



UFUK ASSOCIATION FOR RELIEF AND DEVELOPMENT

Protecting Children and Vulnerable Adults Policy



1. Introduction

This Protecting Children and Vulnerable Adults Policy Document has been developed to further emphasize the responsibilities of all members, representatives, staff, and volunteers of UFUK Association for Relief and Development who are in direct contact and interaction with child beneficiaries, as outlined in the Code of Conduct. This document complements the UFUK Association for Relief and Development's Code of Conduct and its Prevention of Sexual Exploitation and Abuse (PSEA) policies.

Accountability is essential in fulfilling the mission of UFUK Association for Relief and Development. The organization acknowledges that the natural power imbalance between institutions and affected communities can increase the potential for abuse and exploitation. Aware of this vulnerability, UFUK Association for Relief and Development accepts and declares its responsibility to create and maintain an operational environment that aims to prevent and deter any intentional or unintentional actions or neglect by its personnel that could result in harm or abuse to children.

Any violation of this policy is considered a serious breach that will initiate a disciplinary process, which may include termination without notice, in addition to any other applicable legal actions.

This policy must be read in conjunction with the following documents:

- The Statute of UFUK Association for Relief and Development outlining its fields of work and activities,
- UFUK Association for Relief and Development Code of Conduct,
- UFUK Association for Relief and Development Feedback and Complaints Policy,
- UFUK Association for Relief and Development Accountability Framework to Affected Communities,
- UFUK Association for Relief and Development Anti-Corruption and Conflict of Interest Policy,
- UFUK Association for Relief and Development PSEA Framework,
- UFUK Association for Relief and Development Personal Data Protection and Processing Policy,
- UFUK Association for Relief and Development Internal Complaints Policy,
- UFUK Association for Relief and Development Guidelines for Investigating Reports of Suspected Misconduct.

2. Definitions

Child: Any person under the age of 18.

Child Protection: A set of policies, procedures, and practices adopted by UFUK Association for Relief and Development to ensure the organization is a safe place for children. The primary purpose of child protection is to create a secure environment for children. It involves ensuring that all children are safeguarded from any intentional or unintentional actions by UFUK personnel, representatives, and

volunteers that may cause actual harm or pose a risk of harm. It requires both collective and individual responsibility and proactive measures.

Best Interests of the Child: Prioritizing the rights and well-being of the child to ensure their physical, mental, emotional, and social development.

Exploitation: Taking advantage of a child's vulnerability, the power imbalance, or a relationship of trust by using one's position, power, or privilege to force or attempt to force a child into labor, domestic service, or criminal activity.

Emotional Abuse: Actions that harm a child's emotional, mental, or psychological development. It can be a one-time incident or a pattern over time and may include humiliating or degrading behavior (e.g., name-calling, threats, yelling, swearing, mocking, constant criticism, belittling, shaming), failure to meet emotional needs, or acts of rejection, ignoring, intimidation, isolation, or confinement.

Physical Abuse: The use of physical force that causes or risks causing injury or pain to a child, whether intentional or unintentional. This includes hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, torture, and other forms of physical harm.

Sexual Exploitation: The actual or attempted abuse of vulnerability, power imbalance, or trust for sexual purposes, including for financial, social, or political gain.

Sexual Abuse: Any actual or threatened sexual act carried out by force, under unequal or coercive conditions, or by exploiting a position of power.

Commercial Exploitation: Using a child in work or activities in ways that harm their physical or mental health, education, or social-emotional development. This includes, but is not limited to, child labor.

3. Do No Harm Principle

The "Do No Harm" principle is a standard used by organizations working in the humanitarian field. It refers to the responsibility of organizations to minimize any harm their activities might cause as a result of their operations.

4. Commitments

In accordance with its Code of Conduct, UFUK Association for Relief and Development commits to prioritizing the "best interests of the child" principle in all legal support activities and interventions involving children and minors. All UFUK Association for Relief and Development personnel shall always strive to protect and uphold children's rights and act in a manner that ensures the best interests of the child are the primary concern. Any form of abuse, neglect, exploitation, or violence against children (defined as anyone under the age of 18) is strictly prohibited.

