution providing services or collaborating with them, regardless of the quality of the product or service received, if due diligence is not exercised. The parties will consider any progress payments made up to the date of violation of this provision.



## Communication and Media:

In its communication activities, CŞMD adopts rights-based communication principles and rights-based journalism standards in its relations with the media. The organization prioritizes the best interests of the child while respecting their right to privacy and confidentiality. CŞMD does not employ an approach that emphasizes the victimhood of children or tarnishes their reputation in any way within its communication and media activities. Instead, it adheres to a rights-based language and framework in the content it generates. Using children's photographs in ways that serve adult perception can perpetuate the objectification of children and negatively impact their healing process after experiencing sexual abuse. Therefore, drawings and illustrations are preferred for visual content. Children's photos are not used in announcements. CŞMD does not disseminate negative cases as examples and refrains from reconstructing violence. Individuals and institutions, such as photographers or journalists, participating in activities with children - regardless of their affiliation with CŞMD - are expected to adhere to these guidelines. To ensure compliance, the Policy Text and the Code of Conduct are shared with these individuals before the event, and their commitment to these principles is required.

Whether involving employees, external experts, or visitors, when children's images, views, or products are used as a communication tool, the participation of children in the consent process is ensured. An **Informed Consent Form (ANNEX-1)** is obtained from their guardians.

## Protection of Children-Related Information:

CŞMD prioritizes privacy in all its activities. Accordingly, it requires that all types of personal information, photos, and videos of children be secured. While this is regulated according to the structure of each program and organization that CŞMD collaborates with, information about children is, as a principle, stored in physical or digital environments using necessary security measures. Access to this information is restricted to a limited number of adults involved in activities with the child. The association regularly updates its protection tools through workshops and expert support focused on secure archiving and digital security. Additionally, it develops its institutional structure to standardize data security measures for each project and program. Children's personal information is not shared with grantors or donor organizations.

## Safe and Accessible Programming:

CŞMD assumes responsibility for ensuring that all programs, services, and activities are safe for children. To achieve this, it designs all its activities from the simplest to the most comprehensive - with a focus on child safety throughout the planning, implementation, and evaluation processes. Within the scope of its programs, CŞMD adopts an approach that counters ageism and power imbalances between adults and children, avoiding depictions of children as weak, needy, or rights-deprived. Instead, it emphasizes the view of children as individuals with their rights. The program content is inclusive of every child, reflecting diversity in gender identity, sexual orientation, health/disability, ethnicity, age, and class. Discrimination is strictly prohibited. Additionally, chapters on child protection and child participation are integral components of the program content.

CŞMD considers the risk analysis process, a key component of safe programming, as a central chapter in its annual risk analysis meetings. It takes necessary steps to mitigate the risks identified through this analysis and develops alternative strategies or contingency plans for ongoing risks. CŞMD also integrates processes that may not initially seem linked to children but are indeed relevant to child protection, including these in the overall risk analysis study.

Protocols are signed with the stakeholders involved in 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)** outlines behaviors that all individuals in direct or indirect contact with children should and should not exhibit to prevent harm and ensure that children feel safe and supported. The Code of Conduct is based on the fundamental principles of the Policy Document and establishes the standards for the reporting mechanism discussed below. Before commencing their work, CŞMD staff, members, volunteers, the Board of Directors, and other relevant bodies are required to acknowledge these rules, sign the document, and commit to the Code of Conduct. CŞMD is responsible for ensuring that individuals and institutions directly involved in its activities, as well as the children it works with and the adults around them, are informed about the Code of Conduct. The target group and relevant individuals assist in promoting awareness of the notification email address and its function. For this purpose, various visual materials are provided, including child-friendly versions of the document.

## 3 PROCEDURES ON REPORTING AND RESPONSE

***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.***

CŞMD supports individuals who express concerns about the well-being of children and follows up on all types of examinations conducted, collaborating with those who oversee these evaluations and implementing appropriate corrective actions to prevent such incidents from occurring in the future addressing all questions, complaints, and notifications regarding child safety, CŞMD's Child Safeguarding Procedures on Reporting and Response are put into effect. In the event of an incident or concern, CŞMD conducts the entire process confidentially, sharing information with the necessary individuals and departments, while maintaining transparency throughout.

Individuals who have witnessed or have indirectly obtained information regarding violations of the Policy Document and the Code of Conduct, or those who believe that the association may jeopardize child safety, can submit a written to the following address:

**[cocukguvenligi@cinselsiddetlemucadele.org](mailto:cocukguvenligi@cinselsiddetlemucadele.org)**

The Child Focal Person is responsible for monitoring this email address, while the Child Safeguarding Commission is tasked with evaluating the reports. It is sufficient to provide the information and express a suspicion that a report needs to be made; no preliminary examination or investigation is required.

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

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

Upon receiving a notification, the Child Safeguarding Commission convenes within a maximum of 3 (three) working days to evaluate the situation. The Commission will reach out to the Coordination Team to implement the necessary action or measures. If a member of the Commission is involved in the reported incident, that individual is excluded from the evaluation process. When making decisions, the Commission may seek input from the Coordination Team or the Board of Directors if deemed necessary. Should a more in-depth investigation be required, the notification will be forwarded to the Ethics Committee. After conducting the necessary interviews and examinations, the individual or individuals responsible for the violation may receive a warning, be referred for additional child safety training, or face termination of their relationship with the institution. The Commission documents the entire notification and examination process in writing and submits this report to the Coordination Team.

