



Gender-Based Violence in the Workplace

"took too many sick days to deal with an abusive spouse, and when I had no more sick days, I began to use annual leave. I was worried about losing my job. The fear of losing my job made it even more difficult to cope with emotional and legal matters. Having used up all my sick days and annual leave doubled the pressure on me. I was trying to keep my abusive and violent relationship a secret at work. I was ashamed to admit the matter - besides, what could my work possibly do?

- An anonymous email sent to a Human Resources manager

Tragically, gender-based violence is widespread reflecting in fact exacerbating the inequality between women and men. It has consequences that affect women and the society as a whole. Gender-based violence is the most prevalent violation of human rights around the world. It is so inhumane, insidious and vicious that most violations of the rights stated in the United Nations' Universal Declaration of Human Rights occur through gender-based violence.

Despite decades of efforts by governments, international institutions, and above all, the women's movement, women and girls are still subjected to violence, abuse and trafficking; they are still prevented from accessing education, employment or politics, and these are but a few of the human rights violations they face.

Gender inequality exists, among other places, in the labor market. The participation of women in the workforce is 33% while in men this is 72.3% (TÜİK workforce statistics, 2016). Unemployment among men is 9.7% while unemployment among women is 13%. One of the reasons why women find so little representation in the labor market is their encounter with gender-based violence at home and in the workplace.

Violence against women as a byproduct of gender inequality is prevalent in Turkey as it is worldwide. The "Business Against Domestic Violence" survey of some TÜSİAD members and signatories of the Women's Empowerment Principles (WEPs) in 2014 revealed that sexual and physical violence was prevalent among white-collar women (32%) and that the private sector lacked mechanisms to combat violence. Women are being subjected to physical, psychological and economic violence regardless of their status in the workforce. The situation is exacerbated by cultural norms, the fear of losing their jobs as well as embarrassment, while the lack of support mechanisms to utilize in the case of violence do not help the situation.

The United Nations Population Fund (UNFPA) works to ensure gender equality in all aspects of life and eliminate gender-based violence, and one of its focal points in this effort is issues faced in employment. Based on the results of the survey financially supported by the UN Population Fund, the Sabancı University Corporate Governance Forum has developed a guide aimed at companies wishing to design mechanisms for supporting the victims of domestic violence among their workforce and provided trainings to pilot companies, and both efforts were supported by the Fund's Turkey office. 36 companies have received support so far, most of which have developed policies against violence, conducted trainings, built awareness, and designed support mechanisms.

We hope that the guide, as revised after two years of experience, will assist companies that want to create violence-free workplaces. The UN Population Fund will continue to support this and all other initiatives that combat gender-based violence in the workplace.

As the United Nations Population Fund, we would like to thank the Sabancı University Corporate Governance Forum, TÜSİAD, Sabancı Foundation, and all participating companies which helped the creation of the guide and the implementation of the project.

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This guide was developed as part of the Business against Domestic Violence¹ project. The project materialized out of our investigation into the obstacles that prevent women from participating in economic decisions, specifically from ascending to executive management and boards of public-ly-traded companies. Our interaction with women who had management responsibilities showed that domestic violence, thought to primarily affect social strata with lower income and education, was also a problem for educated women with relatively high levels of income.

A 2014 study ² confirmed our findings in the field. Our report was published in the same year as the European Commission report showing that domestic violence was a global issue, and that educated, higher-earning women were at greater risk of sexual harassment and assault at the workplace. ³

Field studies in Turkey and around the world show that violence against women affect their employability and work performance, and may even put the colleagues of the victim at risk. Although it is impossible to quantify exactly, violence also results in considerable economic loss. Loss of efficiency, mistakes or accidents resulting from lack of concentration, missing work, treatment costs, impact on workplace morale, and additional burden on colleagues are among the largest causes of loss.

While comprehending that hiring women provided significant leverage to economic development and admitting that the presence of women improved the quality of business decisions, companies could not remain indifferent to an issue that plagues both businesses and the economy in general.

Throughout the project, we were told that companies were enthusiastic to take responsibility in this subject, but had misgivings about the limits of their responsibility. Perhaps this is why many companies had chosen to deal with domestic violence as a social responsibility initiative by supporting awareness-building, training and capacity-building activities outside of the workplace. This guide is based on the legal framework defining the responsibilities of companies to remove any doubt and hesitation.

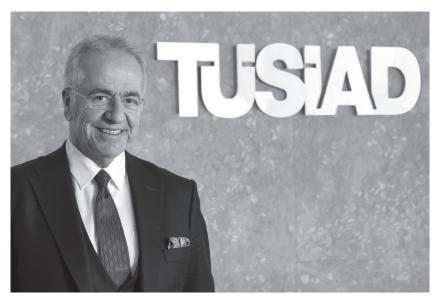
Experts and researchers point out that violence against women may increase as a reaction to global efforts for the empowerment of women, and their action to break the vicious circle that is violence. Governments and businesses have a joint responsibility to protect and empower women through this process, and ensure security of employability and earning a wage, which are critical to putting an end to violence.

I would like to thank TÜSİAD for their support of the project, and hope that other employer organizations also become a part of this initiative, giving a hand to the government and civil society organizations in the implementation of the Istanbul Accord.

¹The Business Against Domestic Violence (BADV) project is a member of the Domestic Violence at Work Network. Please see http://www.dvatworknet.ca/

² Domestic Violence Against White-Collar Working Women in Turkey (2014). See: http://badv.sabanciuniv.edu/sites/badv.sabanciuniv.edu/files/badv_report.pdf

³ Violence Against Women; an EU-wide Survey (2014) See:http://fra.europa.eu/en/publication/2014/violence-against-women-eu-wide-survey-main-results-report



EROL BİLECİK President TÜSİAD

BUSINESS AGAINST DOMESTIC VIOLENCE

Women should become more influential in every aspect of social life, especially in education, working life and decision-making mechanisms. "Violence against women" emerges as a very important barrier to achieve gender equality and it also reinforces gender inequality. The data draws attention to the extent of the problem both in the world and in our country: 30% of women in the world, 723 million women are victims of violence . Four out of 10 women in Turkey have suffered physical and/or sexual violence from their spouses or partners at one point in their lives. Twenty-four percent have been subjected to economic violence such as being prevented from working, forced to leave their jobs, or deprived of their income .

Domestic violence against women is, first and foremost, a violation of human rights. Violence is also a key factor that prevents women from accessing health, education and social life, hindering their empowerment in economic and social areas. According to the UNDP report, the economic cost of violence becomes manifest in the form of medical and judicial services, loss of productivity, and potential loss of wages . In order to overcome the direct and indirect consequences of violence, a "zero tolerance to violence" approach must be adopted, which must be propagated by the joint efforts of the public and private sectors as well as civil society.

The equal access of women to the opportunities yielded by economic growth is a requirement for achieving social welfare and sustainable development. Studies clearly show that the involvement of women in the economy empower both the institutions they work in, and the global economy in general. When countries attain "best in region" levels of gender equality in economic participation, the global economy stands to grow by 12 trillion US dollars or 11% by 2025 . Research suggests that companies which achieve gender equality improve their performance .

It is known that the number of companies that incorporate the concept of gender equality into their corporate policies have been increasing as the awareness about understanding of inclusive growth becomes widespread. TÜSİAD firmly believes that policies to prevent "violence against women" should be included in the corporate policies of the companies, and that we must mobilize all our corporate capabilities to fight against violence.

Knowing that it is imperative to develop permanent solutions through sustainable projects and provide companies with tools and methods from which they will benefit, we have been proudly supporting the Sabancı University Corporate Governance Forum's "Business Against Domestic Violence" project since 2015.

The "Business Against Domestic Violence Policy Development and Implementation Guide", to which our member companies have also provided input through their representatives, is a valuable resource for all companies. We express our gratitude to the Sabancı University Corporate Governance Forum, UNFPA and Sabancı Foundation, for this valuable partnership in the BADV project.

TÜSİAD supported the dissemination of the "Business Against Domestic Violence" project and will continue to do so. It falls upon all of us to create an environment where women live in safety. "We cannot fly on one wing alone".

¹ McKinsey Global Institute, 2015. "The Power of Parity: How advancing Women's Equality Can Add \$12 Trillion to Global Growth" http://www.mckinsey.com/global-themes/employment-and-growth/how-advancing-womens-equality-can-add-12-trillion-to-global-growth

² "Domestic Violence Against Women in Turkey Summary Report", December 2014, The Ministry of Family and Social Policies and Hacettepe University http://www.hips.hacettepe.edu.tr/ING_SUMMA-RY_REPORT_VAW_2014.pdf

³ http://www.undp.org/content/undp/en/home/ourperspective/ourperspectivearticles/2013/03/29/violence-against-women-also-hurts-business-and-development.html

⁴ McKinsey Global Institute, 2015.

⁵ McKinsey, "Why Diversity Matters" 2015. http://www.mckinsey.com/insights/organization/why diversity matters



NEVGÜL BİLSEL SAFKAN

Sabancı Foundation

Violence against women is a fundamental threat to the lives of its victims and prevents them from taking part in social life or economic output.

Domestic violence against women is one of the most prevalent forms of human rights violations worldwide, irrespective of education or economic development. Figures paint a stark picture. Thirty percent of the world's women are subjected to some form of violence . In Turkey, this is closer to 39% . In other words, four out of 10 women in Turkey suffer some form of violence at the hands of their spouses or partners at one point in their lives. Considering that 48% of women are unable to speak to anyone about the violence they suffer, we may assume that reported data is far below actual.

Violence against women is a fundamental threat to the lives of its victims and prevents them from taking part in social life or economic output. Violence victims face challenges in obtaining and retaining employment. Unfortunately, domestic violence is usually regarded a private matter in Turkey, and its detrimental effect on women's participation in the economy is disregarded.

Tackling a multidimensional issue like violence against women necessitates extensive cooperation between academia, civil society and businesses. The Business Against

Domestic Violence Project implemented by the Sabanci University Corporate Governance Forum in association with TÜSİAD, the United Nations Population Fund (UNFPA) and Sabanci Foundation sets a brilliant example in this regard. The project ensures the cooperation of different actors, and empowers businesses to become stakeholders that play an active part in fighting domestic violence while recommending tangible solutions. The "Business Against Domestic Violence Policy Development and Implementation Guide" prepared as part of the project is a first in that it is a definitive guide to what companies can do to tackle the issue. Companies that adopt solution recommendations and support mechanisms presented in the Guide will ensure equality for their employees while significantly improving social justice.

As Sabancı Foundation, we have been conducting projects for women, youth and disabled persons for over a decade, making the improvement of the human rights of women a priority. Our grant programs work with leading civil society organizations to implement long-term projects designed to secure gender equality in Turkey. We believe that violence against women cannot be tackled independent of gender equality. As a result, we are proud to be a sponsor of the "Business Against Domestic Violence" project, and to help disseminate the project as a best practice across Turkey and the world. We would like to thank the Sabancı University Corporate Governance Forum for their dedicated work, and the United Nations Population Fund and TÜSİAD for their support.

In addition to public policies, we must each play an active part in reaching permanent and sustainable solutions, starting with our immediate spheres of influence. We invite businesses to develop and implement policies for domestic violence against women, and hope that this publication guides and directs them in this matter.



MELTEM AĞDUK National Program Coordinator UNFPA

Violence against women rooted from gender inequality is a stark truth of the world and the most prevalent form of human rights violations. It is so

inhumane, insidious and vicious that most violations of the rights stated in the United Nations' Universal Declaration of Human Rights occur through gender-based violence. It is a severe issue in the world as well as in Turkey: according to a national Domestic Violence study performed in 2014, four out of 10 women in Turkey are subjected to some form of physical or sexual violence at one point in their lives.

Gender-based violence knows no bounds: age, education, socio-economic status, ethnicity and faith are non-factors in the incidence of violence. Therefore, well-educated women holding secure jobs and elevated status are not at less risk compared to their polar opposites. According to a survey performed during the first phase of the Business Against Domestic Violence (BADV) project, 75% of white-collar women have suffered one kind of violence at least once in their life time. Among manager-level women, 58% suffer psychological violence, and 13% suffer physical violence. The survey also points out a disturbing lack of mechanisms developed against such a significant issue. The situation is exacerbated by cultural norms, the fear of losing their jobs as well as embarrassment, while the lack of support mechanisms to utilize in the case of violence do not help the situation.

Domestic violence is a major obstacle that prevents women from joining the workforce, and hinders their career when they do. On the other hand, an article published by the Peterson Institute for International Economics in February 2016, companies that have more women in executive positions are more profitable.

The "Business Against Domestic Violence" (BADV) Project was initiated by the Sabancı University Corporate Governance Forum with the support of UNFPA, TÜSİAD and the Sabancı Foundation in 2013 to build support mechanisms against domestic violence, make violence against women more visible, and determine means with which businesses can leverage their organizational capabilities to provide safeguards and ways of support against domestic violence.

The BADV project started off with a survey in 19 companies to determine the prevalence of domestic violence among working women, employees' level of awareness of domestic violence, and what policies companies had in place against this. The survey revealed that working women had low awareness of domestic violence and were reluctant to share such incidents with their supervisors, fearing that it would have an adverse effect on their careers. Many surveyed companies did not have a domestic violence policy, either.

