

APPROVED

By the decision of the Board of NJC «Al-Farabi
Kazakh National University» from October 29,
2024 № 14



Anti-harassment policy at NJC «Al-Farabi Kazakh National University»

Almaty, 2024

Anti-harassment policy

Policy statement

Al-Farabi Kazakh National University (KazNU) actively strives to create an inclusive, safe and respectful environment for all members of the university community. Harassment in any form, whether based on race, ethnicity, gender, religion, age, disability, sexual orientation, social status or other characteristics, is unacceptable and contradicts the values of academic freedom, equality and humanity on which our educational institution is built.

This anti-harassment policy is part of KazNU's strategic approach to implementing the Sustainable Development Goals set by the United Nations (UN). We strive to contribute to the achievement of the Sustainable Development Goals, including Goal 5: Achieve gender equality and empower all women and girls, Goal 10: Reduce inequalities in and between countries, and Goal 16: Promote peace, justice and effective institutions. The policy is aimed at creating a more just, equitable and inclusive university community, which is an important part of the UN global agenda for sustainable development.

The purpose of this policy is to establish clear rules and mechanisms for preventing, detecting and responding to cases of harassment in the university environment. This policy is aimed at creating an environment in which every student, teacher and staff member will feel safe, respected and appreciated.

In accordance with this policy, everyone, without exception, is provided with equal opportunities for employment, enrollment, as well as participation in university programs, services and events. The University will also contribute to the provision of equal opportunities and equal treatment through the implementation of this policy and other measures provided by the university for this purpose. According to the university's policy, any action that constitutes harassment, discrimination or retaliation is strictly prohibited. Consequently, each member of the university community is obliged to strictly comply with this policy and any procedures initiated



by the President of the University in order to implement the policy. This includes notifying each staff member/student of their rights and responsibilities under the Discrimination and Harassment Policy. Management and employees are responsible for taking reasonable measures to prevent any actions in the industrial and educational environment that are or reasonably may be considered acts of intimidation, hostility, discrimination or retaliation. Any person who considers himself to be a victim of discrimination or harassment by an employee, representative or student of the university is encouraged to contact the Office of Equality, Diversity and Inclusivity, which provides complaint procedures for the prompt and fair resolution of disputes related to discrimination. Complaints relating to issues other than alleged discrimination or harassment may be filed in accordance with the current procedure provided for in the collective agreement or the Handbook on Management/Confidentiality, or with the student complaints procedure. The responsible head of the university establishes operational policies and procedures that ensure consistent implementation of this policy at the university.



Glossary

The following definitions are used in this policy

1. Harassment is any unwanted, offensive or derogatory behavior that causes a person to feel fear, humiliation or discrimination. Harassment can manifest itself in various forms, including physical, verbal, emotional, or digital violence.
2. Discrimination is a biased attitude towards a person or group of people based on their racial, ethnic, sexual, religious, age, social or other affiliation, which manifests itself in the restriction of rights, opportunities or humiliation of dignity.
3. Physical harassment — the use of force, threats of violence or other actions aimed at causing physical harm, violence or personal harm.
4. Psychological or emotional harassment — actions or behaviors aimed at manipulating, intimidating, threatening or creating a sense of humiliation and isolation that affect a person's psycho-emotional state.
5. Verbal harassment is the use of derogatory or insulting statements, comments, words or phrases aimed at humiliating a person's dignity based on gender, race, ethnicity, religion, sexual orientation or other characteristics.
6. Digital harassment (cyber harassment) is a form of harassment involving the use of digital technologies such as email, social media or other online platforms to intimidate, threaten, insult or harass.
7. Zero tolerance is the principle that the university does not accept or condone any form of harassment or violence.
8. Inclusivity is a principle based on ensuring equal opportunities for all members of the university community, regardless of their social, cultural, religious or other affiliation, in order to create an open and respectful atmosphere.
9. The Zero Tolerance Policy is a strategic approach that assumes that the university will not tolerate any form of harassment, violence or discrimination, regardless of their form and context.

1. Principles of anti-harassment policy

This policy is based on the following principles:



Equality and inclusivity: The University ensures equal rights for all members of the community, regardless of their affiliation to any social, cultural or other group.

Safety and respect: Everyone has the right to be treated safely, respectfully and with dignity by other members of the community.

Zero tolerance: KazNU adheres to a zero tolerance policy towards all forms of harassment, discrimination and violence.

