Fostering a Safe and Inclusive Academic Environment: Implementing Effective Anti-Harassment Policies at Nazarbayev University

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ABSTRACT

Despite progress in gender equality, harassment remains a pervasive issue that affects whole communities. Especially, it is prevalent in educational institutions due to unequal power dynamics, organization structure, and the concentration of young adults. Nazarbayev University is committed to developing a robust anti-harassment policy and this project aims to create such a policy through comparative analysis of policies of such institutions as National University of Singapore, the University of Malaya, and the American University of Central Asia, incorporating insights from GenderSAFE and UniSAFE. Best practices from the University of Melbourne, University College London, the University of Glasgow, and Central European University are adapted to fit Kazakhstani context.

1. INTRODUCTION

Gender equality is a fundamental principle enshrined in international human rights law and remains an ongoing global struggle. At its core, gender equality claims that all individuals, regardless of gender, should have equal rights, opportunities, and access to resources; individuals shall not be treated differently based on their gender at birth.[1] While significant progress has been made in advancing gender equality in various spheres, disparities and challenges persist, underscoring the need for continued advocacy and action.[2]

In the pursuit of equality, harassment is a relentless adversary, fueled by power imbalances and entrenched societal norms. Rooted in unequal power dynamics and reinforced by societal norms and stereotypes, harassment disproportionately targets individuals based on their gender identity or expression.[3] Moreover, although anyone can experience harassment, women[4] are disproportionately affected. Women endure the majority of gender-based harassment, facing pervasive threats to their safety, dignity, and autonomy. However, it is crucial to recognize that harassment can impact individuals of all genders, highlighting a systemic imbalance of power that perpetuates inequality and discrimination.

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[1] Carolyn Hannan, *Handbook on Gender Mainstreaming for Gender Equality Results* (UN Women, 2022).

[2] Fredrik Bondestam and Maja Lundqvist, "Sexual Harassment in Higher Education – A Systematic Review," *European Journal of Higher Education* 10, no. 4 (February 18, 2020): 397–419, https://doi.org/10.1080/21568235.2020.1729833.

[3] Council of Europe and Amnesty International, rep., *The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence* (Strasbourg: Council of Europe, 2014).

[4] Amy E. Street et al., "Gender Differences in Experiences of Sexual Harassment: Data from a Male-Dominated Environment.," *Journal of Consulting and Clinical Psychology* 75, no. 3 (June 2007): 464–74, https://doi.org/10.1037/0022-006x.75.3.464.

1.1. The Importance of Addressing Harassment in Universities

Gender-based violence permeates all aspects of life. In the lives of many, the place where they spend the most time each day is either at work or at university. Therefore, institutions of higher education and research are particularly susceptible to high levels of gender-based violence due to some features unique to these environments.[5] Factors such as unequal power dynamics, organizational culture, and the concentration of young adults[6] make instances of gender-based violence more prevalent in these institutions compared to others. Findings from the UniSAFE project indicate that students residing on campus are particularly vulnerable to gender-based violence, especially sexual violence, sexual harassment, and physical violence.[7]

Not only does gender-based violence harm the victims directly but it also undermines the fundamental purpose of academic and research institutions. This leads to a worsened quality of life, and a negative impact on the health and well-being of students and staff, therefore slowing their academic or career successes.[8] Gender-based violence means a failure to provide a safe, inclusive, and respectful environment[9] which is among the basic obligations of educational institutions.

Implementing anti-harassment policies is essential for universities to fulfill their duty of care and maintain academic excellence.[10] By taking proactive measures to prevent and address harassment, universities can create safer, more inclusive, and conducive environments for

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[5] Ana Jordan et al., "Hierarchies of Masculinity and Lad Culture on Campus: 'Bad Guys', 'Good Guys', and Complicit Men," *Men and Masculinities* 25, no. 5 (January 27, 2022): 698–720, https://doi.org/10.1177/1097184x211064321.

[6] Ibid.

[7] UniSAFE consortium, Unisafe D8.3 Policy Brief 1, (2022), https://doi.org/10.5281/zenodo.7333222.

[8] Giedre Blazyte and Vilana Pilinkaite Sotirovic, "Individual Experiences and Observation of Gender-Based Violence in Academia. Executive Summary of the Analysis of Interviews with Researchers at Higher Risk to Gender-Based Violence," UniSAFE, February 2023, https://doi.org/10.5281/zenodo.7643496.

[9] Ibid.

[10] Marcela Linková, Zuzana Andreska, and Jana Dvořáčková, "White Paper for Policymakers and Institutional Managers ," UniSAFE, 2023, https://doi.org/10.5281/zenodo.7870649.

learning, research, and professional development. Moreover, considering the requirements of the modern world which seems to be devoted to principles of equality, committing to protect people from harassment, upholds the reputation and integrity of the institution.[11]

Additionally, addressing gender-based violence signifies a commitment to gender equality and social justice, influencing societal change and shaping future generations' attitudes and behaviors.[12] Universities have the opportunity to nurture healthy, respectful generations. To fulfill these roles effectively, universities must adopt robust policies and proactive measures to combat gender-based violence.

