



2023- 2024  
HISAR SCHOOL  
CHILD PROTECTION POLICY







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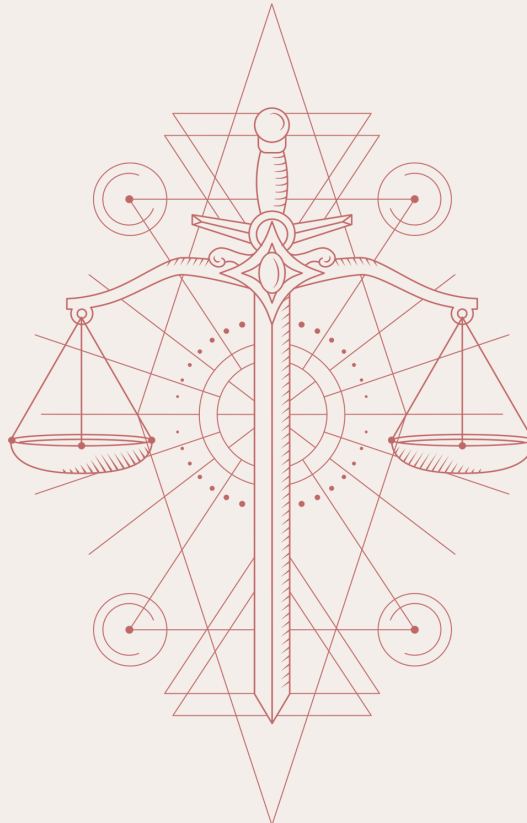
## 1- INTRODUCTION

Hisar School's Child Protection Policy is incorporated in the school's action plan named "Creating a Safe Environment to Ensure Child Protection" under the Hisar School Strategic Plan, and predicated on the UN Convention on the Rights of the Child adopted in 1989 and ratified by Türkiye. All work to be carried out under the Hisar School Child Protection Policy shall be in accordance with the Turkish constitution, Child Protection Law, Regulation of MEB (Ministry of National Education) on Preschool Education and Primary Education Institutions, and Regulation on Secondary Education Institutions. This policy is also linked to the following two articles aimed at child protection as set out in the UN Convention on the Rights of the Child:

Article 19 - States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

Article 34 - States Parties undertake to protect the child from all forms of sexual exploitation and sexual abuse.

Protection of the child from abuse and neglect, which is a global problem violating the rights of the child, is a critical issue that all schools must address seriously. A safe school environment is the number one priority when establishing the ideal conditions for the child to grow, develop and learn as it plays a large part in the life of the child. As a contemporary education institution committed to children and human rights, and to improvement through rigorous devotion, we strive to maintain a learning and teaching environment that maximizes students' safety and well-being. Driven by this purpose, Hisar School commits to guarantee students' safety in line with the Child Protection Policy it has developed and put in practice, as well as with the standards of the UN Convention on the Rights of the Child and International Task Force on Child Protection. Hisar School Child Protection Policy applies to the stakeholders of the school (all students of the school, parents, academic/administrative staff, staff of subcontractors working in partnership with the school, and all the guests who attend events at the school). The policy encompasses all the procedures and protocols we implement to prevent any harm to children we are in charge of.





## 2- OBJECTIVE OF THE POLICY

Hisar School Child Protection Policy is aimed at preventing risks and setting the principles to be followed and adopted when protecting the child at risk. Individuals in direct/indirect interaction with the child are responsible for learning and implementing all the principles set out in this policy.

Purposes for which Hisar School Child Protection Policy was established:

- Ensuring that children feel safe and protected and providing learning environments that are supportive of their physical, emotional and social well-beings,
- Respecting children's fundamental rights, observing the principle of equality and ensuring that they enjoy equal rights without facing any discrimination,
- Ensuring that school stakeholders are aware of all the rules, expectations and schedules on child protection, and supporting the achievement of child protection objectives,
- Continuously and regularly improving practices that might pose a risk for child safety, and
- Establishing an assessment system to proceed with the commitments and actions on children rights, child safety and well-being towards joint targets.

## 3- DEFINITIONS

All the terms used in this Hisar School Child Protection Policy are defined below.

**Child:** means every human being below the age of eighteen years despite attaining adolescence at an earlier age [as per the UN Convention on the Rights of The Child (UNCRC, 1989)]

**Rights of the Child:** means the United Nations Convention on the Rights of the Child dated 1989 was signed by Türkiye on September 14, 1990 and ratified on January 27, 1995. As per the Convention, the primary responsibility of caring and safeguarding the child rests with parents; however, if parents fail, for a variety of reasons, to take on caring and safeguarding responsibilities, other institutions in society shall support the parents or fulfill the responsibility of parents in their absence. Priority must be the child's interests; child protection and participation must be guaranteed; and children must face no discrimination pursuant to the Convention. Rights governed in the Convention on the Rights of the Child have been predicated on four fundamental principles (life, development, protection, and participation).

**Child Safety:** means creating environments where children/students at Hisar School feel safe and protected against any risk of neglect and abuse.

**Neglect:** means the continuous failure of adults in charge of caring and upbringing the child to meet the child's essential physical and/or psychological needs and, as a result, a material inhibition of the child's development.

**Abuse:** means any incidents that may harm or risk the life and development of the child, including all forms of intentional physical force and emotional bullying against students, or engaging students in sexual acts that are inappropriate for their age or for which they are not ready.

- **Physical abuse:** means physically harming the child deliberately and in different ways (e.g. hitting, shaking, throwing, burning, strangling etc.). Physical harm also occurs when the parent or caregiver causes to child to get ill and/or ignores the symptoms of the child when they are ill.
- **Emotional abuse:** means giving the child continuous poor treatment to leave severe and lasting effect on the child's emotional and psychological development. Emotional abuse also includes that causing the child to feel that they are not valued and loved, insufficient, or valuable as long as they meet the needs of the other. Burdening the child with expectations not fitting their age or development, or causing them to feel fearful or in danger are also within the scope of emotional abuse.
- **Sexual abuse:** means engagement of the child in a sexual activity that the child does not properly understand, is not in a capacity to give consent because they are not developmentally ready, or such sexual activity that violates the rules or taboos of society. Also covering adult to child and child-to-child interactions, sexual abuse of the child takes place when they are pushed to sexual acts by another person with whom they are in a relationship of trust or power and who can take on responsibility in terms of their age or developmental level. Many forms of sexual abuse towards the child involve physical contact; however, it should be noted that such abuse may also occur without any physical contact ("non-contact abuse"). Common examples of "non-contact sexual abuse" include unsolicited comments and remarks with sexual content and verbal abuse.
- **Economic abuse:** means forcing the child to work at very low wages and unhealthy and unprotected working environments that harm the child's physical and mental health, and inhibit their skills to interact and socialize with their surroundings. All work and activities the child performs, including the work that they deliver in return for pay, profits or a living for the family, and the unpaid work performed at family-owned enterprises, are considered economic activity.
- **Peer Bullying:** means any situation where a child faces intentional and repetitive negative treatment by one or more of their peers. Peer bullying involves power inequality, which is aimed at harming the targeted individual physically, emotionally, and socially. It includes verbal attacks, swear words, insulting, humiliating or threatening remarks; psychological domination or pressure over the other; circulating rumors about the other; acts of physical violence such as hitting, pushing etc.; acts that infringe the other's boundaries on the Internet and social media platforms; deliberately isolating the other in social environments; and damaging and stealing the other's belongings.



- **Cyberbullying:** means any acts of offending, harming or harassing others in digital environments or by using digital communication tools. Sending insulting, threatening or degrading messages via online tools, spreading false news, slandering, attempting to capture others' personal information, sharing or exploiting others' private photos, excluding others from online communities and groups or destroying their community relations, impersonating another person to create a fake account, and ruining the reputation of another person with false information are all defined as virtual (cyber) bullying.

**Stakeholder:** means students, parents, academic/administrative staff, employees of all subcontractors working in collaboration with the school, and all guests who attend the school's events.

**Well-being:** means an approach aimed at delivering a holistic reflection of the child in such areas as health, education, financial status, relationships, participation, risk and safety in light of subjective and objective criteria. Considering that the child is an active subject, it also presents well-being from the perspective of the child.

