

Child Protection Policy
Minerva Business and Human Rights Association
Policy and Procedures No. COC05

1. Purpose and Scope

The Child Protection Policy (**the Policy**) regulates the activities to be carried out by the employees (partners, professional employees, interns and volunteers) of the Business and Human Rights Association (**Minerva**) to ensure the safety of the children they work with. The Policy applies to Minerva Board members, employees, agents, representatives, consultants, interns, volunteers and all individuals representing Minerva on and off duty. These individuals are referred to as ‘Minerva Stakeholders’ under the Policy. The Child Safety Policy aims to raise awareness on child protection, child safety, child participation and sexual exploitation and abuse, and to set out actions that include preventive approaches.

2. Definitions

Child abuse: Minerva references the World Health Organisation's definition of child abuse and defines this term as ‘behaviour that adversely affects a child's health and physical development, whether intentionally or unintentionally by an adult, society or country’. These attitudes and behaviours, done or not done by individuals, institutions or processes, are steps that directly or indirectly harm children or undermine the possibility of a safe and healthy development towards adulthood. This Policy covers all forms of child abuse.

Sexual abuse: It refers to the sexual exploitation of the child by others with or without contact. This situation can be realised in the form of touching the child's private parts (chest, buttocks, genital area and lips), as well as actions such as flirting with the child, showing sexual content, talking, taking, recording and sharing images of the child for personal pleasure are also considered within the scope of sexual abuse of the child.

Physical abuse: Physical abuse, which is usually seen together with emotional abuse, refers to the whole of non-accidental damaging behaviours.

Emotional abuse: It refers to behaviours that cause psychological harm to the child and lead to emotional neglect of the child.

Negligence: Failure or disregard by caregivers to meet the child's needs for health, nutrition, shelter and safety, education, emotional and cognitive development.

Exploitation: Child exploitation refers to the use of children for financial gain, sexual gratification or personal benefit.

3. Basic Rules Minerva Stakeholders Should Always Follow

- 3.1.** Recognising that individuals under 18 years of age are children, it should be accepted that children have inalienable rights.
- 3.2.** Children should be treated with respect and equality regardless of their age, race, colour, sex, sexual orientation, language, religious belief, region, region, class, political or other opinion, nationality, citizenship or migration, ethnic or social origin, disability or any other personal characteristic.
- 3.3.** In every environment where children are present, positive and non-violent behaviour should be displayed and a good example should be set.
- 3.4.** Recognising that they are part of a team committed to creating a safe environment for children and caregivers/guardians/parents/legal guardians etc., they should act accordingly.
- 3.5.** Whenever it is necessary to be alone with a child, another adult should be present as much as possible.
- 3.6.** As part of an organisation committed to creating a safe environment for children and their families, assignments should be made in line with cultural sensitivities and gender equality.
- 3.7.** The privacy and confidentiality of information of children, families and the community must be protected.
- 3.8.** In activities to be carried out with children, children's right to participation should be observed and children's autonomy should be protected. Things that children can do for themselves should not be done on their behalf.
- 3.9.** Any concerns or risks to child safety should be reported to Minerva Management.
- 3.10.** Any suspicion of behaviour contrary to the Policy should be reported immediately to the relevant manager or Minerva Board of Directors.

4. Behaviours that Minerva Team Members Absolutely Should Not Do

- 4.1. Children shall not be discriminated against. Children cannot be treated unequally and unfairly by favouring or excluding one over the other.
- 4.2. No inappropriate, contemptuous, sexually suggestive, degrading, humiliating, degrading or culturally inappropriate language or behaviour may be used against children.
- 4.3. Children cannot be treated in a way that negatively affects their self-confidence and sense of self-worth.
- 4.4. Children may not engage in behaviours or conversations with sexual content, implying sexuality or sexual activities.
- 4.5. No corporal punishment or force may be used on children.
- 4.6. No child or relative may be invited to the person's home without being accompanied by an adult. A relationship with the child and/or his/her family that can be considered outside professional boundaries cannot be developed. Children and caregivers/guardians/parents/legal guardians etc. cannot be contacted through social networks.
- 4.7. Confidentiality of information about children and carers/guardians/parents/legal guardians etc. is guaranteed. Information about children and caregivers/guardians/parents/legal guardians (name-surname, telephone, address, social media addresses, etc.) cannot be requested, collected or recorded for personal relationships. Shared personal information cannot be archived and shared with 2nd and 3rd parties.
- 4.8. Photographs and information about children cannot be shared on personal websites, social networks (Facebook, Instagram, etc.) and any other media, including but not limited to these.
- 4.9. Photographs and/or videos in which children's faces are directly visible cannot be taken except in mandatory situations (collective events, field visits, situations where it is difficult to show the current situation).
- 4.10. Children must not be near children under the influence of alcohol or drugs.
- 4.11. Child labour cannot be exploited.
- 4.12. Children cannot be portrayed as victims (weak, powerless, helpless, hopeless, etc.) in any activity.
- 4.13. Photographs of children that have not been checked and approved by the relevant administrator may not be used.
- 4.14. Any concerns and/or violations of the Policy cannot be condoned or ignored.

