INTERNATIONAL INFORMATION TECHNOLOGY UNIVERSITY JSC

# IITU ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

ALMATY 2025



# 1. PURPOSE

The International Information Technology University (hereinafter – IITU) is committed to providing a safe, respectful, inclusive and equitable environment in which all members of the University community are treated with dignity and respect.

This Anti-Discrimination and Anti-Harassment Policy establishes the University's institutional commitment to preventing and addressing discrimination, harassment, sexual harassment, bullying, intimidation and retaliation in all areas of University life.

The objectives of this Policy are to:

- prohibit discrimination and harassment in education, employment, research and other IITU activities;
- promote equal rights, opportunities and treatment for all members of the IITU community;
- protect individuals from discriminatory conduct, harassment and retaliation;
- establish clear and accessible mechanisms for reporting and addressing complaints;
- ensure fair, impartial, confidential and timely consideration of reported incidents;
- promote awareness, prevention and a culture of mutual respect and accountability.

# 2. SCOPE

This Policy applies to the entire IITU community, including prospective and current students, academic staff and administrative staff, university management, visiting professors, researchers and other academic contributors, interns and trainees, contractors and other individuals participating in University activities, where applicable.

The Policy applies to conduct occurring:

- on University premises and in University facilities;
- during classes, examinations, research activities and academic events;
- in recruitment, employment, promotion and professional development processes;
- during IITU-organized events, conferences, internships, fieldwork and business trips;
- through digital platforms, online learning environments, email and social media where the conduct is connected to IITU activities or relationships;
- in other circumstances where the conduct affects the safety, dignity or equal participation of members of the IITU community.

# 3. DEFINITIONS

For the purposes of this Policy:



**Discrimination** means unjustified differential treatment, exclusion, restriction or disadvantage that affects or may affect an individual's equal access to education, employment, professional development, participation or other University opportunities on a protected or other relevant personal ground.

**Direct discrimination** occurs when a person is treated less favourably than another person in a comparable situation because of a particular characteristic.

**Indirect discrimination** occurs when an apparently neutral rule, practice or requirement places individuals with a particular characteristic at a particular disadvantage, unless objectively justified by a legitimate aim and proportionate means.



**Harassment** means unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

**Sexual harassment** means unwanted conduct of a sexual nature, including verbal, non-verbal, physical or digital conduct, that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may include unwanted sexual comments, gestures, messages, advances, requests for sexual favours or inappropriate physical contact.



**Bullying** means repeated or serious unreasonable behaviour that intimidates, humiliates, undermines or isolates an individual.



**Retaliation (victimisation)** means any adverse action, threat or disadvantage imposed on a person because they have submitted a complaint, reported misconduct, participated in an investigation, provided information or supported another person acting under this Policy.

**Protected characteristics** include, but are not limited to, sex, gender, gender identity, age, disability, race, ethnicity, nationality, language, religion or belief, social or economic background, marital or family status, pregnancy, parental status and other characteristics protected by applicable law.

# 4. CORE PRINCIPLES

IITU shall apply the following principles in implementing this Policy:

1. **Human dignity and respect:** Every individual has the right to be treated with dignity and respect.
2. **Equality and non-discrimination:** No person shall be subjected to discrimination or harassment in University-related activities.
3. **Zero tolerance:** Discrimination, harassment, sexual harassment, bullying and retaliation are incompatible with the University's values and shall not be tolerated.
4. **Fairness and impartiality:** All complaints shall be considered objectively, without bias or predetermined conclusions.
5. **Confidentiality:** Information shall be shared only with individuals who need it for the proper handling of a complaint, subject to applicable legal obligations.
6. **Protection from retaliation:** Individuals who report concerns or participate in investigations in good faith shall be protected from retaliation.
7. **Proportionality:** Any response or disciplinary measure shall be proportionate to the established facts and consistent with applicable University procedures and law.
8. **Accessibility:** Reporting channels and support mechanisms shall be accessible to members of the University community.

