

September 28th, 2021

REPORT ON THE RIGHT OF THE CHILD TO PLAY IN TURKEY

Submission by Izmir Child Studies Network

**NGO Submission on the Right to Play to the UN Committee on the
Rights of the Child**

For the Pre-Session and Prior to Adoption of the List of Issues

91st Pre-session (February 7th - February 11th 2022)

Turkey

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About Izmir Child Studies Network and the list of contributors

Izmir Child Studies Network was founded in 2018 with by human rights activists and civil society organisations to carry out rights-based advocacy work on the rights of the child at the local level. The network works towards developing the field of the right of the child to play. This report was prepared with the participation of five member organisations, namely Sürdürülebilir Kalkınma ve Girişimcilik Derneği (Sustainable Development and Entrepreneurship Association), Çocuk Pusulası Platform, İzmirde Suriyeli Mültecilerle Dayanışma Derneği (Association for Solidarity with Syrian Refugees in Izmir), Uzlaş1-Der and Civil Talks Initiative.

Methodology

The child rights indicators, developed by and through the Izmir Child Studies Network for the benefit of all CSOs were used in the preparation of this report.¹ These indicators were developed based on the General Comment No. 17 (2013) of the United Nations Committee on the Rights of the Child. The report summarises the steps to be taken by the public administration in Turkey for children in Turkey to efficiently enjoy the right to play, leisure and participation in cultural activities of the UN Convention on the Rights of the Child in light of the indicators.

¹ For the indicator set, please visit [Set-Of-Indicators-And-Guidelines-For-Monitoring-The-Right-Of-The-Child-To-Play-At-The-Local-Level.pdf](http://izmircocukcalismalari.org/Set-Of-Indicators-And-Guidelines-For-Monitoring-The-Right-Of-The-Child-To-Play-At-The-Local-Level.pdf) (izmircocukcalismalari.org)

Table of Contents

<i>Introduction</i>	4
<i>Problems Pertaining to the Right to Play in Turkey</i>	4
Accessibility Issues	4
Health Hazards at Playgrounds	8
Safety Hazards at Playgrounds	12
Access to Toys and Toy Libraries	14
Solution Recommendations	14
<i>Conclusion</i>	16
<i>References</i>	17

Introduction

Despite being a state party to the Convention on the Rights of the Child for over 30 years, Turkey is yet to fully meet the Convention's provisions. While the reasons for this are numerous, inaccurate social perceptions of the child, deficiencies in legal provisions and underestimation of the matter may be cited as the main reasons. This report specifically focuses on the status of the right of the child to play in Turkey. It emphasises the historical process of the rights of the child and the Turkey's deficiencies in this field. Recommendations for solutions and points to consider are presented in the conclusion.

According to the official data from the Turkish Statistical Institute (TURKSTAT - 2020), children make up 27.2 per cent of Turkey's population.² Given this high proportion, one might expect efforts for the rights of the child to be given more weight. However, Turkey neither possesses a strategy nor an action plan on the rights of the child in general or the right to play in particular. Neither the central nor local administrations fulfil their duty to provide information on the Convention on the Rights of the Child (CRC).

Local administrations are actors that are partially responsible for the promotion and dissemination of the rights of the child. The most significant work they have carried out in this field is children's councils. However, there are significant doubts as to the effectiveness of the decisions taken at children's councils. Since the activities and findings of these councils and similar bodies are not shared transparently with the public in Turkey, their level of activity and effectiveness is a matter of dispute.

Problems Pertaining to the Right to Play in Turkey

Accessibility Issues

² <https://data.tuik.gov.tr/Bulten/Index?p=37210>

Although Turkey has been party to the CRC for decades, children's right to play in the country remains constrained. Urban areas with high population density are noisy and polluted and contain no suitable playgrounds for children. Urban areas also witness a high number of road accidents and limit children's mobility. According to a report published on the website of the national daily *Milliyet* in 2018, children and babies were killed and injured the most in road accidents over the last 10 years in Turkey. The newspaper report states that a total of 3,233 children died in road accidents between 2008 and 2018.³ Faulty urban planning by local and central administrations and inappropriate zoning practices negatively affect children's physical activities, indirectly depriving children of their right to play.

The right of children to have places to play is particularly under risk in several urban settings. The poor design of residential areas, commercial centres and transport in urban areas, combined with population density, noise, pollution and several other dangers create unfavourable environments for younger children.

