

Approved  
by the AEO "Nazarbayev  
Intellectual Schools"  
Board's decision  
June 26, 2025  
(Protocol No.28)

## **Student safeguarding policy at the branches of AEO “Nazarbayev Intellectual schools”**

### **1. General provisions**

1. The Student safeguarding policy at the branches of the autonomous educational organization “Nazarbayev Intellectual Schools”, the main subject of which is educational activities (hereinafter referred to as the branches), is a system of basic principles, rules and procedures aimed at helping to ensure the physical and psychological well-being of students of the branches in a situation of abuse against a student.

2. The legal basis of the Policy is the Constitution of the Republic of Kazakhstan, the Convention on the Rights of the Child, the Codes of the Republic of Kazakhstan "On Marriage (Matrimony) and Family", "On Public Health and Healthcare system", "On Administrative Infractions", the Criminal Code of the Republic of Kazakhstan, the Laws of the Republic of Kazakhstan "On the Rights of the Child in the Republic of Kazakhstan", "On education", "On the status of "Nazarbayev University", "Nazarbayev Intellectual Schools" and "Nazarbayev Foundation", the Code of Ethics for employees of the autonomous educational organization "Nazarbayev Intellectual Schools" and organizations of Intellectual Schools, Internal regulations for students of Nazarbayev Intellectual Schools, Rules for imposing disciplinary penalties on employees of the autonomous educational organization "Nazarbayev Intellectual Schools", approved by the decision of the Board of the autonomous educational organization "Nazarbayev Intellectual Schools", and other regulatory legal acts of the Republic of Kazakhstan and legal acts of the autonomous educational organization "Nazarbayev Intellectual Schools".

### **2. Principles of Student safeguarding policy and definitions**

3. The main principles of this Policy are:

1) The principle of absolute intolerance. This Policy establishes that ill-treatment, insults, bullying, and discrimination against students by employees, legal representatives, service providers, and other students are prohibited, and every violation and illegal action will be prosecuted.

2) Personal responsibility. All employees of the branches comply with ethical rules of conduct in accordance with the internal legal acts of the autonomous educational organization "Nazarbayev Intellectual Schools" (hereinafter referred to as AEO). Employees are responsible for assisting in the implementation of this Policy and are required to take measures to prevent ill-treatment of students in the branches,

as well as to respond to any violations of the provisions of this Policy.

3) **Versatility.** The provisions of this Policy are binding on everyone who interacts with the students of the branches.

4) **The priority of students' interests.** In a complex situation, the priority is to ensure a student's safety and well-being, as well as meeting his physical, social and psychological needs.

5) **Tolerance.** AEO branches strive to establish a favorable environment based on mutual respect for all participants in the educational process, understanding and acceptance of socio-economic, cultural, gender and other differences.

6) **Safety and security.** The safety and security of students is a priority in the work of AEO branches.

7) **Confidentiality.** All cases, reports regarding student abuse, as well as case investigations, are conducted by ensuring the protection, safety of students and confidentiality of information.

8) **Respect.** Respect for the rights and dignity of students, choices, needs and wishes should determine the decisions made by AEO and its branches.

9) **Timeliness.** Timely implementation of preventive measures, identification, investigation and response to reports of student abuse is ensured.

10) **Cooperation.** To ensure compliance with the provisions of this Policy, AEO branches interact with legal representatives of students, specialists from external organizations (police, health, social protection authorities, educational departments, non-governmental public organizations, etc.).

11) **Effectiveness.** The collaborative efforts of school staff and external organizations result in positive behavioral changes among students and their immediate environment (school, classroom, peer group, family, etc.).

4. The following definitions are used in this Policy:

**An aggressor** is an adult (school employee, legal representative, or other person), student, or group of students who exhibit aggressive, violent behavior toward a student and/or students.

**"Low-level" concern** is any concern about an adult's actions towards a student or students that does not comply with the code of ethics and/or standards of conduct towards students and raises doubts and concerns about the adult's suitability to work with children.

**Well-being** is the physical, mental, social, and other conditions and opportunities that help students realize their life potential.

**Case management** is the coordination of joint efforts by school staff and/or external specialists and government-authorized individuals aimed at addressing situations of student abuse through assistance based on the individual needs of the student and the capabilities of his immediate environment.

**Adults** are school employees, parents/guardians of students, contractors/suppliers working with the school, and all other people over 18 who have contact with students.

**A volunteer** is an intern, trainee, or any other individual who, while not being a school employee, participates on an unpaid basis in educational, extracurricular, and other activities aimed at ensuring student well-being and their holistic development.

**Protection and safety** – measures implemented by schools and the AEO to safeguard students from harmful conditions and circumstances, including physical,

psychological, and sexual violence; neglect; exposure to danger; and other threats to their health, lives, and long-term development.

**The KiVa team** is a team that reviews bullying cases at school and consists of school employees, including school deputy principals, teachers, curators, psychologists and other employees.