# 5. PROHIBITED CONDUCT

The following conduct is prohibited within the scope of this Policy:

**5.1 Discrimination**

- unequal treatment in admission, enrolment, assessment or access to educational opportunities;
- discriminatory recruitment, employment, remuneration, promotion or professional development practices;
- exclusion from academic, research or institutional activities on discriminatory grounds;
- denial of reasonable support or accommodation where required under applicable rules;
- discriminatory language, stereotypes or practices that undermine equal participation.

**5.2 Harassment and bullying**

- offensive, humiliating, intimidating or degrading remarks or behaviour;
- repeated unwanted comments or actions targeting an individual's personal characteristics;
- threats, intimidation, deliberate isolation or abuse of authority;
- hostile or humiliating conduct in classrooms, workplaces, meetings or digital environments.

**5.3 Sexual harassment**

- unwanted sexual comments, jokes, gestures or messages;
- unwanted touching or other inappropriate physical contact;
- repeated unwanted invitations or advances of a sexual nature;
- requests for sexual favours;
- conditioning academic, employment or professional benefits on sexual cooperation;
- threats or adverse treatment following rejection of unwanted sexual conduct;
- sharing or displaying sexually explicit material without consent in University-related settings.

A single serious incident may constitute harassment or sexual harassment. Repeated conduct is not required in every case.

**5.4 Abuse of power**

The misuse of academic, managerial, supervisory or other institutional authority to intimidate, coerce, disadvantage or obtain personal benefits from another person is prohibited.

Particular attention shall be given to relationships involving unequal power, including lecturer–student, supervisor–researcher, manager–employee and mentor–mentee relationships.

# 6. REPORTING CHANNELS AND SUPPORT SERVICES

## 6.1 General provisions

Any member of the University community who experiences, witnesses or becomes aware of possible discrimination, harassment, sexual harassment, bullying or retaliation may report the matter through the University's established channels.

Individuals may seek support without being required to submit a formal complaint.

## 6.2 President's Blog

The President's Blog may serve as an institutional channel for submitting complaints, raising concerns and reporting incidents covered by this Policy.

Where a complaint concerns a senior University official or an individual who would ordinarily be responsible for receiving or handling the complaint, an alternative impartial route shall be established.

## 6.3 Deputy Deans for Student Affairs and Educational Work

Deputy Deans responsible for student affairs and educational work may serve as designated first points of contact for students.

**Their responsibilities include:**

- receiving and listening to students' concerns in a respectful and non-judgmental manner;
- informing students about their rights and available reporting channels;
- referring students to the Psychological Support Service or other relevant University services;
- forwarding formal complaints to the designated authorized person or body in accordance with established procedures;
- maintaining confidentiality and avoiding unauthorized disclosure of information.

Deputy Deans shall not conduct independent investigations or make findings of responsibility unless specifically authorized under applicable University procedures.

Students shall retain the right to bypass faculty-level channels and submit complaints directly through other established reporting mechanisms.

## 6.4. PSYCHOLOGICAL SUPPORT SERVICE

The University's Psychological Support Service provides psychological consultations and support to students and employees who experience emotional distress related to discrimination, harassment, bullying or other difficult situations.
Access to psychological support shall not be conditional upon submitting a formal complaint or participating in an investigation.
The Psychological Support Service shall maintain professional confidentiality, subject to applicable legal requirements and circumstances involving immediate risks to safety.
The Psychological Support Service shall not be responsible for determining whether a violation of this Policy has occurred or for conducting disciplinary investigations.

## 6.5. HUMAN RESOURCES DEPARTMENT

The Human Resources Department shall receive and address employment-related concerns in accordance with applicable employment legislation and University procedures.
Where a complaint involves a conflict of interest, the matter shall be referred to an alternative authorized and impartial person or body.

## 6.6. ALTERNATIVE REPORTING

No individual shall be required to use all available channels before a complaint can be considered.
Individuals may request assistance in submitting a complaint. Anonymous reports may be considered where sufficient information is available to assess the concern and determine an appropriate response.
No individual shall be required to confront the alleged perpetrator directly before submitting a complaint.

# 7. INITIAL ASSESSMENT AND INVESTIGATION

**7.1. Receipt of a complaint**

Upon receiving a complaint, the designated responsible person or unit shall:

- acknowledge receipt of the complaint;
- assess whether the matter falls within the scope of this Policy;
- identify any immediate safety or wellbeing concerns;
- inform the complainant about available support and possible next steps;
- refer the complaint to the appropriate procedure or authorized body.