When the reported subject is not a member of the association but rather a stakeholder, the Child Safeguarding Commission offers counseling and supervision to the association's members to address their concerns. For incidents involving stakeholders, a written report detailing the notification and evaluation must be prepared and submitted to the Coordination Team.

Regardless of who the subject of the reporting is, in cases that require notification, a member of the Board of Directors, with support from the legal advisor, promptly forwards the notification to relevant institutions and organizations. If a child is the one making the report, they are informed urgently at the start of the process and also notified once the outcome is finalized.

## **4 ACCOUNTABILITY AND MONITORING**

The Child Safeguarding Policy and Procedures Document is a dynamic document. This indicates that the principles and procedures outlined within it are regularly monitored and revised as part of CŞMD activities. The Child Safeguarding Commission considers feedback from association members and stakeholders while overseeing and reviewing the implementation of the CŞMD Child Safeguarding Policy, Child Safeguarding Code of Conduct, and all related procedures. The policy document is updated at least once every three years or as necessary, depending on new conditions, organizational structures, and the introduction of new programs or projects.

# 5 ANNEXES

## ANNEX-1: Informed Consent Form

### INFORMED CONSENT FORM SAMPLE – FOR ADULTS

I consent to the participation of \_\_\_\_\_ (child's first name and last name), who is under my guardianship, in the activity titled \_\_\_\_\_ (name of the project/activity) organized by the Association for Struggle Against Sexual Violence. I understand and agree that during this activity, photos and videos may be taken that include my child, and my child may be asked to share their opinions. Both visual and verbal data may be used in printed and electronic publications related to the subject, including on the Association's web pages. I am aware that I have the right to withdraw my consent regarding my child's participation in the study, as well as the use of their visual or verbal contributions if I deem it inappropriate.

I acknowledge that the personal data of my child and their family, as well as any data collected during the study, will be kept secure throughout the process. I understand that my child's safety will be protected by the Child Safeguarding Policy and Code of Conduct of CŞMD. Additionally, I am aware of the procedures for reporting and responding to any concerns regarding potential violations.

I have read and understood all the information provided 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, whether verbal or physical, is accepted.
- ▷ Equal opportunity is ensured in all work involving children, with a focus on inclusivity and accessibility in the generated content
- ▷ Children must not be differentiated based on their gender identity, sexual orientation, or gender expression. They cannot be compelled to conform to assigned gender roles.
- ▷ It is recognized that children are unique regarding their development, living conditions, and needs, and this understanding shapes the perception of children. Generalizations are actively avoided.
- ▷ A positive, constructive, and empowering language is employed when engaging with or advocating for children.
- ▷ The child's right to privacy and personal data, including their name, photo, and story, is respected and protected. Children's photos are not utilized in publications or social media posts, and any content involving children cannot be disseminated.
- ▷ Children are not compelled to engage in any actions or express any statements against their will.
- ▷ Aggressive, humiliating, or threatening language is strictly prohibited in all communications with children.
- ▷ Abusive personal relationships with children, including any conversations, correspondence, and behaviors of a sexual and romantic nature, are strictly prohibited.
- ▷ Personal communication with children encountered during CŞMD's activities, including through social media, is not conducted outside the context of the association's activities.
- ▷ CŞMD staff do not remain alone with children during association activities (such as seminars and workshops) without the presence of another responsible adult. If a child requests individual counseling, at least two individuals will be present to listen and provide guidance.
- ▷ No contact or touch disregards children's bodily autonomy or is not necessary for the activity or work, and any such contact must be based on explicit consent.

- ▷ Children must not be humiliated in ways that diminish their value or induce shame, such as through teasing, nicknames, or any negative comments regarding their thoughts, emotions, bodies, gender, or choices.
- ▷ Relationships that involve emotional, physical, economic, or sexual exploitation of children are strictly prohibited.
- ▷ Adults must not use children as instruments for their interests or the benefit of the institution.
- ▷ Children's opinions are valued, and efforts are made to ensure their meaningful participation in decision-making processes, particularly in matters concerning their well-being.
- ▷ Adults refrain from imposing their values and experiences on children, instead providing them with choices to make. Informed consent is obtained from children regarding the use of their photos and videos, ensuring they understand where, how, and for how long the content will be utilized. Additionally, agreements are established regarding the future use of their images, and guardians are involved in signing the informed consent form when necessary.
- ▷ A culture of open communication is fostered, creating a safe environment where children feel comfortable expressing and discussing their safety-related situations and concerns.
- ▷ The empowerment of children is acknowledged, and discussions are held with them regarding their rights, what constitutes appropriate and inappropriate behavior, and the actions they can take if they encounter a problem.
- ▷ What children express, including their questions and requests, is acknowledged and taken seriously.
- ▷ For children involved in the judicial system, accusatory language is avoided, victim-blaming is prohibited, and the rights of the child in this context are safeguarded.
- ▷ It is acknowledged that there is a mandatory obligation to report crimes related to children, and appropriate actions are taken without delay.

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CinselŞiddetleMücadeleDerneđi

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