All UFUK Association for Relief and Development personnel are responsible for ensuring the safety and well-being of children, preventing abuse, neglect, exploitation, and violence, and intervening when necessary. Under no circumstances may staff ignore or disregard suspected or actual abuse or violence against a child, including when committed or suspected to be committed by individuals affiliated with partner organizations. Such situations must be reported immediately through the appropriate reporting mechanisms.

UFUK Association for Relief and Development further commits to:

- Treating all children respectfully and equally regardless of their age, gender, language, religion, beliefs, nationality, ethnicity, social origin, status, class, caste, sexual orientation, disability, or any other personal characteristic.
- Establishing a culture of communication and building trust with children and their families.
- Creating a safe environment for children and families while respecting cultural sensitivities.
- Supporting children through non-violent, positive behavior.
- Encouraging children and communities to speak openly about their interactions with adults and one another.
- Informing children about their right to report any uncomfortable situations and how to raise concerns.
- Empowering children to better protect themselves.
- Ensuring the confidentiality of information related to children, families, and communities.

In line with the Code of Conduct, any sexual relationship between staff and beneficiaries is prohibited, even if it is not considered exploitative or harassing. Such relationships may compromise the integrity and credibility of UFUK Association for Relief and Development and its staff. The organization also emphasizes that any sexual activity involving children (anyone under 18) is strictly forbidden. Misrepresentation of a child's age is not a valid defense.

To protect the integrity, well-being, and health of children, UFUK Association for Relief and Development personnel must:

- Never accept sexual favors in exchange for money, employment, goods, or services, nor subject children to any degrading, humiliating, or abusive behavior.
- Never touch children or use provocative, harassing, demeaning language, or make inappropriate proposals that could negatively affect a child's trust or self-esteem or disrespect cultural norms.
- Never act in ways that damage a child's confidence or self-worth.
- Never exploit a child's labor (e.g., making them perform domestic chores).
- Never show favoritism or discriminate in ways that result in unequal or unfair treatment of children.
- Never invite a child or their relatives to their home or form relationships outside the bounds of professional conduct.
- Never visit a child's home without prior approval from a senior manager and unless it is required by their job.
- Never meet a child outside of working hours, even in the office, without prior permission from a senior manager.
- Never work with children while under the influence of drugs or alcohol.

- Never photograph or record children without authorization from a manager. (If a child wishes to take a photo with UFUK staff, written informed consent must be obtained from the child's relatives.)
- Never publish a story or image that may put the child, their family, or community at risk.
- Never watch, distribute, produce, or share child pornography or show such materials to children.
- Never display the faces of children who are victims of sexual abuse, mistreatment, trafficking, or those associated with armed groups.
- Never post or share images or information about children on personal websites or social media (Facebook, Instagram, etc.) unless officially authorized.
- Never contact beneficiary children or their families via social media unless explicitly permitted and required for a specific UFUK project.
- Never take children to places where alcohol is served. (During domestic or international trips for legal support services, UFUK personnel must maintain professionalism. When necessary, children may be taken to age-appropriate venues, but under no circumstances should their safety be compromised.)
- Never ignore, downplay, or fail to report any suspected or actual breach of the Code of Conduct, PSEA Framework, or Child Protection Policy.

5. Protection and Deterrence

To ensure that UFUK Association for Relief and Development is a safe space for children, the organization promotes awareness and prevention mechanisms across all its programs, operations, and activities to reduce actual harm or risk of harm to children caused by staff behavior:

Awareness: All staff receive context-based support to help prevent, report, and address protection-related concerns. Representatives are informed of their obligation to act in line with this policy.

Prevention: During program implementation and daily operations, staff demonstrate awareness of potential risks to children by following procedures and good practices, and by applying effective strategies to reduce harm, abuse, and exploitation. Personnel and managers are supported in creating a safe and healthy environment where children's rights are respected and abuse is prevented.

Reporting: Every representative of UFUK Association for Relief and Development knows how and to whom to report a concern when an issue arises.

6. Child Protection Training

UFUK Association for Relief and Development undertakes proactive measures to ensure that all staff understand child protection policies, acceptable and unacceptable behaviors, their roles and responsibilities regarding child protection, and how and to whom to report concerns and/or incidents.

As part of the onboarding process for new hires, training sessions covering UFUK Association for Relief and Development's Code of Conduct, PSEA, and Child Protection Policies are delivered by the Ethics and Compliance Manager. In addition, refresher trainings are provided to the entire team every six months to maintain ongoing awareness and compliance.

