



SATBAYEV  
UNIVERSITY



SUSTAINABLE  
DEVELOPMENT  
GOALS

# EQUALITY, DIVERSITY AND INCLUSION (EDI) POLICY

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## PREFACE

**1 DEVELOPED** by the Project Office for Sustainable Development Goals – support and facilitation of inclusive education of NJSC “Kazakh National Research Technical University named after K.I. Satpayev”

### 2 APPROVED

Board member - Vice-Rector for  
Administrative, Social and Educational  
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« 5 » 03 2026



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**3 INTRODUCED** to replace Edition No1 of March 1, 2023

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2029 year

**5 REVIEW FREQUENCY**

3 years

# **SATBAYEV UNIVERSITY EQUALITY, DIVERSITY, AND INCLUSION POLICY**

## **I. INTRODUCTION**

### **1.1 Purpose**

Satbayev University (hereinafter referred to as the “University”) is committed to ensuring an educational, occupational, research, and social environment in which all members of the university community, including persons with disabilities and special educational needs, are treated with dignity, fairness, and respect. The University values diversity and strives to ensure full inclusion for all students, employees, candidates, visitors, contractors, service recipients, and partners, so that everyone feels a sense of belonging to the university community and has equal opportunities to realize their potential.

This Policy defines the University's commitment to the principles of equality, diversity, and inclusion (EDI), prohibits discrimination, harassment, bullying, gaslighting, bossing, mobbing, stalking, ageism, sexual harassment, and retaliatory measures, and establishes responsibilities and procedures through which these obligations will be implemented.

### **1.2 Legal framework**

This Policy shall be interpreted and applied in accordance with 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 Law of the Republic of Kazakhstan dated June 26, 2021 No. 56-VII “On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Inclusive Education”, the Law of the Republic of Kazakhstan “On Social Protection of Persons with Disabilities in the Republic of Kazakhstan”, the Law of the Republic of Kazakhstan “On Architectural, Urban Planning and Construction Activities in the Republic of Kazakhstan”, the construction standards of the Republic of Kazakhstan (SN RK 3.06-01-2011 “Accessibility of Buildings and Structures for Persons with Limited Mobility”, SP RK 3.06-101-2012 “Design of Buildings and Structures with Accessibility for Persons with Limited Mobility”), as well as other regulatory documents in the field of creating a barrier-free and inclusive environment, the Order of the Minister of Labor and Social Protection of the Population of the Republic of Kazakhstan dated December 30, 2020 No. 22003 “On Approval of the Qualification Directory of Positions of Managers, Specialists and Other Employees”, the Order of the Minister of Education and Science of the Republic of Kazakhstan dated October 30, 2018 No. 595 “On Approval of the Standard Rules for the Activities of Higher and Postgraduate Education Organizations”, the Order of the Minister of Science and Higher Education of the Republic of Kazakhstan dated December 5, 2024 No. 4 “On Approval of Qualification Requirements for Educational Activities of Organizations Providing Higher and (or) Postgraduate Education and the List of Documents Confirming Compliance Therewith”, the Law of the Republic of Kazakhstan dated July 1, 2024 No. 103-VIII “On Science and Technological Policy”, the Law of the Republic of Kazakhstan dated November 18, 2015 No. 410-V “On Combating Corruption”, and other applicable regulatory legal acts and internal acts of the University. The University has the right to set standards that exceed the minimum legal requirements in order to develop an inclusive academic community.

### **1.3 The scope of the Policy**

This Policy applies to:

a) all job applicants, employees, faculty, researchers, supervisors, temporary workers, interns, and other persons working at or on behalf of the University;

b) all applicants, students, interns, and participants in academic or extracurricular activities of the University;

c) all visitors, contractors, suppliers, consultants, recipients of services, guests, graduates with their participation in the activities of the University, as well as partner organizations interacting with the University.

This Policy applies to staff selection and recruitment, admission and enrollment, teaching and learning, assessment, research, career growth and promotion, training and development, working conditions, student support, accessibility, campus services, digital and physical accessibility, events, communications, and external partnerships.