The small number of studies carried out in Turkey on this subject show that there are very few playgrounds for children and green spaces in urban areas. Uysal (2013) clearly shows how inadequate green spaces and playgrounds are in Turkey. Structural deficiencies including the lack of direct criteria about children's playgrounds in Turkey's zoning legislation and the lack of legal monitoring of the existing indirect legal regulations prevent the enjoyment of the right of the child to play.

Apart from children's playgrounds, Turkey has serious problems with the preservation of its green spaces. The report by the World Cities Culture Forum ranks Istanbul last among 40 cities in terms of the proportion of green spaces in metropolises (World Cities Culture Forum (WCCF), 2018). The World Health Organisation recommends a minimum of 9 per cent of set

³ <https://www.milliyet.com.tr/yerel-haberler/istanbul/son-10-yilda-meydana-gelen-trafik-kazalarinda-3-bin-233-cocuk-hayatini-kaybetti-12808668>

aside for green spaces in cities. While Ministry of Public Works and Settlement criteria require 10 square metres of green space per capita in urban areas, a study has shown that this amount is 5.9 square metres for Istanbul and 4.4 square metres for Antalya (Gül et al., 2020). The low accessibility rate of green spaces severely curtails opportunities for children to play outdoors.

Gender-based discrimination also constrains the right to play. A United Nations Population Fund study found that in Turkey, one in five women aged between 18 and 45 in was married as a child (UNFPA, 2021). Furthermore, the report states that 15 per cent of women currently aged between 20 and 24 were married before turning 18. This report clearly shows that a substantial number of girls in Turkey have to deal with pregnancy, marriage and/or domestic work at the age of play.

Another subject on the equal access to the right of the child to play in Turkey is the exploitation of child labour in the country. TURKSTAT data shows that the 5-17 age group population in Turkey was 16,457,000 (2019) and 720,000 of this child population was engaged in economic activities.⁴

Given the significant link between child labour and poverty, child labour is more frequently encountered in economically vulnerable areas and among Syrian refugees. A considerable number, if not all, of Syrian refugee families allow and even encourage their children to work due to economic deprivation. Like adults, children are forced to work under very difficult and strict conditions. Although there is little research on refugee children in Turkey, it is estimated that more than 380,000 refugee children engage in child labour (Bahadır and Demiral, 2019). Economic hardship faced by Syrian refugee families cause children to be deprived of the education and playground opportunities that schools offer.

⁴ <https://data.tuik.gov.tr/Bulten/Index?p=Child-Labour-Force-Survey-2019-33807>

Although they are not considered as working children, a significant number of children in Turkey help their families with domestic work. This reduces the time children can spend for themselves and therefore limits their right to play. 45.5 per cent of children in Turkey help their families with domestic work and give up the time they ought to be spending for themselves (TURKSTAT, 2019).⁵ The same report shows that most children who participate in domestic work spend 2 to 7 hours a week for themselves. Considering responsibilities such as school and homework, children are clearly left with very little time to play.

Consequently, a significant number of children, particularly girls, children of economically vulnerable families and refugee children are completely or partially deprived of the right to play. There are legislative, as well as economic causes of this problem. Encouraging children to work has become the most frequently sought means of dealing with economic hardship, particularly among poor households.

Children face problems in accessing the right to participation, in addition to enjoying the right to play. Insufficient participation by children and their parents in decision-making processes, particularly regarding playgrounds, is a factor reducing the efficiency and practicality of playgrounds. Karataş and Acar (2008) argue that the reason for children in Turkey being denied the right to participation in almost all fields is the fact that children are not being perceived as active citizens. The fundamental problem is therefore the lack of full societal understanding of the issue and the resulting inability to come up with relevant solutions. While in recent years there have been attempts to increase child participation at the institutional level, shortcomings cannot be met as long as child participation is taken to consist solely of participation in events organised for this purpose (Erbay, 2013). In Turkey, the minimum age for joining a labour union is 16 and the minimum age for membership of an association is 18

⁵ <https://data.tuik.gov.tr/Bulten/Index?p=Child-Labour-Force-Survey-2019-33807>

(Şahin and Polat, 2012). It could therefore be claimed that the opinions of children on any matter are not taken seriously.