5. Media Where Children Take Part

The following points will be fulfilled when photographing or filming the child or children or using these materials in the activities/activities/projects participated in:

- 5.1.** Before images, words, stories and history of children are recorded or used, written and, where necessary, verbal authorisation must be obtained, explaining how the images and information will be used.
- 5.2.** When taking photographs and/or videos of children, existing customs or restrictions should be assessed and filmed in an appropriate manner.
- 5.3.** Ensure that the images used honestly reflect the context and the facts.
- 5.4.** It should be ensured that the child does not pose in self-degrading or sexually suggestive poses.
- 5.5.** Ensure that photographs and/or videos featuring children show them in a dignified manner without undermining their dignity and do not portray them as weak, powerless, etc.
- 5.6.** Do not show the faces of children who have been sexually exploited, who are victims of trafficking or abuse, who are in conflict with the law, who are associated with armed groups or who can be easily located even if their identity is changed.
- 5.7.** Stories and images that could endanger the child, his/her family or community should not be published.
- 5.8.** The images of children to be included in photographs and videos may be sexually orientated in any way that it will not give rise to any perception.
- 5.9.** Computers, cameras, smartphones, smartphones, cameras or social media tools should not be used in any way to abuse or harass children and/or in any way that could harm children.
- 5.10.** When sharing images and/or videos electronically or publishing them in any format, it should be ensured that file labels, names, computer data or text descriptions do not reveal the identity of the child and caregivers/guardians/parents/legal guardians etc.

6. Violation of the Policy:

For Minerva Stakeholders, this document is an integral part of the employment contract. For signatories who are not Minerva Employees, this document is directly related to the

cooperation contract or agreement that allows them to represent Minerva. Every Minerva Employee is obliged to act in accordance with this Policy. Failure to comply with the Policy is subject to disciplinary action, which may result in verbal warning, written warning or termination of the relevant contract and employment relationship. Sanctions are not limited to these, and legal consequences based on the laws of the Republic of Turkey may also arise in relevant cases. Minerva Stakeholders must ensure that breaches of the Policy are handled with a high level of vigilance. In the event that a violation of the Policy is noticed or suspected by Minerva Stakeholders, the relevant employees are obliged to immediately inform their immediate managers about the situation. If this is not appropriate, the Minerva Board of Directors should be contacted as soon as possible. Willful failure to disclose a violation will result in disciplinary action. In the event that the laws of the Republic of Turkey or the country of employment are violated by Minerva Stakeholders, the relevant legal, administrative and criminal sanctions are reserved.

I, the undersigned,

Acknowledge that I have received, read and understand the Minerva Child Safeguarding Conduct Policy and undertake to work in accordance with the Minerva Child Safeguarding Conduct Policy, which is an integral part of my contract or agreement with Minerva. I understand that failure to comply with the Minerva Child Safeguarding Conduct Policy may result in termination of my relationship with Minerva and other disciplinary or legal action. I declare that I have no criminal history of offences against children (which I have not previously declared) and that there is no reason known to me why anyone would consider me unsuitable to work with children. Subject to compliance with personal data protection legislation, Minerva reserves the right to inform organisations requesting professional references that my contract or agreement has been terminated due to a breach of child protection principles.

Status: No. COC05 under Minerva Policy and Procedures, Approved.

Acceptance Date: March 2023

Entry into force: March 2023

Approved by: Board of Directors

Annex 1- CHILD PROTECTION POLICY COMMITMENT

I accept that I have read and understood the following code of conduct to be valid in all processes that I am in a business relationship with the Business and Human Rights Association (Minerva), and I accept, declare and undertake that this code of conduct is an integral part of the employment contract I have signed with Minerva and that I will comply with the Child Protection Policy.

Name-Surname :

Name and Position :
of the
Institution/Organiza
tion

Date :

Signature :