**Report** is any notification regarding cases where school employees, legal representatives of students, or other individuals (including students) cause harm to students, commit violence against them (including physical, psychological, or sexual violence), neglect children's needs, exploit students, or engage in unlawful acts, offenses, crimes, or other harmful actions toward students.

**A service provider** is an individual or legal entity that performs work (services) at a school under a contract (catering, security, and others) on a permanent or long-term basis, whose employees operate on school premises and may interact with students during their activities.

**Victim** is a student who has experienced or is experiencing abuse by adults or other students, resulting in psychological, physical, and/or material harm.

**An alleged offender** is a person accused of mistreating a student, who is being investigated by branch employees and/or authorized external organizations.

**Branch employees** are individuals hired by the school under an employment contract, including school administration, teaching staff, personnel classified as equivalent to teaching staff, support staff, and technical personnel.

**Reasonable cause/reasonable grounds** – in the context of student safeguarding and protection, refers to the presence of observable physical indicators (bruises, hematomas, etc.), verbal or written reports from students, evidence in students' oral/written work, other credible information, and professional judgment indicating that a child is experiencing abuse, and/or there is a risk of harm, maltreatment, or neglect to the child.

**Investigation** is an activity involving the timely, comprehensive, thorough, and objective collection of information and examination of materials regarding child maltreatment, including risk assessment and fact-finding to inform decision-making.

**School safeguarding team (service)** is a branch-based team comprising school administration representatives, teaching staff and equivalent personnel, support and other branch staff, responsible for prevention, identification, response, and provision of assistance to students and their families in cases of maltreatment.

### **3. Child abuse, its types and indicators**

**5. Child abuse** in educational settings refers to acts or omissions by legal guardians, school staff, students, or other individuals that cause harm to a student's physical or psychological health, violate sexual integrity, constitute neglect of basic needs, or involve bullying.

**6.** This Policy adopts the following classification of child abuse types and forms: physical abuse, psychological abuse, sexual abuse, neglect of a child's needs (including abandonment in dangerous situations), exploitation and bullying. The observable indicators, and potential developmental consequences for students are detailed in Appendix 1 to this Policy.

**7. Physical abuse** is a form of child maltreatment involving the deliberate infliction of bodily harm that causes impairment to physical or psychological health

and results in adverse consequences for the student's development.

**8. Psychological (emotional) abuse** is a form of child maltreatment characterized by persistent, prolonged mental/emotional pressure, gradual corrosive impact on the student's mental health, developmental retardation and pathological personality trait formation.

**9. Sexual abuse** is a form of abuse encompassing sexual harassment and coercion into sexual acts, including manual, oral, or genital contact with a child's/adult's sexual organs, direct sexual intercourse

**10. Neglect of a child's needs** is a form of child maltreatment characterized by failure to provide adequate care by adults, reckless disregard of custodial responsibilities, including delayed/denied medical treatment, educational deprivation, nutritional insufficiency, exposure to life-threatening environments

**11. Bullying** is the intentional and repeated infliction of suffering or harm upon an individual who lacks the capacity to effectively defend themselves.

**12. Exploitation of students** is the coercion of students into labor or other activities that benefit third parties or institutions, including unauthorized use of student labor by school administration/staff, violations of educational principles and established regulations.

#### **4. Organization of student safeguarding measures at schools. Competency of the AEO, school administration and staff**

##### **14. Competencies of the AEO:**

- 1) to establish and maintain a zero-tolerance environment toward all forms of child abuse and ensure branch-wide compliance with this Policy's provisions;
- 2) the coordination of the activities of the branches for the prevention of students' abuse, their protection and safety are carried out by the structural unit of the AEO, which oversees the well-being, physical and psychological health of the students.

##### **15. Competencies of the school principal:**

- 1) bears personal responsibility for implementing this Policy, ensuring conditions and procedures that uphold student well-being;
- 2) issue an order to establish the School safeguarding team, KiVa team, and appoint the school's Vice-principal for student affairs as the Student safeguarding lead, who coordinates and oversees procedures for responding to actual/suspected cases of child abuse and implementing preventive measures against abuse.
- 3) engage professional security companies (security services) to ensure student safety and physical protection.

**16.** All branch staff, school service providers, volunteers, and affiliated personnel shall be fully informed of this Policy's provisions, participate in its implementation within their designated competencies according to guidelines specified in Appendix 2 to this Policy.

**17.** All branch visitors shall adhere to behavioral standards and safety responsibilities by complying with the Visitor Code of Conduct specified in Appendix 3 of this Policy.

## **5. The Student safeguarding lead and the School safeguarding team**

18. The Student safeguarding lead (SSL) coordinates student protection and well-being initiatives, performing the following functions:

- 1) organizes the operations of the branch's School safeguarding team (SST);
- 2) manages reporting procedures for alleged abuse cases, including systematic data collection and record-keeping, initiation and oversight of investigations;
- 3) monitors implementation of student support plans/programs;
- 4) liaises with external specialists (e.g., social services, law enforcement) on case management;
- 5) evaluates SST performance by analyzing incident trends, reports to the school principal, give recommendations for operational improvements;
- 6) reviews and updates school policies/procedures per this Policy's guidelines;
- 7) escalates systemic challenges in Policy implementation to branch leadership.

