



**Anti-Harassment Policy of the autonomous organization of education
Nazarbayev University**

Category: Policy

Approval Date: 01.09.2026

Effective Date: 01.09.2026

Level of Access: Open to Public

Classification Number: 1.2 PROG

Approving Authority: Managing Council

Registration Number: 01.09.26

Owner: Department of Organizational
Culture, Diversity and Inclusion

Revision Date: 01.08.2029

Applicability: Nazarbayev University

Retired Documents:

Title:

Date:

Registration Number:

Approving Authority:



Section 1. Purpose and Application

1.1. The autonomous organization of education Nazarbayev University (hereinafter the “University”) is committed to fostering a safe, welcoming, respectful and inclusive working and learning environment for all University Community Members.

1.2. This Policy establishes the principles of inadmissibility of the forms of Prohibited Conduct (harassment) and the procedure for filing Complaints.

1.3. This Policy uses certain terms and definitions with the meanings provided for in the international treaties to which the Republic of Kazakhstan is a party. These terms are used solely to describe forms of Prohibited Conduct (harassment) and do not alter or expand the list of offenses and liability measures established by the legislation of the Republic of Kazakhstan.

1.4. This Policy applies to all University Community Members and to all instances of Prohibited Conduct (harassment) that take place within University premises, online, and off-campus.

Section 2. Terms / Definitions

2.1. Definitions and definitions used in this Policy are as follows:

1) **Complainant** means the person filing a complaint against another Member(s) of the University Community for alleged Prohibited Conduct (harassment). The Complainant may be the subject of the alleged Prohibited Conduct or a witness of it;

2) **Complaint** means a written/electronic statement by a University Community Member(s) concerning an alleged instance of Prohibited Conduct (harassment), submitted in accordance with the complaint form – the document used to file a complaint against other University Community Member(s) regarding any instance(s) of Prohibited Conduct (harassment) and/or any violation of this Policy;

3) **Consent** is an affirmative, voluntarily made decision to engage in mutually acceptable conduct or behavior between parties, including sexual activity that is freely given by clear actions and/or words. Consent may not be inferred from silence, passivity, or lack of active resistance alone. Consent must be expressed through the words and/or clear actions of a person capable of giving informed consent and demonstrating voluntary agreement to participate in acts of an intimate nature. A person is unable to give consent if the person is in a state of incapacitation (Helpless State).

The presence of Consent does not render romantic, intimate, and/or sexual relationships between employees and students permissible. Such relationships are considered unacceptable regardless of mutual consent;

4) **Disciplinary Commission** means a collegial, advisory body established to consider materials of an investigation of facts related to the University Community Member(s), and to develop recommendations on the disciplinary measures in accordance with the FPP and/or Student Code of Conduct and/or the Labour Code;

5) **FPP** means the Faculty Policies and Procedures Nazarbayev University;



6) **Helpless State** refers to the state when the victim lacks the ability, due to their physical or mental condition, to resist the perpetrator (as a result of alcohol or drug intoxication, physical impairments/disabilities, mental disorder and/or other painful or unconscious state, etc.);

7) **Prohibited Conduct (harassment)** means the collective term encompassing all forms of harassment established by this Policy;

8) **Respondent** means a Member(s) of the University Community against whom the allegation/accusation regarding Prohibited Conduct (harassment) is made;

9) **Student Code of Conduct** refers to the document, which consists of standards, policies and disciplinary procedures governing student conduct of the autonomous organization of education Nazarbayev University;

10) **University Community Member(s)** refers to students and employees of the University, as well as individuals participating in University academic programs, including visiting researchers and individuals providing services to the University under civil law of the Republic of Kazakhstan;

11) **Witness** means a person or group of people who personally saw, heard, or otherwise directly perceived circumstances relevant to establishing the facts of the Complaint (case) under review.

2.2. Other terms used in this Policy have definitions established in accordance with other internal documents of the University.

Section 3. Main Provisions

3.1. Principles

3.1.1. The University adheres to the following principles with respect to any violations of this Policy.

3.1.2. **Principle of Humanity** – the principle according to which, in the prevention, identification, and review of instances of Prohibited Conduct (harassment), respectful treatment of every University Community Member is ensured, together with respect for their honor and dignity, the inadmissibility of humiliation, intimidation, persecution, or the infliction of physical and/or moral suffering, and the creation of a safe and supportive environment.