#### **1.4 Guiding principles**

The University is guided by the following principles:

- a) equality of opportunity and fair treatment;
- b) respect for human dignity;
- c) inclusion and a sense of belonging to the community, including the creation of a barrier-free physical, digital, and learning environment;
- d) accessibility and the removal of unnecessary barriers for persons with limited mobility and individuals with special educational need;
- e) transparency, accountability, and data-driven development;
- f) shared responsibility of all members of the university community.

#### **1.5 Consulting and revision**

This policy was developed in consultation with the Center for Equality, Diversity, and Inclusivity and other stakeholders, including: executive boards and representative bodies of staff and students.

## **II. STATEMENT OF COMMITMENT**

### **2.1 The University undertakes to:**

- a) to ensure an educational, work, and social environment free from discrimination and all forms of unacceptable behavior, including harassment, bullying, gaslighting, bossing, mobbing, stalking, ageism, sexual harassment, and adverse retaliatory measures;
- b) promote equal access to opportunities, resources, and support;
- c) to actively identify and, where possible, eliminate barriers that limit the participation, advancement, or success of any members of the university community
- d) provide reasonable adaptation and accessibility measures in accordance with applicable laws and University procedures;
- e) promote inclusive approaches in teaching, education, research, leadership, and service delivery;
- f) take proportionate data-based measures when addressing persistent underrepresentation or disadvantage, if permitted by law;

g) to ensure the accessibility of relevant information, services, and communications in accessible formats (including alternative formats for persons with disabilities);

h) handle complaints fairly, in a timely manner, and in accordance with applicable procedures;

i) monitor the implementation of this Policy and report on progress made.

## **2.2 Expectations for the community**

The University expects all members of its community to behave respectfully, foster an inclusive environment, and comply with this Policy and related procedures.

## **2.3 Academic freedom and respectful behavior**

Nothing in this Policy restricts legitimate academic activities, fair fact-based discussion, or freedom of expression conducted in a respectful manner and in accordance with the University's codes of conduct. Discrimination, harassment, intimidation, and abusive behavior are not protected by the principles of academic freedom or freedom of expression.

## **III. DEFINITIONS**

The terms used in this Policy are defined in Appendix 1. These include, but are not limited to: EDI (Equality, Diversity, Inclusion), persons with limited mobility, discrimination, harassment (including sexual harassment and other forms of objectionable behavior), forms of psychological pressure and pursuit (including bullying, mobbing, bossing, gaslighting, stalking), ageism, measures of adverse impact (retaliation), as well as ensuring accessibility of the environment and providing reasonable conditions (adaptations), necessary for the accomplishment of equal opportunities.

## **IV. EQUALITY, DIVERSITY, AND INCLUSION IN THE LABOR FIELD**

### **4.1 Selection and recruitment of staff**

The University ensures fairness and transparency based on the principles of meritocracy, a reasonable combination of internal personnel reserve and external resources, the effectiveness of previous work that proves and allows us to confidently assume the effectiveness and success of his work in a new position, professional qualities, relevant work experience and achievements in the professional field, compliance with the requirements imposed by orders of departmental ministries, legislative acts and qualification requirements for positions in the recruitment and hiring processes, free from discrimination based on gender, race, nationality, social status, religion, and political beliefs. The University, in recruitment and hiring processes, also takes into account the principles of inclusion by ensuring reasonable accommodation at the stages of selection and onboarding of new employees, including persons with disabilities.

The University undertakes to use objective selection criteria in accordance with the Qualification requirements for the position.