19. The School safeguarding team ensures student protection and security through early identification of risks, timely response to incidents, thorough investigation of cases, provision of assistance and support to affected students, implementation of preventive measures

The School safeguarding team handles all cases of child maltreatment, except for bullying incidents, which are addressed by the KiVa team in accordance with KiVa program protocols.

20. The School safeguarding team membership is approved by the school principal's order and includes the Student safeguarding lead, curator, school psychologist, physician or nurse, school legal counsel. Additional ad hoc members – teachers, dormitory staff (for boarding students), HR officer and other relevant school personnel - may be included case-by-case.

21. The School safeguarding team performs the following functions:

- 1) organizes and conducts awareness sessions for school staff, service providers, volunteers, students and their legal guardians, members of the School Board of Trustees on student safeguarding, protection and safety protocols;
- 2) participates in investigations of alleged students' maltreatment cases;
- 3) holds case resolution meetings to address incidents of student abuse;
- 4) develops and implements student support plans/programs to ensure well-being and protection;
- 5) collaborates with external specialists to provide student assistance;
- 6) maintains and updates a contact details of external support organizations for crisis intervention, emergency situations, stakeholder notification (students/parents/staff);
- 7) proposes amendments to branch incident response procedures and this Policy's provisions.

## **6. Prevention of student maltreatment cases**

22. The prevention of student maltreatment requires schools to establish and implement comprehensive safeguarding systems, including standardized protocols and safety procedures, rigorous staff recruitment processes designed to eliminate

abuse risks, and mandatory training programs for employees, volunteers, service providers, and parents. Schools must maintain physically and psychologically secure learning environments while actively engaging parents and local communities in preventive initiatives. Effective prevention further depends on systematic mechanisms for registering, documenting, and monitoring all reported cases, suspected incidents, and disclosures of potential abuse.

23. Student protection and safeguarding in schools is ensured through secure personnel and volunteer recruitment practices, which include:

- 1) comprehensive background verification of all applicants, including review of biographical data and reference letters, official certificates from authorized bodies, employment history verification;
- 2) incorporation of ethical standards and this Policy's provisions into staff performance evaluations;
- 3) mandatory Policy review by candidates prior to employment contract signing;
- 4) clear communication of disciplinary measures for violations against students, legal accountability under the legislation of the Republic of Kazakhstan, consequences per AEO internal regulations;
- 5) mandatory safeguarding training for all branch employees and volunteers;
- 6) maintenance of an internal registry documenting confirmed cases of staff misconduct toward students, disciplinary actions taken (including termination), all abuse-related reports and investigations;
- 7) notification to branch HR officer, AEO's HR division regarding confirmed offenders to prevent future re-employment within the organization.

24. To ensure student safety and prevent maltreatment, branch staff, school service providers, and volunteers must refrain from:

- 1) inviting students to private residences;
- 2) meeting students in cafes, restaurants, clubs, or other public venues, except for school-sanctioned educational events with multiple staff present;
- 3) inappropriate physical contact, excluding non-violent interventions to:
  - restrain a student from self-harm or harming others;
  - remove dangerous objects/situations using reasonable force;
  - offer comfort (e.g., brief shoulder/hand contact);
  - gain attention (e.g., light shoulder tap);
- 4) one-on-one interactions in enclosed spaces without prior justification documented to administration and another adult present nearby (with student's awareness);
- 5) using student-designated restrooms;
- 6) requesting secrecy about safety-related matters;
- 7) posting abusive, humiliating, threatening, or sexual comments via social media (Instagram, Facebook, etc.), messaging apps (WhatsApp, VKontakte, etc.), private conversations;
- 8) using student images/videos/messages for sexual purposes;
- 9) creating fake student profiles or distributing indecent materials;
- 10) bullying, threatening, or fostering fear – physically or digitally;
- 11) failing to act during emergencies, including physical danger and medical crises;

- 12) discrimination in any form;
- 13) sexual, physical, or psychological abuse (including attempts);
- 14) humiliating punishments, such as corner-standing, sarcastic remarks, degrading statements.

25. Branch students are prohibited from:

- 1) engaging in discrimination of any form;
- 2) using inappropriate or offensive language toward other students, legal guardians/family members, school staff including via digital platforms or mobile communications;
- 3) causing harm to others' health, physical well-being, or property;
- 4) bullying, threatening, or creating an atmosphere of fear/isolation through any form of pressure (physical, psychological, digital), social media or messaging platforms;
- 5) using staff-designated restrooms;
- 6) using restrooms designated for students of opposite gender;
- 7) recording photos/videos without consent, especially in locker rooms, restrooms and other private areas;
- 8) violating online safety protocols, including:
  - sharing personal data (own/others') with third parties;
  - breaching data confidentiality/anonymity in social media profiles;
  - communicating with strangers or disclosing location/family details;
  - using easily guessable passwords;
  - ignoring cybersecurity rules for website browsing, online purchases, gaming/file downloads;
  - posting unethical/aggressive content online;
- 9) sharing intimate materials, such as photos/videos/documents, solicitations to buy/sell such content with school staff, volunteers, service providers, strangers, or other students.