#### 4-PRINCIPLES OF HISAR SCHOOL CHILD PROTECTION POLICY

Hisar School Child Protection Policy is composed of the following principles that are in line with Hisar School's vision and mission aiming at enabling students to realize their potential and grow as global citizens:

- **Hisar School observes the best interests of the child:** In Hisar School, any incident/initiative/action directly or indirectly affecting children is comprehensively evaluated in terms of the impacts it will have on the children; environments and methods to provide the conditions necessary for the child's well-being and safety are child-friendly, i.e. tailored for their age and developmental stage. The well-being of students is aimed at observing the best interests of the child and adopting a holistic approach to objectively reflect the child's standing in such areas as physical and mental health, education, financial status, relationships, participation, risk, and safety.
- **Hisar School adopts a preventive approach and practices against violence towards children:** The school strives to prevent and protect against all forms of abuse and neglect against all children. This includes full collaboration among all adults for child protection, working in the best interests of the child.
- **Hisar School upholds the principle of non-discrimination:** No child can be faced for any reason and in any form at Hisar School. Training sessions for teachers, parents and staff are organized to prevent any discrimination on the grounds of physical attributes, ethnic origin, belief, native language, gender, sexual orientation or other characteristics. Class content and design are prepared and planned accordingly.
- **Hisar School promotes the principle of survive and development:** Hisar School implements necessary adjustments and plans to enable children to maintain their development by maintaining their physical and emotional integrity. Each student's developmental level is taken into account and is supported in a way that is appropriate for their own pace of development.
- **Hisar School guarantees privacy:** Hisar School takes all necessary measures and regulations to ensure that information collected, decisions made, and practices carried out with the utmost consideration for the best interests of the child are accessible, usable, and shareable only among relevant individuals, in order to fully protect the security of the information. HisarNet, contracts Ministry of Education agreements, parent consent forms, and other work and practices conducted under the Personal Data Protection Law are all planned in a manner to guarantee data security at the highest level.
- **Hisar School values children's participation:** Hisar School provide children with the opportunity to freely express their opinions; their expressions are met with respect and equal participation of all children is guaranteed without discrimination. At Hisar School, all processes are accountable, transparent, safe and risk-sensitive; children are informed about how their views are interpreted and used, and they receive clear feedback on how their participation will impact the outcomes.

#### 5- TOPICS OF THE CHILD PROTECTION POLICY

Protecting students from all forms of neglect and abuse is our top priority at Hisar School. In this respect, it is critical to be aware of and monitor students' physical, behavioral, emotional and cognitive symptoms of any physical, emotional, sexual abuse and negligence they may face.

All forms of abuse can be perpetrated by adults or peers, and these forms of abuse can occur in physical or digital environments.

1. Physical abuse
2. Sexual abuse
3. Emotional abuse
4. Economic abuse
5. Peer Bullying
6. Neglect

Processes stipulated in the child protection policy are implemented in cases where the child demonstrates or reports symptoms of physical, emotional, sexual abuse and/or neglect.

Some symptoms are common indicators that may indicate one or more forms of abuse/neglect, as well as being applicable in situations where there is no case of abuse:

- Learning difficulty
- Avoiding physical contact
- Thoughts, remarks and acts on destroying bodily integrity
- Developmental disorders



- Perceiving self as insecure and worthless
- Trust and attachment problems
- Decline in grades and academic performance at school
- Attention deficit, absentmindedness, disorganization
- Memory difficulties
- Impaired social interactions
- Use of alcohol, cigarettes or substances

A holistic assessment is important while data on the child is being collected.

### **5.1. Physical abuse:**

Physical abuse is broadly defined as “the child suffering physical harm as a result of non-accidental and preventable behaviors” or “non-accidental injury to the child.” It can also be defined as causing harm to the child’s body, with or without leaving marks, through actions involving hitting, pushing, kicking, shaking, shaking, biting, choking, burning, poisoning, and similar acts, performed with the intention of enforcing obedience, punishment, or venting anger.

It encompasses intentionally harming the child physically in different forms (such as hitting, shaking etc.) It also results in physical harm when the parent or caregiver causes the child to get ill and/or ignore the symptoms of the child when they are ill. Awareness on physical, behavioral and cognitive symptoms of physical abuse plays a critical role in revealing any suspected physical abuse.

Physical and emotional symptoms of physical abuse:

- Unexplained wounds and jolting marks on parts of the body (slapping, belts, biting etc.)
- Burn scars on different parts of the body, on the back, palms and soles, in particular
- Bruises in different colors from different time periods
- Broken bones in the body arising the suspicion that physical abuse has been committed against the child (repetitive broken bones or soft tissue injuries on hands, arms, body, nose, chin and skull etc.)
- Severe pains on chest and abdomen arising the suspicion of internal bleeding, wide regional bruises, sensitivity on parts of the body
- Clothing to cover injuries and bruises, rejecting examination, attempts to hide scars
- Believing that they deserved punishment, self accusations
- Demonstrating excessively obedient behavior, submission
- Abstaining from communicating with people older than the child, demonstrating shy behavior
- Being scared, beware of the parent
- Refraining from, being scared of, going to the place or house where the incident occurred
- Behaviors of self harm, attempting suicide
- Aggressive or timid behavior
- Aggressive or timid behavior
- Avoiding physical contact
- Escaping from the house or skipping the school

Although professional assessment of physical findings is only possible with a comprehensive medical examination (upon application to the health institution or request of judicial units following a report), field professionals such as teachers, who witness the child’s domestic life and school cycle, play an important role in noticing some of these findings.

### **5.2. Sexual abuse:**

Sexual abuse involves involving a child in a sexual activity that the child cannot fully comprehend, cannot give full consent to, or is not developmentally ready for, and that violates society’s given laws or social taboos. While most forms of sexual abuse towards the child involve physical contact; however, it should be noted that such abuse may also occur without any physical contact (“non-contact abuse”). Examples of non-contact sexual abuse include forcing the child to watch pornographic content, making sexual comments and remarks, and verbal and visual harassment (unauthorized sharing of an individual’s inappropriate images and/or using inappropriate verbal remarks on social media/digital environments).

Sexual abuse means sexual exploitation of individuals who are defined as children in international conventions and national legal instruments (every individual is a child until the age of 18) by someone who holds a position of trust or power and takes advantage of their age and developmental level. Sexual abuse should not be confused with curiosity-driven games and behaviors among peers based on consent.

Sexual abuse does not only refer to behavior involving physical contact with the child’s body or sexual organs. Such an approach to sexual abuse and assumption that it is unproblematic as long as it does not include physical contact would prevent us from noticing other forms of sexual abuse. Sexual abuse can include touches, gazes, conversations, expressions of affection, and addressing the entire body, not just the sexual organs. For this reason, it is important to note that sexual abuse may include non-contact abuse but which still harms the child’s mental health. Sexual abuse may take place in virtual or digital environments. Applications such as Instagram, Facebook, Twitter, Telegram, WhatsApp, and methods such as e-mail communication are the means via which this conduct may take place.

The Turkish Criminal Code governs the abuse of children under two categories of offence. All kinds of sexual attempt without any force, violence, or fraud against children who are older than 15 and have the ability to understand the legal consequences of such acts shall be considered as the crime of sexual act with a minor. Any sexual attempt committed against children who are below the age of fifteen, or who, despite being older than fifteen, lack the ability to understand the legal meaning and consequences of this act, by force, violence, fraud or



another reason affecting the willpower shall be considered as the crime of sexual abuse of the child.