### **4.2 Recruitment advertising**

With regard to job advertisements, the University must provide staff qualification requirements that specify the mandatory, essential, and desirable requirements, skills, knowledge, experience, and competencies for each position. The general qualification requirements for the position are defined in the Qualification requirements for the positions of employees of KazNRTU. named after K.I. Satpayev, developed in accordance with the "Qualification Directory of positions of managers, specialists and other employees" (Order of the Minister of Labor and Social Protection of the Population of the Republic of Kazakhstan dated 12/30/2020 No. 22003 "On approval of the

Qualification Directory of positions of Managers, Specialists and their Employees") and the "Unified Tariff and Qualification Directory of Workers' Jobs and Professions" (Order of the Deputy Prime Minister-Minister of Labor and Social Protection of the Population of the Republic of Kazakhstan dated 01.09.2023 No. 364 "On approval of the Unified Tariff and Qualification Directory of Workers' Jobs and Professions").

#### **4.3 Executives' responsibility and HR service**

Executives and HR Service play a leading role in the implementation of this section, advising on fair employment issues.

### **V. EQUALITY, DIVERSITY, AND INCLUSION IN EDUCATION AND SERVICE DELIVERY**

#### **5.1 Admission and access**

Admission and enrollment procedures should be fair, transparent, and free from discrimination. The University strives to expand access and reduce entry barriers for talented applicants from underrepresented or socially vulnerable groups.

#### **5.2 Increased participation**

The University facilitates access to programs for students from underrepresented groups. It will be implemented through various recruitment and awareness-raising activities, including a comprehensive lifelong learning program offering alternative development paths and its policy of recognizing prior learning. The University offers a range of student services to support students during their academic progress and assist them in achieving successful outcomes in their programs.

#### **5.3 Teaching, education, assessment, and research**

The University supports inclusive approaches to the development of educational programs, teaching, academic supervision, assessment, research practice, and participation in academic life. Academic departments shall take reasonable measures to ensure a respectful, accessible, and supportive educational and research environment that accommodates diverse views and needs, including the application of Universal Design for Learning (UDL) principles, the use of assistive technologies, differentiated teaching methods, and the adaptation of materials for students with special educational needs.

#### **5.4 Student support and accessibility**

The University provides student support services in an inclusive and accessible manner. Students with disabilities or other proven needs have the right to reasonable accommodation and support in accordance with applicable procedures. The University develops a comprehensive system of psychological, pedagogical, and social support for persons with special educational needs, including the services of tutors, sign language interpreters, and specialists in inclusive education. The University is obliged, clearly and through accessible means, to inform about the opportunities of obtaining support.

#### **5.5 External stakeholders and partnerships**

The University expects contractors, suppliers, service providers, and partner organizations involved in the University's activities to comply with the principles of this Policy. Relevant contracts, agreements, and partnership documents should reflect this requirement, if necessary.

#### **5.6 Feedback and continuous improvement**

The University shall systematically collect feedback from students, employees, service recipients, and partners to identify barriers, improve services, and support the continuous development of practices in the field of equality, diversity, and inclusion (EDI).

Types of feedback:

- anonymous surveys and questionnaires (annual and thematic);
- focus groups and meetings with representatives of student and staff organizations;
- direct submissions through official channels (email, hotline, electronic document management system);
- feedback through the Equality, Diversity and Inclusion Center / HR service;
- analysis of complaints and suggestions submitted through the reporting procedure.

Procedure for receiving and reviewing feedback:

1. An individual submits feedback in any convenient form (anonymously or with identification).
2. The responsible body (EDI Center or authorized unit) registers the submission within 3 working days.
3. Feedback is analyzed within 15 working days (if a complex review is required – up to 30 calendar days, with mandatory notification of the applicant about the extension).
4. The applicant receives a written response (via email, personal account, or in hard copy upon request) containing information on the results of the review and the measures taken or planned.
5. If the feedback contains indications of a Policy violation, it shall be referred to the complaints handling procedure (Section 6.3).
6. The results of feedback analysis shall be summarized annually in the Policy implementation report and considered when planning EDI-related activities.

### **5.7 Promoting equality, diversity, and integration in the service sector**

The University continues to develop systems for collecting and analyzing a wide range of information related to equality, diversity, and inclusivity in relation to students, staff, and service recipients. This process should identify weaknesses and obstacles to participation, as well as assess progress.