26. Legal guardians of students must not:

- 1) neglect participation in school-organized safety awareness initiatives, child protection training programs, parent-child educational activities;
- 2) employ harmful disciplinary practices, including violent or cruel punishment methods, involving students in marital/family conflicts, exploitation or age-inappropriate expectations;
- 3) address school incidents independently by taking physical /psychological actions against other students, bypassing school staff/other guardians, using social media or parent chat groups for retaliation.

## **7. Identifying and responding to incidents of abuse against students**

### **7.1. Reporting cases of student abuse**

27. Reporting cases of student abuse includes information about suspected, planned, or actual incidents of abuse against students by staff members, other students, legal representatives, or other individuals inside or outside the branch.
28. Methods for reporting cases of abuse include:
- 1) direct report by a student about a violent act committed against themselves and/or another student;
  - 2) reports from branch staff, volunteers, or school service providers about a

violent act committed against a student of the branch or suspicions of such acts;

3) reports from parents, other legal representatives, or third parties about a violent act committed against students of the branch or suspicions of such acts.

29. Reports may be submitted in person, in writing or verbally, by phone, email, messaging apps, or any other means to the Designated Student safeguarding lead of the school.

30. Reporting methods, including contact details (phone numbers, email addresses) of the Designated Student safeguarding lead, members of the School safeguarding team, and other relevant information, are published on the branch's official website, its social media pages, and communicated to staff, students, and legal representatives through postings in publicly accessible areas.

31. Identification of potential victims and actual victims of violence (both within and outside school) by branch staff is conducted through:

- 1) monitoring changes in students' mood, behavior, and peer interactions;
- 2) observing behavior of branch staff, volunteers, legal guardians, and other adults who have been reported/suspected of abuse or where "low-level concerns" exist, while investigating the reasons for their behavior;
- 3) analyzing essays, drawings, and other student creative works, including interpretation of projective techniques and role-playing exercises conducted with students;
- 4) gathering multi-source information about students' lives, circumstances, traumatic experiences, and family development situations;
- 5) conducting victim interviews to determine the type of abuse experienced;
- 6) monitoring students' social media activity and online presence;
- 7) conducting home visits to assess family dynamics, living conditions, and significant life events affecting the student.

## **7.2. Procedures for responding to student abuse reports**

31. Reports regarding suspected or confirmed cases of student abuse (occurring either at school or off-campus) shall be submitted to the branch's Student safeguarding lead.

32. If reports of abuse involve the Student safeguarding lead, it must be submitted directly to the school principal. If reports involve the school principal, the Student safeguarding lead must immediately notify the AEO corporate division responsible for student well-being, including the coordination of psychological and medical services across all branches.

33. The Student safeguarding lead conducts a preliminary assessment of received reports in accordance with Appendix 4 to this Policy.

34. Cases of bullying involving school students, provision of assistance to students in bullying situations, and other related activities are handled by the branch KiVa team following the response protocol of the KiVa anti-bullying program.

35. The KiVa team coordinator and team composition are established by an official order of the school principal.

36. Where reasonable grounds exist to suspect student abuse, the Student safeguarding lead must notify the school principal and/or AEO's division responsible for student well-being, including the coordination of psychological and medical services across branches, initiate an investigation by the School safeguarding team, assign a case manager for preliminary risk assessment.

37. If a medium or high risk level is identified and with the consent of legal guardians, a case file is opened to coordinate support and help the affected student using a case management approach.

38. The School safeguarding team shall take the following measures:

- 1) investigate based on testimonies from the affected student, alleged perpetrator, and other relevant individuals, while systematically gathering evidence;
- 2) when engaging with the alleged perpetrator, maintain principles of openness and transparency by clearly explaining the nature of the allegations, providing information about the investigation process, communicating potential consequences.

39. Response protocol for identified cases of student abuse:

- 1) immediately isolate the affected student from the alleged perpetrator and ensure a safe and supportive environment;
- 2) provide emergency medical assistance to the affected student if required;
- 3) notify the student's legal guardians of the incident - all further discussions with the student must occur in their presence;
- 4) report to the appropriate authorities as needed, including law enforcement, child protection agencies, or medical institutions, depending on the nature of the case.

40. Guidelines for conducting interviews with affected students, other students, and branch staff:

- 1) maintain a calm and supportive demeanor throughout the interaction;
- 2) listen attentively to the student without interruption;
- 3) reassure the student that they acted correctly by reporting the incident;
- 4) engage in dialogue using only essential questions to gather factual information about the incident;
- 5) avoid requesting repetition of details to prevent re-traumatization;
- 6) guide the conversation neutrally - refrain from introducing personal assumptions, interpretations, or judgments about the student's actions;
- 7) allow the student to recall critical details without interference;
- 8) inform the student that responsible personnel will be notified to ensure they receive necessary support and resolution;
- 9) document the student's account verbatim, without alterations or omissions;
- 10) prepare a formal written record of the interview.