1.2 The Necessity of an Anti-Harassment Policy at Nazarbayev University

Despite limited research on harassment in Kazakhstan, there is data revealing that gender inequality remains a pressing issue across various domains such as education, workplaces, and public settings.[13] Cultural and social norms might lead to low reporting rates, resulting in underreporting and limited awareness of the problem's scale. Harassment can manifest in different forms, including but not limited to sexual misconduct, verbal aggression, intimidation, and gender-based discrimination.[14] Victims might encounter obstacles in seeking justice or support due to societal stigma, fear of reprisal, and insufficient legal frameworks. While efforts to address harassment in Kazakhstan are growing, including awareness campaigns and support initiatives by media, non-governmental organizations, and advocacy groups such as

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[11] Ibid.

[12] Linkova, et al., "White Paper," 2023.

[13] Asian Development Bank, rep., *Kazakhstan Country Gender Assessment* (Mandaluyong, Philippines: Asian Development Bank, 2013).

[14] International Criminal Court, "Addressing Discrimination, Harassment, Including Sexual Harassment, And Abuse Of Authority," 2022, https://www.icc-cpi.int

BatyrJamal[15] or the Nemolchi Foundation[16], significant strides are still needed to foster safer and more inclusive environments. Additionally, the difficulty in classifying certain behaviors, like leering, as severe offenses contribute to many instances of sexual harassment going unrecognized under criminal law.[17]

Nazarbayev University (NU) is considered one of the most prestigious universities in Kazakhstan. Despite its young age (founded in 2010[18]), it ranks first in Kazakhstan and 106th in the world among young universities, according to Times Higher Education.[19] Throughout these years, NU students have been on the biggest news media headlines a few times due to their reports of harassment experienced within the university walls such as a student reporting the case of her friend[20] has highlighted the absence of the policy. A recent case involved the FaceMash app created by an NU student, where male students rated their female peers based on their "hotness."[21]

Given its status, high expectations, mission, and students' demands the university is committed to caring for its students as much as it cares about its image. Therefore, it is crucial for NU to adopt and enforce a robust anti-harassment policy to fulfill its duty of care, maintain academic excellence, and most importantly, ensure a safe and respectful environment for all. By taking

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[15] "Batyr Jamal - Медиа о Том, Как Живется Женщинам в Казахстане," The Village Kazakhstan, January 4, 2024, https://www.the-village-kz.com/village/weekend/best-of-web/17565-women-life-in-kazakhstan.

[16] Aliya Kadyrova, "«Не Молчи»: Как Женщины в Казахстане Обретают Голос," Wonder, December 7, 2016, https://www.wonderzine.com/wonderzine/life/life/222909-kazakhstan.

[17] Aruzhan Serdalina, "Адвокат о Сексуальных Домогательствах в Казахстане: «Статья 123 Вообще Нерабочая»," Newtimes, December 6, 2022, https://newtimes.kz/obshchestvo/160821-advokat-o-seksualnyh-domogatelstvah-v-kazahstane-statya-123-voobshe-ne-rabochaya.

[18] "About Us," Nazarbayev University, n.d., https://nu.edu.kz/about#:~:text=NU%20is%20a%20modern%2C%20English,re%20more%20than%20a%20novelty.

[19] Times Higher Education, "Nazarbayev University," Times Higher Education, 2024, https://www.timeshighereducation.com/world-university-rankings/nazarbayev-university.

[20] "Домогались и Насиловали," Liter, August 19, 2022, https://liter.kz/domogalis-i-nasilovali-studentka-nazarbaev-universiteta-rasskazala-o-prestupleniiakh-v-stenakh-vuza-1660896445/.

[21] "Кто горячее," October 20, 2023, https://orda.kz/kto-gorjachee-v-nazarbaev-universitete-skandalnyj-sajt-po-ocenke-vneshnosti-studentok-suschestvuet-ne-pervyj-god-377950/.

proactive measures to prevent and address harassment, NU can create a safer, more inclusive, and conducive environment for learning, research, and professional development.

1.3 Project Goals and Objectives

"But why didn't you report?" "What were you wearing?" "Are you sure that it is what you think it is?" "Do you have proof?" These are just a few of the many questions and doubts anyone trying to speak up about the harassment encounters. Doubts, concerns, a lack of understanding, insufficient knowledge, judgment, peer pressure, victim blaming, and other barriers to speaking up are numerous and deeply ingrained. How do we create a university environment where these barriers are dismantled, and every voice is empowered to speak out against harassment? This is the main question of this project.

The project aims to address the pressing issue of gender inequality, with a specific focus on harassment, by implementing effective anti-harassment policies at the educational institution level. Recognizing this need, NU has expressed its commitment to developing an anti-harassment policy.

To create a comprehensive policy this project will compare and analyze differences in approaches to anti-harassment policies. The aim is to critically examine and evaluate how these policies are adapted to align with the cultural norms and values of societies similar to Kazakhstan. Through a comparative analysis involving national universities aspiring for international status, such as the National University of Singapore (NUS)[22] and the University/Universiti of Malaya (UM)[23], as well as branches of international universities

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[22] "About," National University of Singapore, n.d., https://nus.edu.sg/about.

[23] "Vision and Mission," Universiti Malaya, n.d., https://um.edu.my/vision-amp-mission

established in different countries, such as the American University of Central Asia (AUCA)[24] in Kyrgyzstan, the project seeks to integrate the best practices from the world while carefully adapting them to Kazakhstani norms. AUCA will be closely observed given the similarities between Kyrgyzstan and Kazakhstan societies in terms of values, norms, and cultures.[25] Hence, the definitions and policies established by AUCA can provide valuable insights and benchmarks for other institutions within similar cultural contexts.

