	«С.Ж.АСФЕНДИЯРОВ АТЫНДАҒЫ ҚАЗАҚ ҰЛТТЫҚ МЕДИЦИНА УНИВЕРСИТЕТИ» КЕАҚ NJSC «ASFENDIYAROV KAZAKH NATIONAL MEDICAL UNIVERSITY»	
	Legal Department	Policy on Counteracting Discrimination and Harassment at the NJSC "KazNMU"
		Edition: 3
		Page 1 of 7

APPROVED
 by decision of the Board
 Dated " 03 " March 2025
 Protocol № 4


Policy on Counteracting Discrimination and Harassment at the NJSC "Kazakh National Medical University named after S.D. Asfendiyarov"

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Section	page
1. General Provisions	3
2. Normative References	4
3. Terms and definitions	4
4. Goals and Objectives	5
5. Fundamental Principles	5
6. Procedure for Reviewing Complaints	6
7. Responsibility	7
8. Final provisions	7

	«С.Ж.АСФЕНДИЯРОВ АТЫНДАҒЫ ҚАЗАҚ ҰЛТТЫҚ МЕДИЦИНА УНИВЕРСИТЕТИ» КЕАҚ NCJSC «ASFENDIYAROV KAZAKH NATIONAL MEDICAL UNIVERSITY»	
	Legal Department	Policy on Counteracting Discrimination and Harassment at the NJSC "KazNMU"
		Edition: 3
		Page 3 of 7

1. General provisions

1.1. The Constitution of the Republic of Kazakhstan establishes that no one may be subjected to discrimination on the grounds of origin, social, official, or property status, gender, race, nationality, language, religion, beliefs, place of residence, or any other circumstances (Clause 2, Article 14).

1.2. This Anti-Discrimination and Harassment Policy (hereinafter referred to as the "Policy") of the Non-Profit Joint Stock Company "S.D. Asfendiyarov Kazakh National Medical University" (hereinafter referred to as the "University") is developed based on the provisions of the Constitution, which states that the Republic of Kazakhstan affirms itself as a democratic, secular, legal, and social state, whose highest values are the individual, their life, rights, and freedoms (Clause 1, Article 1), and that human dignity is inviolable (Clause 1, Article 17).

1.3. This Policy is an internal regulatory document of the University, establishing the fundamental principles and procedures for counteracting discrimination and harassment, including sexual and other forms of harassment against employees and students of the University.

1.4. This Policy is aimed at creating and maintaining a professional environment of respect for employees, officials, Board of Directors/Management Board members, and students of the University, ensuring the inviolability of their dignity.

1.5. In its activities, the University is guided by moral and ethical, professional, and academic principles that exclude discrimination and harassment of employees and students.

1.6. Employees, officials, and members of the University's Management Board/Board of Directors have the right to work and fulfill their functional responsibilities in a comfortable environment that ensures equal opportunities for professional growth without discrimination or harassment.


1.7. Every student of the University has the right to receive educational services that comply with state compulsory education standards and exclude discrimination and harassment.

1.8. The University recognizes the priority of adhering to moral and ethical, professional, and academic relations that exclude discrimination and harassment of employees, officials, Board of Directors/Management Board members, and students of the University.

1.9. The University declares its commitment to actively counter discrimination and harassment, including sexual and other forms of harassment, against employees, officials, Board of Directors/Management Board members, and students of the University.

1.10. In its activities, the University is guided by:

1. The Constitution and other regulatory legal acts of the Republic of Kazakhstan;
2. The Charter of the University;
3. The University's Code of Business Ethics;

	«С.Ж.АСФЕНДИЯРОВ АТЫНДАҒЫ ҚАЗАҚ ҰЛТТЫҚ МЕДИЦИНА УНИВЕРСИТЕТІ» КЕАҚ NJSC «ASFENDIYAROV KAZAKH NATIONAL MEDICAL UNIVERSITY»	
	Legal Department	Policy on Counteracting Discrimination and Harassment at the NJSC "KazNMU"
		Edition: 3 Page 4 of 7

