

Acronyms

CMC: Child Monitoring Centers
CPL: Child Protection Law
CRC: Convention on the Rights of the Child
CSO: Civil Society Organisation
FIR: Forensic Interview Rooms
MoH: Ministry of Health
MoJ: Ministry of Justice
MoNE: Ministry of National Education
SRHR: Sexual and Reproductive Health Rights
TCC: Turkish Criminal Code

Follow-up to previous review and current situation

1. Turkey didn't submit a mid-term progress report after its last UPR process, nor has there been any public discussion at any level about results of the UPR process and a plan to address the supported UPR recommendations.
2. During first and second UPR process, Turkey received 63 recommendations on child rights; supporting 58 and noting 5 recommendations. 22 of them from first round of UPR.
3. 5 noted recommendations focus on minorities, right to education, sexual orientation and gender identity.
4. Turkey made some progress in some of the supported UPR recommendations on child rights including ratification of number of international human rights instruments.
5. However, Turkey has so far fell short of honouring many of the promises made before the UN Human Rights Council, especially on one key child rights issue: VAC. UPR recommendations supported by Turkey on such areas of concerns as corporal punishment, child marriage, juvenile justice are all left unattended or retrogressed. Recommendations for the rights of girls dominated the UPR process for Turkey (21 of them) with varying formulations in different rights categories.

International instruments

6. As response to UPR recommendations (Portugal,Zimbabwe – UPR.2), Turkey ratified Optional Protocol to CRPD and the Optional Protocol to the CRC on a communications procedure..

Recommendations for actions (RFA)

7. However, Turkey is still not party to two main human rights treaties: International Convention for the Protection of all Persons from Enforced Disappearance and Optional Protocol to the International Covenant on Economic, Social and Cultural Rights. We strongly urge Turkey to lift all reservations on the CRC (Brazil,Uruguay – UPR.1) and ratify the Convention against Discrimination in Education 1960.
8. Turkey has also been usually late in submitting its initial and periodic reports to UN treaty bodies Turkey just submitted its 4 and 5 combined report to UNCRC Committee with mostly statistics from 2015. It is important that Turkey prepare timely human rights monitoring reports in order to benefit from the international authoritative expert knowledge for the betterment of conditions for children. We also urge Turkey to ratify and implement following CoE instruments :
 - European Convention on the Compensation of Victims of Violent Crimes
 - Additional Protocol to the Convention on Cybercrime, concerning the criminalisation of acts of a racist and xenophobic nature committed through computer systems
 - Additional Protocol to the European Social Charter Providing for a System of Collective Complaints
 - Protocol No.12 to the Convention for the Protection of Human Rights and Fundamental Freedoms (general prohibition of discrimination)
 - European Charter for Regional or Minority Languages
 - Framework Convention for the Protection of National Minorities
 - European Convention on the Adoption of Children (Revised)