Physical and emotional symptoms of sexual abuse:

- Sexual remarks and behaviors not appropriate for their age
- Frequent use of words with sexual content in their daily speech
- Extreme interest in sexual activities
- Inappropriate games with sexual content
- Seducing behaviors
- Genital or anal itching, pain or bleeding
- Complaints such as incontinence, pain while in the toilet
- Extreme weight gain and loathing their body
- Masturbation in public or non-public places within the school
- Avoiding physical contact
- Affective fluctuations such as self accusation, anxiety and shame
- Sleeping problems (inability to sleep, nightmares etc.)
- Problems with trust and attachment, not being able to trust anyone, lack of self-confidence
- Fearful and sudden reaction to physical contact
- Constant need for company, avoiding staying alone
- Accepting inappropriate behaviors due to the need for attention
- Being scared of, avoiding, certain people and places
- Themes with sexual content in their writing, drawings, games or behaviors
- Sexual knowledge not aligned with their age and developmental stage

### **5.3. Emotional abuse:**

Emotional abuse involves treating the child inappropriately on a regular basis to have a negative, long-lasting impact on their emotional and psychological growth. Emotional abuse also includes causing the child to feel that they are not valued and loved, insufficient, or valuable as long as they meet the needs of the other. Burdening the child with expectations not fitting their age or development, or causing them to feel fearful or in danger are also within the scope of emotional abuse.

Emotional abuse involves constantly denigrating the child's qualities, capacities and desires, depriving the child of their engagement with social relations and resources, constantly threatening the child with severe social harm or abandoning them, making demands that do not fit the age or strengths of the child, and upbringing the child with socially inappropriate methods for child care.

In this respect, patterns of emotional abuse in a manner to harm the child's mental integrity include:

- Shouting, reprimanding,
- Constantly comparing,
- Constantly mocking,
- Extremely protective behavior, making the child extremely dependent, establishing authority over the child;
- Offending, ignoring,
- Humiliating, calling names,
- Not taking care of their needs
- Remaining unresponsive to their effort to communicate
- And having expectations not fitting their age/capacity.

Physical, emotional and cognitive symptoms of emotional abuse:

- Delayed physical development
- Difficulty with using words and phrases
- Delayed and regressive speaking
- Aggravated chronic diseases
- Habitual regressions such as thumb-sucking in a not appropriate age
- Anti-social behavior (engagement in crimes etc) and substance abuse
- Bodily complaints
- Behavioral disorders such as aggression, passive aggressive behavior

### **5.4. Economic abuse:**

It means forcing the child to work at very low wages and unhealthy and unprotected working environments that harm the child's physical and mental health, and inhibit their skills to interact and socialize with their surroundings. It involves exploiting the child and employing them for works not fitting their physical, mental and moral development.

The Convention on the Rights of the Child is aimed at protecting the child against economic abuse. Accordingly, they are granted the right to protection against working in situations that may risk their safety, education, health and physical, mental, moral and social development. Hisar School and affiliated service providers are committed to engaging no child labour in accordance with the principles of this Convention. Employees' rights are protected in line with the Labour Code and regulations on social security. In addition, training courses are organized to





raise the awareness of Hisar School employees on these matters.

### **5.5. Peer Bullying:**

Peer bullying involves physical, verbal, virtual, and psychological assault and intimidation which the offender, who takes advantage of the physical or psychological imbalance of power between peers, commits against the weaker peer that is deliberate, intentional, planned, systematic and regular attempting to cause fear, anxiety and harm on the victim. Bullying behavior may be verbal, physical or relational. Verbal bullying may take the forms of calling names, mocking, offending, humiliating, being sarcastic, insulting, and threatening others; physical bullying includes hitting, punching, kicking, scratching, tripping, spitting; and relational bullying includes ignoring, excluding, disregarding, alienating, demonstrating inappropriate behavior, circulating rumors, throwing hostile looks, hiding or taking personal belongings while not permitted, or damaging the other's belongings.

Cyberbullying involves all forms of bullying and harassing behavior on cyber environments via the means of social media platforms and other technologies. Cyberbullying may take place in a wide variety of forms from unauthorized sharing of personal information/visuals, posting or forwarding threatening messages about another person (Tompson, Benz & Agiesta, 2013).

### **5.6. Negligence:**

It refers to the ongoing inability of adults who are responsible for the child's care and upbringing the child to meet their essential physical and/ or psychological needs and, as a result, a material inhibition of their development. An example would be a dangerous incident that may put the child at risk due to a lack of attention (in cases where such danger is possible to prevent).

"Negligence to the child" is defined as the negative impact on, or inhibition of, the child's physical, emotional or social development caused by, first and foremost, parents, or by others responsible for taking care of them, who neglect the child's essential needs including nutrition, clothing, accommodation, education, affection, and health. Although it is difficult to define negligence as a concept and measure it:

**Emotional abuse** involves ignoring the child's emotional needs due to lack of any form of love, affection and attention; failing to sufficiently meet or disregard such needs; causing the child not to feel safe; and depriving them of support and oversight during adolescence in particular.

The term "**educational negligence**" refers to a child not attending school during years when attendance is required, not paying attention to their special educational needs, allowing the child to be absent frequently, failing to take care of their classes, failing the school, not attending parent-teacher conferences on a regular basis, and not cooperating with the school's directives and development plans.

**Physical negligence** refers to inability and insufficiency in meeting the child's essential needs such as nutrition, accommodation, health and clothing.

**Health negligence** is a sub-category of physical negligence and involves the following: failing to take the child to a medical expert or being late in doing so when they are sick; not having them vaccinated; not complying with treatment or refusing treatment; sending the child to the school even when they are sick; not collaborating with the measures taken to address health and safety at school; not informing the school in a timely fashion if the child has received a medical report confirming their infectious disease.

Physical and emotional symptoms of negligence to the child include:

- Insufficient hygiene: oily, messy hair; smelling sweat etc.
- Clothing that does not fit the season
- Untreated illness, missing vaccinations
- Developmental percentile remaining below the age average
- Delay in development, frailty, decayed teeth
- Parasites, abdominal bloating, appearing sleepless
- Bouts of anger, sleeping and eating problems, aggression, hostility
- Constant exhaustion and fatigue
- Taking over adults' responsibilities
- Not going to school or constantly being late

## **6. ROLES AND RESPONSIBILITIES**

At Hisar School, Child Protection Teams and Child Protection Boards are in place so as to effectively perform the tasks of protecting children and guaranteeing their safety in accordance with the Child Protection Policy and applicable regulations. In case of any suspected abuse/negligence, the Child Protection Board and Child Protection Team are responsible for implementing the Child Protection Policy and Procedures, and for reporting and referring to relevant authorities. All members of the teams work in light of the principle of privacy.

All the stakeholders of Hisar School comply with the provisions of Hisar School Child Protection Policy (Annex 1). Hisar School employees are updated on child protection procedures and their respective responsibilities via regular training sessions delivered annually. Child Protection Team provides information to all school employees on the Hisar School Child Protection Policy and reporting of incidents where necessary.



Stakeholders are informed about Child Protection Procedures and Policy through a variety of communication channels. Child protection procedures and policy are accessible on the Hisar School website under the quick access tab. School stakeholders are informed about the Child Protection Procedures and Policy via the Parent and Employee Handbook and Parent Information articles.

### **6.1 School Administration:**

School Administration consisting of the School Principal and Vice Principal is responsible for carrying out the following roles while the School Principal monitors and tracks associated work and procedures.

- It ensures that procedures are in place to prevent any incidents that may cause abuse or negligence, and that these procedures are understood and implemented by all stakeholders of the school.
- It ensures to take urgent action in case of any suspected abuse and/or negligence of the students at school.
- It enables children to safely report any concerns on abuse and/or negligence without fear of retaliation or punishment.
- It encourages the staff and other persons to safely report any concerns on child abuse and/or negligence without fear of retaliation or punishment.
- It takes the opinion of children and parents on safety and protection at school.
- It promptly reports potential cases of abuse and/or neglect of children to the relevant authorities as specified in this policy.
- It guarantees the participation of target staff and administrators, including themselves, in current training sessions on child protection.
- It organizes onboarding sessions for parents/guardians during admissions and at the start of every academic year so as to introduce this policy and brief them on their roles, responsibilities, rights and duties.
- Where a staff member is suspected of having committed a crime involving child abuse/negligence, it promptly suspends them from learning environments until the suspicion is concluded with a final decision.