The "Business Against Domestic Violence Policy Development and Implementation Guide" was designed based on these results. The guide provided recommendations and examples to companies for creating their own policies to combat domestic violence. 2016 was the pilot implementation year of the guide and the BADV project in general.

In the same year, representatives of 17 corporations (Aras Kargo, ARGE Danışmanlık, Aygaz, Doğuş Group, Eczacıbaşı Holding, Ekoten, Erdemir Group, Ericsson Turkey, Garanti Bank, Havaş, İnci Holding,

lpekyol, Organik Kimya, Sabancı University, Siemens Turkey, Sun Tekstil, Turcas Petrol and Yeşim Tekstil) attended a 5-day train-thetrainer course. Sessions were spread across 3 months to balance the workload of the participants, who received training in gender, violence against women, associated national and international legislation, and techniques for discussing the matter with victims, and then presented and discussed the mechanisms they planned to design and implement in their respective companies. After the training sessions, companies began to form their policies and Garanti Bank established a call center for its employees. Others, most notably Aygaz, Yeşim Tekstil, Aras Kargo, Havaş, Organik Kimya, İnci Holding, Ekoten and Sun Tekstil, developed corporate policies that support gender equality and fight domestic violence. In an international conference held in Istanbul in December 2016, companies presented the policies they had developed and shared their experiences in the implementation of the project, recommending revisions to the guide.

The key takeaway of the conference was the need for upper management to own the efforts expended in this endeavor, which in turn facilitated the development and dissemination of a corporate policy. It was noted that executive managements also needed to undergo awareness training. Another recommendation was having more train-the-trainer sessions to reach more employees in order to raise general awareness of the subject. Participants pointed out the need to include these sessions in onthe-job training programs and create web-based modules. To keep the subject current, trainings had to be supported with in internal and external communications that underlined the issue. One key channel would be social media. Finally, it was recommended to disseminate the efforts across the supply chains of participating companies.

Based on these recommendations, both the train-the-trainer program and the guide were extensively revised in 2017. The training program was expanded to 6 days with the inclusion of training communication and adult training modules as well as the 2016 experience sharing panel. An annex to the guide dealt specifically with how to disseminate policies across supply chains. The examples in the first edition of the guide were expanded with best practices from pilot companies.

In 2017, 15 new companies from Istanbul, Izmir, Antalya and Bursa (Accor Hotels, Agrilink, AGT, Akra Barut Hotels, BASF, COATS, EKER, Fiberli/PSL Elektronik, Izmir Mercantile Exchange, MAY Tohum, Dal Mantar, Ral Tekstil, Sabancı Holding, Schneider Electric, Seger) joined the project.

To recap the process so far, the project has been met with unexpected interest since its launch, and companies have taken ownership of the matter. This level of interest and ownership needs to be backed with a more structured and expanded support given to companies after training. Some companies found support from other private sector players or nongovernmental organizations (including Mor Çatı and the Federation of Women's Associations of Turkey). Increased interest in the matter is a good start towards transforming the project into a platform or structure. The reorganization of the Business Against Domestic Violence in the light of the 2017 meetings and the recommendations of pilot companies will be key to the project becoming one of the leading examples in the world. Before the English version of the handbook published the number of companies raised to 52 at the end of 2018 which shows us the wide interest of the private sector on the programme.

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GUIDEBOOK

AIM AND APPROACH OF THE GUIDEBOOK

This guidebook has been prepared to help companies with the objective of establishing gender equality in the workplace by developing a business culture which does not tolerate violence against women. It focuses on the violence to which women have been exposed in their intimate relationships in the past or in the present as well as the effects of this violence on work and workplace. This guidebook departs from the fact that violence against women is not only a human rights violation but also a problem that negatively influences the work environment and women's effective participation in the economy. Therefore, violence against women is not only a social problem that indirectly affects companies, but also an issue that directly affects work and workplace.

Whether it occurs in the public or in the private sphere, violence against women is a form of discrimination and human rights violation (Istanbul Convention, article 3-a). In the preface of the Universal Declaration of Human Rights which was declared on 10 December 1948, it is stated that not only all states but also all people are responsible for the worldwide recognition and implementation of human rights. Therefore, states and non-governmental actors struggle together against gender-based violence against women in accordance with due diligence obligation of international law and they have to abide by this obligation (Istanbul Convention article 5-a). Collective action on the part of the states and non-governmental actors with respect to developing and implementing common strategies to fight against value judgments legitimizing violence against women will expedite the process of finding solutions to the problem. (Istanbul Convention article 7 and 17, the law No. 6284 article 16/2). In this context, the position undertaken by companies in combating domestic violence against women as non-governmental types of organizations which observe the diligence obligation of states gains considerable importance. This is the perspective adopted in preparing this guidebook.

SCOPE OF THE GUIDEBOOK

This guidebook, besides the steps which shall be taken by companies that have adopted gender equality principle in the workplace to develop policies and guidelines which will minimize the effects of domestic violence against women on work, workplace, and employees, also includes the tools and instruments which shall be utilized and examples of best practices.

Secondarily, this guidebook brings to the attention of the readers the social responsibility projects of companies which aim at contributing to the social struggle against violence against women to the attention of readers.

TARGET READERS

Target readers of the guidebook are executive senior staff and company unit(s) or teams which undertake the task of developing company policies addressing violence against women.

PROCESS OF DEVELOPMENT OF THE GUIDEBOOK

This guidebook has been written by the Sabanci University Corporate Governance Forum with the assistance of a wide range of specialists and practitioners after the completion of the steps mentioned below:

- Company policies, practices, and guidebooks that have been developed both to reduce the negative effects of violence against women on work, workplace as well as female and male employees and to empower women throughout the world were reviewed.
- The findings were shared and discussed with the BADV project Advisory Committee and leading companies which are sensitive to this issue and specialists and representatives of non-governmental organizations.
- Following TÜSİAD's decision to support the BADV project, in a meeting in which companies that are members of TÜSİAD participated, the participants were informed about the previous work and the development process regarding the guidebook. Those member companies who would like to contribute to the guidebook were also specified in this meeting.
- The draft of the guidebook has been prepared. The 'legal framework' chapter of the draft has been prepared by a team of legal scholars and the "internal audit" chapter has been prepared by a team of internal audit experts. The draft of other chapters has been written by the Sabancı University team together with the contributions of voluntary companies.
- On 4 November 2015, in a workshop in which companies that are members of TÜSİAD, representatives of other companies, BADV Advisory Committee, academicians and experts participated, the draft was discussed and participants offered their suggestions.
- The draft was finalized by 30 November 2015.
- The guidebook has been revised according to the feedback received from companies which implemented the guideline in 2017.

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FORMATION OF COMPANY POLICY

The effects of domestic violence are frequently observed in workplaces and it is an issue that affects work life. Yet, until now, the companies in Turkey have rarely adopted formal company policies to fight against this issue. However, employees and managers should avoid giving personal advice and suggestions to women who are exposed to violence and should act according to formal policies and guidelines created by their companies on this issue.

INITIALIZING AND MANAGING THE PROCESS (1)

Company policies that will be implemented to fight against violence against women may vary across companies according to the structure and resources of the company.

In creating a new policy which will affect all employees of a company it is necessary as an initial step to identify the person who will be responsible for developing, implementing and updating this policy. Any policy addressing violence against women should be supported and adopted by the senior management and the authority of the team responsible for the development of the policy and senior management's support on this issue should clearly be made public company-wide.

SETTING UP THE POLICY DEVELOPMENT TEAM:

The responsibility and task of developing company policy addressing violence against women may be assigned to a specific unit in the company or entrusted to a task force/team that is established for this purpose and comprised of representatives from all relevant units. Even in cases where the responsibility is assigned to a specific unit, it is recommended that this unit should run the process by getting feedback and opinion from other units. The recommended units which should participate in the process are as follows:

- Human Resources
- Occupational Health and Safety
- Security
- Legal
- Operations

• Ethics

- Corporate Communication
- Industrial Relations
- Internal Audit

It is recommended that the team responsible for the process of policy development should carry out its activities under the support or leadership of a senior executive and receive training from experts on the issue before starting the process.

The unit or team responsible for the development of the policy should take into account the specific structure and resources of the company and pay strict attention to getting advice and opinions from non-governmental organizations specialized in combating violence against women as well as the authorized union if there is one in the workplace, and from other external experts. Experts who are not company employees may be invited to attend some meetings or may be included in the team. Within the policy-making team, representation of and diversity regarding gender, sexual orientation, ethnic origin, religion, and culture should be observed.

RISK ASSESSMENT (2)

The team that is responsible for implementing policies to fight violence against women by analysing the demographic features of the company employees may determine the probability of the employees' risk of being exposed to violence. In determining this risk, one can refer to the following data gathered from a small number of comprehensive research done in Turkey on the issue of domestic violence against women.

According to the Research on Domestic Violence against Women in Turkey published in 2014, 36% of women who are married to or living together with a man are exposed to physical violence by their partners. In short, 4 out of every 10 women state that they have been subjected to physical violence by their husband or partner. The research points at a negative correlation between the welfare level and domestic violence. Whereas the ratio of women from high-welfare levels who are exposed to physical and sexual violence is 31%, this ratio increases to 43% for women with low-welfare levels. The highest ratio of married women who are exposed to physical violence is observed in the Central Anatolian region with 43% and the lowest ratio is observed in the Eastern Black Sea region with 27%. 12% of married women state that they have been exposed to sexual violence throughout a period of their lives. The region where sexual violence is most commonly seen is the Northeastern Anatolia with 16%.

Even though the ratio of physical or sexual violence against women tends to decrease as education levels increase, the high ratios are remarkable. This ratio may reach up to 43 percent among women who did not finish primary school while it decreases to 25 percent among women who have completed bachelors or higher degrees. However, Ayşe Gül Altınay and Yeşim Arat draw attention to the fact that women with higher education levels tend to act more reserved when it comes to sharing the violence they suffered.

The probability of being exposed to violence varies between different age groups. The frequency of being exposed to physical or sexual violence amongst women who are in the 15-24 age group is approximately three times higher extent than women who are in the 45-59 age group.

A femicide map, which is based on the "Male Violence Monitoring Report" of Bianet and shared on the web site of www.kadincinayetleri. org, reveals that 1679 women lost their lives because of male violence between the years 2010-2017. 53.6% of women are killed by their current or ex-husbands, 18.8% of women are killed by men in their families or relatives and 14.2% of women are killed by their current or ex-boyfriends according to this map. 4.1% of women died because of violence against women in the workplaces¹.

The policy implementation team should follow-up new research on this issue and benefit from new information in evaluating the average risk of employees being exposed to violence in the workplace. However, it is necessary to be careful while determining the risks pertaining to employees in order not to violate an employee's right to privacy.

¹According to male violence tally of BiANET, 261 women died in 2016 and 168 women died as a result of male violence in 2017 including July.

FACT FINDING (3)

Before developing the policy, it shall be beneficial for companies to determine the level of awareness of company employees on the issue of domestic violence, the state of affairs with respect to female employees being exposed to violence and male employees inflicting violence and the effect of this state of affairs on work performance. This evaluation renders it possible to establish realistic targets and criteria in order to develop policies and guidelines appropriate to the current situation and to measure the effectiveness of the implementation. Besides, it also helps in terms of evaluating the effectiveness of existing policies and determining the fields of improvement. For example, in company A the ratio of male employees committing violence may be high while the awareness of all employees about the issue of domestic violence may be very low in company B. Therefore, it would be useful to conduct a survey in the workplace for this purpose and shape the methods and instruments which would ensure change and transformation in the workplace according to the results of this survey.

RISK ASSESSMENT OF COMPANY EMPLOYEES WHO ARE UNDER THE RISK OF BEING EXPOSED TO VIOLENCE OR COMMITTING VIOLENCE-SURVEY

The survey developed by researchers from Sabanci University within the scope of Business Against Domestic Violence (BADV) project may be helpful in determining the extent of cases of violence against women among employees and understanding the effects of this violence on work life.

The survey has been designed to be implemented on all white and blue-collar female and male employees at every level, including high-medium-low levels, and may be conducted via electronic media or on paper according to the employee profile. It takes approximately 20 minutes to complete the survey. Companies that want to conduct the survey can contact Sabancı University BADV project team. vii

FORMULATION OF NEW POLICIES (4)

Since each case of violence against women may require different approaches and solutions, the formulated policy should be both clear and explicit and enable flexibility in practice.

Definitions and forms of violence against women should be included in the policy which will be formulated.

The organizational bodies and authorities to which female employees who are exposed to violence and employees who have been informed about or observed that their co-workers are exposed to violence or commit violence will appeal and the required steps which the managers of these employees and those responsible for the implementation of the policy will follow should be clearly specified.

There should be room for those who would like to acquire expert opinion and support in cases when such opinion and support is deemed necessary during the implementation process of the policy.

The relation of the victims and those who perpetrate violence with the company may be complex. The act of violence can take place in or out of the workplace, during work hours, in a location where the victim is working for the company but also outside working hours. The perpetrator who commits violence may be an employee of the company or another company that has business relations with the company. These possibilities should be considered while formulating the policy.