- Protocol amending the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data

Child protection system and mechanisms

9. Turkish public administration system is highly centralised yet rather scattered in its organisation when it comes to preventive, protective and supportive services to children. For the last 15 years, the governmental agency that was designated to coordinate efforts on the rights of the child has changed four times, from the Social Services and Child Protection Agency into different ministries with bigger and bigger mandates. Constituting over one third of the population of Turkey (around 23 million plus over 1,5 million refugee children), these changes have shown themselves in irregularities in service delivery and erosion of protective environment for children as each change signifies a time and administration reshuffling for the new administration to adjust and set up new systems. Yet budget and administrative authority of the Children's Services General Directorate remained relatively the same with plans and programmes that were neither monitored nor strengthened. Although considerable efforts were made in the area of child rights in Turkey, they all fell short of their commitment of accountability towards children and the public. Because the protective and supportive services to children are highly scattered, a Child Protection Coordination Board at the central and local levels were set-up as per Child Protection Law (CPL) in 2005, but they are not functional throughout the country. The CPL, itself seen as a Turkish Criminal Code (TCC) for children, falls short of providing a holistic normative framework for an enabling environment to prevent VAC from happening, protect children against VAC, and provide support and redress services to victims of VAC, hold perpetrators of VAC to account. Other laws also fall short of protecting children, at times even put children in harm's way, for example, by letting children in conflict with the law get tried as if they are adults, by letting victims of VAC get further victimised within the security and justice systems.
10. Number of new draft laws and policies has been stuck in preparation for over 5 years or more and risk losing their application due to changing legal and political changes of the administration. For example, a draft law on victim rights has been pending at the parliament for the last 6 years in different times and child victims of VAC lack necessary legal baseline for their protection. Another example is the National Strategy and Action Plan on VAC, which has been pending finalisation and adoption for the last 7 years.
11. Number of strategies and action plans past their termination dates without any evaluation made or new ones to replace them. For example, no evaluation was conducted on the Child Rights Strategy and Action Plan covering the years 2013-2017. Children in Turkey still waiting for a new strategy that may address ever-growing challenges and negatively effecting their development and the development of their country. Same applies to other areas like violence in schools, disability and juvenile justice.
12. A very limited and non-disaggregated statistical data and information about children, enjoyment of their rights and their wellbeing exacerbate the situation to develop and evaluate any legal or policy measure to protect children from violence and harm. In most cases, disaggregation of data of children by age, by sex, by disability and other protected groups is either missing or not shared publicly.
13. Another area that is left neglected is a visible and sufficient budget for children that corresponds to the diverse needs of and an enabling environment for the enjoyment of rights of the whole child population within Turkey's jurisprudence. It is imperative to understand

how much budget goes to children to hold policy makers to account to children, their most vulnerable constituents. Unfortunately, currently it is impossible to decipher if budget for children is increasing or decreasing, if budget spent corresponds to the impact it might have, and which programmes should get funding and which ones do not deliver for children and must stop being funded.

RFA

We urge Turkey to

14. harmonise its laws and policies in full compliance with CRC
 - 14.1. introduce a child rights framework law in unifying definitions of the child as well as preventive, protective and supportive normative measures for children
 - 14.2. finalise VAC National Action Plan and adopt it at the Parliament and implement it with a monitoring and evaluation component implemented in partnership with civil society
 - 14.3. introduce a holistic strategy and a time-bound and budget for child rights with publicly shared indicators for monitoring the budget and with all necessary elements including
 - 14.3.1. VAC in all settings
 - 14.3.2. Preventive measures such as nation-wide campaigns, inclusion of peace education and violence prevention including sexual abuse prevention in school curricula from pre-school on Disability, Gender equality
 - 14.3.3. All groups of children with special protection needs such as the Roma, migrants and refugee children, trafficking victims, victims and witnesses of crimes, children in conflict with the law, and other groups as per identified by the CRC Committee's General Comment 13.
 - 14.3.4. Protection from harmful content, online and offline
 - 14.3.5. Providing children and families with supportive resources and learning opportunities to protect themselves with timely evidence-based and relevant information including sexual and reproductive health and rights
15. Develop a child rights monitoring and data system disaggregated in accordance with the CRC articles 1 (18 years old and under), 2 (prohibited grounds of discrimination) and 4 (general measures of implementation of child rights).
16. Make the budget for children transparent, CRC compliant and increase it proportionately to the child population
17. Set up helplines (telephone and otherwise) specifically designed for and with children

Violence (including cruel, inhuman or degrading treatment or punishment)

18. One of the most repeated recommendations was on VAC, especially against girls. Most specific one being Turkey's obligation to prohibit all forms of VAC in all settings, including corporal punishment. (Armenia from UPR1, Luxembourg, Poland, Slovenia)
19. According to TurkStat data of 2016, as punishment, 20.7% of parents beat their children while 32,6% of them slap them in the face and 72,6% of them verbally chastise them.ⁱ Although Turkey accepted to act on banning corporal punishment of children in all settings in first and second UPR reviews, no progress was made. Corporal punishment is still not explicitly banned.