3.1.3. **Principle of Fairness** – in the review of Complaints concerning forms of Prohibited Conduct (harassment), each party has the right to be heard and to present its position, evidence, and explanations. Decisions are made on the basis of an objective assessment of all available facts and circumstances of the case, without bias, unfounded assumptions, or stereotypes. The review procedures must ensure a balance between protecting the rights of the Complainant and respecting the rights of the person against whom the complaint is filed.

3.1.4. **Principle of Impartiality** – all Complaints are reviewed independently and objectively. Persons involved in reviewing a Complaint are obliged to act in good faith, to avoid conflicts of interest, and to prevent personal relationships, official position, social status, sex, age, nationality, religion, or other characteristics of the participants in the process from influencing the decisions made.



3.1.5. Principle of Respect for Human Dignity – the University recognizes the inherent dignity of every individual and ensures respectful treatment of all participants in the process, regardless of their role in the review of a Complaint. In the course of reviewing a Complaint, humiliation, stigmatization, accusatory rhetoric, discrimination, or any other treatment capable of harming a person's honor, dignity, or professional reputation is inadmissible. All participants in the process must be able to express their position in a safe and respectful environment.

3.1.6. Principle of Confidentiality – information related to a Complaint concerning a form of Prohibited Conduct (harassment) is subject to protection and is disclosed only to those persons who require it for the proper review of the case, the making of decisions, or compliance with the requirements of the legislation. All participants in the process are obliged to maintain the confidentiality of the information received and to prevent its unauthorized dissemination.

3.1.7. Principle of Timeliness – the University ensures the timely review of Complaints concerning forms of Prohibited Conduct (harassment).

3.1.8. Principle of Protection from Retaliation – no Member of the University Community shall be subjected to persecution, pressure, threats, intimidation, discrimination, or other adverse consequences in connection with filing a Complaint regarding an alleged form of Prohibited Conduct (harassment), participating in its review, providing information, or assisting an investigation.

3.2. Prohibited Conduct (harassment)

3.2.1. Harassment – single or systematic unwanted conduct of a verbal, non-verbal, physical, or digital nature directed at specific individual/individuals, causing psychological discomfort, violating personal dignity, or creating a negative social or professional environment, the purpose or effect of which is to degrade personal dignity or to create an intimidating, hostile, degrading, or offensive environment.

3.2.2. All forms of harassment are prohibited and unacceptable at the University.

3.2.3. Harassment constitutes the following forms:

1) **Bullying** is defined as systematic (two or more times) aggressive behavior aimed at humiliating, intimidating, or exerting repeated psychological pressure on another person, which humiliates, insults, demeans, intimidates, and/or threatens an individual or a group of individuals, and/or leads to social isolation and/or the spreading of rumors;

2) **Cyberbullying** refers to a form of bullying carried out using electronic devices;

3) **Intimidation** is defined as an act consisting of coercion through fear, threats, and/or blackmail directed at a person or group of persons, with the aim of compelling them to engage in unwanted conduct, including conduct of a sexual nature, whether verbal or non-verbal acts or omissions, in the self-interest of the person carrying out the intimidation;

4) **Stalking** – the systematic and obsessive pursuit of a person against their will, creating a sense of fear, anxiety, or threat to safety. Stalking is characterized by the following features:



repeated nature of the acts/actions;
obsessive surveillance;
persistent calls, messages, or other attempts at contact;
following the person;
intrusion into private life;
the unwanted nature of the contact;
the creation of a sense of fear and danger;

5) **Sexual Harassment** refers to any form of unwanted conduct of a sexual nature that violates a person's dignity or creates an adverse learning or working environment. It includes a range of behaviors that constitute discrimination on the basis of sex, including unwanted sexual advances, requests for sexual favors, physical or visual conduct of a sexual nature, remarks of a sexual nature, and the distribution or display of sexual images.

3.2.4. A breach of this Policy may result in disciplinary sanctions, including dismissal, termination of employment, or termination of civil law (service) contracts, in accordance with the internal documents of the University and the legislation of the Republic of Kazakhstan.

3.3. Reporting Procedure

3.3.1. The procedure for filing and reviewing Complaints concerning the instances of Prohibited Conduct (harassment) at the University shall be carried out in accordance with the Student Code of Conduct and/or the Faculty Policies and Procedures (FPP) and/or the Labour Code.

3.3.2. Instances of Prohibited Conduct (harassment) shall be referred to the contact persons specified in Annex to this Policy.