The project acknowledges that there is no one-size-fits-all approach to anti-harassment policies, considering the diverse legislative frameworks, values, and norms across different countries and societies. Initiatives like UniSAFE[26], GenderSAFE[27], and Yellow Window[28] are working towards creating universal policy frameworks, and the project will analyze and compare their recommendations with existing policies to assess alignment with local realities. With a strong multidisciplinary consortium of European partners at UniSAFE and GenderSAFE, recommendations are based on in-depth knowledge and research, providing valuable insights for this project's goals.

This paper will outline the essential components that should be included in NU's anti-harassment policy. It will focus on such parts of the policy as the types of misconduct included, the parties involved, bystander intervention and witnesses, retaliation and victimization, consent, and time limitations. By comparing the policies of the NUS[29], the UM[30], and the

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[24] "AUCA at a Glance," American University of Central Asia, n.d., https://www.auca.kg/_/about_auca_/

[25] Bibiziya Kalshabayeva, Gulnara Dadaybaeva, and Dauren Eskekbaev, "Kazakh Diaspora in Kyrgyzstan: History of Settlement and Ethnographic Peculiarities," *Folklore: Electronic Journal of Folklore* 76 (August 2019): 155–78, https://doi.org/10.7592/fejf2019.76.kazakh.

[26] "UniSAFE Ending Gender-Based Violence," UniSAFE, n.d., https://unisafe-gbv.eu/the-project/.

[27] "The Project," GenderSAFE, n.d., https://gendersafe.eu/the-project/.

[28] "Policy Design," Yellow Window, n.d., https://yellowwindow.eu/.

[29] Office of the Senior Deputy President and Provost of National University of Singapore, A Policy On The Protection Of Staff And Students Against Sexual Misconduct, 2021.

[30] Integrity Unit Universiti Malaya, Code Of Free From Sexual Exploitation, Abuse And Harassment At Universiti Malaya (UM), 2021.

AUCA[31], it will analyze best practices and existing possible gaps that might be avoided in the NU policy. Based on these comparisons, along with insights from GenderSAFE and UniSAFE recommendations, it will formulate comprehensive recommendations for NU.

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[31] American University of Central Asia, Anti-Harassment Policy, 2019.

2. MAIN BODY

2.1 Purpose and Legislative Foundation of the Policy

Before further delving into the more detailed organization of the policy, every policy should establish a clear and concise purpose. By clearly identifying the policy's aims, it is easier to have a comprehensive and effective approach to preventing and addressing harassment within the university.

For instance, **NUS** makes a statement of purpose at the very beginning of its policy.[32] This helps to set a strong foundation for the policy by clearly outlining its values, expectations, and commitments regarding misconduct. In a similar way, **AUCA** underscores its commitment to fostering a respectful and supportive environment through its anti-harassment policy.[33] They also highlight their position on harassment, emphasizing the critical principles and responsibilities that underpin its educational mission.

Meanwhile, **UM** not only demonstrates its commitment to creating a safe and inclusive environment for the UM community but also shows the rationale behind it.[34] The rationale section underscored the necessity of such a policy to develop its human capital. The policy mentions its alliance with both national and international legal frameworks. It references the Federal Constitution's prohibition of gender-based discrimination and aligns with the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), which Malaysia signed in 1995.[35] This alignment underscores UM's commitment to upholding human rights and promoting gender equality.

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[32] National University of Singapore, A Policy, 3.
[33] American University of Central Asia, Anti-Harassment Policy, 1.
[34] Integrity Unit Universiti Malaya, Code, 4.
[35] Ibid., 6.

2.1.1 Recommendations

The NU policy should start with a clear statement of the university's values, expectations, and commitments regarding harassment. This will set the tone for the entire document and align the university community around shared principles.

Among other important concerns of the policy is its legislative foundation. Integrating a legislative framework into the anti-harassment policy can provide a foundation that ensures compliance, enhances credibility, and promotes a culture of respect and safety. While not all university policies explicitly include a legislative framework, integrating such frameworks into NU's policy development process offers clear guidelines on organizing the policy and specifies a range of sanctions that can be applied.

The anti-harassment policy of NU will be grounded in existing national and international regulations, policies, and conventions that Kazakhstan is a part of. Integrating these frameworks will ensure that the policy is comprehensive, legally sound, and aligned with global standards.

Those legal instruments include and are not limited to:

a) Constitution of the Republic of Kazakhstan[36] - Articles 12, 14, 17, 18, and 24, which outline fundamental rights and freedoms, including the right to dignity and non-discrimination;

b) Criminal Code of the Republic of Kazakhstan[37] - Relevant articles such as 106 and 107 (Intentional infliction of grievous bodily harm), 110 (Torture), 117 (Infection with a

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[36] Constitution of the Republic of Kazakhstan, 1995.

[37] Ministry of Justice of the Republic of Kazakhstan, The Code of the Republic of Kazakhstan "Penal Code of the Republic of Kazakhstan," 2014.

venereal disease), 118 (Human immunodeficiency virus (HIV) infection), 120 (Rape),

121 (Sexual assault), 123 (Coercion to sexual intercourse), and 131 (Insult);

c) Covenant on Economic, Social and Cultural Rights[38] - Articles 6, 7, 12, 13, underscoring the importance of creating a conducive environment for education and work free from harassment;

d) Convention on the Elimination of All Forms of Discrimination against Women[39] - which sets out principles and obligations for state parties to eliminate discrimination against women in all its forms, including gender-based violence and harassment.