20. Bullying in schools and online is an emerging concern especially in connection to discrimination against refugee etc community in Turkey. According to a study by the OECD, around 20% of children in Turkey experience at least one form of bullying at school.ⁱⁱ Another study in Turkey reveals higher figures for children in middle schools in 2015: while 34% of children are exposed, 30% of children are perpetrators of some form of bullying.ⁱⁱⁱ Turkey launched a nationwide campaign on bullying at the end of 2017, however considering the magnitude of the child population, the campaign should be strengthened, made more visible.
21. Third issue of concern is VAC online including exposure to sexual abuse materials and misleading and incorrect news. According to a follow-up study in Turkey, over 50% of children encounter sexually explicit materials online, 73% of these on social media. 30% of children receive sexually explicit messages online, again mostly on social media.^{iv} As to exposure to misleading and incorrect news, in Turkey, exposure to made-up news is 49%; proportion who agree that government should do more to separate what is real and what is fake on the internet is 68%.^v Even this limited information prompts urgent comprehensive policy action, which is lacking.
22. Another grave issue of concern is lack of legal and policy framework to protect victims of VAC. Last four years, around 513542 children victims of crime were brought to security units.^{vi} Turkey does not have a legal framework to protect and support child victims of violence and crimes.
23. Regarding VAC in prisons, although the data shared by the Ministry of Justice (MoJ) indicate 92 complaints regarding torture and ill-treatment from juvenile prisons between 2006 - 2016^{vii}, CSOs working in the field identified 111 complaints of torture and ill-treatment against children between November 2015 – December 2017.^{viii} Such discrepancy between the information sources indicates to problems of data management, accessibility and usage of state complaint mechanisms for children deprived of liberty.
24. According to the data shared by the MoJ^{ix} on 14.11.2018, 743 (519 of convicted, 224 of arrested mothers) children between the ages of 0-6 were staying with their parents in penal institutions.

RFA

We urge Turkey to

25. Repeal TCC art.232/2 about the concept “disciplinary power” as a step towards banning corporal punishment in all settings. Introduce an explicit ban on all forms of VAC in all settings including home, school, alternative care settings, early childhood care and education settings, penal institutions;
26. Set up accessible complaints’ mechanisms for children, considering the regional, linguistic, disability, economic and social diversity of them all. Ensure that complaint mechanisms in institutions that deprive children of liberty (i.e. prisons etc.) are accessible, anonymous, effective and does not carry the risk of retaliation.
27. Make mediation and courts systems accessible to children by making laws understandable to children, by including information about how to claim one’s rights in formal school curriculum.
28. Intensify preventive efforts on bullying in schools and online bullying.
29. Introduce legal and policy measures to address dangers posed by online harmful materials, such as introduction of new legal concepts like grooming, online child abuse and exploitation into criminal law and other relevant laws.

30. Make necessary legislative reforms to ensure that alternatives to incarceration, detention and/or postponement of the imposition of the sentence is duly considered for mother with children between the ages of 0-6.

Sexual exploitation, abuse and gender-based violence

31. There were no recommendations on direct sexual exploitation and abuse during neither of Turkey's UPR reviews but the highest number of recommendations are received about gender-based violence (Algeria, Armenia, Bangladesh, Chechia, Egypt, France, Germany, Japan, Jordan, Kirgizstan UPR1, Panama, Myanmar, Sweden, Maldives, Israel, Timor-Leste, Belgium). However, the issue of sexual exploitation and abuse is of grave concern as each year around 17000 child sexual abuse cases are filed in courts in Turkey^x and for the last four years 59284 children 51818 of them girls are brought into security units as victims of sexual abuse and exploitation. In addition, every year over 20000 girls are married to an adult^{xi} and thousands of court cases are lodged to increase the age of girls for marriage. It is also observed that courts are using less protective foreign marriage laws enabling refugee girls getting married in some cases at the age of 13.^{xii} The situation exacerbates as, on grounds of infringing freedom of religion, the Constitutional Court annulled art.230 paras-5 and 6 of TCC on criminal law measures with respect to power of civil marriage over religious marriage which had been put as a preventive measure. Therefore, a comprehensive legal and policy response in this area is vital yet missing in Turkey.
32. For example, Turkey is committed to take necessary legislative or other measures to collect and store data relating to the identity and to the genetic profile (DNA) of persons convicted of the offences established as per the CoE (Lanzarote) Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Art.37/1). However, the no publicly known steps have been taken to comply with this Convention.
33. Another example is that the "Turkish government has put a 'repentance' draft law before the Parliament that, if passed, would enable courts to 'delay punishment or defer the announcement of a verdict' concerning men who marry girls. The new draft law also aims to lower the age at which sexual relations with a child under the cover of marriage would be considered a crime from 15-years-old to 12-years-old. If it passes, it will 'pardon' the underage-marriage offenses of approximately 10,000 men currently serving prison sentences on sexual-abuse charges."^{xiii}
34. With lack of victim centred legal and policy framework, newly established forensic interview rooms (FIR) and monitoring centres for child sexual abuse victims (CMC) are not available everywhere and does not correspond to the numbers of victims of child sexual exploitation and abuse. Even in cases of places with FIRs and CMCs, child victims are taken to police units and courts for interrogation and exposed to further trauma as if they are the criminals. Court case statistics also reveal that there are girls and boys under 18 who are in prison for offences like prostitution and child trafficking.^{xiv} This is extremely worrying information shows the dire need for child and victim centred VAC legal and policy responses.
35. Another issue is that there is no follow-up procedure envisaged in law on execution of criminal offenses in relation to so-called honour crime.
36. Additionally, there is no legal and policy framework for the protection for children who are of different gender identity and sexual orientation. There are cases reported by bar associations during consultation meetings where Human Rights and Equality Agency of