### **6.2. Child Protection Teams:**

#### **Who are the Members of a Child Protection Team?**

There is a Child Protection Team at all levels of the school. Teams are established by school administrations with a maximum of five people from each of the Pre-school, Primary School, Middle School and High School units who have the necessary qualifications to assume this task. By taking the principle of volunteer work into account, individuals nominated by school administrations are approved after an assessment by the Executive Committee of Hisar School.

Child Protection Teams receive Child Protection Courses from reference institutions. The Team consists of a team leader, and a member for each level.



## Hisar School Child Protection Teams

### Preschool Child Protection Team



**Ezgi Çebi**  
Preschool VP  
Preschool CPT Leader



**Eylül Şarman**  
Counselor  
Preschool CPT Member



**Nurşen Ahmetolan**  
Teacher  
Preschool CPT Member



**Rejin Yalman**  
Teacher  
Preschool CPT Member

### Primary School Child Protection Team



**Yıldız Ayyıldız**  
Primary School VP  
Primary School  
CPT Leader



**Gözde Türkmen**  
Counselor  
Primary School  
CPT Member



**Caitlin Buchman**  
Teacher  
Primary School  
CPT Member



**Handan Erbey Kuş**  
Teacher  
Primary School  
CPT Member



**Tuğçe Öznemli**  
Teacher  
Primary School  
CPT Member

### Middle School Child Protection Team



**Füsün Toparlık**  
Middle School VP  
Middle School  
CPT Leader



**Burcu Kıranlar**  
Counselor  
Middle School  
CPT Member



**Tuba Akarlı**  
Teacher  
Middle School  
CPT Member



**Özge Aydemir Kaya**  
Teacher  
Middle School  
CPT Member



**Can Yasa**  
Teacher  
Middle School  
CPT Member

### High School Child Protection Team



**Göker Avcı**  
High School VP  
High School  
CPT Leader



**İclal Yılmaz**  
Counselor  
High School  
CPT Member



**Emine Ulusoy**  
Teacher  
High School  
CPT Member



**Sedef Şeker**  
Teacher  
High School  
CPT Member



**Lütfi Kaya**  
Teacher  
High School  
CPT Member



### Functioning of the Child Protection Team:

- Members of the child protection team for each school are presented to all employees at the general assembly held in August every year; their photos and names are placed at visible spots in the building and posted on the school's website.
- Child protection team of each school convenes at the beginning of the academic year to set the targets for the year. An evaluation meeting is held at the end of every quarter.
- When an incident has been witnessed, the person who witnessed the incident reports it to the Child Protection Leader in charge of that building/area.
- When an incident is submitted, the team leader gathers team members to collect data, keep records and devise a plan. They then meet with the school principal in the light of this plan. The school principal evaluates the plan, and necessary action is taken after the principal's approval of the plan. Relevant school principal forwards the action plan to Child Protection Board.

### Responsibilities of the Child Protection Team:

- Members of the Child Protection Team work in harmony and collaboration with Hisar School administrations, psychological counseling specialists, and disciplinary committees of the school.
- Child Protection Team leader at each school acts as the incident officer of the relevant school. Incidents are reported to the Child Protection Team Leader of the relevant school.
- Where the leader is not present, the Child Protection Team member of the relevant school takes on this role.
- Team members identify the needs and make necessary revisions.
- Team leader of the relevant school submits a report to the Hisar Child Protection Board (see 7.3.) at the end of each term, twice a year.
- Child Protection Teams take on a leadership role in the implementation of procedures under the child protection policy.
- They promote and uphold the child protection policy and procedures and encourage exemplary practices.
- They monitor and review the child protection policy and procedures to ensure they are updated and fit for the intended purpose.
- They contribute to the awareness of parents/guardians on Code of Conduct while working with children.
- They communicate regularly with Child Protection Board, participate in relevant courses and events, and monitor developments in the field of child protection.
- They conduct/deliver necessary courses for all adults working with children or doing volunteer work at schools.
- Communications take place by observing the child's wellbeing.
- Child protection team leader of the relevant school keeps records of reported incidents and measures taken.
- In line with the decision of the Child Protection Board, the Chief Public Prosecutor's Office is communicated with to make sure all information is forwarded to them.

### Responsibilities of the Child Protection Team Leader:

In addition to child protection team responsibilities:

- Prepares a plan for suspected cases of neglect/abuse reported and the steps to be taken for the cases reported.
- Collects information and evidential documents in line with the plan prepared as they deem appropriate from the parent/guardian, teacher/psychological counsel/healthcare practitioner in charge of the child.
- Evaluates the issue with its team and school principal; prepares a comprehensive report and presents it to Hisar School Child Protection Board where a decision is reached to proceed with further investigation and monitoring.
- Upon Child Protection Board's feedback and approval, they initiate a child protection case monitoring process, and take measures to address the child's needs after promptly guaranteeing their safety.
- Policy steps are taken in cases of abuse/neglect/self-harm, and they take on a leading role to enforce legal responsibilities when necessary.

## 6.3. Child Protection Board:

### Who are the Members of the Child Protection Board?:

"Hisar School Child Protection Board" is in place as a higher council of Child Protection teams at K12 level.

Members of the child protection board include a vice principle from each school, school doctor and Occupational Health and Safety Specialist - Technical Director. The board reports to the Executive Committee.

### Functioning of the Child Protection Board:

- It monitors recent developments and attends current courses in the field of child protection, while planning training sessions in collaboration with PÖMER (Professional Learning Center).
- It organizes the participation of Hisar School stakeholders in these training courses.
- It is in charge of revising the Child Protection Policy.
- The Child Protection Board monitors the work of relevant child protection team on existing case, and instructs the child protection team to initiate legal proceedings when necessary.
- When it deems necessary, the Board takes the opinion of the school's legal counsel or an external legal counsel with competence in this area.
- Members of the Board convene twice a year.



#### 6.4. Stakeholders of the School

Addressing incidents of abuse and neglect to the child is the responsibility of Hisar School. However, all stakeholders of our institution have a responsibility to preserve the child's wellbeing, establish the necessary safe environment and support the implementation of applicable policies in line with the principles of the Child Protection Policy.

Stakeholders under the Hisar School Child Protection policy are as follows:

- Hisar School's academic staff,
- Hisar School's administrative staff,
- School and foundation administration,
- All students, parents and legal guardians,
- Persons and entities that signed a contract with the school.

Regardless of position and role, all the constituents of the school community have the following responsibilities:

- a) As all internal and external stakeholders of the school, attending training courses on Hisar School Child Protection Policy conducted by relevant officers/professionals of child protection,
- b) Reporting/forwarding accusations of actual or suspected incidents of neglect and abuse that involved children,
- c) Reporting all actual or suspected incidents of misconduct against children by the staff,
- d) Carrying out necessary efforts in line with the Child Protection Policy,
- e) Embedding the school's Child Protection Policy in its own work, integrating it with contracts, taking measures pursuant to this policy in its work, collaborating with the school if there is risk or damage arising from its staff, and aligning attitudes with this policy document,
- f) Confidentiality of information received with regards to child protection concerns or incidents must be respected and protected. It is mandatory to share this information only with designated staff and monitor existing protocols for disclosure.
- g) Preliminary information on the school's Child Protection Policy is provided to short term visitors and visiting educators at school; rules are shared in writing and visitors are expected to act in accordance with the Code of Conduct described.

In this respect, Hisar School Financial and Administrative Affairs Department and Human Resources Department forward Hisar School Child Protection Policy to internal and external stakeholders at the contract/agreement stage. Efforts are undertaken to ensure that activities covered by such contracts are implemented in a manner to prevent any risk for children. Whether stakeholders comply with the principles and procedures of the child protection policy as stated in the contract will be monitored throughout the process.

When conduct that contradicts these provisions is identified, the child protection team reports this case and submits it to the board. After the board's evaluation, relevant communications are made with the related party whose employment with the school is terminated due to the violation of contractual provisions.

Teachers, psychological counselors, and the school's healthcare unit that are in constant and direct interaction with the child have more elaborated responsibilities, as described below:

#### Teacher Responsibilities:

The teacher is obliged to share their concerns to the child protection team leader if they reasonably suspect that the child may be facing the risk of abuse or neglect. They must provide information in a prompt, accurate and detailed fashion and by following the reporting procedures specified in the child protection policy.