2.2 Ensuring Clarity and Consistency in Policy Definitions

In general, the policy document must be clear to all members of the community despite the level of knowledge they possess. Harassment, unfortunately, can happen to anyone despite their age, the language they speak, or affiliation with the university. Clarity ensures that all members of the university community are aware of the prohibited behaviors, reducing the likelihood of harassment. It also prevents misunderstandings and misinterpretations that can undermine the policy's effectiveness. Furthermore, clear definitions enable consistent application and enforcement of the policy across different situations and contexts.

Ambiguity over what constitutes sexual misconduct or harassment reduces reporting and allows the perpetuation of violence within institutions.[40] For example, a study in Czech universities[41] found that 78% of students experienced professor's behaviors that could be

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[38] United Nations, International Covenant on Economic, Social and Cultural Rights (ICESCR), 1966.

[39] United Nations, Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 1979.

[40] Laurie M. Graham et al., "Sexual Assault Policies and Consent Definitions: A Nationally Representative Investigation of U.S. Colleges and Universities," *Journal of School Violence* 16, no. 3 (April 12, 2017): 243–58, https://doi.org/10.1080/15388220.2017.1318572.

[41] Ibid.

characterized as sexual harassment, and only 3% asserted that they had been harassed. This might be explained by stringent definition requirements for harassment. Including definitions of consent is also vital, as it protects victims from self-blame, helps identify sexual harassment and abuse more easily, and encourages reporting.[42]

The definitions section, in general, often varies from one entity to another based on the language used in legal and policy documents, which can differ significantly depending on factors such as cultural norms, legal traditions, and the specific requirements of the governing legislative framework. Yet, the part of the definition is one of the most important parts of the policy, it should be clear and consistent throughout the policy and any other applicable regulation. It is important to communicate and enforce the policy properly.

Different policies do have different ways of presenting definitions. AUCA[43], NUS[44], and UM[45] include brief and direct definitions within the main body of their policies. An expanded version of these definitions is available in the appendices part. This approach keeps the primary document concise and accessible while providing detailed explanations as a reference. It prevents the policy from being too lengthy and therefore difficult to understand.

The glossary toolkit provided by UniSAFE[46] covers a variety of terms and concepts. Since the topic is relatively new for the community of NU, it was decided to include as many terms as it would be possible, explaining such related concepts as "Contractors," "Complainants," "Designated Ombudsperson," and others to ensure every part of the policy document is clear and comprehensible.

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[42] Graham, et al., "Sexual Assault Policies and Consent Definitions," 2017.
[43] American University of Central Asia, Anti-Harassment Policy, 5.
[44] National University of Singapore, A Policy, 3.
[45] Integrity Unit Universiti Malaya, Code, 8.
[46] "Toolkit," UniSAFE, n.d., https://unisafe-toolkit.eu/glossary/#other.

2.3 Types of Misconduct Included

Any policy must clearly state the aim and purpose of the policy, as well as the scope of its application, and in the case of anti-harassment policies, it must define the kinds of violations it covers. This clarity is necessary for several reasons: it informs all members of the university community about what constitutes unacceptable behavior, helps potential victims recognize and report harassment, and ensures that there is a common understanding of these terms across the institution.[47]

NUS provides clear definitions in the appendices of its policy, detailing what constitutes sexual misconduct and listing actions that fall under this category. The inclusion of extensive examples helps clarify these violations for the university community. The statement "Sexual Misconduct includes, but is not limited to, the examples set out in the following sections…"[48] might encourage reporting other cases that people might initially consider as not being in the scope of the policy.

UM's policy adopts an even more detailed approach to defining harassment. It provides detailed explanations of sexual exploitation, abuse, and harassment, also covering verbal, non-verbal (gestures), visual, psychological, and physical types of harassment.[49] The policy gives explicit examples such as life-case scenarios and specific references to specific body parts: "Boss who gives a hug that enables touching of breasts or buttocks."[50]

On one side it might help to eliminate misunderstandings and ensure clear communication of prohibited behaviors. However, such explicit language used in the policy might trigger victims

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[47] Mergaert Lut et al., *UniSAFE Toolkit, UniSAFE,* 2024, https://unisafe-toolkit.eu/wp-content/uploads/2024/06/UniSAFE-Toolkit_100624.pdf.

[48] National University of Singapore, A Policy, 13.

[49] Integrity Unit Universiti Malaya, Code, 11.

[50] Ibid., 12.

reading the document. These scenarios might suit training sessions, public lectures, or awareness-increasing campaigns as they make complicated concepts way easier to understand.

Meanwhile, **AUCA's** policy gives a range of examples to illustrate what constitutes harassment, including offensive jokes, slurs, physical assaults, threats, intimidation, ridicule, mockery, and insults[51]. The specificity of terms is always beneficial as it helps the university community identify and understand various forms of harassment. However, the policy's effectiveness might be undermined by its very narrow scope, requiring that behavior must create a "hostile environment"[52] to be considered harassment. The policy also outlines that behavior must be "severe" and meet certain criteria before the university starts an investigation, which might deter individuals from reporting cases that in their opinion do not meet these *requirements*.

Particularly concerning is the clause that states, "Petty slights, annoyances, and isolated incidents (unless extremely serious) will not rise to the level of creating a hostile environment."[53] This clause might be discouraging the reporting of seemingly minor yet harmful behaviors and fails to protect individuals from repeated offenses that collectively create a hostile environment.

2.3.1 Recommendations

In more conservative societies where discussions on harassment, discrimination, or power abuse in general are limited, it is important for university policies to provide clear and detailed definitions of what constitutes harassment. Not only NU policy should include various forms

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[51] American University of Central Asia, Anti-Harassment Policy, 5.