4. The Code of Honor for faculty members and employees of the University;
5. The Internal Regulations for students of the University;
6. The Collective Agreement;
7. The International Standard ISO 9001:2015, approved quality management system documents (the University's quality policy and objectives, quality manual, documented quality procedures, etc.);
8. The International Standard ISO 37001, the anti-corruption policy, the University's anti-corruption standard, and the requirements of other internal regulatory documents of the University on anti-corruption;
9. Decisions of the Board of Directors and the Management Board of the University;
10. Orders and directives of the University's administration;
11. Other internal regulatory documents and decisions of the University's collegial bodies (regulations, instructions, rules, standards, protocols, etc.);
12. This Policy.

2. Regulatory references

2.1. This Policy is developed on the basis of the following external regulatory documents:

- 1) Constitution of the Republic of Kazakhstan (adopted at a national referendum on August 30, 1995);
- 2) Civil Code of the Republic of Kazakhstan (General Part), adopted by the Supreme Council of the Republic of Kazakhstan on December 27, 1994;
- 3) Civil Code of the Republic of Kazakhstan (Special Part) No. 409-I of July 1, 1999;
- 4) Law of the Republic of Kazakhstan dated July 1, 2024 No. 103-VIII "On Science and Technology Policy";
- 5) Code of the Republic of Kazakhstan dated July 7, 2020 No. 360-VI "On the health of the people and the healthcare system";
- 6) Law of the Republic of Kazakhstan " On Education " dated June 27, 2007 No. 319-III.

3. Terms and definitions

The following terms and definitions are used in this Field:

- 1) **Discrimination** – Violation of the equality of citizens, which implies direct or indirect restriction of a person's rights and freedoms based on origin, social, official, or property status, gender, race, nationality, language, religion, beliefs, place of residence, membership in public associations, or any other circumstances.
- 2) **Harassment** – Illegal actions or behavior causing discomfort and/or harm to another person, violating their dignity, including insults, threats, sexual and other forms of harassment affecting a person's honor and dignity.



3) **Counteracting Discrimination and Harassment** – The practical implementation of measures for preventing, responding to, and eliminating discrimination and harassment in employment, education, healthcare, and other activities of the University.

4. Objectives and Goals

4.1. The primary goal of this Policy is to achieve zero tolerance for discrimination and harassment, as well as to take timely and effective measures for prevention, response, and elimination of discrimination and harassment in employment, education, healthcare, and other areas of the University's activities.


4.2. Key tasks of the Policy include:

- 1) Creating and maintaining an atmosphere of zero tolerance for discrimination and harassment;
- 2) Ensuring adequate and timely awareness among employees and students about the inadmissibility and consequences of discrimination and harassment;
- 3) Conducting comprehensive activities for the development and implementation of safe and confidential protection against discrimination and harassment;
- 4) Improving the established procedures for timely prevention, response, and elimination of discrimination and harassment against employees and students of the University;
- 5) Assisting employees, officials, Board/Council members, and students of the University in ensuring their protection against discrimination and harassment, including sexual and other forms of harassment while performing their professional functions and during their studies at the University.

5. Fundamental Principles

5.1. This Policy is based on the following fundamental principles:


- 1) The principle of equal opportunities in employment, the performance of professional duties, and access to educational services, ensuring that every individual has equal opportunities to exercise their rights and freedoms in the professional and scientific-educational spheres of the University, except in cases and in the manner prescribed by the Labor Code of the Republic of Kazakhstan and other regulatory legal acts of the Republic of Kazakhstan;
- 2) Solidarity among all employees and students of the University in creating a comfortable moral and psychological environment that excludes all forms of discrimination and harassment;
- 3) The inadmissibility of sexual and other forms of harassment that infringe on human honor and dignity;
- 4) The inadmissibility of sexual and other forms of harassment in cyberspace, including through social networks, internet chats, email distribution, text messages, and other means of communication;