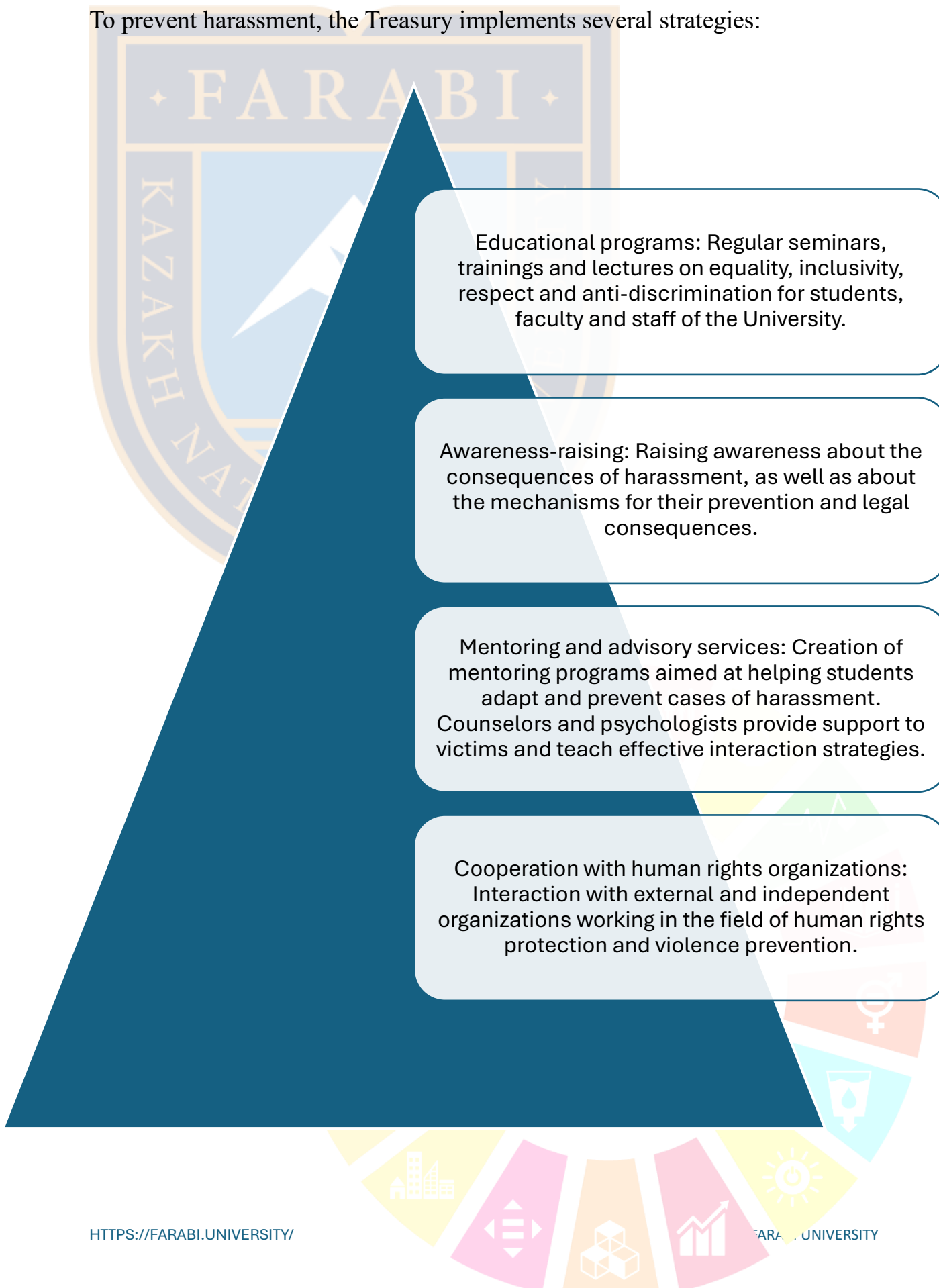
Confidentiality: All harassment complaints will be handled confidentially. Information about incidents of harassment will be protected from unauthorized dissemination.

Responsibility: All members of the university community are responsible for maintaining an atmosphere of mutual respect and understanding. Violations will have corresponding consequences.

Contribution to sustainable development: KazNU recognizes its responsibility to society and supports the global Sustainable Development Goals set by the United Nations.

2. Mechanisms for preventing harassment

To prevent harassment, the Treasury implements several strategies:



Educational programs: Regular seminars, trainings and lectures on equality, inclusivity, respect and anti-discrimination for students, faculty and staff of the University.

Awareness-raising: Raising awareness about the consequences of harassment, as well as about the mechanisms for their prevention and legal consequences.

Mentoring and advisory services: Creation of mentoring programs aimed at helping students adapt and prevent cases of harassment. Counselors and psychologists provide support to victims and teach effective interaction strategies.

Cooperation with human rights organizations: Interaction with external and independent organizations working in the field of human rights protection and violence prevention.