The company should decide upon the measures which will be taken to prevent violence victims from losing their work rights or their rights in terms of career opportunities and announce these measures to the employees clearly.

The qualifications and limitations of the kind of support that the company will offer to victims must be clear and explicit.

While developing the policy to fight against violence against women, the workplace safety, occupational health and safety, family support and other related policies and guidelines should also to be adapted to the policy that is being formulated.

Subcontractors and supplier companies should also be encouraged to adopt and implement the policy that is being formulated and developed.

IN-HOUSE TRAINING: _

In order to make policies combating domestic violence against women more effective training should be organized for company employees at every level.

It would benefit the team that will develop the project and the senior manager who will be responsible for the project to receive training beforehand on gender equality, concepts related to violence against women and effects of violence on work, workplace and employees. It is recommended that this team receives training on how to execute the process and (use the guidebook).

Additional training may also be provided to ensure that employees learn how to read the signs of violence that may be observed in victims of violence or in perpetrators, how to respond to these signs sensitively and confidentially, and how to get in touch with victims and/or perpetrators. It is particularly recommended that the awareness of managers in issues related to violence should be improved.

In-house training with respect to domestic violence against women should be regularly repeated.

IN-HOUSE AWARENESS AND COMMUNICATION STUDY:

The success of a corporate policy addressing domestic violence against women is directly proportional to the extent to which the management and employees adopt and show support to this policy.

Awareness raising practices and regular training of the company employees on policies will ensure that the employees embrace this issue both in and outside the company.

ENSURING THE SUPPORT OF EMPLOYEES:

It is important for company employees to know that their company will support them when they are exposed to domestic violence and that their job security will not be affected by the victimization they suffered and they will not lose their rights or opportunities. This awareness also encourages both the victims and employees who observe signs of violence to appeal to the appropriate authorities and creates a confident environment for them to share their observations and suggestions with the company.

It is necessary to pay special attention and care to the privacy of the relationship between the victim and perpetrator and to protect the confidentiality of their experiences throughout all these processes. Otherwise, the relationship of trust between the company and the victim would be damaged.

COOPERATION WITH LABOR UNIONS: _

In workplaces where union organizations are present, unions constitute one of the most important support mechanisms of the workers. The task of the unions is not limited to the protection of wages and other benefits of the workers but also includes the maintenance of a peaceful working environment as well as keeping an eye on the welfare, education, and development of the workers. At every step of the work life, the relationship between the union and the workers is usually closer than the relationship between the worker and the employer and the endeavors of the unions are supported and embraced more by the workers. Therefore, when developing policies addressing violence against women, if there exists a union in the workplace, the companies should seek the support and collaboration of the management of the union as well as its representatives.

Support and contribution of unions should be ensured for awareness raising training which empowers women against violence in workplaces. It is also necessary to increase the awareness of union representatives on this issue before the training. Labor unions may strengthen female members by organizing collective campaigns addressing violence against women at the workplace and may be effective in raising awareness in male members on this issue.

For some time now, international labor unions confederation and the unions in some other countries have started to include in their union politics policies which aim at combatting violence against women. It is also observed that some unions in Turkey have also started to act against violence against women. For example, the article 'to combat all kinds of violence against women at home, workplace and union' is expressed as a union objective in the Union Internal Regulations of some unions. Additionally, 'stipulation of disciplinary punishment about those who engage in sexual violence, mobbing, and violence against women' in internal regulations of some unions also constitute a positive development. The campaign organized by a labor union with the motto of 'Break the Siege of Violence Against Women' and another union's campaign entitled 'Stop violence against women at home, work and streets' indicate that the unions are also active in awareness-raising efforts. Moreover, the training offered by some unions to women under the title of 'Women's School' contribute to awareness-raising amongst women in many different subjects from female employment to occupational diseases and women's organizations in unions to the prevention of violence against women. Besides these, it is also seen that in the regulations of headquarters and branches some administrative provisions with respect to increasing the number of women members are included. However, please refer to the "Policy About Employees Perpetrating Violence" chapter for the issues that need to be handled carefully in order to prevent punitive sanctions from being detrimental to the victims.

The most important form of cooperation with unions involves the inclusion of this issue in collective labor contracts. Particularly in Australia and Canada, it is a common practice that the support offered to victims of violence is secured in the collective contracts signed. Paid vacations that are to be provided for the violence victims are frequently included in such collective contracts. Even though there are some contracts which contain articles with respect to the punitive actions that will be taken against violence perpetrators, it should be noted that penal sanctions may also bear results to the detriment of the victims.

PUBLIC ANNOUNCEMENT OF THE COMPANY'S POLICY:

Disclosure of the company's policy addressing the violence against women plays an effective role in assuring the implementation of the policy within the company. The company policy may be disclosed to other companies operating in the same sector, subcontractors as well as media and relevant non-governmental organizations and may be included in corporate communication themes.

The announcement of the company policy on this issue by employees to other shareholders will lead to the widespread circulation of the fight against violence against women and the development of effective collaborations.

Cooperation between the worker and the employer unions and confederations in combating violence against women will effect positive results because this violence influences the working environment and all the employees.

REVIEW AND REVISION OF EXISTING POLICIES

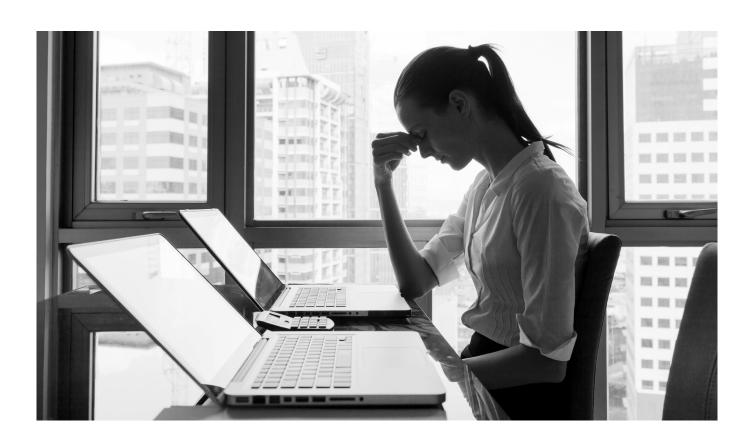
Company policies addressing violence against women should be reviewed regularly and revised in line with the lived experiences and changes in the employee profile of the company. In this context, it is important for ensuring the effective implementation of policies and guidelines that the policy team receives regular feedback from company employees and all shareholders about their awareness pertaining to the violence against women and the employees who are under the risk of being exposed to violence and committing violence. Moreover, it is favorable to include policies addressing violence against women in the processes of internal audit and risk management.

The policy that is to be developed by the company is directly related to the policies and measures developed by public and non-governmental organizations of the country where the company is located. The company policy is also shaped in relation to the scope and features of the support that will be provided by public and non-governmental organizations during and after the violence. For that reason, the unit/team responsible for the policy should follow-up changes in laws and legislation as well as the precedents in the implementation of the policies.

SETTING AN OBJECTIVE (5)

The objectives and priorities of the policy addressing violence against women may vary from company to company. For that reason, the very first step that needs to be taken by the company is to clearly define the objective of the policy. The objective may include some or all of the following items or involve different aims specific to a company:

- To ensure that employees refrain from violence by way of creating an egalitarian, healthy, safe and solidarist corporate culture that does not tolerate any kind of violence
- To ensure that women who are exposed to violence are able to identify this situation and have the self-confidence to take steps necessary for distancing themselves from violence by way of practices which aim at empowering women at the workplace viii
- To ensure that employees act in line with the company policies and guidelines in cases of violence against women
- To create support mechanisms which will ensure that the positions and careers of female employees who are subject to violence at home and/or in their family will be minimally affected by this situation
- To ensure that struggle against violence against women is extended in a way that it will involve subcontractors and supplier companies of the company by way of utilizing organizational possibilities and connections of the company



DEFINITIONS (6)

The roles and responsibilities imposed on women and men in the social life tend to subordinate women in a secondary position when compared to men and are influenced by the male-dominant point of view based on the assumption that men are superior to women. This point of view which normalizes both the disadvantageous position occupied by women by virtue of being a woman and the violence at the societal level leads to any violence that does not threaten physical integrity and life of a woman being overlooked. The first step to change this perception and to fight effectively against violence is the development of a collective mentality and use of a collective language on this issue by companies and their shareholders.

The following definitions largely derived from the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence, generally known as the Istanbul Convention which is signed by the Republic of Turkey in 2011 and the Law No. 6284, known as the Law to Protect Family and Prevent Violence Against Women do not provide the general meanings of the concepts, but rather offer meanings that are limited to the objective of this guideline.

VIOLENCE AGAINST WOMEN

Violence against women should be understood as a human rights violation against women and a form of discrimination. Violence against women, whether it is committed in the public or in the private spheres, includes all kinds of actions based on a gender perception that inflicts physical, sexual, psychological or economic damage or pain on women, threats of committing such actions, acts of coercion or arbitrary deprivation of women of their freedom. The term woman also includes girls who are minors (below 18 years of age) (Istanbul Convention, August 2014).

GENDER

"Gender means the socially constructed roles, behaviors, activities, and attributes that a given society considers appropriate for women and men" (Istanbul Convention, August 2014).

GENDER-BASED VIOLENCE AGAINST WOMEN

Gender-based violence is a form of violence that is directed against a woman by virtue of her being a woman or that affects women disproportionately (Istanbul Convention, August 2014).

FAMILY VIOLENCE / DOMESTIC VIOLENCE / INTIMATE PARTNER VIOLENCE _

All acts of physical, sexual, psychological or economic violence that occur within the family or the domestic unit or between former or current spouses or partners, whether or not the perpetrator shares or has shared the same residence with the victim (Istanbul Convention, August 2014). 'Intimate partner violence' can be considered as a more inclusive term because it does not limit violence to relations established by a civil or religious ceremony and to cohabitation under the same roof. 'Family violence', 'domestic violence' and 'intimate partner violence' concepts are used synonymously in this guideline.

Available data on violence against women and femicides in Turkey show variance. For example, according to the data which is based on Police and Gendarmerie records and presented in 'the Report of the Parliamentary Investigation Committee Established to Search Reasons of Violence against Women and Determine the Measures required to be Taken' at the Parliament on 8 May 8 2015, 118.014 women were exposed to domestic violence and 235 women were killed intentionally. On the other hand, according to the data collected by the non-governmental organizations, in 2016 at least 261 women were killed. There exists no available data with respect to the acts of violence which did not result in the event of the death of a women on which non-governmental institutions agree.

VICTIM

Any person who is subjected to acts of violence by someone with whom she is in a close relationship.

THE PERPETRATOR OF VIOLENCE / OFFENDER

Any person who has in the past inflicted or who in the present inflicts violence upon the person with whom he is in a close relationship.

PHYSICAL VIOLENCE

The efforts on the part of the perpetrator of violence to get the victim under control by means of physically aggressive behaviors. Types of physical violence include pushing, beating, laying a hand on, slapping, punching, threatening and inflicting injury with sharp and penetrating or caustic materials, and throwing an object. Physical violence may not always leave scars and cannot always be distinguishable.

SEXUAL VIOLENCE

In a sexual relationship, mutual consent is essential. Sexual violence refers to acts when a woman is forced into a sexual relationship to which she does not give consent by a man and is exposed to sexually explicit harassment, threats, defamation or assault. Sexual violence does not only comprise of physical harassment or rape but also the situations in which a woman is forced to give consent to sexual relationship under psychological oppression or threat. These acts are considered as sexual violence whether they occur verbally, in written form or in a virtual platform.

PSYCHOLOGICAL VIOLENCE

It is the act of a perpetrator systematically oppressing the victim emotionally or psychologically. Threats, verbal harassments, humiliation in front of others, deprecations, controlling, restricting clothes, behaviors, relations of a victim, threats directed at her on her relatives and her kids are amongst different forms of psychological violence.

ECONOMIC VIOLENCE

It is the act of a perpetrator systematically putting pressure on the victim's economic decisions and restricting the area of economic decisions of the victim. Types of economic violence include controlling and appropriating the income of the victim, damaging her property or seizing her assets.

VIOLENCE CYCLE

Systematic violence in intimate relationships brings along reiteration of the violence-excuse cycle. Violent behaviors of the perpetrator are followed by processes of apologizing to the victim, making the victim feel guilty, cutting communication with the victim, promising to change behaviors followed by subsequent acts of violence again.

SIGNS OF VIOLENCE AGAINST WOMEN

Since violence against women usually takes place in a private space, it may not be easy to understand it from the outside. However, some behaviors of the victim may be read as signs of the fact that she is exposed to violence. Common signs of violence are listed as follows:

- **Physical signs:** Noticeable scars, bruises and purple spots on bodily areas like ankles and neck, plucked hair that is clearly visible, makeover that may be intended to cover physical wounds, unnecessary and unsuitable accessories, weakness of muscles, limping, slow and restless movements aimed at preventing possible pain.
- **Behavioral signs:** Depression, feelings of inadequacy and lack of self-confidence, edginess, incessant sadness, uneasiness, fear, feelings of guilt, aggressiveness, anxiety, communication disorder, feelings of hopelessness, fatigue, overstaying at the workplace at times when there are no work-related duties.
- **Signs in direction of job performance:** Being late to work, leaving work early, frequently taking causal leaves, repetitive mistakes and forgetfulness, inability to concentrate, refraining or hesitating to answer the phone, problems of perception, fear of leaving the workplace building or walking to car park alone, spending excessive time on issues that are not work-related.