41. During the investigation, to prevent harm to the life and health of other students, the school principal must refrain from the following actions regarding the alleged perpetrator:

- signing confidentiality agreements or non-disclosure statements that would restrict sharing information about the case;
- entering settlements that allow the individual to "quietly resign," including mutual termination agreements, voluntary dismissal arrangements, and non-renewal of employment contracts as a means to resolve the issue;
- initiating the removal of the student from the school through expulsion, transferring to another educational institution, granting academic leave, or similar measures;
- pressuring legal guardians if they choose to involve law enforcement or initiate legal proceedings.

42. Based on the investigation findings, the School safeguarding team shall initiate

disciplinary measures on the alleged perpetrator in accordance with the severity of the violations and the internal legal regulations of AEO. If the case is referred to law enforcement agencies, administrative or criminal penalties may be applied as per the legislation of the Republic of Kazakhstan.

43. Cases of student abuse perpetrated by another student or branch staff member shall be further reviewed by the school's Disciplinary committee. The school principal shall determine whether to refer the matter to law enforcement authorities.

44. If reasonable grounds exist indicating abuse of a student by a legal guardian or another adult, the branch director must report the information to law enforcement agencies, child protective services (where applicable), and/or relevant social services.

## **8. Support for affected students**

45. School staff provide psychological, pedagogical, and other support to help students overcome negative experiences and trauma through the following measures:

- 1) restoring normalcy by creating a stable and safe environment at school and beyond;
- 2) providing emotional support and continuous psychological-pedagogical guidance;
- 3) assisting in processing trauma, overcoming internal psychological barriers, and addressing behavioral challenges;
- 4) teaching coping strategies, including managing emotional distress, practicing safe behaviors, seeking help and self-help techniques, regulating emotional responses;
- 5) offering academic assistance from teachers to address any learning gaps caused by the trauma;
- 6) monitoring student well-being through the school medical team, with referrals to healthcare specialists when necessary.

46. The student support and assistance plan must incorporate the student's personal strengths and areas for development, including communication skills enhancement, self-esteem reconstruction, awareness of habitual (automatic) behavioral patterns, retraining of new reactions, thought processes, and emotional responses.

47. To facilitate referrals to external child protection organizations for students and legal guardians, the branch must maintain an updated list of relevant external organizations with current contact information, provide this information to interested parties when needed, ensure easy accessibility of this information.

## **9. Confidentiality**

48. The branch administration must ensure the protection and confidentiality of whistleblowers who report abuse cases or suspicions, while clearly communicating the consequences for unauthorized disclosure of confidential information.

49. All information related to abuse incidents and whistleblowers is strictly confidential. Members of the School safeguarding team are prohibited from discussing cases among themselves beyond operational necessity, sharing details with unauthorized personnel inside or outside the school.

50. The School safeguarding lead, School safeguarding team, and school principal

may only share or discuss case-related information with staff members when such disclosure is strictly necessary for investigating the incident or providing support to the affected student. Prior to any information sharing, the staff member must be formally notified of their confidentiality obligations and made aware of the disciplinary consequences for unauthorized disclosure.

51. Upon submitting all required investigation materials, the School safeguarding lead and School safeguarding team must immediately delete such information from personal computers, including recycle bins and email accounts. When copying data to electronic storage devices, password protection must be applied to secure the information.

52. All hardcopy records pertaining to student abuse cases (incident logs, student files, investigative documentation) shall be secured in a key-operated safe under the custodianship of the School safeguarding team, with access restricted to authorized personnel.

53. A branch employee who proactively reports verified incidents of student abuse, or concerns about branch operations or colleague conduct that may endanger students, shall be protected from retaliation, harassment, or disciplinary action by branch administration.

## **10. Reporting and monitoring of cases**

54. The School safeguarding team maintains a permanent record of incidents throughout the academic year, documenting all reports and investigations of student abuse cases occurring both within and outside the school, in accordance with Appendix 5 of this Policy.

55. Case investigation outcomes shall be stored in a separate file/folder from the student's personal records/portfolio. All child protection-related information must be securely maintained. The School safeguarding lead is responsible for ensuring all case documents are complete, factual, and contain appropriate conclusions.

56. If a case is not referred to law enforcement agencies, child protective services, or external social support organizations, the school must securely retain all records of the report and investigation outcomes, document the rationale for non-referral in the case file.

57. The Student safeguarding lead, in collaboration with the School safeguarding team (SST) and branch leadership, shall conduct an annual comprehensive review of all reported concerns and suspected cases of student abuse within the branch, investigation processes and outcomes, existing safeguarding procedures and response protocols. Based on this review, they shall submit formal recommendations to the AEO for potential amendments to this Policy, revise internal school procedures and response algorithms as necessary, document all proposed improvements and implementation timelines.