Complaints against student(s) shall be filed to the Department of Student Services (DSS) in accordance with the established procedures of the Student Code of Conduct.

Complaints against faculty member(s) shall be filed to the Dean of the respective School. Complaints concerning faculty members of the Center for Preparatory Studies (CPS), shall be submitted to the General Director of the CPS in accordance with the procedures prescribed by the FPP.

Complaints against administrative employee(s) shall be filed to the Department of Organizational Culture, Diversity and Inclusion (DOCDI) in accordance with the established procedures of the Labour Code.

3.3.3. Complaints concerning individuals providing services to the University under civil law of the Republic of Kazakhstan shall be referred to DOCDI for a preliminary review to determine whether there are indications of Prohibited Conduct (harassment). If indications of Prohibited Conduct (harassment) are identified, DOCDI shall send a notice to the authorized representative of the party that entered into the civil-law (service) contract with the Respondent, informing them of the need to take appropriate measures in respect of the Respondent. The authorized representative of the party that entered into the civil-law contract with the Respondent shall be obliged to notify DOCDI of the measures taken within 5 (five) business days from the date of receipt of the relevant notice.



3.3.4. Where an individual holds multiple statuses at the University (for example, both an employee and a student simultaneously), Complaints shall be handled in the following order of precedence:

- 1) the Labor Code and/or the FPP, where applicable;
- 2) the Student Code of Conduct, where paragraph (a) does not apply; and
- 3) the applicable civil law (service) contract, where neither paragraph (a) nor paragraph (b) applies.

3.3.5. In instances involving acts that bear the characteristics of an administrative or criminal offence, the University may assist individuals in referring the matter to the relevant state or law enforcement authorities.

3.4. Protection from Retaliation

3.4.1. Retaliation refers to any adverse action taken against an individual(s) for filing a Complaint, supporting, or providing information in connection with the Complaint of Prohibited Conduct (harassment).

3.4.2. Retaliation constitutes a separate violation of this Policy.

3.4.3. Individuals subjected to Retaliation have the right to file a separate Complaint, which shall be reviewed in accordance with the established procedures.

3.5. Anti-Harassment Committee

3.5.1. The Anti-Harassment Committee (hereinafter the “Committee”) is an advisory body under the Vice President of the University that recommends initiatives and develops proposals for creating a safe, welcoming, respectful, and inclusive environment at the University.

3.5.2. The Committee shall not serve as a disciplinary body and shall not apply disciplinary sanctions/measures.

3.5.3. Members of the Committee may provide advisory consultations on matters related to this Policy.

3.5.4. The Bylaws, composition, and authority of the Committee shall be approved by the Vice President of the University.

3.6. Supportive Measures

3.6.1. The University provides counseling, information, and support. The Supportive Measures include, but are not limited to:

- 1) Campus Psychological Counseling as far as possible and subject to the availability of relevant specialists (including emergency counseling);
- 2) Provision of on-campus medical services (if available);
- 3) Security of designated areas of the campus;
- 4) Placing temporary limitations/restrictions on an individual’s access to certain University facilities, areas, premises and activities in cases of threat to life and health or causing of severe harm to the safety, health and well-being of University Community Members;



5) Non-academic support services within the Department of Student Services include, but are not limited to: on-campus housing and accommodations, including free of charge emergency relocation for students (if available); Resident Assistant Services in the Student Dormitory; SENU Mentorship Program (available for students only);

6) Leave of Absence (in accordance with the Policy and Procedures on Leave of Absence, Dismissal and Voluntary Withdrawal for students of Nazarbayev University);

7) Advisory consultation by the University Anti-Harassment Committee members.

Section 3.7. Miscellaneous

3.7.1. All onboarding materials for newly enrolled students, including exchange and visiting programs, employees and individuals providing services to the University under civil law of the Republic of Kazakhstan shall include a hard and/or electronic copy of the Policy.

3.7.2. The University posts this Policy on the University website and makes it known to all University Community Members.