[52] Ibid., 6.

[53] Ibid.

of harassment (even those that seem to be understandable), verbal, non-verbal, visual, psychological, and physical, but also offer examples.[54] Examples can help people understand what is unacceptable and can be reported. However, that should not go on the other spectrum and become too narrow.

Moreover, the policy cannot limit cases to only those considered "severe" or "creating a hostile environment" as it raises questions of how and who will evaluate whether it is severe or not. People do perceive different situations in a completely different way and according to UniSAFE findings, one of the main reasons for not reporting is uncertainty whether the case can be reported or not.[55] In societies with a limited perception of harassment, even severe cases might go unreported because they are not seen as *strong enough*. NU policy should challenge these norms and encourage people to report any behavior that feels disturbing, promoting a shift towards more respectful and healthy interactions: it is not a question of severity but respect.

For that purpose, in the NU anti-harassment policy, it is planned to include a big section on explaining different types of misconduct. The main term is based on international conventions ratified by Kazakhstan that also formulate the legislative basis for the whole policy, such as CEDAW, ICESCR, ICCPR, and the Criminal Code of the Republic of Kazakhstan.

The part of the suggested example for the future policy on one of the major concepts: "Harassment - any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offense or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle,

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[54] Mergaert Lut et al., *UniSAFE Toolkit,* 2024.
[55] Anke Lipinsky et al., rep., *Gender-Based Violence and Its Consequences in European Academia. Summary Results from the UniSAFEsurvey.* (UniSAFE, 2022).

humiliate or embarrass another or which create an intimidating, hostile or offensive work and learning environment."

2.4 Defining Involved Parties

There might be a misunderstanding that these policies only pertain to those who have directly experienced harassment or are alleged perpetrators. However, more people can be involved in a case, such as witnesses to the event or those to whom the victim has confided. Explicitly recognizing these roles in policies is essential to ensure that everyone understands their potential role in either solving the case or preventing future cases from happening.[56] Moreover, since there is often a negative perception of reporting as "snitching" people tend not to report on someone else.[57] This negative connotation can deter individuals from reporting misconduct, as they may fear retaliation or damage to their relationships.[58] Universities can change this perception by explicitly recognizing the importance of witnesses and third-party reporters.

For example, **AUCA's** anti-harassment policy provides a straightforward and clear definition of the complainant as "a person who is subject to alleged harassment, and/or related retaliation."[59] This clarity is beneficial because it ensures that anyone who believes they have experienced/witnessed harassment understands their role in the complaint process.

In contrast, **UM** implicitly acknowledges that the person reporting harassment can be someone other than the victim.[60] This approach promotes a community-wide responsibility to address

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[56] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

[57] Dorothy L. Espelage et al., "Snitching versus Reporting: A Qualitative Analysis of Barriers and Facilitators to Addressing Safety Concerns among High School Students," *Social Psychology of Education* 25, no. 5 (August 17, 2022): 1177–1203, https://doi.org/10.1007/s11218-022-09703-9.

[58] Ibid.

[59] American University of Central Asia, Anti-Harassment Policy, 5.

[60] Integrity Unit Universiti Malaya, Code, 14.

and prevent harassment, fostering collective accountability. However, it does not explicitly define the parties involved in harassment cases, which might lead to ambiguity regarding the roles and responsibilities of different individuals in these cases.

NUS's policy lacks clarity in its definition of the complainant party. While the term "reporting party"[61] is used, it is not included in the list of affected persons, which includes the respondent, complainant, and witness. This might create a misunderstanding on the role of individuals who report harassment that they have witnessed but have not experienced. By not explicitly recognizing whistleblowers, NUS's policy might fail to encourage comprehensive reporting, limiting the policy's effectiveness.

2.4.1 Recommendations

Clearly defining the parties (complainants, respondents, witnesses, and third-party reporters) and their roles within the policy ensures that everyone understands their potential involvement and responsibilities.[62] The importance of clarifying parties involved in the university harassment policy and their roles is to promote a sense of common responsibility within the academic community. Harassment is an issue that affects the entire environment, and everyone has a role to play in preventing it. By clearly defining these roles and emphasizing that there are more than "alleged perpetrator" and "complainant", NU can foster a culture of collective accountability and vigilance. Moreover, it is important as it helps to emphasize third-party reporting, helping to counteract the stigma around "snitching" and framing the actions of those who report misconduct on behalf of others as essential to maintaining a safe and supportive environment.

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[61] National University of Singapore, A Policy, 4.
[62] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

To clarify the parties involved and describe the scope of the policy, the NU policy considers clarifying the NU community in general. Non-academic misconducts do affect every member of the university community and including them in the policy is one more way to emphasize: ""University Community" includes Students, Employees, and Others."

2.5 Bystander Intervention and Witness

Another important factor to consider is that the inclusion of bystander intervention provisions in university anti-harassment policies is a significant step forward in promoting a culture of active bystandership and collective responsibility for safety and well-being. In more conservative societies, such as those in Central Asia, cultural norms often discouraged interference in others' affairs, even in serious situations.[63] People tend to believe that everything that happens between two people must stay between those two.[64] One popular saying, such as "lyubopytnoi Varvare nos otorvali" (curiosity killed the cat), reflects this attitude, suggesting that individuals should not intervene in the lives of others.