## **11. Training and awareness for staff and school community members**

58. All school employees, volunteers, service providers, and members of the Board of Trustees must complete mandatory annual training on child protection and the provisions of this Policy. Additionally, newly appointed individuals shall receive this training upon assuming their duties. The Student safeguarding lead and the School safeguarding team are responsible for organizing and delivering this training.

59. The School safeguarding lead and members of the School safeguarding

team shall receive specialized training from the AEO division responsible for student wellbeing, including coordination of psychological and medical services across branches.

60. Students and their legal guardians shall be informed about this Policy's provisions through parent-teacher meetings, engagement with the Republican parent council under the AEO Board Chair, accessible communication channels (e.g., student/parent handbooks, digital platforms).

## **12. Accountability**

61. All individuals, including branch employees, students, legal guardians, and other parties, shall be held accountable under AEO regulations and the laws of the Republic of Kazakhstan for committing acts of abuse against students of the branch, concealing information about cases of abuse, providing false information regarding abuse allegations.

## **13. Final provisions**

62. The branch administration shall ensure all employees, students, and their legal guardians are formally informed of this Policy's provisions.

63. Matters not expressly addressed herein shall be resolved in accordance with valid AEO regulatory documents, the legislation of the Republic of Kazakhstan.

**Appendix 1**  
to the Student safeguarding policy  
of the Autonomous Educational Organization  
"Nazarbayev Intellectual Schools"

**Classification of abuse types, forms, indicators, and developmental consequences**

| <b>Type of violence</b> | <b>Forms and signs (external and behavioral)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Factors</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Implications for student development</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Physical abuse          | <p>Forms: infliction of bodily injury and damage, regular physical punishment, deliberate deprivation of shelter, clothing, food, care and nurturing, involvement in substance use, deliberate inducing and feigning symptoms of illness by parents of students for personal gain (Munchausen syndrome).</p> <p><u>External features:</u></p> <ul style="list-style-type: none"> <li>- abrasions, bruises, bruises, wounds, scratches, scars, scars (both fresh and early), swelling, tumors, and impact marks on the student's body;</li> <li>- ocular haemorrhage not associated with other diseases;</li> <li>- signs of strangulation on the neck with outlines of objects (belt buckle, cord, stick, fingerprints);</li> <li>- burns with hot objects and cigarettes, burns with hot liquids on the body; bite marks, pinching;</li> <li>- knocked out and loose teeth, lacerations or cuts in the mouth, lips, ears;</li> <li>- patches of baldness on the head;</li> <li>- loss of consciousness, vomiting, headaches from the blows;</li> <li>- Delayed physical development (body weight deficiency)).</li> </ul> <p><u>Behavioural traits:</u></p> <ul style="list-style-type: none"> <li>- changes in the mood and behaviour of students (became withdrawn, avoids communication, was calm, became aggressive);</li> <li>- mistrust of adults, particularly those to whom trusting relationships are the norm;</li> <li>- fright and fear of adults (startle at touch, approach);</li> <li>- fatigue and passivity;</li> <li>- reluctance to learn, to attend school;</li> <li>- Reduced attention span, memorisation of educational material;</li> <li>- obsessive behaviour with adults in search of attention and warmth.</li> </ul> | <p><u>Family factors:</u></p> <ul style="list-style-type: none"> <li>- families where physical punishment is an acceptable method of child-rearing;</li> <li>- parents are alcoholics, drug addicts, substance abusers, have mental illnesses, are under stress due to death of loved ones, illness, loss of work, moving, economic situation in the family.</li> <li>- families where there are frequent quarrels, scandals, conflicts;</li> <li>- Parents who have high expectations and make excessive demands on children that are inappropriate for their age and developmental level</li> </ul> | <ul style="list-style-type: none"> <li>- difficulties in socialising with peers;</li> <li>- – decreased academic performance at school;</li> <li>- decreased interest in the environment;</li> <li>- poor health, frequent illnesses, including headaches, abdominal pain, difficulty sleeping, etc.;</li> <li>- lack of desire to socialise, desire for loneliness;</li> <li>- Eating disorders (overeating or malnutrition, marked fluctuations in weight);</li> <li>- aggressive, demonstrative behaviour</li> <li>- antisocial, deviant behaviour;</li> <li>- the use of psychoactive substances</li> <li>- self-harming behavior</li> <li>- care and preference for the virtual world;</li> <li>- psychopathologies;</li> <li>- personality and behavioural disorders;</li> <li>- depressions;</li> <li>- suicidal behaviour.</li> </ul> |