Turkey and Ministry of Family, Labour and Social Services denied LGBTI+ refugee and other children, protection and support shelter homes.

RFA

We urge Turkey to

37. harmonise laws and policies on child sexual exploitation and abuse with CoE's Lanzarote Convention.
38. include child protection from sexual abuse (bodily integrity, consent, getting support) information in pre-school and primary school formal curriculum.
39. intensify efforts to protect child victims of sexual exploitation and abuse.
40. Increase number and capacity of Ministry of Health's (MoH) CMC (only 41^{xv}) and FIRs.
41. amend the TCC articles on crime reporting (278, 279, 280) to include protection clauses for those reporting crimes against child and make a public campaign for these obligations to be known by children and general public.
42. renew the definitions of sexual abuse and exploitation in law to include new and emerging types of sexual abuse online.
43. raise the age of marriage explicitly to 18 with no legal gap to be abused at the detriment of the girl child. Apply Turkish laws of marriage for refugees.
44. amend remaining discriminatory articles in the TCC, such as art.287, which allows virginity testing without the woman's consent under certain circumstances and art.104 that may be interpreted as criminalizing consensual sexual relations between teenagers aged 15 to 17.
45. prosecutors and judges should not hesitate to apply art.84 of TCC (instigation to commit suicide), whenever it is warranted; the highest sentences should be sought and given for all murders that serve to control women or curb their personal autonomy regardless of whether the crime is committed in the name of honour or custom.
46. introduce legal and policy framework for the protection needs of children of different gender identity and sexual orientation.

Child labour and trafficking

47. There were several supported recommendations (Egypt/UPR1, Montenegro, Sweden Togo, Ukraine, Sri Lanka, Japan) on preventing and combating child labour, hazardous work and trafficking through legal, policy and programmatic efforts.
48. Although Turkey made considerable efforts against child labour, it remains to be one of the persistent violations of child rights in Turkey. It is also one of the areas VAC information is severely lacking.
49. Regrettably, the most recent information about child labour in Turkey dates back to 2012. Almost similar numbers from 2006 and 2012 child labour surveys indicate that efforts to combat child labour have not been effective and a new integrated policy response is needed. Official child labour survey in 2012 revealed that, although below legal working age, 292000 children aged 6-14 were working. There were also 601,000 children aged 15-17 working. With children working at home, the total number reaches to 8 million 397 thousand.^{xvi} Official labour statistics from 2017 also indicate that there are about 2 million children aged 15-19 were in legal labour force.^{xvii} One of the main reasons of child labour is the level of poverty in Turkey. A recent study revealed that according to poverty

definition of the European Union, seven million or one in three children in Turkey live in households in severe material deprivation (poverty) in 2017.^{xviii}