Universities besides acknowledging other parties than the alleged perpetrator and complainant through incorporation of bystander intervention into anti-harassment policies challenge those cultural norms and encourage individuals to take an active role in preventing and addressing harassment. Outlining the role of bystanders sends a message that everyone has a responsibility to contribute to the creation of a safe and respectful environment. Besides clarifying the parties involved, this is a step further that helps to outline the important role third parties might play in protecting people and preventing such cases from happening in the future.

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[63] Anton Alexeyev, "Cultural attitudes to whistleblowing: Kazakhstan," Ius Laboris, 13 January 2023, https://iuslaboris.com/insights/cultural-attitudes-to-whistleblowing-kazakhstan/.
[64] Ian Foxley, "Overcoming Stigma: Whistleblowers as 'Supranormal' Members of Society? ," *Ephemera Theory and Politics in Organization* 19, no. 4 (2019): 847–64.

All universities do imply that third parties to the case might intervene and play an important role as witnesses. They can report, bring up the case, and bring justice either for the alleged victim or the alleged perpetrator. However, there is still a need to encourage people to report even if they are not an affected party.

For example, **UM's** policy states: "A complaint may also be made by a person other than the victim who is sexually exploited, abused, or harassed, provided they have information or have witnessed the conduct. The individual must provide sufficient evidence regarding the incident experienced by the victim."[65] This provision ensures that third parties can report incidents, helping to ensure that cases are investigated properly and fairly.

2.5.1 Recommendations

UniSAFE suggests that to effectively combat harassment within university settings, it is important to incorporate comprehensive measures that will encourage bystander intervention/witness reporting.[66] NU can explicitly define the roles and responsibilities of bystanders within their anti-harassment policy, outlining what it constitutes, and providing clear guidelines on how they can safely intervene in situations of misconduct. Also, it sends a strong message that everyone is responsible for contributing to a safe and respectful environment. This might help to shift cultural norms of non-reporting and change the perception of witness reporting away from snitching.

Moreover, to encourage third-party reporting, they should be entrusted with protection from retaliation and confidentiality. This should also be acknowledged in the policy itself. Universities should provide assurances that reports from third parties will be taken seriously

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[65] Integrity Unit Universiti Malaya, Code, 14.

[66] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

and investigated thoroughly. Protection mechanisms should be in place to safeguard these individuals from retaliation, ensuring they feel safe and supported when coming forward with information.

Provisions on bystander intervention will be further added to the NU policy, it will also incorporate the definition from the University of Illinois Chicago training program on bystander intervention[67]: "Bystander intervention is a way to encourage witnesses/observers of a misconduct to take actions when they witness a potential situation of misconduct and to offer support to a victim."

2.6 Retaliation and Victimization

Issues of retaliation and victimization are related to the previous section as it must be one of the primary concerns of the policy - to protect all the parties identified. Such protection safeguards the complainant and fosters a safe environment where individuals feel confident reporting harassment. Retaliation and victimization are critical concerns that should be addressed to protect all parties involved in harassment cases.

AUCA's anti-harassment policy includes the concept of retaliation, recognizing its importance in dealing with harassment cases. It goes even one step further and includes protection from both retaliation and victimization.[68] This protection is vital, as it ensures that individuals who report harassment are not subject to further harm or unfair treatment. As well as victims should not feel threatened for reporting. This comprehensive approach is essential, especially in

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[67] "Bystander Intervention," University of Illinois Chicago, n.d., https://sexualmisconduct.uic.edu/education-and-training/bystander-intervention/#:~:text=Bystander%20intervention%20is%20a%20prevention,in%20keeping%20the%20community%20safe.

[68] American University of Central Asia, "Anti-Harassment Policy," 1.

societies with prevalent victim-blaming attitudes[69], ensuring that victims do not feel threatened or discouraged from coming forward.

While the policy of **UM does** not explicitly define retaliation, it acknowledges the need to protect individuals from it. The policy ensures that those who report harassment are protected from retaliation and protects them from punishment.[70] However, the concept of victimization is not represented in the policy.

NUS acknowledges the need to protect all parties involved from retaliation[71], including the Reporting Party, Complainant, Witness, and NUS staff involved in the investigation and disciplinary proceedings. By explicitly detailing what constitutes retaliation and the measures in place to prevent it, NUS ensures that all individuals understand their rights and the support available to them.

2.6.1 Recommendations

Terms such as retaliation or victimization should be explicitly defined, detailing what constitutes each. Most importantly, protection should be extended to all individuals involved in the reporting and investigation process, even including witnesses or staff members. By ensuring the safety of all members from retaliation people will feel safe to report harassment.

Strong anti-retaliation measures should be implemented as well, which include confidential reporting mechanisms to protect the identities of those who are either complainants or witnesses to a misconduct case and be actively involved in monitoring the well-being of those parties involved in the case to ensure no retaliation is happening.[72] Most importantly, to prevent

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[69] Mergaert Lut et al., *UniSAFE Toolkit,* 2024.
[70] Integrity Unit Universiti Malaya, Code, 15.
[71] National University of Singapore, A Policy, 9.
[72] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

it from happening the policy should clearly define the consequences for engaging in such behavior.

Issues of retaliation and victimization are important and should be tackled in the policy, based on the practices observed at University College London (UCL)[73] and the University of Glasgow[74] NU should incorporate comprehensive measures to address these issues effectively. The suggested way to incorporate the retaliation and victimization issues in the NU policy by including the following: "NU will regard as victimization or retaliation any instance where a person is subjected to detrimental treatment because they have, in good faith:

a) made an allegation of harassment or

b) indicated an intention to make such an allegation, or

c) assisted or supported another person in bringing forward such an allegation, or

d) participated in an investigation of a complaint or

e) participated in any disciplinary hearing arising from an investigation or

f) taken any other steps in connection with this Policy or

g) is suspected of having done so;

e) been subjected to unfair academic treatment, contract non-renewal or denied promotion."