This also includes implementation of preventive measures to minimize child abuse or neglect. Teachers must set clear boundaries and develop positive relations, encourage respectful and inclusive behavior, and be ready to listen to and support students who may face difficulties. They must also collaborate with parents and other professionals involved in the child's life and contribute to the prevention of abuse and neglect to the child.

#### Responsibilities of the Psychological Counselor:

- Psychological counselor is in charge of the child and work in collaboration with the child protection team.
- In accordance with the school's child protection policy and legal requirements, they must report to the child protection team leader any acts of abuse, neglect or other suspected or documented problems in connection with child protection.
- Psychological counselor in charge of the child acts as the responsible party to support students' emotional and mental wellbeing, manages problems and provides necessary assistance to students in line with the child protection policy. These responsibilities may be specific to the case, and may vary depending on the respective needs of the child.
- The psychological counselor designs and implements training programs aimed at raising awareness in the areas of child protection, personal safety, health relationships and appropriate boundaries. These programs may be delivered via counseling sessions, workshops, bulletins or seminars in which external experts are invited.
- The psychological counselor collaborates with teachers, parents and/or legal guardians and other staff so as to address students' problems in relation to child protection and establishes a supportive environment for students.
- The psychological counselor identifies the symptoms of emotional distress and potential child protection problems among students. She promptly intervenes to prevent issues from escalating and provides the necessary support.
- The psychological counselor in charge of the child provides a safe and private environment where the child can express their emotional concerns, challenges and distress.



- The psychological counselor keeps accurate and confidential records of her discussions with students, observations, counseling sessions and problems related to child protection. This documentation is important to track progress and monitor relevant procedures.
- The psychological counselor also organizes individual and group counseling sessions to help children develop resilience, coping strategies and awareness.

#### Responsibilities of the School Doctor/Nurse:

- The doctor or nurse examines the child in cases of physical injury and writes a preliminary report on the child's physical and emotional status.
- When there is a suspected incident of abuse committed against the child, the physician/nurse provides emotional support alongside the psychological counselor.
- In the case of suspected cases of abuse, the physical condition of the child, and observations and findings of any signs of abuse are also kept under records by the doctor/nurse. They provide immediate treatment in emergency cases. The school's doctor or nurse (if the doctor is not present) updates the parent on the child's health and medical response given. They also involve the parent in the decision-making process for further treatment.
- Abuse of the child may leave deep emotional scars; therefore, school doctor/nurse, psychological counselor and teachers in charge of the child must recognize these symptoms and help develop a rehabilitation plan.
- In some cases, the child may have to take medication as a result of abuse. School physician or nurse must ensure that all standards and procedures on the administration of drugs at school are fully met.

#### Responsibilities of Parents/Legal Guardians

- They collaborate with school administration and staff.
- They answer all questions on the student's behavior and academic performance, and respond to all feedback and instructions.
- They are expected to attend all general information meetings planned for child protection policies. They are obliged to attend meetings relating to their child. Relevant administrators call the parent not attending the meeting to convey the importance of such discussions and collaboration. They notify school administration or relevant school staff on concerns related with the child's behavior, observations on their condition or any behavioral change.

### 7. STEPS TO BE TAKEN IN THE CASE OF SUSPECTED ABUSE OF/NEGLIGENCE TO THE CHILD

**1. Step:** Persons who witness or have knowledge of a suspected incident of abuse/neglect committed against the child (stakeholders, visitors, etc.) must report the incident verbally or in writing to the school's child protection team leader or other members of the team in 24 hours. Where the leader or members are not present, this must be reported to their most trusted or competent individual at the level of school administration. The Child Protection Team Leader must fill out the Notification Form for Suspected Incident of Abuse/Neglect Against the Child and submits it to the principal.

**2. Step:** Assessment of the suspected incident being reported must be conducted by the relevant school's child protection team and the psychological counselor. The principal's advice on the matter must be sought. Whether there is a need to take action must be decided by this team which also includes the principal and vice principal.

**3. Step:** Hisar School Child Protection Team must develop an action plan and create a report for the plan on the steps to be taken so as to address incidents of alleged, suspected or documented abuse/neglect. The following steps must be taken on this matter:

- The Child Protection Team Leader, the psychological counselor of the child or school principal/vice principal provides information to the family on the suspected incident of abuse/negligence against the child in a face-to-face meeting.
- The relevant school's psychological counselor provides support to the student and family.
- When an emergency response or attention is required as a result of an incident at the school, the physician or nurse of the school gives such response. They also keep a record of their examination and response. In cases that require further examination or attention, an informatory note must be written on observations about the incident, examination results, and the response given, after which the student is redirected to healthcare institutions with relevant expertise.
- Legal and/or judicial consulting is provided by the school's legal counselor.
- In accordance with the decision of the Child Protection Board, the suspected incident, reported crime or the requirement of protection must be notified to institutions specified below.
- When the suspected individual is a staff member, the Board decides to suspend such staff member's employment for an infinite or fixed term. The crime and the need for protection, if any, is notified to relevant institutions.

**Reporting the offence;** Everyone is obliged to report, to the relevant authority, an offence that is in progress pursuant to the Turkish Criminal Code (Article 278). The obligation of any public officer to report an offence of which they become aware in the course of their duty is stipulated in Article 279. In addition, all individuals are responsible to report a person who needs assistance due to age or other circumstances to relevant authorities (Article 98). Failure to meet these obligations is considered to be an offence according to the Turkish Criminal Code. The report may be conveyed in writing or verbally; the person who submits the report will not be forced to reveal their identity or may wish to remain anonymous. Since acts of abuse fall under the category of offence, such acts must be reported to the police, gendarmerie or the public prosecutor's office.

**Reporting the need for protection;** A child's protection needs must be reported in accordance with applicable laws and regulations. Such reports and notifications are governed in the Law on Social Services (Article 21), Child Protection Law (Article 6), Regulation on



the Implementation of Protective and Supportive Injunctions As Per the Child Protection Law (Article 6), and the Law on the Protection of Family and Elimination of Violence Against Women (Article 7). Accordingly, all persons who have knowledge of the child's need for protection, including judiciary or administrative authorities, heads of villages, law enforcement officers, municipal officers, healthcare and education institutions, public officials, and civil society organizations, must report the situation to relevant authorities. The notification of circumstances that require protection of the child and support for the family shall be made to the Ministry of Family, Labor and Social Services. Need for protection may be notified in writing or verbally; the person who submits the report will not be forced to reveal their identity and may wish to remain anonymous. Verbal reports may be conveyed to the Provincial Directorates of the Ministry either physically or by phone, or by reaching the hotline 183. Written notifications shall be made via e-mail or a letter addressed at the provincial directorate.

**4. Step:** All reports and documents on child protection must be kept by the child protection team and its officers in a confidential file for Child Protection. Documents in this file must either be kept digitally or in a locked cabinet, and shared with relevant authorities as necessary and legally required. In either case, access by persons other than authorized individuals at the school is prohibited.

**5. Step:** Decisions taken at the meetings are shared with the child and relevant parties to assure them that the issue is being monitored and they will have the support needed.

**6. Step:** The incident is monitored at regular intervals.

#### For all adults:

- Stay calm.
- Listen carefully.
- Give time for the other to say what they wish to say: Do not make assumptions or offer alternative remarks.
- Do not make promises on confidentiality. Only explain that the school's Child Protection will be notified.
- Promptly report the incident to the Child Protection Team Leader of the child's school.

#### For all children:

- Share the incidents you have witnessed, experienced or told, in the shortest time possible, with an adult you trust at the school (teacher or psychological counselor).
- Information you share will be treated by the Child Protection Team with confidentiality.
- The Child Protection Team will manage the process in a safe manner.