50. With around one and half a million refugee children mostly from Syria and few other countries like Iraq, Afghanistan, it is safe to say that child labour will continue to be an issue of concern with respect to VAC. This necessitates Turkey to adopt new policy and programmes to combat child labour.
51. Regarding trafficking, although progress has been made, there are several outstanding issues that need to be voiced during upcoming UPR process. For example, exiting data about trafficking is not disaggregated and is not made fully available to the public to facilitate a constructive dialogue benefitting of child trafficking victims. Inconsistent annual fluctuations of trafficking victim numbers raises concerns that victim-centred efforts are not implemented.^{xix}
52. Additionally, there have been reports of disappearances of migrants in, or transiting through, Turkey, including reports of women and children disappearing in trafficking networks when being trafficked from the Syrian Arab Republic to Turkey.^{xx}

RFA

We urge Turkey to

53. conduct a nationwide survey to monitor the changes in situations and numbers in child labour
54. adopt policies to end root causes of child labour including poverty reduction strategies
55. adopt national and local social and economic policies to guarantee and maintain children and their families with adequate standard of living, such as increasing home-ownership of the poorest %20 percentile, decreasing the food insecurity, increasing the budget for social support programmes
56. launch public information campaigns addressing root causes of exploitation, with research, information and mass media and social and economic initiatives to prevent and combat trafficking
57. train law enforcement officials, judges, prosecutors, labour inspectors, teachers, health-care workers and the staff of its embassies and consulates and disseminate more widely information on child trafficking and on assistance to victims
58. protect child victims of trafficking from prosecution, detention or punishment for activities in which they were involved as a direct consequence of their situation
59. The children must be educated with information and life skills that are gender sensitive and appropriate for their age in an understandable language and environment.
60. provide appropriate housing to all child victims of trafficking

Justice

61. Turkey have made considerable efforts in the area of juvenile justice; however, they fell short of taking all necessary measures in compliance with relevant international norms (Argentina, Kuwait and Switzerland from UPR1, and Indonesia at UPR2)
62. For example, for crimes involving children and adults, children are tried at adult courts due to a legal weakness in the CPL art.17/3 which enables this issue.^{xxi}
63. Another issue is that bar associations observed that CPL is seen and formulated as a criminal law with respect to juvenile offenders instead of a public law to protect all children from harm. Although, the law strives to do that in practice it is used mainly about children

in conflict with the law. Even then, in practice it falls short of protecting children from first instance and unnecessary detention and deprivation of their liberty. For example, for the last four years 452390 children were brought into security units as offenders^{xxii} while 11805 children in 2017 were taken into prison.^{xxiii} Although, there is an effort to increasingly use probation and diversion for children (around 20000 children^{xxiv}), it is observed by the bar associations that it is not seen as a norm for children by the judges and prosecutors yet. Likewise, it is observed by court appointed social workers that judges and prosecutors are undermining the importance of social enquiry reports that are compulsory under the CPL to decrease the unnecessary and arbitrary deprivation of liberty of children.

64. The current justice system envisages child courts and heavy penalty child courts instead of a streamlined juvenile justice system where deprivation of liberty is an exception as these courts are not set up everywhere in Turkey.
65. The other issue of concern is that laws and procedures fall short of protection against unlawful and unnecessary deprivation of liberty to those detained outside the criminal justice system, whether on the grounds of mental health issues, or because they are minors at risk. For example, even the limited evidence shows that 67.3% of the children in conflict with the law in Turkey had at least one psychiatric disorder.^{xxv}

RFA

We urge Turkey to

66. Increase the age of criminal responsibility from 12 years of age to at least 15.
67. Amend CPL art.17/3 for the best interest of the child and bar joint trials of children by general courts.
68. Abolish the child heavy penalty courts and strengthen law on child courts to take over all cases involving children, to enable specially trained judges, prosecutors and lawyers to protect the best interest of the child, and use detention, arrest and incarceration of children as a last resort and for the shortest period of time possible.
69. Establish and strengthen mental health support, poverty reduction and family support policies and programmes for children to prevent repeat offending
70. As mentioned above, victim rights bill prepared by the MoJ has been put on hold, therefore efforts have put rights of child victims of violence largely in limbo without a legal protection framework. We urge the government to promulgate the victim rights bill into law and provide child victims with all necessary safeguards before, during and after the legal processes free of charge.