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[73] University College London, Prevention of Bullying, Harassment and Sexual Misconduct Policy, 2023.
[74] University of Glasgow Equality and Diversity Unit, Dignity at Work and Study Policy and Procedure § (2012).

2.7 Consent

One of the fundamental aspects of any anti-harassment policy is consent. Its presence ensures that all interactions are based on mutual agreement and understanding, while its absence can lead to harassment and other forms of misconduct.[75] Emphasizing consent in policies fosters an environment of mutual respect. It underscores the importance of considering the feelings, autonomy, and choices of others, reducing cases of harassment and coercive behavior.

NUS provides an extensive definition of consent in its policy, covering all necessary elements to ensure clarity and understanding.[76] The policy states that consent must be given by an individual with legal capacity, and the intentions of both parties must be understood and agreed upon. Additionally, it emphasizes that consent must be given freely and voluntarily, and it must be "ongoing (i.e. not withdrawn) throughout the entire duration of sexual activity".[77] This thorough explanation helps to eliminate ambiguity and ensures that all members of the university community are aware of the continuous nature of consent.

UM's policy, while implicitly recognizing the importance of consent throughout the policy, does not explicitly define it or explain its characteristics. This might lead to confusion or varied interpretations among the university community, potentially undermining the policy's effectiveness in preventing harassment. In societies where sex might be a taboo topic and the practice of obtaining explicit consent is uncommon, policies like this could serve as crucial platforms to teach the importance of consent, thus helping to prevent harassment.

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[75]Sophie GE Kedzior et al., "'It's Complicated': Young People's Views on the Complexity of Asking for Consent and the Role for Sex and Relationships Education," *Sex Education*, March 18, 2024, 1–17, https://doi.org/10.1080/14681811.2024.2317330.

[76] National University of Singapore, A Policy, 3.

[77] Ibid., 12.

However **AUCA's** policy does consider consent, it includes a provision that says: "In certain circumstances, the sexual history between the parties may have limited relevance to explain the context."[78] This consideration reflects the societal norms common for Kyrgyzstan and Kazakhstan, where traditional views on relationships, gender roles[79], and the so-called "uyat"[80] may affect perceptions of consent. In general, women are perceived as someone more submissive and who need to be "conquered" by men.[81] Women shall be more modest and shy, and having a lot of partners is not considered normal in the cultures of Central Asian societies.[82] The AUCA's policy considers this part of society and the possible lack of consent in people's relationships as it is the norm. Yet it is something that must change. The hope is that with time this will change, and consent will not be something exceptional but a rule.

2.7.1 Recommendations

The NU policy should ensure that the definition of consent is detailed and covers all necessary elements, such as the capacity to give consent, the voluntary basis on which it was given, and the continuous nature of consent. NUS's comprehensive definition of consent, which emphasizes legal capacity, mutual understanding, and the continuous, voluntary nature of consent, sets a strong example. NU should adopt this approach to promote clarity and prevent misunderstandings. Also, considering the example of AUCA policy, it might be necessary to

[78] American University of Central Asia, Anti-Harassment Policy, 11.

[79] Catherine Putz, "It's Time to Incorporate Consent Into Central Asia's Sexual Violence Laws," The Diplomat, January 26 2023, https://thediplomat.com/2023/01/its-time-to-incorporate-consent-into-central-asias-sexual-violence-laws/

[80] Hélène Thibault and Jean-François Caron, *Uyat and the Culture of Shame in Central Asia* (Singapore, Singapore: Springer Nature Singapore Palgrave Macmillan, 2022).

[81] Vanita Sundaram et al., "A Continuum of Acceptability: Understanding Young People's Views on Gender-Based Violence," chapter, in Gender Based Violence in University Communities (Policy Press, 2018).

[82] Thibault and Caron, *Uyat*.

include that consent must be obtained regardless of prior history of the nature of the relationship between people.

The provision on consent is inspired by existing policies of Central European University[83], University of Melbourne[84], and NUS.[85] The recommended provision on consent for the NU policy is the following: Consent is an affirmative decision to engage in mutually agreed upon sexual activity and is given by clear words or actions. Consent may not be inferred from silence, passivity or lack of resistance alone. Furthermore, consent to one form of sexual activity does not imply consent to other forms of sexual activity and the existence of a current or previous dating, marital, or sexual relationship is not sufficient to constitute consent to additional sexual activity. Assent shall not constitute consent if it is given by a person who, because of youth, disability, intoxication, or other condition, is unable to lawfully consent.

2.8 Time Limits for Reporting Harassment Cases

There are some instances where policy might set time limits for reporting cases of harassment. If there are time limits, it should be clearly stated to ensure the complainant is aware. Indeed, reflecting on practical considerations in legislative frameworks and that with time, it gets more complicated to investigate and resolve incidents, it might be a reasonable addition to the policy. However, even if it ensures prompt handling of cases, it overlooks the psychological barriers that individuals face when reporting harassment.