	«С.Ж.АСФЕНДИЯРОВ АТЫНДАҒЫ ҚАЗАҚ ҰЛТТЫҚ МЕДИЦИНА УНИВЕРСИТЕТИ» КЕАҚ NCSJC «ASFENDIYAROV KAZAKH NATIONAL MEDICAL UNIVERSITY»	
	Legal Department	Policy on Counteracting Discrimination and Harassment at the NJSC "KazNMU"
		Edition: 3 Page 6 of 7

- 5) The inadmissibility of harassment in the form of psychological pressure, threats, intimidation, expressions of hostility, or other aggressive behaviors;
- 6) The inadmissibility of obscene, offensive conversations and the dissemination of information that violates human dignity and privacy;
- 7) The inadmissibility of displaying, distributing, or discussing offensive and discriminatory images, audio and video materials, text messages, or other content.

6. Procedure for Reviewing Complaints

- 6.1. An employee, official, member of the Board of Directors, or student of the University has the right to file a complaint in cases of discrimination and/or harassment, including sexual and other forms of harassment, either against themselves or another employee and/or student. The complaint must detail all circumstances of the incident, information about witnesses, and any other relevant information, including the complainant's personal data.
- 6.2. The complaint must be submitted to the Executive Director of the University through the Documentation Support and Control Department, which ensures strict confidentiality of all information provided by the complainant.
- 6.3. The head of the Documentation Support and Control Department of the University bears personal responsibility for the disclosure of confidential information received from the complainant and for failing to ensure its proper protection.
- 6.4. To ensure prompt response and action in cases of discrimination and/or harassment, including sexual and other forms of harassment, the complainant should submit their complaint no later than three calendar days from the date of the incident.
- 6.5. To ensure an objective internal investigation regarding discrimination and/or harassment, including sexual and other forms of harassment against an employee or student of the University, such complaints shall be reviewed by a collegial body of the University
- 6.6. To protect the confidentiality of the information contained in the complainant's statement, considering the individuals involved and other significant circumstances, the Chairman of the Board – the Rector of the University independently determines the authorized collegial body responsible for reviewing the complaint regarding alleged discrimination and/or harassment, including sexual and other forms of harassment against an employee or student of the University.
- 6.7. Based on the results of the internal investigation, the authorized collegial body of the University is required to make well-grounded decisions that include effective measures to counter discrimination, harassment, and sexual or other forms of misconduct against University employees and students.
- 6.8. The Department of Human Resources Development, in collaboration with the Security and Internal Control Department of the University, is responsible for the prevention and mitigation of unlawful discriminatory practices and harassment, including sexual and other forms of misconduct, against University employees and officials.

	«С.Ж.АСФЕНДИЯРОВ АТЫНДАҒЫ ҚАЗАҚ ҰЛТТЫҚ МЕДИЦИНА УНИВЕРСИТЕТІ» КЕАҚ NCSJC «ASFENDIYAROV KAZAKH NATIONAL MEDICAL UNIVERSITY»	
	Legal Department	Policy on Counteracting Discrimination and Harassment at the NCSJC "KazNMU"
		Edition: 3 Page 7 of 7

6.9. The Department of Academic Affairs, in collaboration with the Security and Internal Control Department of the University, is responsible for the prevention and mitigation of unlawful discriminatory practices and harassment, including sexual and other forms of misconduct, against university students.

7. Responsibility

7.1. The Department of Human Resources Development is responsible for the practical implementation of this Policy concerning University employees and officials.

7.2. The Department of Academic Affairs is responsible for the practical implementation of this Policy concerning University students.

7.3. University officials and employees are accountable in accordance with established procedures for failure to comply with or improper execution of their obligations under this Policy.

7.4. This Policy applies to the University's business partners and other individuals present on the University premises.

8. Final Provisions

8.1. This Policy (including any amendments and/or additions) is developed by the Legal Department and approved by a decision of the University Board.

8.2. This Policy comes into effect on the date of its approval and remains in force until a new version is adopted.

8.3. Compliance with this Policy is mandatory for all University employees and officials, as well as all students and other individuals present on the University premises.

8.4. The Digitalization Department must publish the approved Policy on the official University website under the "Internal Regulatory Documents" section.