Disabilities

71. About children with disabilities, there were four supported recommendations (Belarus, Panama, China) that inclusion of children with disabilities in schools, in society and protection of them.
72. Although Turkey made progress in inclusive education, progress in other areas have been slow especially in data about inclusion of children with disabilities in society and protecting them. Likewise, the UN Committee on Rights of Persons with Disabilities (CRPD) indicated there is no updated and transparent information about progress about accessibility and care service plans, action plan on child rights and child protection services.^{xxvi}
73. Lack of reliable and timely statistics and lack of strategy make it difficult to develop informed policy interventions for the best interest of the children with disabilities. Former national disability strategy ended in 2013 and has never been evaluated. A new strategy is

being prepared for the 2018-2023 period^{xxvii} as a project is still not out and largely unknown by the disability rights organisations.

74. The families allowance system for children with disabilities are subject to impairment assessment system with 40 % threshold.^{xxviii} This may result in further harm to the children with disabilities if even a minor disability is not well attended in childhood.
75. Institutionalization of children with disabilities is still prevalent in nursery residential schools and orphanages^{xxix};
76. Even though the exact number of disabled children of schooling age is not known in Turkey, the estimated number is at least 480000 children aged 3-19^{xxx}
77. Such weaknesses in the disability and child protection systems facilitates VAC with disabilities. Furthermore, there is no effective child friendly and disability-conscious mechanisms to support children with disabilities in the community, especially in rural areas. Likewise, there is no mechanisms specifically tailored to the needs of children with disabilities to lodge complaints about violation of their rights. Existing mechanisms like there is only one social support line (183 call centre) caters for all disenfranchised groups, including all children regardless of their abilities, their age or other characteristics. It has a highly limited project-based section for people with hearing disabilities. Different groups of children with disabilities are not considered in this service.
78. VAC with disabilities is not reported, fear of reprisal of family members, of professionals
79. Children with disabilities in general are catered for in public or privately-owned centres under the supervision of Ministry of National Education (MoNE). These places are not open to independent oversight mechanisms. As per required by art.3 of the Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment, Turkey is required to establish one or more designated visiting body as national preventive mechanism. Turkey established only one, which is underfunded and understaffed to make visits to rehabilitation centres for children with disabilities. As of September 2017, there is new system of biometric surveillance camera control system in the rehabilitation centres. However, this system is used only to identify the person with disability at the centre and control if the education programmes are delivered or not, because these programmes are directly funded by MoNE and have been exploited by parents and rehabilitation centre founders. Due to poverty and myriad of other social and economic difficulties, this conditional state support has been used as a lifeline for majority of the families with children with disabilities.

RFA

We urge Turkey to

80. introduce a mechanism enabling children with disabilities to lodge complaints in a confidential way before public authorities particularly in the family, school, in institutions;
81. extend the coverage and implementation of child care allowances to families of all children with disabilities ensuring that single parents can also access this type of entitlements;
82. adopt, implement and monitor a new integrated and participatory strategy at the national and provincial levels, with a concrete timeframe and benchmarks to support for independent living of children with disabilities.

Right to health

83. Despite data gaps especially from the rural areas and about sexual reproductive health of children, it is safe to say that Turkey has made considerable progress towards improving health care services for maternal and child health (Bangladesh–UPR.1).
84. However, there are still areas that need urgent attention with respect to children’s right to health and VAC. For example, MoH statistics indicate that there is noticeable increase in child deaths by external causes of injury and poisoning, from 11000 deaths in 2009 to 19000 deaths in 2017. Statistics suggest that gender plays an important role as boys constitute around $\frac{3}{4}$ of deaths by external causes of injury and poisoning in Turkey.^{xxxix}
85. Another VAC related area of concern is sexual and reproductive health rights (SRHR) of children. For example, adolescents cannot receive lifesaving information and other support and services without parental consent. Considering the high rates of gender-based violence (over 40%^{xxxix}) including honour killings, sexual abuse (over 8%^{xxxix}), child marriage (over 6%^{xxxix}) and adolescent fertility (over 21%^{xxxix}) in Turkey, lack of SRHR services means more violence and life-threatening situations for children in general, girls in particular.
86. Regarding the early childhood development, holistic policies should be followed in every aspect for healthy development of child. Accordingly, the safety, physical development (health and nutrition), cognitive development (play possibility, institutional preschool education), language and communication skills, socio-emotional development (affection, child protection, self-regulation, emphasis on social participation, etc.) mental development (as defined in the child's culture) should be developed in the form of common policies cross cutting all the issues mentioned in this report.
87. In Turkey, the vaccination scheme is determined by the MoH and implemented by family physicians. According to the MoH vaccination program, each child has a vaccine scheme for tuberculosis, diphtheria, whooping cough, tetanus, polio, mumps, measles, rubella, hemafilus influenza, pneumococcus, chickenpox, hepatitis A, B. It is the state's responsibility to deliver and administer vaccines to children.^{xxxix} While the number of families not having their children vaccinated was 183 in 2011, it increased to 980 in 2013, 5400 in 2015, 12,000 in 2016 and 23,000 in 2018.^{xxxix}