**7.2. Initial assessment**

The initial assessment shall determine:

- the nature of the reported conduct;
- the individuals and University processes involved;
- whether interim protective measures may be necessary;
- whether the matter requires an internal investigation;
- whether the case should be referred to the Disciplinary Council or another competent authority.

**7.3. Investigation**

Where an investigation is required, it shall be conducted by an impartial person or commission authorized by the University.

The investigation shall:

- consider relevant evidence and information;
- provide the complainant and respondent with an appropriate opportunity to present their positions;
- maintain confidentiality;
- avoid unnecessary disclosure of sensitive information;
- document relevant findings and recommendations;
- identify potential conflicts of interest and ensure impartial handling.

**7.4. Conflict of interest**

Any person involved in receiving, investigating or considering a complaint shall disclose a potential conflict of interest.

A person whose impartiality may reasonably be questioned shall not participate in the relevant stage of the proceedings.

Where a complaint concerns a member of the Disciplinary Council or a senior University official, an alternative impartial review arrangement shall be established.

**7.5. Timeframes**

The University shall establish reasonable internal timeframes for acknowledgement, initial assessment, investigation and communication of outcomes through its implementing procedures.

The complexity of the case, availability of evidence and need for protective measures shall be taken into account.

# 8. DISCIPLINARY COUNCIL AND INSTITUTIONAL RESPONSE

**8.1. The IITU Disciplinary Council** shall participate in the consideration of cases involving alleged violations of this Policy within the scope of its authority under the Regulation on the Disciplinary Council (R-83).

**8.2. In accordance with its established functions, the Council may:**

- consider complaints and documented cases involving alleged violations of University rules and ethical standards;
- assess materials obtained through preliminary reviews or internal investigations;
- organize or initiate the necessary internal review or investigation mechanisms within its authority;
- invite relevant University representatives and other persons to provide information;
- consider the circumstances and available evidence;
- make recommendations regarding appropriate disciplinary or institutional measures;
- refer matters to authorized University management or competent bodies where required.

**8.3.** The Council shall observe the principles of fairness, impartiality, confidentiality and procedural fairness when considering cases under this Policy.

**8.4.** Where a complaint concerns a member of the Council or another person whose participation may create a conflict of interest, that person shall not participate in the consideration of the relevant case. An alternative impartial review arrangement shall be established.

**8.5.** For cases involving employees, disciplinary measures shall be applied in accordance with QP-14, applicable employment regulations and the legislation of the Republic of Kazakhstan.
**8.6.** For cases involving students, the relevant student disciplinary procedures and University regulations shall apply.
**8.7.** The Disciplinary Council's consideration of a complaint shall not replace the University's reporting channels, psychological support services or initial complaint assessment mechanisms.
**8.8.** Where the facts may indicate an administrative or criminal offence, the matter shall be referred to the competent authorities in accordance with applicable legislation.

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# 10. DISCIPLINARY COUNCIL AND INSTITUTIONAL RESPONSE

**10.1.** Where necessary and appropriate, the University may introduce interim measures to protect the wellbeing and rights of individuals while a complaint is being considered.
**10.2. Such measures may include:**

- temporary changes to reporting or supervisory arrangements;
- alternative class, examination or work arrangements;
- non-contact instructions;
- adjustments to schedules or locations;
- referral to psychological or other support services;
- other proportionate measures consistent with applicable legislation and University regulations.

**10.3.** Interim measures are precautionary and shall not be treated as a finding of misconduct.
**10.4.** The University shall seek to ensure that protective measures do not unfairly disadvantage the complainant or restrict their access to education, employment or professional opportunities.

# 11. PROTECTION AGAINST RETALIATION

**11.1. IITU strictly prohibits retaliation against any individual who, in good faith:**

- reports discrimination, harassment or other conduct covered by this Policy;
- submits or supports a complaint;
- provides information or evidence;
- participates in an investigation or related proceedings;
- requests assistance or protection under this Policy.

**11.2.** Retaliation may include threats, intimidation, adverse academic decisions, unjustified changes to employment conditions, exclusion from opportunities, reputational attacks or other forms of disadvantage.