#### For the psychological counselor engaged by the Child Protection Team Leader:

- The counselor has a talk with the child in an environment where the latter feels safe. A calm and soft tone of voice is used during the talk. In this talk, open-ended questions that are not leading by nature are posed such as "Would you tell me what happened?" In parallel with what the child has told, details must be asked. These questions must be asked without making comments or leading the conversation.
- Information must be noted objectively in the Information Form as soon as possible after the conversation. (Annex 1)
- The counselor must use the child's own words, keeps notes in a real-time manner and adds information as to what has been done afterwards.
- Together with the Child Protection Team Leader, she submits a report to the School Principal.
- In cases of abuse, negligence or emergencies, the psychological consultant reports the case to the school protection team leader.
- The psychological counselor of the child has a conversation with the child. This is important for the child's safety to ensure they feel comfortable.
- The counselor collaborates with the Child Protection Team and follows the steps planned by the Child Protection Leader.
- She also collaborates with external mental health practitioners to observe affected students' safety and wellbeing. Depending on the needs of the student, the counselor provides emotional support during and after the crisis.
- As necessary, the counselor prompts the Psychological Counseling and Guidance Services Executive Committee (RHYS) in an extraordinary session so as to evaluate what can be done in and outside the school for the child to be academically and emotionally supported and to create an action plan.
- The counselor makes sure that sensitive information students shared is treated with confidentiality unless it refers to a risk of self-harm on bodily integrity for the child or unless the child is legally required to report this information.

#### Deciding not to report

There may be cases where the child protection officer or team do not find a notification necessary as per the child protection policies. If that is the case, the decision must be described with the grounds for not reporting and attached in the above mentioned confidential Child Protection File.

If the Child Protection Team decides that such a report is not necessary, they must document

- i) the reasons for not reporting and
- ii) the measures taken.



## 8. AWARENESS, TRAINING AND PREVENTIVE WORK:

Hisar School provides regular training courses to all its stakeholders which are conducted with the support of an expert institution in this area.

### 8.1. Parent

Parents are notified by the school on this policy, they are encouraged to participate in all seminars and training courses with the support of the PTA members.

The school encourages parents to share their children's needs and safety concerns. In addition, parent feedback on the implementation of this policy is taken into account; the policy is regularly reviewed and improved.

For the child protection policy to be understood, owned and implemented thoroughly, the Child Protection Team plans and conducts regular family training every year, in addition to informative bulletins/letters forwarded to parents. Parents can always and easily access the policy at HisarNet and at the website of Hisar School. Meanwhile, an informative letter on Hisar School's Child Protection Policy is sent to parents at the start of every academic year.

### 8.2. Student

Students participate in the development of the child protection policy when the opinion of the Representatives of Middle School and High School Students' Associations is taken. At the start of each academic year, all students are briefed on the policy by psychological counselor at their respective level and take training on which ways to pursue when faced with risky or suspicious circumstances regarding child protection.

Hisar School conducts personal and/or group talks, seminars and in-class events in line with the developmental stage of every age group so as to address issues such as safeguarding students, raising their awareness, recognizing the circumstances under which they are unsafe, helping them develop the right behavior to take corrective measures and instructing them on how to ask for help. By allowing them to ask questions, the school encourages students to express their thoughts on feeling safe, setting boundaries and forming healthy relationships.

The articles of the "UN Convention on the Rights of the Child" are embedded in the curriculum when working with children. Guidance classes, classroom courses, safe school culture and other specialized training help raise students' knowledge and awareness on child protection and rights of the child. Starting from preschool, priority is placed on children acquiring awareness for physically protecting themselves. Training provided to students covers recognizing emotions, expressing emotions and thoughts, rights and responsibilities, body awareness, personal boundaries, and healthy eating. Primary school curriculum includes the declaration of the rights of the child; topics covered include recognizing emotions, expressing emotions, communication skills, protecting one's self, knowing when, how and from whom to get help, personal boundaries, and being able to say no. Classes are delivered as part of anti-bullying training program. At Grade 4, classes include sexual health and responsible and safe use of technology. At middle school, topics covered include safe use of social media and technology, rights of the child, bullying, sexual health training, personal boundaries, growing and development characteristics and adolescence, being able to say no, and communication skills. At high school, topics covered include respect for differences, inclusion, the language of peace, sexual health training, safe sexuality, dating abuse, rights and freedoms, safe use of technology and social media.

Collaboration with parents is important as the school plans and conducts these efforts. Feedback is sought from students and parents in order to evaluate and develop the work conducted. Work is updated in a more comprehensive manner in light of the feedback collected.

### 8.3. Academic and Administrative Staff

For the Child Protection Policy (CPP) to be implemented thoroughly, all the staff at school (i.e. teachers, support staff, employees of contracted firms etc.) take mandatory and regular CPP training either face-to-face or online. Such training focuses on issues such as identifying the signs of abuse, taking protective measures and taking the right steps to be able to help children. A network for child protection is established for constant communication and collaboration among staff members. The Child Protection Policy can always be accessed at HisarNet and on its website. In addition, visitors and all volunteers working with students are briefed on who to contribute to the continuity of the student's feeling of safety and well-being in line with Hisar School Child Protection Policy. Meanwhile, once in every academic term, all staff members take short questionnaires/tests to assess their knowledge of the content and implementation procedures of Hisar School Child Protection Policy.

### Human Resources Department

"Hisar School Safe Onboarding Procedure" is applied in the light of [Private Education Institutions Regulation of the Turkish Ministry of Education](#) and [Labor Law](#) in recruitment processes. In recruitment processes, Hisar School takes all necessary measures to prevent inappropriate individuals from working with children. These measures apply to staff/departments working/communicating directly or indirectly with children.

In accordance with Hisar School Onboarding Procedure, when a new individual is being hired as academic, administrative or support staff with access to children, the following steps shall be taken for child protection and safety:

- 1. Step:** Candidates' screening and recruitment takes place pursuant to the requirements of the Child Protection Policy. As per the Child Protection Policy, the candidate is required to provide a criminal record that can be traced back in the archives. Checks are then conducted by contacting the candidate's references from their previous workplaces on qualifications and competencies.
- 2. Step:** As a candidate is being screened, letters issued by the Ministry of Education are taken into account which includes the letter





no. CGTİHK.108/9-f “Being Banned from Conducting Activities Requiring Care and Oversight for the Child”. Such circulars are checked during hiring processes; and efforts are undertaken to ensure there is no risk for the candidate to work with children.

**3. Step:** Hiring interviews and reference checks are conducted by the qualified and trained HR staff with knowledge of Child Protection. Questions asked to the candidate assess their understanding of a child’s safety and check capabilities of addressing sensitive situations.

**4. Step:** Personality assessment that candidates fill out and its results are reviewed carefully while assessing them. In addition to references and professional qualifications, candidates’ skills as required under the Child Protection Policy are also checked. Written or verbal response will be sought for questions in the “Reference Check Form”.

**5. Step:** After the candidate is hired, briefing and training on Hisar School Child Protection policy is provided to employees as part of their onboarding process. Child Protection Teams are introduced. Behavioral expectations and duties are also explained to the new employee while they are being introduced to the team members.

**6. Step:** In addition to the documents to be submitted to the Ministry of Education at the time of hiring, candidates who are newly hired are required to provide a written and signed statement that they have not been sentenced or subjected to any court or disciplinary proceedings due to a crime involving abuse of the child or failure to meet child care responsibilities. This statement is incorporated in their contract and updated as necessary.

**7. Step:** In addition to their skills involving their primary duty at the school, employees are also assessed in terms of the tasks they are supposed to carry out in connection with child protection.

#### **8.4. Subcontracted Firms of the School**

Subcontracted firms are asked to produce the documents on this [link](#) for their employees so as to demonstrate their fitness for employment at Hisar School.

All subcontractors’ employees must be trained and inducted on the Child Protection Program of the school. They are obliged to fully comply with the procedures as stipulated in this program.

In addition, subcontractors’ employees are provided with assistance for the training courses they are required to take as per the OHS Law no. 6331.

Data on employees’ any conduct or behavior against the Child Protection Policy shall be reported and notified to Hisar School Child Protection Board. The decision of the board shall be submitted to the senior managers of the subcontractor firm to ensure that necessary action is taken. As a result of the assessment of abuse and negligence incidents, sanctions will be implemented which may even include termination of involved employee’s contract with the school.