RFA

We urge Turkey to

88. provide better disaggregated data to analyse accidents as well as injury and poisoning deaths and facilitate a research on the subject to design better policy and programme to address root causes of this increase in preventable deaths caused by injury and poisoning,
89. introduce widespread preventive measures including public awareness campaigns to combat against accidents and injuries as well as toxic masculinity in everyday life and in the media,
90. lift all legal barriers for adolescents to reach SRHR information and services,
91. introduce and support SRHR services tailored for adolescents,
92. include reproductive health education into formal curriculum for secondary and high school students.
93. Additionally, effective policies for the following services are needed; Regular prenatal health check-up, healthy nutrition support during pregnancy, mental health services, prevention of alcohol and substance use during pregnancy, Birth registration, vaccination, access to early childhood care, breastfeeding, psychological support to caregiver, Early childhood education, family education, nutritional support.
94. Effective policies are needed to combat vaccine hesitancy and vaccine refusal.

Right to education and human rights education and training

95. There were only two issues raised in previous two UPR processes in children's right to education. The first one was about supporting girls' schooling (Algeria, Bahrain). Turkey continued making progress in that area. However, it is safe to say that gender gap persists in secondary education (gender parity 0.933), in education attainment (%83 girls as opposed to %96 boys), in choice of science and engineering subjects in higher education (%36 girls as opposed to 61 boys).
96. Second recommendation was noted by Turkey (Czechia) to do more on human rights education and training (HRET) to law enforcement professionals on the protection of women, children, minorities and LGBTI+ persons. There have been efforts in provision of HRET, however their efficacy and impact are not evaluated.
97. There is very little information regarding VAC issues in education in Turkey, even though that there is a rolling strategy and plan on VAC prevention in schools from 2006 on and each school is asked by the MoNE to develop plans to prevent VAC in schools. The rolling plan and school plans do not include efforts to eliminate discriminatory expressions, images and biased information in the education materials in schools^{xxxviii}
Another issue that needs to be highlighted is bullying in schools. Although there is limited data and research around the issue, recent OECD numbers suggest that around % 20 of children experience at least one form of bullying at school.^{xxxix}

RFA

We urge Turkey to

98. close the gender gap in secondary education and prioritize girl's education in the rural areas
99. introduce support programmes to increase education of girls in science and engineering disciplines in higher education,
100. reform education materials and free school books with non-discriminatory discourses in line with the CRC and UNESCO Convention against Discrimination in Education. Ensure the implementations of (including the necessary legislative changes) judgements of European Court of Human Rights of Hasan and Eylem Zengin v. Turkey (app.1448/04) and Mansur Yalçın and Others v. Turkey (app.21163/11)
101. ensure the effective implementation of Law No.2923 on Teaching of Different Languages and Dialects and to ensure that qualified teachers are recruited, trained and employed for the implementation of this law.
102. foster nationwide public campaigns on gender equality norms and against toxic masculinity normalising domination and violent expressions of power,
103. foster nationwide public campaigns against bullying in schools with peace and non-violent communication methods for different age groups of children

Endnotes

- ⁱ TurkStat. Punishments given to children by their parents, 2016 http://tuik.gov.tr/PrelstatistikTablo.do?istab_id=1168
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