**11.3.** Any suspected retaliation shall be treated as a separate potential violation of this Policy and may result in disciplinary or other appropriate measures.

**11.4.** A complaint that cannot be substantiated shall not, by itself, be considered a false or malicious complaint.

**11.5.** Knowingly making a deliberately false allegation may be addressed under applicable University procedures, provided that the relevant facts are established through a fair process.

# 12. OUTCOMES AND CONSEQUENCES

**12.1.** Where a breach of this Policy is established, the University may take appropriate measures in accordance with applicable legislation and internal regulations.

**12.2. Depending on the circumstances and the applicable procedures, measures may include:**

- formal warnings;
- mandatory training or corrective measures;
- changes to supervisory or reporting arrangements;
- disciplinary measures under applicable staff or student procedures;
- restrictions on participation in certain University activities, where authorized;
- referral to relevant external authorities where required or appropriate.

**12.3.** Any decision shall be proportionate, documented and consistent with applicable procedures.

# 13. ROLES AND RESPONSIBILITIES

**13.1. University Management**

**University Management shall:**

- provide institutional leadership and resources for implementing this Policy;
- ensure that appropriate reporting and response mechanisms are established;
- oversee institutional compliance;
- ensure that conflicts of interest are appropriately managed.

**13.2. Disciplinary Council**

The Disciplinary Council shall consider relevant cases within its established authority and make recommendations or decisions as provided by the University's regulations.

**13.3. Human Resources Department**

**The HR Department shall:**

- support implementation in employment-related matters;
- administer applicable employment disciplinary procedures;
- advise on workplace complaints and relevant employment regulations;
- support staff awareness and training.

**13.4. Deputy Deans for Student Affairs and Educational Work**

**Deputy Deans shall:**

- serve as first points of contact for students;
- provide information about reporting channels;
- refer students to appropriate support services;
- forward formal complaints through established procedures;
- maintain confidentiality.

**13.5. Psychological Support Service**

The Psychological Support Service shall provide psychological consultations and support to affected individuals and maintain professional confidentiality.

**13.6. Academic and Administrative Units**

**Academic and administrative units shall:**

- promote respectful and non-discriminatory practices;
- communicate this Policy to staff and students;
- refer concerns to the designated reporting channels;
- cooperate with authorized investigations.

**13.7. SDG Integration Center**

**The SDG Integration Center shall:**

- support the integration of equality and non-discrimination principles into University strategies and initiatives;
- coordinate awareness-raising and educational activities in cooperation with relevant units;
- support monitoring of institutional progress and relevant gender equality indicators;
- contribute to annual reporting on equality, diversity and inclusion initiatives;
- support the University's progress towards relevant Sustainable Development Goals.

The SDG Integration Center shall not be responsible for investigating individual complaints or determining disciplinary responsibility unless specifically authorized under a separate University decision.

**13.8. Students and Employees**

**All students and employees shall:**

- treat others with dignity and respect;
- refrain from discriminatory or harassing conduct;
- report concerns in good faith;
- cooperate with relevant procedures.

# 14. ROLES AND RESPONSIBILITIES

**14.1. IITU shall promote prevention through:**

- regular awareness-raising activities on discrimination, harassment and sexual harassment;
- training for academic and administrative staff;
- information sessions for students;
- communication of available reporting and support mechanisms;
- inclusion of relevant information in staff and student induction activities;
- promotion of respectful communication and professional conduct;
- periodic assessment of the University's institutional environment.

**14.2.** Relevant employees and representatives responsible for receiving complaints shall receive appropriate guidance or training on confidentiality, impartiality, referral procedures and protection against retaliation.

**14.3.** The University shall make this Policy publicly accessible to members of the University community.

# 15. REVIEW AND APPROVAL

**15.1.** This Policy shall be reviewed periodically and whenever significant changes in applicable legislation, institutional arrangements or University practices require revision.

**15.2.** Amendments to this Policy shall be approved by the Center for integration of Sustainable Development Goals of IITU.

**15.3.** This Policy shall enter into force upon approval by the Center for integration of Sustainable Development Goals of IITU.