Employees of subcontractor firms are prohibited to enter children’s changing rooms, toilets, bathrooms and other personal care spaces with the exception of individuals who are tasked with guard duty for children.

#### **Security Firm:**

Security staff provide services pursuant to the law no. 5188 on the Private Security Services under the Security General Directorate of the Ministry of Interior, and they are subject to unannounced audits by the Private Security Department of the Security General Directorate.

It is mandatory for the security staff to undergo psychological and forensic checks and receive verification from official authorities to confirm their fitness for work at the school before they start their duty. Psychological evaluations must be conducted once in every year. Security staff fully comply with the rules specified on this [link](#).

#### **Cleaning Firm:**

It is mandatory for the cleaning staff on duty to do routine cleaning work outside recess hours, during children’s classes or after school hours.

Cleaning staff providing support for children’s self care at preschool must pay attention to the matters under the “Scope of Tasks for Preschool Cleaning Staff” which can be found on this [link](#).

#### **Transport Firm:**

The supplier provides services in accordance with the rules of UKOME (Istanbul Metropolitan Municipality’s Transport and Coordination Center) and the regulations of the Ministry of Education.

The supplier is also audited by relevant authorities. Carrier Commission and Student Transportation Committee, composed of the members of the PTA and School Administration, work to ensure that services provided to students are audited, developed and improved.

Drivers and attendants tasked with transportation services fully comply with the roles and responsibilities specified on this [link](#).



### Catering Firm:

Serving in accordance with the regulations of the Ministry of Agriculture, Ministry of Health and Ministry of Education, the supplier is audited regularly by relevant authorities.

The Food Committee composed of the members of the PTA and School Administration work to ensure that the service students receive is checked, improved and developed.

## 9. SCHOOL POLICIES AND PROCEDURES TO SUPPORT CHILD PROTECTION POLICY

**Hisar School Healthcare Services Policy** is intended to guarantee all stakeholders' quick, fair, constant and most viable access to preventive, protective, diagnostic and treatment healthcare services.

As part of **Occupational Safety at Hisar School**, risk analyses and assessments are conducted to minimize potential risks and eliminate all possible dangers at campus. Accredited institutions are engaged to conduct checks and maintenance on a regular basis

As part of **Hisar School Disaster, Emergency, Risk, and Crisis Management** efforts, emergency guidelines for earthquake, fire, natural disaster and sabotage are communicated to all employees. There is a disaster, emergency, risk, and crisis management team of 12 people in addition to an emergency team of 87 people. Applicable documents are updated at the start of each academic year.

Briefing and awareness training is conducted for all staff, students, and subcontractors' employees who are expected to stay calm, act with common sense and in accordance with the procedures in place in the case of such incidents (Occupational Health and Safety, First Aid and Search & Rescue)

Two drills for fire and earthquake each are carried out at least twice a year with reports being issued after such drills (building evacuation times, student checking times, observations). Post-drill evaluation meetings are held.

In addition to Emergency and Disaster Management Policies, there is a **lockdown procedure** in place.

### Trips

Trips are organized to help children reinforce their learning in connection with real-life. Every trip is organized in accordance with children's developmental level and needs. Prior to any extracurricular activity with children (which includes culture and arts trips, extracurricular tests, one-off project events, school teams' tournaments etc.), a preliminary study must be carried out combined with a risk assessment. The field is visited by the teachers who will lead the trip and thus will check the fitness of the field for children. For all the fields to be visited or for all the environments that children will visit, checks are carried out on factors such as the route, time spent in traffic, as well as the security and safety of the spot where children are to be dropped off and picked up. Prior to a trip involving overnight stay, age-specific measures are taken. Physical safety of the rooms for children is examined and risks reviewed (checks would include TV channels with inappropriate content; the safety of balconies and doors are also checked). Children and adults cannot lodge in the same room. No child can accommodate alone in a room.

Children must wear safety belts while being transported. Music on the vehicle must be appropriate for children's age. At the start of every academic year, this matter is sent as a reminder to the transport company by the school's transport officer.

After each shuttle bus drops children at the site of the trip and after the trip, the driver and attendant conduct a general check on the students. In addition, the supervisor conducts a final check of the interiors of the vehicle to prevent any children from being forgotten inside.

The statements of the driver, attendant, guiding teacher and other staff are taken. The firm organizing the transport also submits criminal records and vehicle compatibility documents. Parents' consent form, medical reports and emergency contract numbers must be fully available on Hisar-net, the school's portal, in an easily accessible manner available for use when necessary. The teacher in charge of the trip prepares a trip plan and trip preparation list, receiving the approval of internal services and school principle and then notifying all the other teachers who will take part in the trip. A reminder note is sent to parents and children at least three days before the trip.

The number of teachers and guides will be determined depending on the number of children and their age. (1 teacher for 10 students, 1 vice principal for 40 students). Our SOS contract is applicable for domestic trips. For smaller children, there will be more supervising teachers. The trip takes place in compliance with the framework contract for education institutions' trips and the school's procedures/plans for trips. Any political event, strike, disaster, weather conditions or adversities in the bilateral relations of states that may break out before or during the trip shall be considered force majeure and \*terminated mutually as per applicable provisions. A new vehicle with the same features shall be provided in cases of breakdowns and accidents.

At the end of the trip, an evaluation is carried out about the destination and trip schedule. Findings of the evaluation are communicated to the internal services department and school administrations. Relevant measures are taken to address certain issues for the next trip of similar nature.

### Personal Data/Archive

Respect for children's reputation and private life is a primary responsibility for Hisar School. As part of the efforts under Hisar School's Personal Data Protection Committee, children's personal information and a transparent information process are handled in accordance with the Personal



Data Protection Law and Hisar School Policy on Processing and Protecting Personal Data.

Information obtained about children and parent/legal guardians shall only be used as required by the Personal Data Protection Law, and in other cases, only upon the approval of children and/or parents/legal guardians by observing children's best interests. Any personal information and photographs of children kept physically or digitally is stored in folders/files that only the adult who is directly engaging with the child can access, or in lock cabinets and encrypted folders involving security measures. Personal data is only shared with persons authorized to access such data and other relevant parties.

All parties that process personal data store and dispose of such personal data by observing a time period if a time period is specified in the applicable laws regarding the storing of personal data. If the applicable law does not set out a time period relating to personal data, it shall be disposed after the purpose for which it was processed expires. As for deleting, disposing and anonymizing personal data, provisions under "Hisar School Policy on Storing and Disposing of Personal Data", and the methods to delete personal data and time periods for disposal as stipulated in the "Hisar School Personal Data Processing Inventory" shall be taken into account.

Where children's personal data is requested in connection with participation in an event or expressing an opinion on a particular subject matter etc., our priority is informing children in a meaningful manner on the basis of the right to access information under Article 17 of the Convention on the Rights of the Child. In this respect, children's personal data stored and protected shall be deleted irrevocable once conditions specified in the European General Personal Data Regulation (GDPR) emerge as per the provisions under "the right to be forgotten".

### **Technology / E-security / Social Media Communications**

Hisar School's activities on digital citizenship, ethics, and awareness have been accredited by the Common Sense, the most influential organization worldwide on this subject. School community is expected to consider this awareness at all times. Everyone at the school community is responsible for alignment with the standards of Hisar School IT Strategies Policy. In addition to activities supporting the productivity and creativity skills of children, the concepts of "Digital Citizenship and Awareness" are addressed starting from primary school, aiming to help them use technology safely, responsibly, and consciously. As such, "digital citizenship" curriculum prepared by the Common Sense Education is integrated into our courses. At K12 level, "online security", "copy rights", "cyberbullying", "confidentiality and security", "digital identity" and "media literacy" are addressed, while trainers who have expertise in their respective fields undertake proactive activities.

The School's IT Department deploys security software to prevent access to explicit content at school. It is critical to not have any games installed on or delete existing ones from iPads, which are used only as an integral part of education at school. In this respect, when iPads are submitted to the IT department in the first week of school, all data is deleted and devices are fully integrated with the system in place at the school.