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| <p>Psychological/ emotional abuse</p> | <p>Forms of psychological violence: constant criticism, ridicule, humiliation, insult, bullying, hostile attitude, public ridicule, intimidation, threats of violence against the student/ his/her relatives, deception and manipulation, unreasonably high expectations, unjustified restriction or prohibition of the student's social contacts with peers or adults in his/her environment, deprivation of the student's right to have his/her own views, feelings, desires, formation of behaviour that does not correspond to the level of his/her development, etc.</p> <p>Signs: threats against the child, manifested in verbal form, actions (bullying), in writing, as well as using the Internet, social networks (cyberbullying).</p> <ul style="list-style-type: none"> <li>- remarks made in an offensive manner, humiliating the child's dignity.</li> <li>- Depriving the child of the necessary stimulation, ignoring their basic needs for a safe environment, care, nurturing and love</li> <li>- making excessive demands on the child that are not appropriate to his or her age or capabilities;</li> <li>- deliberate physical or social isolation of a child;</li> <li>- adults lying or failing to fulfil their promises;</li> <li>- Engaging or encouraging a child in antisocial or destructive behaviour (stealing, cheating, alcoholism, drug abuse, etc.);</li> <li>- One-time harsh psychological impact causing psychological trauma to the child;</li> <li>- terrorisation (threatening to kill, physically harm, take to a dangerous scary place).</li> </ul> | <p>Family factors:</p> <ul style="list-style-type: none"> <li>- families where violence is a style of relations, low socio-economic status, psychological discomfort.</li> <li>- Students who evoke negative associations for parents (e.g. reminiscent of unpleasant wife/husband relatives associated with difficult life circumstances, unwanted pregnancies, or who have health features and disabilities;</li> <li>- oppressive, authoritarian parents with a controlling parenting style;</li> <li>- parents who use alcohol, drugs, suffer from depression and psychological problems.</li> </ul> | <ul style="list-style-type: none"> <li>- the perception of life as hostile;</li> <li>- sleep and eating disorders</li> <li>- inability to communicate, to establish relationships with others;</li> <li>- poor academic performance;</li> <li>- low self-esteem;</li> <li>- aggression towards others, quarrels, conflicts, fights;</li> <li>- solitude, loneliness;</li> <li>- excessive compliant, ingratiating, obsequious behaviour;</li> <li>- delayed physical, social-emotional-volitional development.</li> <li>- social-emotional immaturity;</li> <li>- fears, phobias;</li> <li>- neurosis and neurotic disorders;</li> <li>- aggressive behaviour;</li> <li>- autodestructive behaviour (including non-suicidal and suicidal behaviour)</li> <li>- post-traumatic stress disorder (PTSD)</li> </ul> |
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| Sexual abuse     | <p>Forms may include: physical contact (kissing, touching and caressing of intimate areas, masturbation and sexual intercourse, etc.) as well as non-contact activities (involving students in viewing sexual images, sexual stimulation, sexual coercion, including via the Internet), enticing or coercing a student to engage in sexual activities, involving and exploiting a child in prostitution or other sexual practices, exploiting children in pornographic displays, pictures and materials on the Internet, peeping on a child during intimate procedures (voyeurism), as well as forcing a child to undress; showing naked genitals, breasts/buttocks to a child (exhibitionism) and forcing a child to do so;</p> <p><u>Physical attributes:</u></p> <ul style="list-style-type: none"> <li>- bodily injuries and lesions on the body, including in the intimate areas.</li> </ul> <p><u>Behavioural signs:</u></p> <ul style="list-style-type: none"> <li>- Fear, avoidance of bodily touch/contact;</li> <li>- self-hatred, self-loathing (feeling dirty);</li> <li>- increased sexual awareness;</li> <li>- unrelated erotic fantasies (eroticisation);</li> <li>- Compulsive attachment to adults who have used the child for sexual purposes;</li> <li>- transferring attitudes towards the abuser (fear, disgust, feeling threatened) to other people;</li> <li>- sexual display;</li> <li>- sexually risky behaviour.</li> </ul> | <p>Families with authoritarian style of upbringing, poor relations of the child with parents, especially with the mother, conflict relations between parents, long absence of the mother for various reasons (employment at work, lying in hospital for a long time, etc.);</p> <ul style="list-style-type: none"> <li>- families with the stepfather or the mother's roommate;</li> <li>- parents are alcoholics, drug addicts, toxic addicts, have mental illnesses, were sexually abused in childhood.</li> </ul> | <ul style="list-style-type: none"> <li>- a drastic change in the usual lifestyle;</li> <li>- suicidal tendencies;</li> <li>- fear, phobias, mental disorders</li> <li>- self-aggression, self-harm, self-harming behavior;</li> <li>- tearfulness, loneliness, lack of friends;</li> <li>- abuse of animals, people, partners in marriage in the future, or vice versa, the behavior of the "victim";</li> <li>- fear of physical contact with adults, peers;</li> <li>- sleep disorders, nightmares;</li> <li>- eating disorders.</li> <li>- aggressive and antisocial behavior;</li> <li>- the desire to hide the cause of injury, suspicion;</li> <li>- low self-esteem, self-deprecation, guilt;</li> <li>- promiscuous sex life;</li> <li>- early pregnancy</li> <li>- Eroticized behavior and prostitution</li> <li>- sexually transmitted diseases</li> <li>- depression, mental disorders;</li> <li>- the experience of sexual abuse suffered in childhood increases the risk of becoming a victim of sexual violence in adulthood.</li> </ul> |