According to the summary 'Research Report on the Effect of Violence in Intimate Relationship on White Collar Women Employees and Business' which is based on the survey conducted with 1715 employees from 20 companies within the scope of the BADV project;

- 75% of the white-collar female employees, most of whom are university graduates, has been exposed to at least one type of domestic violence in the past. 40% of the working women have been exposed to psychological-emotional violence, 35% of the working women have been exposed to social violence, 17% of the working women have been exposed to physical violence.
- 16% of the women who have been exposed to violence continued their relationship for economic reasons.
- 40% of the men accept that they have committed an act that may be considered as a kind of violence for at least once in their life against their wives or partners.
- Approximately 30% of the individuals exposed to violence state that they did not mention this situation to anyone.
- The last resort to which women who have been exposed to violence appeal is the human resources department of their company (2.2%). Women mostly appeal to their friends out of work or their neighbours. (43%).
- Approximately 25% of the employees notice some kind of change in the performance of their co-worker whom they think is exposed to violence. The most common signs observed by co-workers are dullness and depression (28%).
- Approximately half of the women (45%) state that they will refrain from disclosing the situation to their managers in the workplace if they are exposed to violence.
- The effect of violence on the work life of women is mostly seen as joylessness (54%) and feeling of tiredness (36%).
- 30% of the working women exposed to violence are obliged to leave their home temporarily due to violence.
- Almost all of the participants (99%) state that the work life and performance of woman will be affected if she is exposed to violence in an intimate relationship.

SUPPORTING VICTIMS AND EMPLOYEES UNDER RISK

With respect to the violence against women, the scope and limits of the support to be provided to the victims and employees under risk as well as the measures to be taken against the perpetrator of violence both by the team that implements the policy and by company workers should be clearly specified.

RESPECT FOR PRIVACY AND CONFIDENTIALITY

In case a woman discloses any act of violence to the company, taking care of the privacy of the victim and compliance with the rules of confidentiality are the most fundamental issues in the implementation of the policy. In this direction;

- Details about the case can only be disclosed to individuals, departments, and institutions with the approval of victim,
- The case procedure will be shaped along with the victim,
- Personal details such as contact number, address, etc. should not be disclosed to any person and institution on any accounts without the approval of the victim (or any employee).

IMPORTANCE OF SPECIALITY

Violence is a matter that should be taken into consideration with experts. The policy should be developed on the basis of the safety of both the company and the employees. Any wrong step may create security risks. Even though it is desired that companies are sensitive towards the issue, in case of any violent act, the employees should get involved in the situation in strict accordance with the relevant guidelines and to the extent that their authorization allow them.

CHANNELS OF APPEAL

Company employees should be informed about the channels through which they can appeal to the appropriate units, departments and personnel in case they are exposed to violence and these channels should be functional. While developing the policy, these channels and their functionality should be evaluated and suggested to the employees. The channels are listed below:

- Emergency Hotline, if it exists, and/or Security Forces
- The institution privately contracted by the company
- Manager of the victim
- Specified officers or units of the company

- Expert non-governmental organizations
- Employee Assistance Program of the Company, if it exists
- Ethics Board of the Company

PHYSICAL HEALTH AND PSYCHOLOGICAL SUPPORT

Any woman who is a victim of violence should be directed to the relevant support body by the workplace doctor and/or psychologist and in the absence of them by the healthcare institutions contracted by the company.

The victim may be enabled to get therapy support from company psychologist or a specialist psychologist outside the company if this is considered necessary by the specialists. Psychological support may be included in the insurance coverage in companies which provide private health insurance for company employees.

In case there are such organizations, the company may direct the victim to expert non-governmental organizations with which the company works or other specialist institutions to enable her to get psychological support. The company, in cooperation with the expert non-governmental organizations, may ensure that the victim is provided guidance and/or emergency hotline service.

FINANCIAL SUPPORT THAT ENABLES INDEPENDENT ACTION (CASH OR RESOURCE ALLOCATION)

The company should estimate and budget for any possible resources required to provide the support needed by women who are victims of violence in accordance with the policy.

In some circumstances, the victim may need to act quickly in terms of her safety and, if she has any, her children. She may need to change her residence, start legal proceedings, benefit from psychological support services. In such situations, the company may provide financial support for the victim. Any support that is to be provided for the victim can be financial and can aim at enabling her to access resources and allocate time to the issue. The victim may be allowed to use her time flexibly, work as part-time or home office during this process. The legal department of the company or, if there is one, the law office with which the company works can provide information to the victim about the situation. Allocation of resources by the company in advance for such circumstances will be beneficial in terms of saving time.

PERFORMANCE EVALUATION AND OCCUPATIONAL SAFETY

The victim should continue to be a part of the company's existing performance evaluation scheme, but the performance criteria that is going to be applied to her should be re-specified. The violence to which the victim is being exposed in her relationship, can affect the performance of women in different ways according to the nature of the work she is doing.

The manager of the woman who has been exposed to violence should take care of the performance improvement plan of the victim personally. The job security of the woman who has been exposed to violence should be ensured and the victim should continue to benefit from performance-based awarding and vested benefits provided for all employees. Throughout this process, the privacy of the victim should be looked after, and the principle of confidentiality should be observed.

THE SITUATION THAT THE PERPETRATOR AND THE VICTIM WORK FOR THE SAME COMPANY (7)

Many companies have some policies to prevent individuals in an intimate relationship from working in the same company, to assign them to different units and/or prevent them from working in a superior-subordinate position. However, such policies are not applicable to all companies. If the victim and perpetrator work in the same company, the issue will be much more complicated. Particularly in the family-run businesses, it may result in tackling the case through traditional methods (like reconciliation and admonishment) rather than through policies and this poses a risk both for the employee and the safety of the working environment. A possible superior-subordinate relationship between the victim and perpetrator makes the situation much more difficult since the victim may not easily disclose the violence to which she is exposed.

In cases where the victim and the perpetrator work in the same company, violence may occur in the workplace. Unacceptable behaviors of one employee against the other with whom he is in an intimate relationship must definitely be reported to the responsible authority. The managers may not be willing to intervene in the privacy of an intimate relationship but the negligence of a verbal or a physical act of violence may result in worse consequences. The management should take care of the matter even though the victim does not request for the consideration of the matter. The matter should not be considered as a private issue particularly in cases of harassment, humiliation, and threat; these should be considered and taken care of as in-house sexual harassment and violence cases, and the relevant policies and guidelines should be implemented.

If the perpetrator and victim of violence against women work in the same company, the perpetrator should be prevented from being in close proximity to the victim. In such a case, the company may change the workplace of the perpetrator by prioritizing the needs of the victim. In the absence of another workplace to which the perpetrator may be reassigned, the perpetrator may be referred to therapy if he accepts. If the matter exacerbates, the perpetrator may be given mandatory leave or dismissed from employment if it is drawn up in the employment contract.

THE POLICY RELATED TO PERPETRATORS OF VIOLENCE (8)

There may be both victims and perpetrators of violence against women in a company. The company is expected to create a policy regarding the perpetrators of violence against women, as well. The research results indicate that just like victims of violence, employees who are perpetrators of violence also have negative impacts on the work and workplace. This not only negatively affects employees' focus and performance but also poses a risk to the company. Besides, any perpetrator of violence against women may do harm to the victim by using the company's devices and instruments to this end. Perpetrators of violence against women may harass and/or threaten the victim in the virtual platforms by phone or by using company computers during working hours.

SIGNS

It may not be easy to understand whether an employee commits violence against women. Besides, the person committing violence may have good relations and may be a person who is loved by his co-workers. The signs indicating that the employee commits violence are considerably similar to the signs displayed by the victims of violence. Another sign that may additionally be observed is that the employee uses aggressive, sexist and discriminative words about his current or ex-wife or behaves in a violent manner towards his co-workers.

If it is observed that an employee displays signs of committing violence, the situation should be reported to the relevant unit. The person who is subject to violence by the perpetrator of violence may call the company to ask for support. In such a case, the matter should not be ignored by giving the reason that the victim does not work for the company and the due process should be initiated in accordance with the specified policy. Another deterrent method in combating violence against women is to inquire whether or not the candidate has a history of violence, in general, and violence against women, in particular, with a detailed investigation during the recruitment process. Any candidate who has such a history should not be immediately eliminated but should be carefully evaluated as to whether or not he has received rehabilitation and is suitable for the position he is applying to.

POLICY AND IMPLEMENTATION

Any measures to be implemented vis-à-vis the employees who commit violence against women should be taken into consideration carefully. Dismissal of any perpetrator of violence may also be considered if it is stipulated in the employment contract. However, the dismissal of or punishment of a perpetrator of violence is a matter that must be carefully considered. This is because perpetrators who commit violence may regard victims as responsible for the situation and may increase the degree of violence. Thus, firstly the experts of violence against women should be consulted about the situation.

If the perpetrator of violence agrees, the company may refer him to rehabilitation or psychological support process. Other measures that the company may take to dissuade employees from committing violence include withdrawal of executive responsibilities, reduction of duties and/or status, delay of promotion or suspension of vested benefits. However, to be able to implement these disincentives, the policies much have been announced to all employees and included in the company policy.

GUIDELINES AND PROCESSES (9)

The units to which the victim or any person being informed about the situation will apply in case of violence against women, forms of application and the procedures will vary according to company's structure, capacity, policies, and implementation plan.

In any case, the process should be considered together with the victim, and safety, the privacy of the victim and confidentiality of the matter must be essential.



If employees who are not part of the managerial or policy team think that their co-workers are exposed to violence in intimate relations, what should they do? In this case, they are advised to ask frank questions to their co-workers:

- Does or has someone hurt you?
- Is there something scaring you at home or work?
- I have a friend whose partner controls all her actions, do you have a similar situation?
- Do you experience/have you experienced something which makes you feel discomfort?
- Is there anyone following or disturbing you?
- Is there anyone forcing you to do anything you don't want to do?
- Is there anyone threatening you with your kids?

Co-workers should never approach the victim critically and use words which question the reasons for the problem such as 'Why don't you leave your intimate partner? Why don't you share your problems with anyone?'.

Any details told by the victim to her co-worker should never be shared with third parties without permission.

Co-workers should make the victim feel that they believe in and accompany her and get the consent of the victim to help her.

They should not give advises to the victim, but just direct her to relevant units, individuals and experts she can appeal to and receive support.

ANNOUNCEMENT OF THE POLICY WITHIN THE COMPANY (10)

The following channels may be used throughout the company for the communication of the policy on violence against women:

- In-house training
- Internet-based training
- Intranet-based training (and tests)
- Tests assessing the effectiveness of training
- Electronic messages
- Message boards
- Company bulletin
- Brochures/posters
- Training as part of orientation training
- Training as part of new manager training

The issue of violence against women should also be included in the agenda of other training programs on different topics. For example, this subject may be proposed for the agenda in training on occupational safety and performance.

It is recommended that the initial announcement of the policy be made by senior management.

POLICIES WITH RESPECT TO EQUAL TREATMENT FOR VICTIMS AS PART OF WORKPLACE OPPORTUNITIES (11)

The support shown to the victims of violence against women by the company is a form of positive discrimination. Positive discrimination is a temporary support mechanism that aims to protect the rights of a person who remains in a disadvantageous position in power relations. This mechanism will be no more needed when the disadvantage is eliminated. Therefore, this is not an intervention in the rights of other employees and does not pose an ethical problem. Necessary information should be provided about positive discrimination in in-house training and it should be specified that this is a policy adopted by the company.

However, other employees of the company may perceive the support provided for the person in question as an unjust treatment towards them. In such a situation, the company may develop the mechanism and practices which will protect the victim against prejudices while avoiding any violation of the right of privacy of the victim. In-house training may improve in-house sensitivity to this subject.

WORKPLACE SAFETY (12)

Violence against women may find a woman in her workplace where she spends most of her time. In case such a possibility, the safety plan should be developed together with the victim, because the victim is the person who can best discern the threat against her.

Depending on the nature of the case, the company develops the most appropriate safety plan for preventing violence against women within the workplace by considering the physical structure (factory, branch etc.) and resources of the company. For example, a victim's shuttle itinerary and the vehicles she uses may be changed.

The access of the perpetrator of violence to the victim at the workplace or en route to the workplace should be prevented.

In case a court suspends the perpetrator or if there are other similar decisions, the victim should always carry the relevant documents with her and submit a copy of the documents to the company.

The photo and license number of the car of the perpetrator of violence against women, if exist, should be submitted to the security team and to the individuals whom the victim thinks are relevant.

The security of the parking lot should be rearranged in necessary situations. Security staff may escort the victim to her car and/or public transportation.

The working area of the victim may be carried to a safer place, if necessary.

Phone records of the perpetrator of the violence against women may be obtained or his electronic messages may be saved.

Wage payment or other benefits may be adjusted appropriately for the benefit of the victim in order to prevent the perpetrator from accessing them.