### **Using Photographs and Images of Children**

Unless curricular activities require it, children are not photographed or videotaped even if Hisar School holds their guardians' consent. School staff may take photos or videos after they get the children's consent and inform them on how and where such images and written materials will be used. Unless it is strictly necessary, photos and videos to be shot at events for publication on the web do not display children's faces. If there is any children or guardian who did not give their consent, that children's photographs shall not be taken. In this respect, Hisar School prepares consent forms for children (based on their age and characteristics) and their legal guardians.

Office staff who directly work with children, as well as parents, caregivers, drivers, and external visitors are responsible for complying with this document and code of conduct. Prior to any work, the Code of Conduct is conveyed to visitors who are then expected to comply with it. The Code applies to everyone who has access to children's photos and uses any photographing equipment. Photos and/or videos of children may not be processed, archived or shared without parents'/children's written and verbal consent and without providing them information as to where these images will be used.

Although external visitors have been approved, may not be photographed or recorded without prior consent/announcement. Children's location, name and surname, and other personally identifiable information may not be specified on social media posts and documents.

For security purposes, there are a total of 213 cameras installed in designated outdoor and indoor locations at school. Cameras may only be viewed by authorized personnel. The approval of the general manager must be obtained when necessary (bullying or emergencies such as fire).

### **Physical Contact/Intimate Care**

Children have a say on their body just as adults. At Hisar School, children cannot be kissed, hugged or asked to kiss or hug others unless they wish to do it. No insistence can be imposed for children to contact others physically. No promises may be made in return for their kissing or hugging, or engagement with them cannot be stalled unless they refuse to do so. Information is provided to all staff so that they do not engage in unauthorized physical contact with children (kissing, hugging or cuddling without permission). The child's consent must be sought for any attempt towards the child's body and information must be provided to them. Insistence is avoided when they say "no". Remarks, contacts, or looks that make children uncomfortable must be avoided. All adults who have direct or indirect engagement with children must implement and observe Hisar School Code of Conduct and maintain the necessary distance in their communications with children even when children ask for an approach involving more contact.

Children cannot change their clothes in the same environment as adults. Privacy of children is respected and changing rooms have been placed in a manner to guarantee such privacy.

For smaller children, in cases that require changing clothes and body-cleaning after the toilet, a supportive approach is pursued to initially help



them provide their own self-care. Where the child asks for assistance and/or it is determined that she needs assistance, it must be provided upon the child's consent and only to the extent necessary. In those cases, only the educator in charge of the child must be involved in such assistance. The educator in charge of the child, from who the child asks for assistance to clean after the toilet, provides such assistance, where possible, by instructing the child on what to do outside the toilet. Other than this exception, nobody can be present in this private space.

### **Response to Crisis**

It is important to be careful in responding to an incident/suspicion of abuse/negligence of the child by observing the child's best interest. Care must be taken to prevent any angry reaction to the incident and emotions must be put aside until necessary help is provided to the child. The role of the teacher/school staff/adults is to report the incident of abuse and support the child rather than investigating it. For example, insisting on seeing physical proof of abuse or interrogating the child on such incident is not the role or responsibility of the educator. It must immediately be reported to Child Protection Team Leaders, which will be followed by the reporting process.

[Hisar School Behavioral Development and Management Policy](#)  
[Hisar School Disciplinary Policy](#)  
[Hisar School Code of Ethics](#)  
[Communication Policy](#)  
[Hisar School Psychological Counseling and Guidance Policy](#)  
[Hisar School Information Strategies Policy](#)  
[Hisar School Cybersecurity Policy](#)

## **10. USE OF THE CAMPUS FOR EVENTS**

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When the school campus is to be used by a team other than school staff or visitors are invited to events organized by school staff:

- School administration ensures that relevant teams implement the applicable policies and procedures on child protection and safety.
- Written information is provided to all members of the event team and visitors regarding Hisar School Child Protection Policy.

## **11. POLICY REVISIONS**

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Hisar School Child Protection Board is responsible for revising the content of the Child Protection Policy and policy-related materials (forms, contracts, handbooks etc.), updating the policy in case of any shortcomings and presenting it to the approval of the Executive Committee of Hisar School for at least once in every academic year.

At Hisar School, child protection team convenes regularly during every academic year to conduct a needs analysis, reaches a decision on which agenda items must be prioritized and reports it to the Board and Executive Committee.

The Child Protection Team monitors developments and takes necessary training in this field. Child protection courses are provided to academic and administrative staff annually on a regular basis during the seminar period. At the start of their employment, all members of the staff sign the declaration form to comply with the Child Protection Policy and Procedures conveyed to them by the Human Resources Department.

**Policy creation date: August 2023**

**Policy revision date: August 2024.**



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## ANNEX 1

Hisar School has a Code of Conduct on child safety and protection in place. The Conduct applies to all teachers, staff, employees, volunteers and students who represent the school and interact with children and young individuals directly and/or indirectly. Behaviors of individuals who act on behalf of Hisar School may motivate and inspire people who they interact with; however, inappropriate behavior may result in significant damage. All stakeholders must be aware of the responsibilities that their duty entails.

Adults, especially while working alone with children and young individuals, must take their and others' vulnerability into account and be aware of their responsibility for protecting physical, emotional and sexual boundaries during such interactions. Individuals with responsibilities must avoid any discreet or express sexual act with the people who they are responsible for. Such acts include seducing remarks or moves, bringing up sexual topics, photo-sharing or physical contact aimed at abuse, misconduct or harassment. Attention must be paid prior to physically contacting children, young people and others; caution must be exercised as to how such physical contact will be perceived or received. Whether such contact is an appropriate expression involving greeting, attention, concern or celebration must be evaluated.

It must be remembered that physical contact with children and young individuals may be misunderstood by the person who receives and witnesses such contact. In general, one-on-one meetings with a child or young individual must ideally be held in a public place, transparent room or a room with it's door open. The concept of transparency is led by communication with children. Hisar School parents, administration, teachers, staff, and volunteers must follow the steps below to minimize the risks of private or inappropriate communication between themselves and minors:

- Communication between Hisar School stakeholders and minors must always be public.
- If possible, e-mail correspondences between a person acting on behalf of the school and minors must be made via the corporate e-mail address of the school.
- Communications on the school network and or platform may be periodically monitored.
- Any online tools (Facebook, Twitter, Whatsapp etc.) or other text messaging tools for communication between Hisar School stakeholders and minors must only be used for activities related with the school.

I declare that I will fully comply with this Code of Conduct and instructions herein as a precondition of delivering services to children and the youth under the umbrella of Hisar School.

- I will treat everyone within the framework of respect, patience, honesty, kindness and dignity.
- I will not stay alone with children and/or the young individuals during school's events without informing another adult on this matter.
- I will use a positive tone in my communications while working with children and avoid any language of criticism, competition and comparison.
- I will always maintain appropriate physical boundaries.
- I will fully comply with Hisar School's guidelines for mandatory notifications and its policy for reporting any abuse of the child.
- I will demonstrate full collaboration in the investigations of abuse of children and/or young individuals.
- I will not sexually or otherwise inappropriately touch or talk with a child and/or a young individual.
- I will not engage in any physical or emotional abuse such as violence, slapping, shaking, belittling, offending, threatening or humiliating.
- Unless they are my own children, I will not drop off a child at their home while we are alone.
- I will not receive or offer gifts from/to children or young individuals outside the knowledge of their parents or guardians.
- I will not have private communication with children and will only communicate via text messaging, e-mail, Facebook, Twitter or other electronic and social media tools for events related to the school.
- I will never use any swearwords when I am with children and/or young individuals.

As an individual who delivers services to children and young individuals under the umbrella of Hisar School, I understand that I am subjected to the checks of my criminal records. By signing, I hereby confirm that I have read this Code of Conduct and agree to comply with the standards herein as an individual working with children and young individuals. I acknowledge that any action violating this Code of Conduct and Hisar School Child Protection Policy or any failure on my part to take measures required under this Code of Conduct may be subject to disciplinary punishment including up to the termination of my employment with Hisar School.

**Name-Surname:**

**Date:**

**Signature:**





2023- 2024  
**HİSAR OKULLARI**  
ÇOCUK KORUMA POLİTİKASI



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