Section 4. Waiver

4.1. Not applicable.

Section 5. Temporary Provision

5.1. Not applicable.

Section 6. Revision

6.1. This Policy shall be reviewed within 3 (three) years after its approval and revised if necessary.

Section 7. Related Documents

7.1. Faculty Policies and Procedures Nazarbayev University.

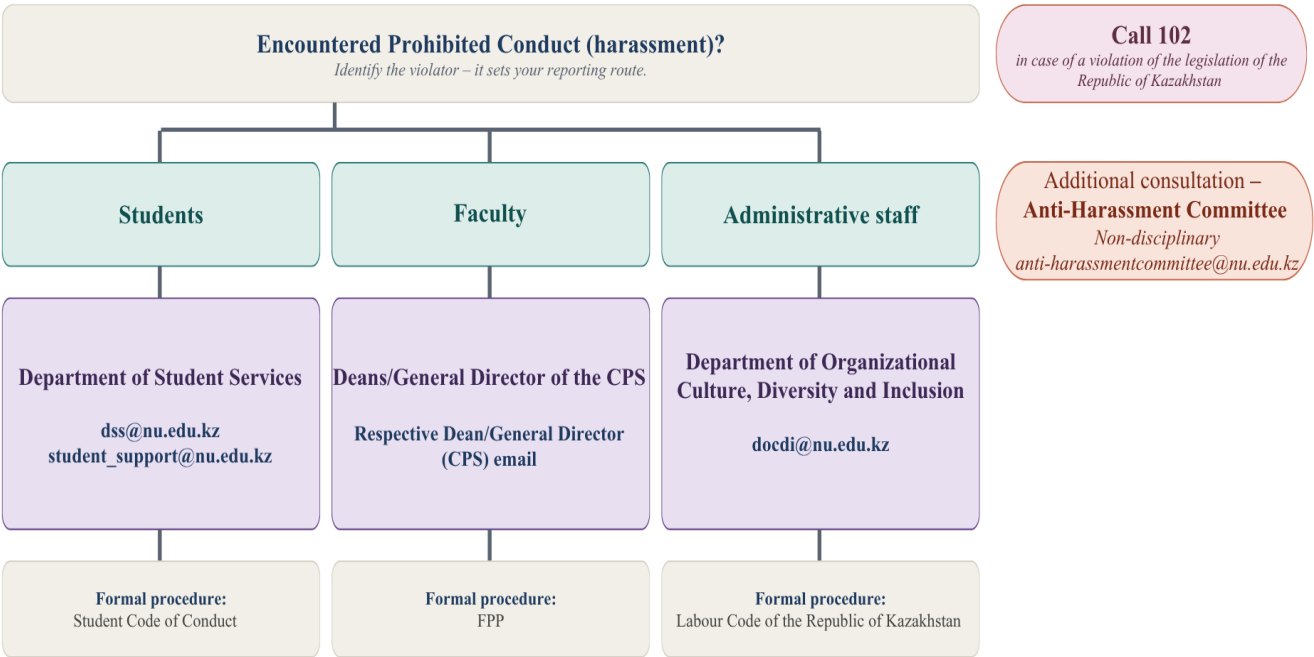
7.2. Student Code of Conduct and Disciplinary Procedures of the autonomous organization of education Nazarbayev University.



Annex
to the Anti-Harassment
Policy of the autonomous
organization of education
Nazarbayev University

Where to report?

The Complaint pathway depends on the category of the alleged violator. 102 and Committee consultation remain available.



Resources for students	Resources for employees
Department of Student Services (DSS) Email: student_support@nu.edu.kz dss@nu.edu.kz Student Government Email: student_government@nu.edu.kz Student Rights Committee Email: student.rights@nu.edu.kz	Respective Dean/General Director of CPS (for faculty) Department of Organizational Culture, Diversity and Inclusion (for staff) Email: docdi@nu.edu.kz Department of Human Capital Development (DHCD) Email: hr_nu@nu.edu.kz
Resources in cases of emergency	
Emergency situations involving health, safety, and/or security must be reported to the police (102) and/or an ambulance (103), the Occupational Safety and health Department at oshd@nu.edu.kz , and/or the Security Office at security@nu.edu.kz .	
Additional Resources for University Community Members	



Anti-Harassment Committee (during working hours)Email: anti-harassmentcommittee@nu.edu.kz**Psychological Counseling** (during working hours)Email: nu_counseling@nu.edu.kz, pcs@nu.edu.kzDuty consultant via telegram at [@pcs_nu](https://t.me/apcs_nu)**Health and Well-being Department** (during working hours)Email: hwd@nu.edu.kz**Emergency hotline** in Kazakhstan – 111

Unified National Contact Center for Victims of Domestic Violence and Bullying.

Works 24/7, free of charge, anonymously for all regions of Kazakhstan