Each field that provides a service (academic, student, or otherwise) is responsible for ensuring the inclusivity of service delivery and identification of strategies to remove any potential barriers to student participation or service recipients. Service fields should report on the implementation of this policy in their reporting and review processes.

## **VI. IMPLEMENTATION, REPORTING OF VIOLATIONS, AND REVIEW**

### **6.1 Governance and responsibility**

Ensuring equality and accessibility at the university is regulated and implemented in accordance with the legislation of the Republic of Kazakhstan and internal regulatory documents of the university.

Each department of the University is responsible for ensuring that the services they provide comply with the EDI obligations set out in this policy. Special attention is given to ensuring an inclusive environment and accessibility across all processes and services.

All employees have a role to play in implementing this policy. The University's Management Team has a special role to play in ensuring that the principles and commitments set out in this policy are respected and implemented into the University's strategies, policies, procedures, and practices.

All students, service users, and others involved with the university should cooperate in the implementation of this policy. All external business contracts should reflect this requirement.

The specific purpose of implementing this policy is included in the future strategic planning of the University.

The HR Department is responsible for regularly reviewing the implementation of this policy and for any amendments to it.

## **6.2 Communication and training**

The University provides information about this Policy and provides the necessary explanations and recommendations for its effective implementation.

## **6.3 Reporting problems and filing complaints**

Any person who has encountered behavior that may violate this Policy, or has witnessed such behavior, is encouraged to seek advice, support, or submit a report through the appropriate University channel. The University provides clear procedures for:

- a) receiving informal advice and support;
- b) problem reports;
- c) filing a formal complaint;
- d) referring the issue to the appropriate disciplinary procedure against the employee or student;
- e) providing supportive measures when necessary.

## **6.4 Fair trial and protection from retaliation**

Reports and complaints shall be handled in a timely, fair, respectful, and confidential manner in accordance with the applicable University procedures.

Review timelines:

- initial registration and preliminary assessment – within 3 working days;
- full review (including information gathering and decision-making) – within 15 working days from the date of registration;
- if additional verification, witness interviews, or complex analysis is required, the period may be extended once up to 30 calendar days, with mandatory written notification of both the complainant and the person concerned.

Adverse retaliatory measures against any individual who has submitted a report, participated in an investigation, or sought support are strictly prohibited and shall themselves constitute a disciplinary violation.

## **6.5 Consequences and sanctions**

If a violation of this Policy is detected, the University has the right to take appropriate corrective, educational, administrative, or disciplinary measures in accordance with applicable procedures. Such measures may include a written warning, restriction of access, disciplinary action,

termination of employment, expulsion or termination of contractual relations, depending on the severity of the case and the applicable rules.

### **6.6 Monitoring and analysis**

The University will use relevant data, consultations, review procedures, and feedback mechanisms to monitor the implementation of this Policy, identify barriers, and evaluate progress. If necessary, the University should take into account the possible impact of significant policies, decisions, and practices on equality and inclusion.

### **6.7 Review**

This Policy is subject to review at least once every three years or earlier in case of changes in legislation, institutional structure, or identified need. An annual summary of the implementation and progress achieved should be provided to the relevant governing body or committee.

### **6.8 Support and resources**

The University publishes and updates the contact details of the relevant support services and channels for reporting violations, including:

- Office of the Vice-Rector for Administrative, Social, and Educational Work /Director for Equality, Diversity, and Inclusivity
- Center for Equality, Diversity, and Inclusivity
- Human Resources
- Trade unions
- Employee Assistance Program
- Student Counseling Service – Officer of the Student Union on Welfare and Equality
- President of the Student Union
- Access Office
- Disability Inspector
- Designated contact persons

### **6.9 Business contractors**

The University strives to ensure that other companies with which it has entered into contracts for goods and services are aware of the existence of this policy. All contractors are expected to familiarize themselves with the EDI policy and SU's obligations in this regard.