3. Complaint and referral procedure

In order to effectively respond to cases of harassment and ensure justice for all parties, the following procedures have been established:

1. Filing a complaint: Any member of the university community who has witnessed or been a victim of harassment can file a complaint via the official website of the university, e-mail, as well as by personal appeal to the special anti-harassment commission.
2. Confidentiality: All complaints will be handled confidentially, without disclosure of personal information, unless it requires verification or violates the law.
3. Verification: Harassment complaints will be checked by the relevant university authorities, including the administration, the psychological service and the Legal Department. If necessary, a check will be organized to establish the facts and circumstances.
4. Measures of influence: In case of confirmation of the facts of harassment, appropriate disciplinary measures will be applied. Depending on the severity of the violation, sanctions may be applied, up to expulsion, dismissal or filing a lawsuit in court.
5. Protection of victims' rights: The University guarantees protection from retaliation or further threats to complainants, as well as provides access to psychological and legal assistance for victims.

4. Responsibility and sanctions

In case of violations of the anti-harassment policy at the university, the perpetrators will be held accountable in accordance with internal regulations and the legislation of the Republic of Kazakhstan.

Depending on the nature of the violation, the following sanctions may be applied:

- For students: warning, expulsion from the university, temporary suspension from the educational process, transfer to another program.
- For teachers and staff: disciplinary penalties, dismissal, deprivation of bonuses and other privileges.
- For external participants: termination of cooperation with the university and filing a lawsuit.

Issues regarding harassment are addressed by the Office of Equality, Diversity and Inclusivity. The Office of Equality, Diversity and Inclusivity has formal and informal methods for resolving complaints from a person who believes that discrimination or harassment is being used against him. The Informal Settlement Process and the Formal Complaint Procedure are outlined below.

The informal settlement process is usually completed before the Formal Discrimination Complaint Procedure begins. However, there may be circumstances in which it is more appropriate to address the issue of discrimination or harassment by initiating a Formal Discrimination Complaint Procedure.

Such circumstances include situations where:

- Based on an initial assessment of the facts, the Office of Equality, Diversity and Inclusivity determines that it is more appropriate to start with a formal process.
- A sexual assault, a violent act of a sexual nature, or a crime has been committed. The person is informed of the right to terminate the Informal Settlement Process at any time and begin a Formal Complaint Procedure.

Anyone with claims of discrimination or harassment should contact the Office of Equality, Diversity and Inclusivity. Within the framework of the Informal Settlement Process and the Formal Complaint Procedure, the Office of Equality, Diversity and Inclusivity, at its discretion, can use any means of assistance of its choice to resolve issues regarding discrimination and/or harassment. Applications are reviewed for the applicability of this policy. If the application does not relate to potentially unlawful discrimination or harassment, the Office of Equality, Diversity and Inclusivity notifies the applicant of its decision to close the complaint and informs the applicant

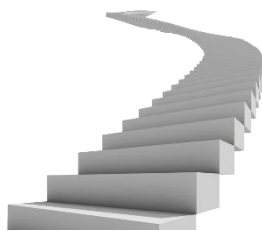
of any other university policy or procedure applicable to resolve the claim. The data in relation to the complaint or incident is stored for the period prescribed by law.



Step A. Informal settlement process

The informal settlement process is voluntary and provides an opportunity to resolve the issue through personal and collective meetings with interested parties. If the informal settlement process does not lead to a settlement of the issue, then the applicant has the opportunity to file a Formal Complaint of Discrimination (Step B). The applicant has the right to complete the Informal Settlement Process at any time and begin the Formal Complaint Procedure.

1. Complaints regarding conduct or policies that may violate the Harassment Policy must be submitted to the Office of Equality, Diversity and Inclusivity orally or in writing within no more than 180 days after the alleged violation.
2. After receiving written or oral notification of the alleged harassment, the Director or an authorized person of the Office of Equality, Diversity and Inclusivity, as appropriate:
 - a. Within 7 (seven) business days, contact the applicant who reported the alleged violation to confirm receipt of the notification.
 - b. Contact the applicant to determine the essence of the issue, clarify the Informal Settlement Process and Formal Complaint Procedure, as well as discuss possible consequences.
 - c. Will attempt to resolve issues with stakeholders through various methods, including: acting as an intermediary between the parties; providing assistance to a department or unit to resolve the issue; conducting specialized education and training programs; providing remedies or referrals to support services; holding meetings with stakeholders to discuss Policy regarding harassment.
3. The informal settlement process is carried out objectively and promptly to resolve issues regarding the alleged violation in accordance with this policy. The Office of Equality, Diversity and Inclusivity informs interested parties about the timing of the Informal Settlement Process in connection with the decision.
4. As mentioned above, the Informal Settlement Process is not mandatory, and interested persons can skip the Informal Settlement Process and file a formal complaint, which is subject to review in accordance with the Formal Complaint Procedure (Step B). The employees represented also have the right to seek consideration of the complaint in accordance with the collective employment agreement.



