



“APPROVED”
Chairman of the Board – Rector
JSC “Mukhamedzhan Tynyshbayev
ALT University”
25 09.2025

POLICY ON THE PREVENTION OF HARASSMENT

Almaty, 2025

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1. GENERAL PROVISIONS

Joint Stock Company Muzhamedzhan Tynyshpayev ALT University (hereinafter referred to as the "ALT University" or the "University") strives to implement modern practices in its daily activities. The teaching staff (hereinafter referred to as the teaching staff), employees and students of the University are required to adhere to high standards of behavior and professional ethics.

The University strives to provide a supportive learning and work environment free from any form of discrimination and harassment, including sexual harassment.

The University considers sexual exploitation, sexual violence and sexual harassment (hereinafter referred to as SAND) as acts degrading human dignity and violating generally recognized international legal norms and standards.

The University implements a Zero Tolerance Policy for any manifestations:

- Sexual harassment
- Sexual exploitation
- Sexual violence
- Discrimination
- psychological pressure
- harassment (bullying)

Any form of harassment is considered a gross violation of academic and work ethics and entails disciplinary, administrative or criminal liability.

The teaching staff, staff, and students of the University are required to adhere to high standards of professional ethics and respectful behavior.

The University provides a safe educational and work environment free from discrimination, violence and harassment.

2. REGULATORY AND LEGAL GROUNDS

This Regulation has been developed in accordance with the legislation of the Republic of Kazakhstan and international standards.

2.1. Legislation of the Republic of Kazakhstan

The Regulation is based on the following normative legal acts:

- The Constitution of the Republic of Kazakhstan
- The Labor Code of the Republic of Kazakhstan
- The Law of the Republic of Kazakhstan "On Education"
- The Code of the Republic of Kazakhstan on Administrative Offenses

The Criminal Code of the Republic of Kazakhstan, including articles:

- Article 120 — Rape
- Article 121 — Violent acts of a sexual nature
- Article 123 — Coercion to acts of a sexual nature
- Article 131 — Insult
- Article 147 — Violation of privacy

The Law of the Republic of Kazakhstan "On the prevention of domestic violence"

The Law of the Republic of Kazakhstan "On Personal Data and their Protection"

The Law of the Republic of Kazakhstan "On Combating Corruption" (regarding abuse of official position)

2.2 International standards

The University adheres to international standards for the protection of human rights:

- ILO Convention No. 190 on Violence and Harassment in the World of Work (ILO Convention 190)
- UNESCO recommendations on a safe educational environment
- The principles of gender equality of UN Women
- The UN Universal Declaration of Human Rights
- United Nations Sustainable Development Goals (SDG 5 — Gender equality)

3. CORE RESPONSIBILITIES

This Policy defines the measures the University undertakes to ensure a safe environment in the field of S&A. The University recognizes the need to counteract all forms of S&A.

The Policy applies to all employees, students, academic staff (PPS), consultants, experts, individuals working under contract, as well as persons sent on business trips by the University.

The Policy establishes the University’s specific obligations to prevent, deter, suppress, and respond to acts of S&A. Its scope may extend to the conduct of employees not only in the workplace and during working hours, but also during various events, seminars, trainings, as well as on social media.

4. DEFINITIONS

“Harassment” – any unwanted conduct or practices, or threats thereof, whether occurring as a single incident or repeatedly, whose purpose, effect, or potential consequence is to cause physical, psychological, sexual, or economic harm, including gender-based violence and stalking.

“Sexual exploitation” – any abuse of vulnerability, unequal power, or trust for the purpose of obtaining financial, social, or academic benefit of a sexual nature, including attempts or threats to obtain such benefit. In cases where the act constitutes a criminal offence, the University shall promptly forward the materials to law enforcement authorities.

“Sexual violence” – intentional unlawful acts that violate the sexual integrity or sexual freedom of employees, academic staff (PPS), students, or other third parties.

“Sexual harassment” – any unwanted physical or sexual conduct, threats, coercion, or abuse of unequal power affecting sexual integrity; unwanted advances, remarks, or actions creating a hostile environment; requests, demands, or suggestions for sexual favors, or any other verbal, non-verbal, or physical conduct of a sexual nature that interferes with work or study, is made a condition of employment, or creates an intimidating, hostile, or offensive environment. Harassment may occur between persons of the same or different genders, and the initiator may be of any gender.

“Complainant” – a person reporting incidents of sexual conduct/exploitation, abuse, or discrimination of any kind.

“Victim” – a person who has been subjected to sexual conduct/exploitation, violence, or harassment.

“Complaint” / “report” – an appeal submitted by a complainant or informant regarding an actual or alleged incident of S&A, as well as an act being prepared against a specific person by a university employee.

“Informant” – a university employee who reports an incident of S&A.