It may be ensured that subcontractors should take necessary measures; particularly the subcontractor who provides security should receive training for awareness-raising regarding violence against women and this matter should also be included in the safety plan.

The risk factors which increase the possibility of violence against female employees should be included in the risk evaluations that are done as part of the workplace health and safety.

GUARANTEEING THE POLICY IMPLEMENTATION (INTERNAL AUDIT) (13)

It is recommended that the companies establish an internal audit mechanism that detects and prevents in-house cases of violence against women; this mechanism should also inquire how effectively the identified problems are managed.

One of the most important steps is to publish a comprehensive policy which states that the company will show determination in this matter, and following this step, it is important to emphasize the sensitivity and decisiveness of the company through a notification which will be announced by the Executive Director or CEO of the company.

If the notification involves all the company shareholders without being restricted to the employees; and if policy provisions are included particularly in the Collective Employment Contracts and in the contracts that are made with subcontractors and supplier firms, the effectiveness of the policy will improve.

It will also be helpful to include different units in the formulation of relevant guidelines and ask for feedback with respect to the effectiveness of actions of detection and prevention. The code of ethics of the company should also mention that violence against women is not approved by the company and all employees are expected to show awareness on this issue.

It will be useful to provide training to unit managers in order to ensure that they detect in-house violence or discern the little signs such as absenteeism, lack of motivation, etc. Asking for a declaration from the employes after the training stating that they will not commit in-house violence and that they are aware of how they should behave towards employees who are exposed to violence will reinforce the impact of training on employees.

These measures would also reassure the employee who is subject to violence: development of a clear and written procedure on the application procedure for the victim of violence, on the ways in which the privacy and confidentiality of the subject are being observed, additional rights that may be granted to the employee (leave, flexible working hours, safety, legal support, counseling, etc.). Similarly, the procedures to be followed in case the person committing violence is also an employee of the company should be clearly written in the guidelines.

It would also be discouraging that the management authorizes the unit responsible for the policy implementation to determine the disciplinary punishments for the employees who are found responsible for inflicting violence.

Creating some special communication channels supported by the guidelines and ensuring that everyone is clearly informed regarding who will be notified in which circumstance is significantly important for the prevention and detection of the cases of violence.

It is highly advisable to establish emergency hotlines managed by independent units/organizations (headquarters human resources department or a completely independent organization) for detection and in case of an appeal, in order to resolve the issue, it is necessary to ensure that the correct units and managers are notified.

Internal audit units of the companies should be involved in the task of investigating the adequacy of internal audit mechanism established to determine and prevent in-house violence as a part of their audit activities and aim for permanent improvement of the existing policies. Auditing the methods and effectiveness of the management of the cases of violence in the company periodically and amending the guidelines in accordance to the internal policies and guidelines are highly important in order to avoid recurrence of such cases in the future.

The internal audit unit is advised to carry out a thorough investigation after each case of violence occurred and to investigate whether or not the actions that were taken after the detection of the case complies with the internal guidelines. Moreover, the internal audit unit is expected to offer advice on necessary measures and direct the management properly in order to prevent similar cases in the future.

It is important for the effectiveness and advancement of the process that the management review the internal policies and guidelines regularly, make necessary updates according to feedbacks of the internal audit, and update the in-house training and notifications accordingly.

The actions taken by the company with respect to domestic violence against women and the details about the number of cases occurred throughout the year and the measures taken on this issue may be included in the annual activity report of the company without violating the right of privacy of the actors involved. Sharing the events in this way will benefit the process in becoming an integral part of the corporate culture and improve in-house audit environment.

LEGAL ASSESSMENT (14)

Since the cases of violence against women may bring about legal processes, the company lawyers should assess whether or not the policy complies with the national and international legal frameworks and general legal principles. In this context, the chapter titles "Legal Framework" included in this guidebook may be instructive.

Different points of view may appear when the phenomenon of violence against women is referred to the legal process. In this case, the priority should be given to the physical safety of victim and employees.

The ways of reporting and proceeding the cases which may require legal action should be clear and explicit, and employees should be informed about this issue.

IN-HOUSE TRAINING (15)

TRAINING ON AWARENESS-RAISING REGARDING VIOLENCE AGAINST WOMEN IN WORKPLACE

*It is recommended that this training is organized primarily for the team that will create the policy and, only after that employees receive it. Awareness-raising training may be provided to employees to empower company staff and make them sensitive on the subject of gender equality. The training is aimed to raise awareness among company employees on the following issues:

- Fundamental concepts of gender (gender, biological sex, paternalistic system)
- Gender roles
- Gender of language, sexist and discriminative discourses
- Gender equality, the the status of women in Turkey and in the world
- Violence against women (domestic violence), types of violence
- Mobbing and sexual harassment, sexual violence
- Gender discrimination

By means of awareness-raising training performed in the the field of violence against women, company employees will:

- Gain awareness about the concept of gender,
- Understand stereotypical gender roles and the patriarchal perspective,
- Have an idea about how women and men are affected by stereotypical gender roles,
- Gain awareness about reasons, consequences, impacts of violence against women and what can be done on this issue,
- Be knowledgeable about how sexist discourse and gender discrimination is related to the human rights of women,
- Gain awareness about issues of mobbing, sexual harassment, and sexual violence.

The training is aimed to ensure that participant will raise their awareness on gender. This awareness should also be incorporated in the corporate structure, actions and employment policies of companies and the competence of the companies about gender equality should be recognized before the national and international public opinion.

TARGET AUDIENCE

The target audience is the employees at all levels within the companies which are willing to receive this training (white collar/blue collar employees, mid/senior-level managers, subcontractors, workers, and supplier firm employees, etc.)

IN-HOUSE TRAINING ON THE POLICY

The team that will develop the policy on violence against women is primarily advised to receive training from the experts on the process of developing the policy and its contents. Following that, a training should be provided for all employees of the company about the content of the policy in order to render the policy more effective.

Training on the policy will include:

- Determining the content and objective of the policy
- Identifying the warning signs, abuse dynamics, and individuals to whom employees exposed to violence should access in or outside the company
- Deciding the support that will be provided for employees under risk and exposed to violence upon violence against women
- Specifying those who are responsible for and the fields of responsibility in the company in combating violence against women
- Determining the scope of privacy and areas of confidentiality

TARGET AUDIENCE

The members of the team who will take part in the process of developing a policy addressing the violence against women and members of the unit responsible unit the companies willing to receive such training.

IN-HOUSE TRAINING FOR MANAGERS XII

Employees should understand the signs of violence and abuse against women and know how to contact a co-worker who is exposed to violence to make the workplace policy more effective.

Unless employees notify their managers or human resources department about an act of violence they are exposed to, managers do not have the authority of dealing with this issue. Therefore, managers should obtain training with respect to how they should address changes in behavior that affect performance. Employees human resources department and managers should refrain from giving personal advice and counseling and leave this mission to the experts. Besides, it is necessary to know how to interact should with the employee if any employee exposed to violence disclose the situation to her managers or to the human resources department.

TARGET AUDIENCE

Mid/senior-level managers and employees of the human resources department within the companies willing to receive such training.



DEVELOPMENT OF EXTERNAL COMMUNICATION AND INTERACTION NETWORK

The company and employees may formulate various works and projects to raise awareness outside the company on the issue of violence against women. Such projects can be realized together with company shareholders which are listed as follows:

- Other companies and organizations in the sector where the company is operating
- Non-governmental organizations which are specialized in intimate violence
- · Local and national media
- Chambers of industry and trade
- Supplier firms
- Subcontractors
- Governments and state organs, public institutions
- Local administrations
- Employer and labor unions and confederations

Collective platforms will render the issue more visible and allow for it to be adopted by different groups and segments of society.

Development of such collaborations to combat violence against women will render it possible for victims to access the resources more quickly in times of possible violence. In this context, such communication works are essential not only for the policies to be developed for the company but also for victims outside the company. Moreover, the public recognition of the company's sensitivity to the issue will contribute to the prestige of the company

INSTITUTIONS AND ORGANIZATIONS THAT CAN BE APPEALED TO IN COMBATING VIOLENCE AGAINST WOMEN

1. Law Enforcement Officers

- Police Stations
- 155 Police Emergency Line
- Gendarmerie Stations
- 156 Gendarmerie Emergency Line

2. Judicial Institutions

- Public/Chief Public Prosecution Office
- Family Courts

3. Healthcare Institutions

- Primary Healthcare Institutions
- Family Health Centers
- Emergency Services
- 112 Emergency Ambulance Service

4. Nongovernmental Organizations

• Stop Domestic Violence Emergency Hotline

Tel: 0212 656 9696 / 0549 656 9696

Web site: www.aileicisiddeteson.com

• Mor Çatı Women's Shelter Foundation

Tel: (212) 292 52 31-32 E-mail: morcati@morcati. org.tr

Web site: www.morcati.org.tr

• KAMER (Women's Center)

Tel: 0530 664 4410 Web site: www.kamer.org.tr

• KAHDEM- Women's Legal Aid Center Foundation Corporate Site Contact: kahdem@gmail.com Web site: www.kahdem.org.tr Ankara Foundation for Women's Solidarity

Tel: (0312) 432 07 82 - 430 40 05

Contact: bilgi@kadindayanismavakfi.org.tr

Web site: https://www.kadindayanismavakfi.org.tr

5. Municipalities

• Municipality Directorates Women's Consultation Centers

6. Organizations affiliated to the Ministry of Family and Social Policy

- Provincial Directorates of Family and Social Policy (ASPB)
- SÖNİM -Violence Prevention and Monitoring Center
- Centers for Family Consulting
- Social Care Services (SHM's)
- 183 Hotline Social Service Consulting Hotline for the Women, the Children and the Disabled
- 144 Hotline Social Aid Emergency Hotline

7. Bar Associations

- Women's Rights Centers or Women's Rights Commissions ludicial Aid Bureau
- Legal Counseling and Attorney Services

How to apply for Women's Shelters?



Application to the shelters can be made to the Ministry of Family and Social Policies Provincial Directorates and Violence Prevention and Monitoring Centers. Moreover, legal proceedings may be initiated by applying to family consultation centers of public relations directorates of municipalities since some municipalities also have shelters.

APPENDIX 1 - CHECKLIST

PROJECT STEPS
 □ 1. Authorization of the unit/team responsible for the development of the policy □ 2. Determining the head executive who undertakes the policy □ 3. Fact-finding and training of the policy development team □ 4. Determining the relevant method by the participation of employees, if there are any, union workplace representatives and experts in the policy development process □ 5. Moking definitions □ 6. Determining the objective of the policy □ 7. Development of the policy draft by the labor law expert □ 9. Approval of the policy □ 10. Developing the guidelines with respect to the implementation of the policy □ 11. Review of other relevant policies and ensuring consistency □ 12. The inclusion of the policy in the code of ethics □ 13. The inclusion of the policy in the internal audit and risk management processes □ 14. Publication and announcement of the policy □ 15. Executive training with respect to the policy and the guidelines □ 16. In-house training with respect to the policy and the guidelines □ 17. Determining the unit which undertakes the responsibility of updating the policy □ 18. Implementation
EFFECTIVE POLICY CHECKLIST
 □ 1. Have the employees and, if there are any, the authorized union been included in the policy development process? □ 2. Has it been announced that the implementation of the policy is guaranteed by one of the senior management executives? □ 3. Has the policy undergone legal audit? □ 4. Have the fundamental issues of the policy been included in the code of ethics?

☐ 1. Have the employees and, if there are any, the authorized union been included in the policy development process?
☐ 2. Has it been announced that the implementation of the policy is guaranteed by one of the senior management executives?
☐ 3. Has the policy undergone legal audit?
4. Have the fundamental issues of the policy been included in the code of ethics?
☐ 5. Has the policy been announced to all employees?
☐ 6. Has the policy been uploaded to the web site of the company?
☐ 7. Is it determined who will be consulted in case a situation that has not been experienced before occurs?
☐ 8. Have the executives been trained with respect to the policy?
☐ 9. Has the staff responsible for the implementation been trained?
☐ 10. Have the policy and the relevant guidelines been included in the internal audit plan?
☐ 11. Have the implementation objectives of the policy been determined?
☐ 12. Is the frequency of policy review and the body responsible for review determined?
☐ 13. Has the cooperation with union plan, if there is any, been put into practice?

APPENDIX 2 - SAMPLE POLICY

AAA Firm

Principles of the Policy Addressing Domestic Violence against the Employees

OBJECTIVE

We care about the health and safety of our employees as the AAA Firm.

Domestic violence is the main cause of women's injuries and deaths in this country. The objective of the Business Domestic Violence Principles is to raise awareness about domestic violence; provide support for employees who are exposed to domestic violence if required; guide executives in addressing domestic violence and its effects on the workplace and create a safe working environment.

DEFINITIONS

Domestic Violence is an oppressive pattern of behavior that a person in an intimate relationship commits against the other party with the aim of gaining power and control. Domestic violence includes physical, sexual, emotional, psychological and economic abuse. Some oppressive behaviors are as follows: hitting, punching, pushing, stabbing, shooting, slapping, threatening, nicknaming, humiliating in front of others, controlling clothes, words and acts of the person, controlling financial decisions of the person, stalking, damaging or attempting to damage property. Domestic violence may occur among all people from all racial, economic, educational and regional backgrounds, it can be committed irrespective of living or not living in the same house, being married or unmarried, being in a short term or long-term relationship.