Health Hazards at Playgrounds

Another critical problem regarding the child's right to play is the unsuitable physical conditions of the parks, which prevent equal access by all children and even pose threats to children's health. In particular, sufficient opportunities are not provided for the access of children with disabilities. Research carried out on children's playgrounds in Turkey found out that existing public parks fail to meet the needs of even children without any disabilities. Bayraktaroğlu and Büke (2015) found that children's playgrounds labelled "Playground for People with Disabilities" or "Accessible Playgrounds" lacked unifying characteristics and on the contrary, separated children according to their differences. Additionally, the materials and design used for playgrounds fail to meet international standards and create negative physical outcomes for children. For instance, constructing synthetic instead of natural environments at playgrounds negatively affects children's health. In addition, irregular and faulty maintenance of playgrounds and equipment may result in injuries (Senyen and Erdoğan, 2019). One study posed the children the question, "Is there anything you dislike about this park?". 66 of 186 participating children complained about the playsets being out of order or broken, 17 were

uncomfortable with the dirty ground and shattered glass around the playground (Uysal, 2013).

The responses indicate that the playgrounds are not regularly maintained.



Figure 1. Playground in Ankara Etlik Zübeyde Hanım Hospital for Gynaecological Diseases (2016)⁶



Figure 2. Photo from a playground in Osmancık, Çorum (2019)⁷

⁶ <https://www.haberankara.com/ankara/ankara-ya-yakismiyor-cocuk-parki-demeye-bin-sahit-h53261.html>

⁷ <https://osmancik.com.tr/kirik-dokuk-ve-pasli-bu-nasil-cocuk-parki/>



Figure 3. A child was crushed to death by a falling lamppost while playing in Arnavutköy, Istanbul (2019)⁸



Figure 4. Photo from a playground in Gördes, Manisa, where a construction site is situated next to the playground and no safety measures are in place

Playsets in most playgrounds are made of iron, fiberglass, polyester and polyethylene. Iron playsets become oxidised over time and sharp edges start to show (Uysal, 2013). Other

⁸ <https://www.ensonhaber.com/3-sayfa/arnavutkoydeki-parkta-olen-gorkem-icin-6-yil-hapis-isteniyor>

frequently experienced problems are playsets not being fastened properly to the ground, playsets that are too high up from or too near to the ground.



Figure 5. Cevatpaşa neighbourhood, Istanbul (2019)

Lack of variety is another shortcoming regarding equipment at the playgrounds. Playgrounds do not include playsets that could be used by children of different ages, inclinations and characteristics. The main reason for this is non-conformity with international criteria. Another frequently encountered problem is playgrounds being built with no precautions for preventing children going out on the road despite surrounding vehicular traffic and playgrounds being located near electric transformers.

In identifying standards for playgrounds, Turkey has merged two internationally recognised standards into one, which is used with the reference TS EN 1176. Although Turkey has agreed to comply with international standards, the production of playsets is not bound by these standards, as the playset standards are subject to optional licensing in Turkey (Senyen and Erdoğan, 2019).

Lack of variety in equipment is another shortcoming of the playgrounds. There is a crucial lack of playgrounds in Turkey that meet children's differences in age and play needs

and protect them from risks. Senyen and Erdoğan's (2019) study on playgrounds in Ankara shows that all playgrounds possessed the same characteristics and did not contain a variety of equipment or design.

Lack of regulations is the most fundamental reason behind the factors posing health hazards and vulnerabilities. No concrete steps have been taken in Turkey at the national or local level on the planning or development of playgrounds and activities involving children. Moreover, no clear standards were identified for the construction of recreational areas where children could spend their free time. Physical deficiencies in numerous playgrounds across the country lead to injuries and even deaths.

Safety Hazards at Playgrounds

The issue of safety hazards in and around playgrounds is another problem that constrains the right of the child to play in Turkey. Many playgrounds in Turkey become dangerous places for children, particularly after nightfall. With simply passing by the playground being dangerous for children, it is impossible for children to enjoy their right to play whenever they wish. The lack of specifically appointed personnel to ensure safety of playgrounds cause

playgrounds to often become meeting places for drug dealers, gangs and criminals.



Figure 6. Young people using drugs near a playground in Iğdır (2019)



Figure 7. A playground in Istanbul cordoned off by the police after a shootout (2021)⁹

⁹ <https://www.ntv.com.tr/turkiye/istanbulda-cocuk-parkinda-silahli-ve-bicakli-kavga,4UFQXBm7yUmo6SpGQvw9hQ>

Access to Toys and Toy Libraries

In addition to the problems and deficiencies of playgrounds, there are also problems with toys and playsets, which allow for individual play. Materials children play with are tools for their healthy development. However, since toy purchases are linked to economic circumstances, toy libraries are significant assets. Access to libraries imparting a sense of achievement to children at an early age is a significant factor for the subsequent development of children. Children spend quality time at toy libraries with their families and enjoy themselves while learning new and helpful information. However, there are extremely few of these spaces in Turkey and they cannot meet the need for play and toys. Though an up-to-date field study on the total number of toy libraries in Turkey has not been carried out, data at hand show that there are only around 10 throughout the country. Among them, even those with the highest capacity are only able to serve several hundred children. Numerically speaking, toy libraries fall far short of meeting the need to play.