For instance, **AUCA** follows the law of the Kyrgyz Republic, which states that "any disciplinary action must be administered no later than thirty (30) days after the alleged

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[83] Central European University, The Central European University Policy on Harassment, 5.
[84] University of Melbourne, Sexual Misconduct, n.d.
[85] National University of Singapore, A Policy, 12.

misconduct on which it is based becomes known, but in no event later than six (6) months after the misconduct occurs."[86]

However, for victims of harassment, coming forward to report can be a deeply personal and challenging decision[87], especially, considering the tendency for victim-blaming in societies as Kazakhstani. These barriers might make it difficult for individuals to disclose their experiences, they might need time to process their trauma and overcome feelings of stigma and self-blame. On top of that, victims of harassment might face additional concerns as potential repercussions[88] for speaking out, particularly in hierarchical or patriarchal environments where power imbalances exist.

NUS exemplifies this approach well: "NUS recognises that an individual who has experienced an incident of Sexual Misconduct may require time and reflection before deciding whether or not they wish to make a Disclosure or a Report of the said incident."[89]

2.8.1 Recommendations

It is necessary to encourage quick reporting for the efficient resolution of the case, yet according to suggestions from UniSAFE[90], it is even more important to recognize and address the barriers that people might encounter when reporting harassment. Policies should incorporate flexible time limits for reporting harassment to accommodate the varying needs of

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[86] American University of Central Asia, Anti-Harassment Policy, 8.

[87] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

[88] Stephen J. Aguilar and Clare Baek, "Sexual Harassment in Academe Is Underreported, Especially by Students in the Life and Physical Sciences," PLOS ONE 15, no. 3 (March 10, 2020), https://doi.org/10.1371/journal.pone.0230312.

[89] National University of Singapore, "A Policy," 6.

[90] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

survivors. It was highlighted in recommendations to adopt a trauma-informed[91] approach, recognizing the psychological impact of harassment.

If time limits are in place, they should be clearly communicated in the policy and during awareness programs. Complainants should be aware of the time constraints and the importance of timely reporting while also understanding the options available to them if they are unable to meet these deadlines.

The support could involve providing flexible reporting options (informal/formal), offering confidential support services, and ensuring that survivors are aware of their rights and the resources available to them. By taking a more holistic, empathetic, and trauma-informed approach to reporting procedures, NU can create a safer and more supportive environment for addressing harassment while still meeting the need for timely resolution of cases.

2.9 The Policy First Impressions

This comes as a general and last recommendation for the policy on how to access it and what the first impressions this policy gives. During discussions with the working group on anti-harassment policy, there were questions raised as to who can access the policy: "Is it publicly available, or is it an internal document of the university?" Based on best practices and recommendations from the UniSAFE[92], it is recommended that the policy be publicly accessible and easily available. Public access to the policy promotes transparency, ensures that everyone—both within and outside the university community—can understand the institution's stance on harassment, and reinforces the university's commitment to creating a safe and

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[91] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.
[92] Mergaert Lut et al., *UniSAFE Toolkit*, 2024.

respectful environment[93]. Moreover, the way policy is structured in general, the language used might influence whether a survivor or a witness will feel comfortable reporting. The language used in the policy is crucial. For instance, the **University of Malaya's** approach of starting the policy with questions like "Are You Harassed, Exploited or Sexually Abused?"[94] can be too direct and potentially put pressure on someone who has experienced harassment.

2.9.1 Recommendations

The general recommendation in that regard is that the anti-harassment policy should be prominently available on the university's official website. Moreover, it should be downloadable in multiple formats such as Word, PDF, and HTML so that all users can access it, including those with disabilities.

The language used should be welcoming and supportive, not accusatory or dismissive. Since the introduction policy should affirm the university's commitment to safety and respect and emphasize support. Moreover, in the same policy of UM, it was stated that the number of official complaints is low. That is good news, yet the policy is not the best to put the current statistical data on misconduct cases. It can be perceived as a minimization of the issue and victims might feel as not reporting. For example, instead of focusing on the low number of official complaints, the policy could emphasize the institution's efforts to create a safe environment for all.

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[93] Ibid.

[94] Nor Aishah Samah, "Are You Harassed, Exploited Or Sexually Abused?," University of Malaya, n.d., https://umintegrity.um.edu.my/news/are-you-harassed-exploited-or-sexually-abusedn.

3. CONCLUSION

The development of an effective anti-harassment policy at Nazarbayev University is an important step towards fostering a safe and inclusive educational environment in Kazakhstan. This paper has highlighted one of the many key recommendations based on experiences of such institutions as the National University of Singapore, the University of Malaya, and the American University of Central Asia, and recommendations given by UniSAFE and GenderSAFE, as well as best practices of some other educational institutions as University of Glasgow.

Most importantly, NU should prioritize clear communication and transparency in its policy by clearly defining harassment, consent, and various types of misconduct. Clarity will ensure that all members of the university community understand their rights, responsibilities, and concepts in general.

Another important point is that policy should adopt a victim-centered approach, acknowledging the psychological barriers individuals face when reporting harassment. It should provide flexible reporting options, confidential support services, and protection against retaliation and victimization. It will encourage reporting without being afraid of stigma or reprisal.

Also, incorporating bystander intervention strategies into the policy can promote the culture of active bystandership and collective responsibility. By encouraging students, faculty, and staff to intervene and support those affected by harassment, NU can empower its community to contribute actively to preventing future incidents. The problem of harassment negatively affects all members of the community, therefore, everyone should be involved in preventing it.

By implementing those recommendations in the policy, NU can create a safer and more supportive environment for all individuals and advance its commitment to gender equality and respect within its educational mission.

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