The perpetrator or the person committing violence is the one doing an act of domestic violence as specified above.

The victim is the person who is exposed to violent acts by the person in an intimate relationship.

OUR PRINCIPLES

Training and Support of the Personnel Who is a Victim of Domestic Violence

AAA will endeavor to ensure the provision of necessary information, orientation, and resources for victims and other employees. AAA will provide support with the Personnel Support Program, Safety and Human Resources staff in addition to referrals towards social organizations. All our employees will be informed to benefit from these resources.

AAA never discriminates domestic violence victims in the process recruitment, layoff, employment or regarding other terms and provisions or employee privileges.

AAA accepts that domestic violence victims may experience some performance problems because of domestic violence such as chronic absenteeism, being late to work, low productivity. AAA shows reasonable effort to consider the status of the employee with all aspects by taking care of the performance and safety issues and evaluate reasonable options in order to help resolve performance and/or safety problems as best as it can. If the attempts fail in resolving performance and/or safety problems, AAA may be obliged to implement necessary disciplinary practices.

Personnel Support Program

We have a Personnel Support Program which incorporates some professionals educated to address cases of domestic violence. These professionals offer consultancy, support, and referrals. Moreover, the Personnel Support Program is a source for our employees who wish to be informed about domestic violence or learn how to help their relatives, family or co-workers on this subject. You can call the following numbers to access these resources:

Personnel Support Program:

Human Resources and Company Security Staff

AAA Human Resources Department and Company Security Staff are also resources which can be an appeal to by the employees. These departments' personnel may help victims in various forms including but not limited to the following if required and permitted:

- Create a business safety plan
- Designate special spaces in the parking lot
- Accompany employees while walking to their cars and other transport locations
- Screen phone calls and exclude the name of the perpetrator from the

automatic phone book

- Place the employee in a safer work location
- Send wage checks to the location requested by the employee
- Arrange personnel social benefits on the name of the victim
- Ensure that the employee takes a leave of absence for acquiring a security guard, finding a new home, receive counseling and healthcare service or for other relevant issues
- Provide flexible working possibilities and ensure that the employee leaves the job for a short time by guaranteeing re-engagement.

The Company Security may be accessed hours a day and days a week. All kinds of communication with Human Resources and Company Security will be kept totally confidential. Others will be informed only in cases vital for the victim and workplace safety.

Call the following numbers to access these resources:

Company Security:

Human Resources: Human Resources Expert (If you do not know who to appeal to the Human Resources department you can call ...)

Social Organizations

AAA encourages victims working in its company and other employees to appeal to social organizations with the aim of acquiring resources and advice. You can call the following numbers which may be accessed 24/7 to access and receive advice from these resources:

Temporary or Permanent Protection/Department Decisions

Every employee about whom a temporary or permanent protection order is issued by a court, by which the location of AAA is also specified as a protection area, should submit a copy of the petition and court order to the company security. Additionally, the employee should give the following details about the abusive person to the Company Security: A photo or description of the physical features, description and license number of his automobile and all other details that are required by the company security for the safety of the workplace

Employees who Committed or Threaten to Commit Domestic Violence

Any employee who commits/threatens to commit domestic violence by using the workplace resources is subject to disciplinary proceedings including but not limited to a layoff. If necessary, law enforcement officers shall be appealed to with the intention of ensuring the arrest of the perpetrator or starting a criminal prosecution and/or investigation. Workplace resources include but are not limited to phones, fax machines, e-mail, mails, cars, office materials, photocopy machines.

Some job positions render it possible for employees to access certain kinds of information and resources. If any employee utilizes this possibility in a way to damage/contact the person with whom he is in an intimate relationship, that employee will be subject to a disciplinary interrogation including but not limited to layoff. Law enforcement officers will be appealed to with the intention of ensuring the arrest of the perpetrator or starting a criminal prosecution and/or investigation if necessary. AAA accepts that the person committing violence also needs help and resources. The employee who commits violence is referred to therapy if necessary.

TRAINING

A significant factor in reducing violence in the workplace is a labor force which has been trained in identifying the circumstances which may be considered as violence in the workplace as well as in coping with and reporting such circumstances. AAA shall develop and offer informative training programs about the methods and guidelines for identifying, reducing and intervening in such circumstances.

Legal Sanctions and Regulations

AAA will cooperate with law enforcement officers and other public institutions insofar as it is legally possible. This in-house policy has been developed by the policy team of the company in cooperation with legal consultants.

APPENDIX 3 - PLATFORMS

UN GLOBAL COMPACT

UN Global Compact is an innovative corporate accountability approach that suggests universal principles to create a collective development culture in the business world that is in continuous competition. Being a party to the Global Compact which adopts the vision of a "sustainable and comprehensive global economy" is completely on voluntary basis.

UN Global Compact primarily represents an inclusive stakeholder group which brings together the business world, labor force, civil society, universities, municipalities, and public institutions by means of the United Nations. It aims to access stakeholders under the administration of the Board of Directors and raise awareness for sustainable corporate social accountability. Providing on-site and direct support by means of the National Networks established in each region and country where UN Global Compact signatories exist, Global Compact manages these National Networks through its secretariats. The national networks that serve for the UN Global Compact's purpose of being adopted in a different nation, language, culture contexts also constitute a significant platform to ensure that companies could come together and take action on the subjects of sustainability. XIIII

UNITED NATIONS "WOMEN'S EMPOWERMENT PRINCIPLES" — UN WEPS XIV

The Women's Empowerment Principles were created in 2010 with the collaboration of the United Nations Global Principles Compact and the United Nations Gender Equality and Women's Empowerment Principles (UN Women). The principles provide guidance for the steps to be taken for improving gender equality and for empowering of women in the society, business life, and economic life. Moreover, it includes many significant commitments including the creation of company-wide gender equality targets, ensuring 30% and over the participation of women in management, creating a policy for zero tolerance to verbal or psychological harassment.

Headings of the Women's Empowerment Principles

- 1. Establish high-level corporate leadership for gender equality
- 2. Treat all women and men fairly at work respect and support human rights and the principle of non-discrimination
- 3. Ensure the health, safety, and well-being of all female and male workers
- 4. Promote education, training and professional development for women
- 5. Implement enterprise development, supply chain and marketing practices that empower women
- 6. Promote equality through community initiatives and advocacy
- 7. Measure and publicly report on progress to achieve gender equality

CORPORATE ALLIANCE TO END PARTNER VIOLENCE (CAEPV) X

CAEPV is a leading alliance established with the aim of combating violence suffered by women in their intimate relationships. It is the only national organization that has been established by business leaders and have workplace-oriented objectives. The alliance has brought companies which desire to generate policies together in the field of violence against women since 1995 and encouraged/still encouraging them to create collective projects, exchange information and support their endeavors to change societies in a positive way. The alliance aims to help the prevention of violence against women by using the power and resources of the companies. It is believed that the alliance has a significant role in raising awareness on this issue and reducing the effects of violence in companies. CAEPV alliance has many member companies and Hürriyet Gazetecilik is a member and signatory of this alliance.



APPENDIX 4 - SAMPLE COMPANY PRACTICES IN THE FIELD OF DOMESTIC VIOLENCE

INTERNATIONAL BEST PRACTICES XVI

ARCHER DANIELS MIDLAND (USA)

Archer Daniels Midlands company, as a member of CAEPV, provides training for its employees about what they should do to fight and prevent violence against women. Employee Assistance Program of the Company (EAP) has published a brochure which includes details about those who are under risk, definitions, and signs of violence pertaining to the victim and perpetrator of violence, and shared this brochure with all its employees by means of the Employee Assistance Program. The importance of guaranteeing business ethics and providing safe and healthy working environment by the company is emphasized, and in this context, the company does not tolerate violence against its employees in any form. The company has developed assistance plans for those employees who have been exposed to violence and showed clear determination in ensuring that these employees access to the necessary assistance and support.

CIGNA

Cigna is a global health service company which has been dedicated to the health, welfare, and trust of people. Being a member of 1997 CAEPV, Cigna has been included in the Fortuna Magazine's list of "Most Admired Companies of US" in 2004. It has created a team to address violence against women and provided training for 40.000 employees on the prevention of this issue. Additionally, the company ensures that its employees are better informed about the issue via news bulletins and brochures; and based on the request of the employees keeping their names confidential sends facsimiles with heading such as 'Receiving Support-Who to be Called?', 'Domestic Violence - What Can Co-Workers Do' which also include important phone numbers. The company also collaborates with physicians and asks them to provide information about domestic violence and to include domestic violence into their routine therapy sessions. It has sponsored the 'Love should not Hurt' program which addressed violence between young couples in five university campuses. The company also organized a seminar titled "Domestic Violence and Workplace: The Role of Managers" for its managers. It has published posters and hung them up in the workplace to remind its employees that they should report if they are exposed to violence and be sensitive about this problem. The company has organized a violence awareness day and provided information not only about domestic violence but also other types of violence which may be detrimental to the safety of its employees. It has taken necessary security measures required

to prevent violence in the workplace and ensuring that the contracts of the offenders are revoked and that they are reported to the police. The company made efforts in order to raise awareness on this issue not only among its managers but also among the managers of other companies.

EASTMAN KODAK

Kodak contacts its employees through different channels to offer training which addresses domestic violence. The employee newspaper constitutes one of the most effective examples. This newspaper includes influential articles and paintings pointing at domestic violence and some ideas for the prevention of domestic violence. Moreover, the company also tries to offer support by any means possible. Kodak also paid attention to achieving a perfect work/life balance, and for this purpose, supported programs such as 'Employee Assistance Program'. Considering the fact that work life can be the reason for domestic violence, Kodak tackled this issue in its presentations and offered support to its employees for achieving a happy work/life balance. Kodak trained its leaders on the issue of domestic violence, as well.

MCKEE FOODS PARTNERSHIP

In 1997, McKee Foods started its project called the 'Affection Project' which aims to prevent domestic violence. In this project, independent teams have been matched with each other. The project aims at dignifying and encouraging employees who are exposed to violence. The aim of this project is to encourage victims to get in touch with McKee Foods for support. McKee Foods also has included training and awareness-raising in its employees as an integral part of the program. McKee Foods tries to offer simple but effective solutions for its employees. For instance, it offers assistance to its employees based on their needs such as parking slots which are closer to the building, police escort when leaving the company or longer periods of leave. The victims can contact and ask for the assistance of their superiors or their teammates in the Affection Project. McKee Foods has been very effective and participated in several events in the Domestic Violence Awareness Week. Some of these events involve the placement of an advertisement on newspapers, distribution of brochures, organizing in-house meetings and publishing articles in the company magazine for employees and retired personnel of McKee Foods. A 24-hour exhibition focusing on domestic violence has been organized as a part of the 'Affection Project' at the entrance of McKee

Foods. This exhibition was later moved to the company sales store and then to neighbourhood high schools. During this exhibition, the 'Affection Project' employees answered questions and tried to offer support as best as they can.

STATE FARM INSURANCE COMPANIES

State Farm Insurance has joined the CAEPV in 1995. It has prepared programs for its employees and managers and provided them training on the subject of domestic violence. In addition, as a part of the Employee Assistance Program, it has offered possible different options for those exposed to domestic violence such as leave days, flexible working hours, healthcare support. The company has supported domestic violence victims by establishing safety plans, arranging special parking spaces in the workplace, and recording threatening messages. It also offered leave days and flexible hours so that the employees may be safe, attend court hearings, search for new houses or receive healthcare support. It has organized events and prepared posters, brochures, and videos for the National Domestic Violence Awareness Day. Hence, it has played a significant role in raising awareness about domestic violence and contributed to people offering support and help.

VERIZON WIRELESS

Verizon Wireless is the first national wireless supplier of USA and more than 50% of its employees are female. The company has created a safe network for its employees who are exposed to violence by using wireless products, provided pre-set phone numbers they could use for emergency calls and offered training about domestic violence to all its employees for more than one occasion. It has received support from educated professionals and aimed to assure the safety of the victims and their children. Moreover, the company has provided the employees with flexible working hours, moved them to safer workplaces when needed and provided security staff to escort them to their vehicles.

NHS

As one of the major employers of the United Kingdom, NHS has increased awareness among its employees by providing training addressing domestic violence to 1.3 million people. It prepared a new policy and provided flexible working hours, health and paid/unpaid leaves for the employees. NHS has published a guidebook on its web site the things employees should do to provide support for victims of violence.

HÜRRİYET GAZETECİLİK VE MATBAACILIK A.Ş.

The campaign called 'Stop Domestic Violence' which started for raising awareness about the issue of domestic violence, mobilizing social forces to stop violence and offering support to victims of violence in Turkey aimed at the issue being adopted and advocated among Hürriyet employees. It was intended to support the employees in their struggles against violence and give assurance to them about Hürriyet's determination to support them in case of violence. Another objective of the campaign is to minimize and even eliminate the negative impacts of violence on Hürriyet employees and the work life. Via the 'Domestic Violence Perception Research' which was conducted concurrently with the campaign and the calls made to 'Emergency Hotline' established in 2007, the Hürriyet has collected some data about its employees. The campaign involved the following practices: to inform employees at every stage of the campaign, to conduct a survey on the issue with the employees, to ensure the attendance of employees in training, meetings, and events. Moreover, the practices also involve special meetings held with authors and department directors, special announcements about the availability of the Emergency Hotline to all employees, integration of the principle of combating domestic violence into its Human Resources policy, declaration of the support that will be given to employees who are subjected to violence and of the disapproval concerning those who commit violence, and the implementation of this policy in ongoing cases.