Step B. Formal complaint procedure

1. If a complaint of possible discrimination or harassment is not resolved through an Informal Settlement Process, or if the applicant prefers to file a complaint in accordance with the Formal Complaint Procedure, the applicant must prepare a written statement using the appropriate forms provided on the website of the Office of Equality, Diversity and Inclusivity, indicating the basis of the complaint and a summary of the facts which supposedly represent harassment. In the context of the Formal Complaint Procedure, the applicant filing the complaint is referred to as the "plaintiff". The person against whom the complaint is filed is referred to as the "defendant".

2. The Director or an authorized representative of the Office of Equality, Diversity and Inclusivity must meet with the plaintiff to understand the essence of the complaint and determine whether the Harassment Policy is applicable.

3. If it is determined that the Harassment Policy is applicable, the Director or an authorized representative of the Office of Equality, Diversity and Inclusivity determines an action plan that may include, without limitation: conducting an appropriate, reliable and objective verification of the application, including the opportunity for both parties to present witnesses and other evidence, as well as examining all accompanying documents. All interested parties have the right to involve another person as a witness during the interviews.

4. Information related to the research is considered confidential and is subject to disclosure in the event that the university considers it necessary due to business necessity or in accordance with legal requirements. The University has the right to respect the confidentiality of the names of witnesses and plaintiffs if, at the discretion of the university, this is necessary to protect the student or employee.

5. Plaintiffs and defendants are obliged to cooperate fully with the investigation. If the plaintiff does not or cannot cooperate, the complaint can be considered withdrawn. If the defendant does not cooperate, this may be considered a violation of the university's policy, although it does not necessarily constitute a violation of this Harassment Policy.

6. If a complaint is filed by an employee, before drawing up the final report, the Director or an authorized representative of the Office of Equality, Diversity and Inclusivity shall consult with representatives of the HR department. If a complaint is filed by a student, the Director or an authorized representative consults with the relevant academic administrator before completing the final report.

7. Upon completion of the audit, the Director or an authorized representative of the Office of Equality, Diversity and Inclusivity is obliged to prepare a draft report describing the essence of the complaint, the results of the audit and propose a remedy, if any. This project is subject to discussion with the relevant supervisor, the immediate supervisor or the relevant academic administrator. The final report may be submitted to the relevant university officials. A letter is sent to the plaintiff and the defendant with a summary of the report and the results of the complaint review.
8. The Office of Equality, Diversity and Inclusivity shall take all measures to complete the audit, compile a final report and a summary letter within 45 (forty-five) working days of the University from the date of receipt of the complaint. If, due to circumstances, an extension of the period of 45 (forty-five) days is necessary, the plaintiff and the defendant are informed of the reasons for the extension and the expected date of completion of the audit. When confirming the groundlessness of the statements in the personal file of the employee or student who is the defendant, no record of the accusation and verification is made.

Step C. The decision of the relevant official of the university



1. Step C takes effect only if the investigator concludes that the charges are well-founded. The Office of Equality, Diversity and Inclusivity provides a written report to the relevant university official.
 2. The relevant official of the University issues a written decision regarding the complaint. If necessary, the resolution should contain a brief description of actions aimed at correcting the situation, such as the steps necessary to stop harassment, eliminate and prevent the resumption of harassment, as well as correct the discriminatory influence on plaintiffs and others.
 3. A written resolution is sent to the Office of Equality, Diversity and Inclusivity, which provides a written response to the plaintiff and the defendant within 10 (ten) business days after receiving a written report from the relevant official of the university, which sets out the results of the examination of the complaint.
- In some circumstances, the university has the right to disclose to the plaintiff information about the actions that will be taken to remedy the situation if the remedy is directly related to the plaintiff (for example, the defendant is prohibited from attending the university for a certain period).

5. The role of university teachers and staff

University faculty and staff have an important responsibility to create a safe and inclusive environment. They must:

1. Apply measures aimed at preventing harassment.
2. Respond to any form of harassment, even if it occurs outside the educational process, but concerns the university community.
3. To teach students about equality, respect and tolerance.
4. Support victims of harassment and refer them to appropriate specialists.

6. Conclusion

Al-Farabi Kazakh National University strongly condemns any form of harassment and strives to create a university environment where every member of the community will feel respected and safe. We are confident that only through active cooperation, observance of the principles of equality and mutual respect, it is possible to ensure the harmonious and productive development of the educational process.

This policy is mandatory for all students, faculty, staff and partners of the university and will be reviewed regularly to take into account new challenges and needs.