Moreover, as an integral part of orientation, specific online trainings are mandatory for teams working closely with children. These courses are available through various platforms and include:

- **Prevention of Sexual Exploitation and Abuse Training** (available in English, Arabic, and Turkish):
<https://agora.unicef.org/course/view.php?id=28696>
- **Protection Fundamentals** (available in English, Arabic, French, and Spanish):
<https://kayaconnect.org/course/info.php?id=1424>
- **Protection** (available in English and Arabic):
<https://kayaconnect.org/course/info.php?id=1651>
- **Child Protection in Education and Other Sector Coordination** (available in English and French):
<https://kayaconnect.org/course/info.php?id=3948>

UFUK Association for Relief and Development also continues to invest in developing a training and resource library containing materials on child communication techniques, child protection, and safeguarding for teams that work closely with children. This library serves as a valuable tool to enhance our staff's knowledge and expertise in child protection.

7. Complaints and Investigations

UFUK Association for Relief and Development is committed to maintaining a Feedback and Complaints Mechanism and an Internal Disciplinary Mechanism that are safe, gender-sensitive, and context-appropriate. Allegations of sexual exploitation and abuse are investigated in a timely, impartial, independent, and fair manner.

In line with the organization's zero-tolerance policy, perpetrators are held accountable for their actions. Confidentiality and the well-being of survivors are prioritized in all cases. Protection against retaliation is provided, survivors are properly informed about the process, and guidance on available support is offered.

The organization commits to being especially vigilant in responding to any signs or evidence of abuse originating from the communities it works with and to report all such concerns immediately to the UFUK Feedback and Complaints Mechanism.

Any report involving exploitation or abuse, even if only a rumor, must be reported to the Feedback and Complaints Mechanism, regardless of whether the person involved is known or affiliated with the organization.

In child-related incidents, the guiding principles for decision-making about how to prevent harm or respond to allegations must include the best interests of the child and the child's right to participate and be heard.

Policy Implementation and Reporting:

All UFUK staff are responsible for reporting concerns. All stakeholders involved in or in contact with UFUK's operations may report any violations or observations related to these principles using the channels outlined in the Feedback and Complaints Policy. Reports submitted will be assessed in line with the procedures described in that policy.

UFUK Association for Relief and Development guarantees the confidentiality of all information and ensures that a proper investigation process is followed for each complaint. Importantly, making a complaint will in no way affect the complainant's ability to receive or continue receiving services from UFUK.

We strongly encourage all staff to report, in good faith and without fear of retaliation, any suspected misconduct or information related to corruption via this channel. UFUK personnel are obligated to report any suspected breach of the provisions above using the communication channels outlined in the Internal Complaints Policy.

These reports will be carefully assessed and investigated according to the procedures described in the "Guidelines for Reviewing Reports of Suspected Misconduct." Anyone who reports concerns or incidents in good faith through these channels will not be subject to retaliation or adverse consequences.

However, knowingly submitting false information will be treated as a violation of this policy. If the individual is an employee, this may lead to disciplinary action, including termination of the employment contract. If the individual is an external party, this may result in the termination of any contractual or working relationship with UFUK Association for Relief and Development.

8. Safe Recruitment

Safe recruitment involves implementing hiring procedures that help keep children safe, including rigorous safeguarding checks. UFUK Association for Relief and Development will only recruit representatives who are deemed suitable to work with children. Strict child safeguarding requirements apply to all candidates and include comprehensive background checks, thorough interview processes, and robust reference verification.

Role of the Ethics and Compliance Manager

The Child Protection Policy must be signed by all staff, serving as a formal commitment to adhere to the organization's child protection procedures in all professional interactions with children. The Ethics and Compliance Manager is responsible for:

- Promoting awareness and implementation of this policy,
- Developing and disseminating procedures set forth in the policy,
- Clarifying any uncertainties that may arise in the interpretation of the policy.

Staff are expected to cooperate with the Ethics and Compliance Manager and utilize their support in implementing this policy. UFUK Association for Relief and Development retains full responsibility for the content and application of this policy. The organization is also responsible for reviewing the policy annually and updating it as needed. The policy is reviewed every June by the Ethics and Compliance Manager and approved by the UFUK Association for Relief and Development management. Any changes are communicated to staff via email. Information about the policy is also shared during regular staff meetings, where questions are addressed. The organization reserves the right to make changes to the policy before the annual review if deemed necessary.