YEŞİM TEKSTİL

In Yeşim Tekstil practices regarding 'Combating Domestic Violence" are part of the Dream of the Butterfly project which was put into practice collectively by Yeşim Tekstil Women and Children Club and Uludağ Soroptimist Club. These practices also include the consultancy and guidance services provided by the corporate psychologist to the Human Resources Department for two days a week.

In the practices performed with the motto "If Women Change the Society will Change" as a part of the Dream of the Butterfly project, female employees of Yeşim attend training and counseling discussions on women's rights, health, self-improvement, as well as family-related issues. Various awareness-raising practices are performed on the issue of "Combating Domestic Violence" and employees can receive free counseling

from lawyers. Moreover, female employees are also supported psychologically through free guidance offered by the corporate psychologist whenever they want. The appointment-based consultations with a corporate psychologist are confidential. The awareness-raising practices held as part of the Dream of the Butterfly project include distribution of hand brochures, posters, and news published in the media organs of the firm (Yeşim Tekstil Magazine, Yeşim Tekstil Newspaper, Portal and Facebook, Twitter). Discussions which are held as a part of the project are also open to all women employees. The practices are continued with different awareness-raising efforts, training, and discussions every year. Since more than half of Yeşim Tekstil employees are women, these practices have been ongoing under different headlines via the Women and Children Club since 2002.

SUTEKS

Having adopted a point of view sensitive to gender equality and strengthened its corporate infrastructure on this subject beginning from the date of its foundation, SUTEKS acts with the same sensitivity on the issue of combating 'domestic violence'.

It is emphasized in SUTEKS Group Staff Regulations that SUTEKS is a corporation that is sensitive to gender equality and is against all kinds of violence including domestic violence. Every employee guarantees to have read and signed the Staff Regulations in the recruitment process. Moreover, all existing employees within the Group had also read and signed the text on the day of its announcement.

Additionally, the events organized within the Group throughout the year includes training on mobbing, and all kinds of methods of combating all kinds of violence, including domestic violence, are discussed in this training. The 'communication' training organized within the company is also important to ensure that the employees could express and defend themselves better.

The employees being subject to domestic violence initially appeal to the Human Resources Department, and then the subject is evaluated in the Ethics Committee within the corporate structure. SUTEKS Group provides support for all necessary moral-financial needs of the victim on this issue where confidentiality is essential. The support offered primarily concerns legal counseling in terms of the necessary steps that should be taken. Employees may receive legal support on this issue for free. Besides,

SUTEKS Group refers its employees to psychological support so that the employees can sustain their life in the best way possible under difficult circumstances. Additionally, the company cover half of the expenses of its employees not only in issue relating to domestic violence but also in all kinds of psychological problems.

In addition to legal and psychological support, it provides direct financial assistance to enable its employees who have been exposed to domestic violence reorganize their lives. For example, SUTEKS Group covers the transportation expenses of an employee who will move to a new home. The "domestic violence" policy of the company is not only important for each and every stage of the work but also in the recruitment process.

Having referred a woman who has been exposed to violence by her husband before getting a divorce to therapy for psychological support and then guided her through the divorce process, SUTEKS Group employed this person after all these processes.

SUTEKS Group's plan on this field for the subsequent period is to include in the recruitment process besides the personality analysis another test which will analyze the applicants' tendency to commit violent acts.

APPENDIX 5 - SOCIAL RESPONSIBILITY PROJECTS ADDRESSING DOMESTIC VIOLENCE

KOC HOLDING

Training Program for Law Enforcement Officers Working with Women Victims of Domestic Violence

The training program that has been developed aims to inform police personnel working with victims of violence against women and domestic violence about legislation, communication, risk analysis, and protection from secondary traumatization. At the onset, a needs analysis was made for the draft of 'Training Program' developed by the Humanist Bureau that gives support to the project. In 2013, a pilot study of the training program was realized with the participation of the law enforcement personnel working in the Üsküdar District Police Department. The basic issues addressed in the training program included psychology (psychology of the victim, the suspect, and the employees), interview techniques with the victims, law, and ethics. Later the training was revised and a distance-learning module was developed for the theoretical part of the program. The part of the program focusing on active practices was included in the face-to-face training program. At the last stage, the trainer training program that has been developed to ensure that the program becomes widespread within the law enforcement agency has been implemented in such a way that the law enforcement personnel working on-site in all districts of Istanbul can reach it. The program which started with the Üsküdar Police Department in 2013 ended with the Istanbul Police Department. The program which was implemented by the assistance of the Humanist Bureau comprises the following steps:

- Examination of the existing programs: Existing training programs addressing professionals working in the field of domestic violence and the training programs addressing law enforcement personnel on other subjects have been examined and their content and methods have been identified.
- Needs analysis (focus group and in-depth interviews): A needs analysis has been done based on focus group and in-depth interview techniques. Focus groups were made with the law enforcement staff and in-depth interviews were made with the judges, prosecutors, Violence Prevention Center (ŞÖNİM) Director and victims of violence. The outputs obtained as a result of the needs analysis have been presented in the form of a report.
- First training (pilot scheme): The theoretical part of the training has been implemented in the face-to-face training with Üsküdar Police Department upon request of Üsküdar Police Department during the development stage of the program and feedbacks pertaining to this training have been evaluated to assess whether or not the content covers the needs.
- Revision and completion of the program material (training materials, trainer guidebook, brochure, and fact sheets): 4 trainer videos and a case video have been shot for the distance training. In addition, the content about legislation, psychology and communication issues have been prepared in the form of question and answer for the case. A brochure for women who want to apply and a fact sheet for police officers working with them have also been prepared. Session presentations, cases, and study notes have been prepared for face-to-face training and their tests have been realized during the process of implementation. Finally, a trainer guidebook has been prepared for the trainers. This guidebook has been tested 3 times with different cases and revised.
- Second training: It has been conducted with the Istanbul Police Department. 224 staff members working in the domestic violence bureau in all districts of Istanbul have attended the distance training. Face-to-face training has been provided for 84 staff members in the form of 3 groups selected from the group that has completed the distance training.
- Trainer training: Trainer training was done following the second training. 19 law enforcement personnel from different districts of Istanbul have attended the trainer training.

VODAFONE

Red Light Mobile Application

Vodafone Turkey believes that in the digital communication era in which we are living, violence against women should be combated by developing innovative solutions. To this end, Vodafone Turkey has developed the Vodafone Red Light mobile application for women. The Vodafone Red Light application, which allows women to swiftly reach the police or their relatives in a moment of violence, aims to prevent violence by providing quickly and easily the necessary aid to women. "Vodafone Red Light" application has been designed as a solution which is accessible to all women, aiming to prevent violence immediately or in advance. It has been designed in such a way that the perpetrator of the violence would not notice it. It is developed to be the "secret aid" of women. All GSM operator users can download this application which can be installed from Apple Store and Google Play for free. It is a simple design that can be used easily by all women. On the main application screen, 183 Hotline Women and Social Services, 155 Police Emergency Line, Domestic Violence Emergency Hotline and 156 Gendarmerie Emergency Line may be reached with one click. Any person being exposed to violence may save up to three contact numbers that she can call for help with one click. One of the most important features of the application is that Emergency SMS information may be sent with just one click. It includes a predefined text and location details which can be sent out to persons who are saved in the contact list. The message and location can be automatically sent to saved persons as "Emergency SMS" by shuffling the phone thanks to the Shuffle-Warn feature. The application is camouflaged as a different application in the mobile phone in order to prevent the person who is committing violence from noticing the application. The closest unit affiliated to the Ministry of Family and Social Policies and Violence Prevention and Monitoring Center (ŞÖNİM) is also displayed on the map screen and communication details may also be accessed on the same screen. Contents which aimed at informing and guiding women victims of violence are displayed on the information screen. In the SMS application developed by the Security General Directorate which is aimed at directing people who are in need to the closest police station, it is necessary to describe the whole situation in detail and this results in delays. However, the Red Light application enables the user to call the police and notify the relatives who may intervene in the situation immediately. The companies may encourage and guide their female employees to use the "Vodafone Red Light" application which is a mobile application that may be used by all women.

APPENDIX 6 - LEGAL FRAMEWORK

Violence against women is not only a social problem but also an issue with a legal dimension. Thus, this issue is addressed both in the national and international arenas with an emphasis on its different legal aspects. It is now necessary to consider the issue of violence against women not as a private family matter but as a matter of human rights. Indeed, today in the contexts of the law of persons, labor law, criminal law, and even the corporate law, the issue is no longer tackled as a private matter and domestic violence against women is considered as an area open for intervention and protection of third parties.

In this chapter of the guidebook, this issue is addressed in terms of various legal problems to guide and assist for the policies that will be developed by the companies. Hereby, it is aimed to render it possible for companies to adopt a legal perspective on the subject of domestic violence against women and evaluate their areas of action. This chapter may be considered as a guide to both the development and implementation of company policies and maintenance of a legal framework throughout the ensuing processes.

GENERAL PRINCIPLES OF LAW AND EVALUATION IN TERMS OF INTERNATIONAL LAW

Historically, the fact that women are exposed to violence due to their gender roles has never been a matter of theoretical or normative interest to law. Thus, modern law systems did not intervene in the private sphere where gender-based violence mostly occur through their norms or judicial decisions.

The perspective of the national law systems was integrated into the international human rights discourse and international law which protects individuals from violence ignored violence in intimate relations. Protection of the right to life has been usually perceived and regulated as a liability of the state to take necessary measures in cases when an individual's life is under threat in the public sphere or as an obligation to prevent arbitrarily dispossession by the state of the life of an individual.

In Turkey and throughout the world, legal systems began to be transformed and gender-based domestic violence became a subject of legislation due to both the empowerment of women's movement and its emphasis on the fact that violence against women is a form of human rights violation and the formulation of various conventions by international organizations. The conventions and regulations regarding domestic and intimate partner violence against women are listed below. In this respect, in Turkish legal terminology, the concept of 'domestic violence' is used.

The most important regulation in combating gender-based domestic violence against women in Turkish national law is the Law No. 6284 on 'Law to Protect the Family and Prevent the Violence Against Women'. It is specified in Article 1, paragraph 2 of the Law No. 6284 that in the implemention of the regulation '... international conventions to which Turkey has become a party with the Republic of Turkey Constitution, especially the Council of Europe's Convention on Preventing and Combating Violence Against Women and Domestic Violence' should be taken as a basis.

"The Council Of Europe Convention On Preventing And Combating Violence Against Women And Domestic Violence" named as the "Istanbul Convention" which has provided a novel and significant support in combating intimate partner violence against women was signed by the Republic of Turkey on 11 May 2011 and ratified by the Parliament on 22 November 2011. The Convention was published in the Official Gazette on 8 March 2012 and the documents with respect to the convention were delivered to the Council of Europe on 10 March 2012. The convention entered into force on 1 August 2014^{xvii}.

Another important international instrument is General Recommendation 19 of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) which addresses violence against women. This recommendation was updated by the CEDAW Committee on 18 July 2017 and a new "General Recommendation 35" on the subject of "Gender-Based Violence Against Women" was accepted.

This new instrument which does not disregard the basic approach of the General Recommendation 19 (1992) was prepared as a result of considering different global tendencies and developments pertaining to the issue of violence against women in the last 25 years and it will be taken as the basis of in the investigation of the reports of on the issue of violence against women prepared by the states which are party to the CEDAW Convention.

In this context, one of the most remarkable aspects of the General Recommendations No. 35 is that it recognized the prevention of violence against women as an international legal norm for the states.

Highly improved opinions and advice are provided by the General Recommendation No. 35, particularly the understanding which recognizes violence against women as a form of torture in certain cases and considers restrictions for reproductive rights as violence.

Article 12 of another international convention to which Turkey is a party, the International Covenant on Economic, Social and Cultural Rights regulates the right to health. According to this article, "The States Parties to the present Covenant recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health."

The liability of companies to the same extent with the states parties in fulfillment of the right to health is emphasized in the UN's general recommendation No. 14 regarding ways in which this article should be interpreted.

Violence against women and domestic violence eliminate the right to health of women. The liability of fulfilling the right to health also requires combating violence against women.

EVALUATION IN TERMS OF TURKISH CIVIL CODE AND INDIVIDUAL RIGHTS

A personal right implies a non-assignable, inalienable and non-pecuniary absolute right that a person possesses on some fundamental values by virtue of being human. The scope of a personal right may not be determined in a restrictive way but some values which are included in this right may be listed. All values which make a person human-like such as physical integrity, moral integrity, freedom to act, economic development, right to life and health, dignity and reputation, secrets and private life of a person are included in the individual rights and must be legally protected. For this reason, it is clear that any violence directed against women constitutes an unlawful attack against the personal right of women regardless of its aspect (physical, sexual, psychological, economic etc.)