“False or malicious report” – a knowingly false or misleading statement made intentionally, knowingly, or negligently for the purpose of obtaining unlawful benefit. A person who submits a knowingly false report may be subject to disciplinary and/or other liability in accordance with the legislation of the Republic of Kazakhstan.

“Survey research” – a method for monitoring the situation regarding S&A within the University.

“Policy” – the University Policy on the Protection against Sexual Exploitation, Sexual Abuse, Sexual Violence, and Sexual Harassment in the workplace.

“Partners” – organizations and individuals with whom the University cooperates and maintains contractual relations.

“Perpetrator” – a person suspected of committing S&A or who has committed such acts.

“Harassment Review Commission of ALT University named after Mukhamedzhan Tynyshbayev” or “Commission” – a collective body that considers complaints/appeals, investigates reports, conducts monitoring, and oversees compliance with this Policy and the prevention of unlawful actions.

5. OBLIGATIONS

The University, guided by the principles of this Policy, is obliged to create and maintain an environment that prevents harassment and S&A.

University employees are required to report to management and the Commission any suspicions of S&A incidents, any anticipated or planned S&A incidents, and to cooperate during investigations and other internal/official procedures and proceedings.

6. PROCEDURES

Every employee, academic staff member (PPS), and student of the University has the right to report to the Commission any actual or suspected acts related to S&A.

Reports may be submitted via the University’s official email, hotline, public reception office, or the Rector’s blog.

Individuals or organizations reporting S&A cases must be aware that they may be held liable for submitting false reports.

The Commission shall take measures to protect the rights and legitimate interests of the complainant and the alleged victim from sexual misconduct and harassment, and shall ensure timely investigation and the application of disciplinary sanctions following the outcome of an internal investigation.

Upon completion of the review, the Commission prepares a report (minutes) and submits it to the University’s management.

If a violation is confirmed, the Commission may propose appropriate disciplinary sanctions, taking into account:

- the severity, frequency, and nature of the inappropriate conduct;
- the presence of previous complaints from the complainant(s);

- the presence of prior complaints (including anonymous ones) against the perpetrator;
- the quality and quantity of available evidence (witness statements, audio/video/photo materials, correspondence, etc.).

If no violation is established, but potentially problematic or inappropriate conduct is identified, the Commission may recommend disciplinary action against the alleged offender in accordance with the labor legislation of the Republic of Kazakhstan, including:

- issuing a warning, reprimand, or severe reprimand to the offender, with the relevant order placed in the employee’s or academic staff member’s personnel file;
- recommending termination of the employment contract with the offender;
- applying disciplinary measures to a student, with the relevant order placed in the student’s personal file.

If either party disagrees with the results of the investigation, the Commission shall inform them of their right to appeal to a court.

If there are grounds to believe that the violation contains elements of a criminal or administrative offence, the materials shall be forwarded to the police or the competent authority. The victim shall be advised, for the protection of their rights and legitimate interests, to file a report with law enforcement authorities or to apply to a court.

7. COMMISSION FOR REVIEWING HARASSMENT CASES

7.1 Composition of the Commission

The Commission is established by an order of the University Rector. The Commission includes:

- Commission Chair (Vice-Rector or an authorized person)
- Commission Secretary

Members of the Commission:

- Head of the Office for Inclusive Education and Mental Health
- Representative of the Legal Department
- Representative of the HR Service
- Representative of the Security Service
- Representative of the Employees’ Trade Union
- Representative of the Student Ombudsperson
- Independent expert (if necessary)

The minimum composition of the Commission shall be no fewer than five members.

7.2 Principles of the Commission’s Work

The Commission is guided by the following principles:

- Objectivity
- Independence
- Confidentiality
- protection of victims
- prohibition of retaliation against complainants

7.2.1 Complaint Review Algorithm

Stage 1 — Submission of an application/complaint

A complaint may be submitted via:

- official email
- hotline telephone
- Rector’s blog
- Psychological Support Office
- written application

7.2.2 Stage — Registration

The Commission Secretary:

- registers the complaint
- assigns a case number
- ensures confidentiality
- prior to the scheduled meeting, distributes case materials and the agenda to

Commission members for preliminary review

- prepares the minutes for each individual complaint and collects signatures
- collects case materials/documents and requests additional documents if

necessary

- manages all documentation and is responsible for the safekeeping of

Commission records

7.2.3 Stage — Preliminary Assessment

Within three (3) working days, the Commission:

- determines the nature of the complaint
- assesses the need for urgent measures

7.2.4 Stage — Investigation

The Commission:

- conducts interviews by inviting all parties and hears each party separately
- analyses submitted case materials/evidence
- reviews witness statements

The investigation period for each complaint shall not exceed fifteen (15) working days from the date of receipt of the complaint.

7.2.5 Stage — Decision

The Commission adopts a decision and prepares minutes.

The Commission’s minutes are advisory in nature and, once signed, are submitted to the University Rector.