9. Reference Documents

This policy has been prepared in full compliance with relevant national and international legal frameworks. UFUK Association for Relief and Development has made significant efforts to align this policy with the principles outlined in the following guiding documents and standards. As of the last review, this policy was harmonized with the following:

- The Constitution of the Republic of Türkiye, Turkish Civil Code (Law No. 4721), Child Protection Law (Law No. 5395), and Turkish Penal Code (Law No. 5237).
- **Convention on the Rights of the Child:** <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>
- **UNHCR Guidelines on Assessing and Determining the Best Interests of the Child (2018):** <https://www.refworld.org/pdfid/5c18d7254.pdf>
- **Inter-Agency Guidelines for Case Management and Child Protection (2014):** http://www.cpcnetwork.org/wp-content/uploads/2014/08/CM_guidelines_ENG_.pdf
- **Core Commitments for Children in Humanitarian Action (UNICEF, 2020):** [https://www.unicef.org/media/130411/file/CCS%20\(English,%20full\).pdf](https://www.unicef.org/media/130411/file/CCS%20(English,%20full).pdf)
- **The Alliance for Child Protection in Humanitarian Action – Child Protection Minimum Standards (2019):** <https://spherestandards.org/resources/minimum-standards-for-child-protection-in-humanitarian-action-cpms/>
- **United Nations, Committee on the Rights of the Child, General Comment No. 14 (2013):** <https://digitallibrary.un.org/record/778523?ln=en#record-files-collapse-header>

10. ADULT PROTECTION

10.1 Definition

For the purposes of this policy, an **adult at risk** (or “vulnerable adult”) is any person aged 18 or above who, due to age, disability, illness, trauma, displacement, social exclusion, or any other condition, may be **unable to protect themselves** from abuse, neglect, or exploitation.

10.2 Principles

The Association upholds the same safeguarding standards for adults as for children, with the following key principles:

- **Respect and Dignity:** All adults have the right to live free from harm, abuse, neglect, and exploitation.
- **Empowerment:** Adults at risk are supported to make their own informed choices and decisions whenever possible.
- **Prevention:** The Association actively identifies and mitigates risks that may expose adults to harm.
- **Proportionality:** Interventions are appropriate to the level of risk and respect the autonomy of the individual.
- **Confidentiality:** Information is shared strictly on a need-to-know basis and always in the best interest of the person concerned.
- **Partnership:** The Association works collaboratively with local authorities, healthcare providers, and protection actors to ensure effective safeguarding.

10.3 Types of Abuse

Abuse of adults may take many forms, including but not limited to:

- **Physical Abuse:** Inflicting physical harm or pain, including hitting or restraint.
- **Emotional/Psychological Abuse:** Humiliation, intimidation, threats, or isolation.
- **Sexual Abuse:** Any sexual act or behavior without consent.
- **Financial or Material Abuse:** Misuse or theft of money, property, or assets.
- **Neglect:** Failure to meet basic needs or provide adequate care.
- **Exploitation:** Taking advantage of an adult's vulnerability for personal, financial, or political gain.

10.4 Procedures and Response

- All staff and volunteers must be vigilant in recognizing signs of abuse among adults at risk.
- Any concern or suspicion must be **reported immediately** using the same safeguarding reporting procedures described in this policy.
- Reports will be handled **confidentially**, and the person will be offered appropriate support and protection.
- Where necessary, the Association will liaise with **relevant authorities or protection agencies** to ensure the individual's safety.

10.5 Capacity and Consent

- Adults should be presumed to have the capacity to make decisions unless proven otherwise.

- Where an adult lacks capacity, any action taken must be **in their best interest** and the least restrictive option possible.

10.6 Training and Awareness

- The Association provides **specific safeguarding training** on working with adults at risk, including recognizing abuse, communication techniques, and reporting mechanisms.
- Staff and volunteers are encouraged to promote **a culture of respect, empathy, and non-discrimination** in all interactions with adults.

Sincerely,

The Board of Directors and Legal Team of UFUK Association for Relief and Development

For detailed questions, please contact,

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