Solution Recommendations

Data, statistics and newspaper reports cited in this report clearly indicate that the child's right to play in Turkey is a highly problematic field and requires solutions. First and foremost, the number of playgrounds that would meet the interests and expectations of children should be increased and local administrations should approach children's playgrounds with the sensitivity this matter requires. Playground area per capita in Turkey should increase. The introduction of legal obligations in line with international world standards is very much needed. Designing playgrounds based on natural elements should be given priority in urban landscape planning by developing planning strategies formulated with an approach that integrates human beings and nature.

The problem with variety should be solved by zoning for urban playgrounds that are large enough to meet the needs and wishes of children of different ages. Many parents think that the playsets are not suitable for younger children's play and are worried about younger children

being put at harm by the more energetic play of older children (Uysal, 2013). The solution to this problem should not be to separate children by age. If the playground is spacious enough, playsets appealing to every age group could be built and activities could be carried out (Uysal, 2013). Children's playgrounds should be built by taking into account the children's interests and expectations and in line with principles of the choice of venue, flooring, planting and safety design. In addition, ensuring the quantitative and areal equal distribution of playgrounds in urban areas is very important to ensure the equal access of children from different socio-economic backgrounds to the right to play. Spaces suitable for the physical and psychological development of children in between classes should be created by building playgrounds in schoolyards of primary schools and providing spaces for preschool education activities at neighbourhood parks. A well-designed and safe playground is an exceptional educational tool for the socialisation and individual development of children with disabilities. Obtaining the opinions and requests of parents of children with disabilities will reveal novel approaches and opportunities. The importance of playgrounds that are prerequisites for healthy and productive future generations should not be ignored and equal access for children from different socio-economic backgrounds should be ensured.

A considerable number of playgrounds have significant safety issues. Children should be able to play at playgrounds without experiencing any safety issues. Responsibility to ensure safe playgrounds falls heavily on local administrations. This problem could be solved by more active policing around playgrounds. Plants at playgrounds would provide a natural setting for children, allowing them to express themselves outdoors more freely. Moreover, environmental awareness should be introduced during childhood, when children grasp information more easily. This consciousness could be best attained at playgrounds, where children spend most of their time.

Conclusion

Although recommendations for the improvement of the access to the right to play may differ according to the approach adopted, the basic characteristics playgrounds should possess could be summarised in a few paragraphs.

The first and most essential requirement for playgrounds is accessibility. Adequate green spaces and playgrounds that children can quickly and easily access should be readily available. Greater space should be allocated in cities for children to play. Materials used in building playgrounds should integrate human beings and nature and they should be frequently and regularly maintained. Adopting international criteria should thus be a priority target.

The safety of playgrounds should also be ensured. Children should be provided with the opportunity to play comfortably without adult supervision. Playgrounds should not be built near areas with heavy traffic or construction sites that do not take precautionary measures. Playgrounds near these areas should be well-inspected. Meaningful participation of children and parents in matters regarding playgrounds and the right to play should be ensured and their demands and recommendations should be recognised. Hybrid use of playgrounds should be sought when building playgrounds. Comfortable play of children of different age groups and different inclinations and interests should be ensured. Children with disabilities should also be provided with suitable toys and equipment in every playground.

Enough time and opportunities for every child to play should be provided in and outside of playgrounds. Children who have to participate in domestic work, who are required to work to contribute to the household and who are forced to marry should be provided with opportunities to experience their childhood.

Societal awareness on the importance of play and the right to play should be raised. Play should not be perceived as a trivial way of killing time.

Not only the playgrounds, but cities as a whole should become child-friendly. Playgrounds should be developed as spaces where children socialise, develop their creativity and discover nature instead of places where children just enjoy themselves and participate in physical activities.

Another matter Turkey should act on regarding the right of the child to play is preparing and implementing guideline materials for playgrounds, playground equipment and activities. Counselling parents responsible for childcare on play and play materials is important for introducing children to the right materials and games. Adults, as well as children, should be provided with counselling to raise their awareness about the materials children play with and the spaces where they play. Counselling about play and play materials should also be provided to various bodies and organisations and not just to people around children. The bodies and organisations that should be informed could be part-time play centres, animation studios, schools, Quran courses, healthcare organisations, social service centres and other platforms with a focus on children. The most important factor for the achievement of these positive developments remains progress in necessary legislation and its implementation.

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