The Rector, at their discretion, makes a decision on further actions regarding the alleged offender based on each Commission report.

8. PROCEDURE FOR STUDENTS

Students can contact:

- a psychologist
- to the adviser
- to the office of inclusive Education
- to the commission.

The student has the right to:

- Anonymity
- psychological support
- protection from pressure
- to change academic conditions if necessary.
- the presence of a lawyer or other representative at all stages of the examination
- and the presence of a legal representative if he is a minor.

9. PROCEDURE FOR TEACHING STAFF AND EMPLOYEES

Employees and teaching staff can:

- submit an application to the commission
- contact HR
- contact the vice-rector
- File a complaint through a trust line.

If a violation is confirmed, disciplinary action is imposed:

- Remark
- Reprimand
- severe reprimand
- dismissal.

10. DISCIPLINARY MEASURES

Possible measures:

- Warning
- Imposition of disciplinary action
- dismissal of an employee/teaching staff
- student's expulsion from the University

11. DEGREES OF VIOLATIONS

11.1. In cases of rape, forced sexual intercourse, threats, blackmail and other serious charges, the Commission is obliged to immediately contact law enforcement agencies.

11.2. Insults, obscene gestures, demonstration of obscene materials, including through the use of mass media and telecommunication networks, as well as other humiliating behavior – the Commission is obliged to notify the authorized body.

11.3. Insulting, humiliating the honor and dignity of teaching staff or students – the Commission recommends that the applicant contact law enforcement agencies.

12. LEGAL REMEDIES

Any victim who has reported or attempted to report an alleged or committed act of SAND has the right to protection, including anonymity, confidentiality and protection from harassment, as well as the right to protective measures provided for informants.

Employees, teaching staff, and students who have suffered stress due to S&A can contact the University for support, including:

- Seek temporary medical help or other emergency support;
- ensuring the protection measures provided for in this Regulation.

All complaints and messages are treated confidentially; information is disclosed strictly on official business.

The identity of the applicant is disclosed only to the participants in the investigation; the University protects the applicant and the informant from harassment.

All materials are stored by the Commission in secure files.

13. IMPLEMENTATION, PREVENTION AND MONITORING

The Commission is developing a plan to implement the Regulation and raise awareness of the S&A problem. The plan includes:

- posting the policy on the University's official website;
- preparation and dissemination of information materials for employees, teaching staff, students, interns, consultants and experts;
- provision of compulsory training/information to all University employees on this Provision;
- Provision of compulsory training/information for new employees, teaching staff and students.

The Commission is responsible for monitoring compliance with the Regulations and maintaining a register of reports and complaints about the S&A.

14. FINAL PROVISIONS

The Regulation comes into force from the moment it is signed by the Chairman of the Board, the Rector of the University.

The Commission has the right to review and amend the Regulations with subsequent approval by the University administration for further improvement or updating.

15. ANALYSIS AND UPDATING OF WORK INSTRUCTION

This Regulation should be updated as changes and additions are made to the legislative and regulatory acts of the Republic of Kazakhstan, as well as to the internal regulations/documents of the University.

16. IDENTIFICATION, ASSESSMENT AND RISK MANAGEMENT

16.1 Identification, assessment and risk management of these Regulations should be carried out in accordance with DP-ALT-05.

17. APPROVAL AND ENTRY INTO FORCE

17.1 The approval of this Policy shall be carried out in coordination with the PRK (First Executive Officer / Rector of the University) and the responsible IMS (Integrated Management System) specialist.

18. STORAGE, PROTECTION, RECOVERY AND WITHDRAWAL OF DOCUMENTS

18.1 The head of the developing unit shall be responsible for transferring the approved original and the electronic Word version of this Policy to the DAPK for storage.

18.2 The storage, protection, recovery, and withdrawal of documents under this Policy shall be carried out in accordance with DP-ALT-01.

19. AMENDMENTS TO DOCUMENTS

19.1 Any amendments to this Policy shall be made in accordance with DP-ALT-01.

20. ACCESS TO DOCUMENTS. CONFIDENTIALITY

20.1 Working copies of this Policy shall be stored in electronic form in all departments whose activities affect the effectiveness of the functioning of documented IMS information.

20.2 Access to documents and the confidentiality of this Policy shall be ensured in accordance with DP-ALT-01.

Appendix 1

SAMPLE APPLICATION FORM

To the Chair of the Commission
for Reviewing Harassment Cases
JSC Mukhamedzhan Tynyshbayev
ALT University

from _____

Full name

(position / institute / year of study
contact phone number)

STATEMENT

I, _____, hereby report a possible violation of the Policy
on the Prevention of Harassment.

Date of the incident: _____

Location of the incident: _____

Person against whom the complaint is filed:

Description of the situation:

Possible witnesses:

I request that this statement be reviewed and appropriate measures be taken in
accordance with the University Policy.
I confirm the accuracy of the information provided above.

Date _____

Signature _____