In this context, it is a requirement for the protection of the personal right of employees that relevant authorities should guide and support the employee in a financial, moral or legal sense if the employee appeals to relevant authorities in her company in cases where she is exposed to violence in an intimate relationship. Additionally, the secrets that a woman wants to be kept confidential for her self-interest and the part of her life that she does not want to share with third parties may be defined as her private life. The fact that the person does not want her private life to be known by others creates a self-interest that needs to be protected for that person. Family life and relations of a person undoubtedly constitute a significant part of that person's private life and they are included as parts of a person's life the confidentially of which is of interest to that person. As a rule, any personal experience in private life may not be intervened without his/her request and consent. Any interventions that are not based on such consent and that do not comply with legal regulations constitute an infringement of the right to privacy.

For this reason, personal information of an employee exposed to violence or a person committing violence against her should be kept confidential and care should be taken to ensure that information sharing is limited to any person to whom the employee has already disclosed such details. For this purpose, it is reasonable to establish a separate unit within the company or assign a sub-unit to this issue in the existing unit; this way, the employee may be enabled to contact few people as possible in case she wants to disclose the information and ask for support. The relevant unit or person responsible after the application of the employee should disclose details related by the victim to a few people as possible while implementing the necessary internal mechanisms and refrain from disclosing the private life of the victim. Disclosure of information to the parties who are not directly related with the issue is considered as an infringement of the right to privacy; furthermore, the form of the disclosure may be considered as an infringement of the dignity and reputation of that person.

As a result of such an infringement, the person who has been exposed to violence is mistreated once again and this possibility may result in individuals who are in a similar situation to hesitate to make an appeal to in-house mechanisms. For that reason, this circumstance of an employee exposed to domestic violence may be disclosed to others, even within the company, to the extent that she has given her consent and it is not against her self-interest. Such an approach reflects a mentality which complies with the international conventions on this issue to which Turkey is a party as well as the rulings of the European Court of Human Right.

EVALUATION IN TERMS OF TURKISH BUSINESS LAW

Violence in an intimate relationship is considered as a risk factor which negatively affects health. The obligation of companies and all members of the society to observe the right to health is not only an imperative of business activities but also a requirement to ensure that the company's own employees have the highest health standard. Using the terminology of the labor law, any employee or worker may get injured or may be disabled and even suffer some mental problems as a result of domestic violence. Negative impacts of domestic violence are also reflected in the workplace and business relations. In this case, the moment when the violence which occurred outside the workplace affects business relationships the responsibility and obligations of the employer come to the fore.

One of the fundamental liabilities of the employer, which is defined as the employer's responsibility to protect the employe in the labor is the protection of the personality of the employee. According to the Article 417 of the Turkish Code of Obligations, "an employer is obliged to respect and protect its employees' personality; keep a reliable and fair order within the workplace; protect the employees from psychological and sexual harassments; and take any necessary precautions to protect employees, who have been subject to harassment, from further damages." In accordance with the same provision, an employer must take all kinds of precautions necessary to ensure occupational health and safety in the workplace. It is clear that the employer needs to take necessary measures within the framework of liability of protecting the employee if the violence in an intimate relationship is carried over to the workplace or the perpetrator of violence is harassing the employee in the workplace. Additionally, efforts should be taken to prevent negative impacts of domestic violence on employees, business relations and workplace by going beyond the concepts of psychological and sexual harassment in the workplace. It is stated in recent research and documents of the International Labor Organization that the workplace/working environment has a key importance in combating domestic violence in terms of prevention and support.

The issue of health and safety at the workplace have progressively become main topics with their changing and developing content and ensuring that employees are in a good and comfortable condition occupies an important place in the agenda of human resources management. The fact that the comfort and safety of the employees are affected negatively due to domestic violence is considered an issue which also concerns the employers.

Another significant aspect of the issue for employers is the negative impacts of domestic violence in the execution of works. Absenteeism, low performance, difficulty in compliance with the job, loss of motivation suffered by a person exposed to domestic violence will affect the employer and other employees in the workplace. Domestic violence negatively affects performance capacity of an employee and his/her behaviors in the workplace and the employer and workplace will continue to be affected by this issue as long as it remains a social issue. The tendency to consider domestic violence a matter of private life is gradually left behind in today's business world. In several countries, special units have been created with the aim of combating domestic violence in workplaces. Some mechanisms to which employees exposed to domestic violence can apply have been put into practice. Listening to any employee who stated that she is exposed to domestic violence, refraining from disclosing her statements to other parties, providing her support are described as necessary steps that the employer should take. A similar possibility for reporting exists in the scope of Law No. 6284. In accordance with Article 7 of the said Law, "if there has been violence or there is a risk of violence, everybody can report this situation to the official authorities and institutions. The public officials who received the report are obliged to fulfill their duties without any delay and inform the authorities for the other necessary measures.

EVALUATION IN TERMS OF TURKISH CRIMINAL LAW

Violence against women which constitutes a big problem in a sociological sense is defined as a "crime" in all cases if we consider it in terms of criminal law.

Physical violence directly constitutes a crime in accordance with Article 86 of the Turkish Criminal Law ("TCK"), and psychological violence may also be interpreted as a "torture" in accordance with Article 96 and/or offense of "threat" in accordance with Article 106.

Turkish Criminal Law has specified that the sentence increases if the offense is committed against a person who is not able to defend him/herself in a physical or mental sense, -mother-father, child or spouse.

Any abuse "against the person with whom one is cohabiting in the same residence" is also sentenced according to Article 22 of the Turkish Criminal Law.

When these regulations in the Turkish Criminal Law are examined, it is seen that the domestic area is no longer considered as a "private sphere" in case of domestic violence and this sphere may be intervened in case of domestic violence. Such intervention becomes difficult and may remain limited as long as the victim of domestic violence does not disclose the situation. For that reason, not only a moral responsibility of supporting the victim of violence but also a legal obligation to disclose the offense to the authorities is of concern for any third parties who are informed about the commitment of the offense in any way.

The relevant obligation to report has been regulated in Article 278 of TCK. Any employer who is informed that an action that may constitute an offense is encountered in the business life does not only have a humanitarian and social responsibility but also a legal obligation to report this situation to judicial bodies.

EVALUATION IN TERMS OF CORPORATE GOVERNANCE AND EXECUTIVE RESPONSIBILITY

Executives of joint stock companies have the obligations of diligence and loyalty towards the company in accordance with provisions of the Turkish Commercial Code (TTK). Executives have to observe the company's benefits while performing company-related tasks and taking decisions that concern the company as a whole. It is considered that the obligation to observe the benefits of the company does not only include protecting the company and shareholders but also other individuals related to the company.

This group of beneficiaries is called the 'stakeholder' and includes employees, investors, creditors, customers, suppliers, and other beneficiaries in accordance with OECD and Capital Markets Board (CMB) Principles of Corporate Governance.

As is seen, company employees constitute a group of beneficiaries who are substantial and probably they are the ones who influence the company's activities among stakeholders most.

In this case, it is clear that company executives have the obligation to observe protect the benefits of employees while performing the company tasks in accordance with the general principles of corporate law. Moreover, observing the benefits of the employees will improve the financial and operational performance of a company in the long run, so such behaviors are also a requirement of executives' obligation of diligence towards their company.

Intensive efforts have been taken to ensure management of all companies, primarily publicly traded companies, in accordance with the principles of corporate governance in Turkey. The fact that protection and observance of company employees is a requirement for best Corporate Governance is accepted inarguably.

For this reason, OECD Principles of Corporate Governance updated version of which was published in September 2015 have placed the protection of employees in a significant position in terms of Corporate Governance: "Boards of Directors are not only responsible for the company and shareholders but also liable to act most properly with their benefits. In addition, boards are expected to take due regard of, and deal fairly with, other stakeholder interests including those of employees, creditors, customers, suppliers, and local communities. Observance of environmental and social standards is relevant in this context."

Similarly, the Principles of Corporate Governance which have been recently updated and published by CMB have considered company employees as one of the significant stakeholders and impose some duties on the company and executives for protection of employees.

One of the important duties imposed on company executive with the Principles of Corporate Governance is the publication of a code of ethics by the company and its disclosure to the public.

- The content of a company's code of ethics shall be determined by executives, the codes of ethics should also specify how proper corporate governance should be like and how necessary precautions should be taken for the protection of physical and mental health of employees as a precondition of loyalty and diligence obligation.
- On the other hand, the social responsibility of companies requires the protection of physical and mental health of employees outside the workplace as well. One of the most important factors damaging physical and mental health in Turkey is the fact that employees are exposed to domestic violence outside the workplace. For these reasons, the code of ethics is expected to include some protective precautions for the physical and mental health of employees.

CONCLUSION

In sum, legal regulations require that company executives take all kinds of measures (including subsidiaries) to protect employees exposed to domestic violence and to prevent violence due to the principle of due diligence, loyalty to the company and for compliance with the principles of corporate governance. If a company takes such precautions with the aim not only of protecting its employees but also of social and communal responsibility, this act is considered as a best practice in terms of corporate social responsibility.

² Any person who abuses anyone with whom he/she is living in the same residence receives imprisonment for a period from two months to one year

ISTANBUL CONVENTION AND THE LAW NO. 6284 - LEGAL INTERPRETATION

Istanbul Convention (The Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence)

The Istanbul Convention stipulates that gender-based violence is regarded as a state responsibility regardless of where it occurs (private and public). States are also held responsible for human rights violations by non-state actors in the private sphere where women are exposed to violence most frequently.

The state parties to the Convention are obliged to ensure that companies which are subjected to their laws will observe human rights in accordance with the principle of due diligence. An important prerequisite for strengthening the principle of due diligence is to ensure the active participation of non-state actors in the process. Article 17 of the Convention particularly underlines the cooperation with the private sector and media in preventing domestic violence. Accordingly:

Article 17 – Participation of the private sector and media

- 1- Parties shall encourage the private sector, the information and communication technology sector, and the media, with due respect for freedom of expression and their independence, to participate in the elaboration and implementation of policies and to set guidelines and self-regulatory standards to prevent violence against women and to enhance respect for their dignity.
- 2- Parties shall develop and promote, in cooperation with private sector actors, skills among children, parents, and educators on how to deal with the information and communications environment that provides access to degrading content of a sexual or violent nature which might be harmful.

The states are obliged to encourage private sector to develop policies toward preventing violence against women and enhancing women's dignity as well as to implement these policies. This is the article of the Convention which most explicitly mentions companies. Within the scope of this article, it is clarified that if any company which is subject to a state party's law takes a preventive or protective measure with respect to domestic violence in order to protect human rights of its own employees, this shall not be regarded as such that the company unlawfully interferes in state's responsibility but, on the contrary, that it has fulfilled its legal obligation. In the national law on companies of the Republic of Turkey that is a party to the Istanbul Convention, there is not any positive obligation for the companies to directly combat domestic violence. However, if desired, companies may share this obligation with the state. The party states are obliged to provide financial and humanitarian resources to non-state actors in combating gender-based violence. This obligation is stated in article 8 of the Convention.

Article 8 – Financial resources

Parties shall allocate appropriate financial and human resources for the adequate implementation of integrated policies, measures, and programmes to prevent and combat all forms of violence covered by the scope of this Convention, including those carried out by non-governmental organizations and civil society.

THE LAW NO. 6284 ON "LAW TO PROTECT FAMILY AND PREVENT VIOLENCE AGAINST WOMEN"

In Turkey, companies may contribute to taking precautions to protect individuals from domestic violence within the scope of national law. The Istanbul Convention obliges cooperation between public institutions and organizations as well as natural and legal entities for implementation of the law No. 6284, in other words in combating gender-based violence in Turkey. Within the scope of the Article 16/2 of the Law No. 6284, companies are obliged to provide assistance to a public institution and immediately carry out any cautionary decisions in combating gender-based violence. Natural and legal entities should be encouraged to support Ministry efforts and to carry out collective projects within the scope of this regulation.

Article 16

- (1) The ministry is charge of interagency coordination in application of the provisions of this Law.
- (2) Public institutions and organizations and other natural and legal persons are responsible for implementing the cautionary decisions without delay and cooperating and assisting to each other in issues related to their agencies in regard to the implementation of this Law. Natural and legal persons are encouraged to support the studies of the Ministry and conduct joint studies within the scope of this Law.

INTERNATIONAL LABOR ORGANIZATION (ILO) CONVENTION (SEPTEMBER 2015)

International Labor Organization (ILO) attempts to realize social justice, and human rights and worker's rights recognized in international plan. Equality of woman and man is the main component of the ILO agenda "Decent Work for All Men and Women". ILO conventions are trilateral. They are signed by labor unions, state representatives and employer unions.

In the international conference of ILO held in Geneva between 29 October - 12 November, the decision was taken to add "domestic violence" to the article on 'violence against women and men in business" of the ILO Fundamental Convention standards. Accordingly, it is decided to

- Include a "standardization" article in the conference agenda No. 107 to be held in June 2018 and
- Assign a team of trilateral experts to prepare a guideline to be evaluated in the 328th meeting of the Board of Directors in November 2016 to be taken into account as preparation for initial discussions

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