### **6.10 Final provisions**

1. This Policy comes into force from the date of its approval, unless otherwise established by the relevant act of the University.
2. This Policy is part of the University's overall approach to sustainable development and is aimed at implementing the priorities determined by the University's Sustainable Development Strategy, as well as contributing to the achievement of the relevant United Nations Sustainable Development Goals (SDGs).

## APPENDIX 1: DEFINITIONS

For the purposes of this Policy:

**EDI (Equality, Diversity, Inclusion)** is an abbreviation for the principles of equality, diversity, and inclusion.

**Equality** is the principle of ensuring equal rights, opportunities, and fair treatment of all persons without discrimination on any grounds.

**Diversity** is the recognition, respect, and consideration of differences between people, including, but not limited to, differences in gender, age, ethnicity, social status, beliefs, and other characteristics.

**Inclusion** is the creation of conditions in which all individuals feel involved, respected, and have equal access to opportunities, resources, and participation, regardless of individual characteristics.

**Persons with limited mobility** are individuals who experience difficulties in independent movement, accessing services, obtaining necessary information, or navigating physical space (including persons with disabilities, the elderly, pregnant women, parents with strollers, etc.).

**Discrimination** means less favorable treatment, exclusion, or creation of an unfavorable position based on a characteristic protected by applicable law or a reason recognized by this Policy.

**Indirect discrimination** means the application of a rule, criterion, practice, or requirement that is outwardly neutral, but actually puts a certain group at a disadvantage, unless it is objectively justified by a legitimate goal and the means to achieve such goal are appropriate and necessary.

**Harassment** is any undesirable behavior (actions, statements, gestures, or other forms of interaction) directed at a person or group of people that humiliates dignity, creates an offensive, hostile, degrading, or unsafe environment, or violates personal boundaries and psychological comfort.

**Abuse** means undesirable behavior related to a protected characteristic or protected status, which has the purpose or consequence of humiliating a person's dignity or creating an intimidating, hostile, demeaning, insulting, or hurtful environment.

**Sexual harassment** means any unwanted verbal, non-verbal, written, visual, online, or physical behavior of a sexual nature with the above-mentioned purpose or consequence.

**Bullying** is repetitive or one time, but significant unreasonable behavior aimed at intimidating, degrading, undermining confidence of, or harming another person, including psychological pressure, insults, or other forms of aggressive influence.

**Bossing** is a form of bullying carried out by a supervisor or a person with managerial authority in relation to a subordinate, expressed in abuse of office, creation of unfavorable working conditions, systematic pressure, humiliation, or unreasonable demands.

**Mobbing** is a form of bullying carried out by a group of individuals against one employee or student, expressed in systematic psychological pressure, isolation, spreading of negative information, undermining reputation, or creation of a hostile environment.

**Gaslighting** is a form of psychological influence in which a person is systematically misled about facts, events, or their own perception of reality in order to cast doubt on their adequacy, memory, or decision-making ability.

**Stalking** is a form of harassment that manifests itself in obsessive and unwanted attention to a person (including surveillance, frequent contacts, messages, attempts to establish interaction) carried out against their will, causing feelings of anxiety, fear for their safety, or creating psychological discomfort and an unsafe environment.

**Ageism** is a form of discrimination, prejudice, or unreasonable behavior based on a person's age, expressed in limiting rights and opportunities, creating unfavorable conditions, debasing, ignoring, or unreasonably evaluating a person's abilities and qualities solely based on age.

**Adverse measures** mean that a person is treated unfavorably because they have filed a complaint, reported a problem, sought support, or participated in a procedure under this Policy.

**Reasonable conditions** mean appropriate and proportionate changes or support measures aimed at removing barriers and ensuring the participation of a person with a disability or other proven needs in accordance with applicable laws and University procedures.

**Accessibility** means designing and delivering environments, information, services, learning, work, and digital systems in such a way that they can be used as fully as possible by various members of the university community.