| Neglect of needs | <p>Forms:</p> <ul style="list-style-type: none"> <li>- lack of attention, care, concern on the part of parents/guardians, school staff in providing conditions for child development: nutrition, housing and safe living conditions;</li> <li>- neglect of education and training needs, when parents do not provide conditions for the child to attend school, allow absences without valid reasons;</li> <li>- Parents/guardians lack sufficient resources, which has a negative impact on the child's health, mental, spiritual, moral or social development;</li> <li>- Medical neglect - failure to care for students with serious somatic or mental health problems who need to receive medical care. This can take the form of regular missed medication, disorganised preventive measures (vaccinations, health checks) and generally inadequate medical support, which can lead to physical or mental health problems in the near future;</li> <li>- lack or insufficiency of supervision - being left unattended, leading to a high risk of accident, risk to life and health, frequent abandonment to the care of unauthorized persons due to the unwillingness of</li> </ul>                                                                                                                                                                                                                                                               | <p>Family factors: -a family where parents/guardians use psychoactive substances;</p> <ul style="list-style-type: none"> <li>- people with mental disorders in the family;</li> <li>- young parents with no parenting experience and skills;</li> <li>- low socio-economic standard of living;</li> <li>- having chronic diseases, disabilities, mental retardation;</li> <li>- survivors of childhood abuse;</li> <li>- socially isolated.</li> </ul>                                                               | <ul style="list-style-type: none"> <li>- mental retardation;</li> <li>- vagrancy.</li> <li>- deviant and delinquent behavior:</li> <li>- stealing, theft, may rummage through rubbish, etc.;</li> <li>- begging.</li> <li>- Craving and attachment to antisocial groups;</li> <li>- communication difficulties;</li> <li>- constant search for attention/participation;</li> <li>- frequent school absences;</li> <li>- aggressive or withdrawn, apathetic; hyperactive or depressed;</li> <li>- unintelligibly friendly or unwilling and unable to communicate;</li> <li>- tendency to arson, cruelty to animals;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|                          | <p>parents / guardians to take care of the child;</p> <ul style="list-style-type: none"> <li>• the child is on the street without adults in conditions dangerous to his life and health or with a high risk of an accident;</li> <li>- cases of legal representatives staying apart from the student for a long time;</li> <li>- neglect of the emotional needs of the child, lack of care, love;</li> <li>- students are often left hungry, not dressed or dressed inappropriately to the weather when the child lives in unsanitary conditions, rooms unsuitable for life, without a permanent place of residence.</li> </ul> <p><u>Physical signs:</u></p> <ul style="list-style-type: none"> <li>- living in unsanitary conditions;</li> <li>- he often stays hungry</li> <li>- tired, sleepy appearance, pale face, swollen eyelids;</li> <li>- the clothes are sloppy, do not match the season and the size of the child;</li> <li>- uncleanness, stale smell;</li> <li>- lack of body weight that does not correspond to age;</li> <li>- pediculosis, scabies, rash;</li> <li>- frequent "accidents", purulent and chronic infectious diseases;</li> <li>- advanced caries;</li> <li>- lack of proper vaccinations;</li> <li>- delayed speech and mental development.</li> </ul> <p><u>Behavioral signs:</u></p> <ul style="list-style-type: none"> <li>- frequent school absences;</li> <li>- inability to communicate with peers;</li> <li>- begging;</li> <li>- constant search for attention/participation;</li> <li>- constant hunger and thirst;</li> <li>- extremes of behavior: infantile or assumes the role of an adult and behaves in a "pseudo-adult" manner; aggressive or withdrawn, apathetic; hyperactive or depressed;</li> <li>- unintelligibly friendly or unwilling and unable to communicate;</li> <li>- tendency to arson, cruelty to animals;</li> </ul> |                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>- Mental and behavioral disorders;</li> <li>- depression, suicidal tendencies.</li> </ul>                                                                                                                                        |
| Exploitation of students | <p>Forms:</p> <ul style="list-style-type: none"> <li>- forcing the student to work/other activities for the benefit of other people/institutions.</li> <li>- the use of students' labor by the administration, school employees, and legal representatives in contradiction with established rules and regulations, goals, and principles of the educational and educational process.</li> </ul> <p>Educational measures, as well as programs aimed at fostering diligence, respect for work, and labor training in branches and at home are not exploitative of students.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>- low economic status of the family;</li> <li>- demoralization of the family;</li> <li>- foster care, where the child is seen as a means of economic gain.</li> <li>- neglect, lack of care for a child in the family</li> </ul> | <ul style="list-style-type: none"> <li>- causing damage to education, including low attendance, academic performance, physical and mental health of the student, as well as his moral, social and emotional development.</li> </ul>                                     |
| Bullying                 | <p><u>Forms of bullying can include a wide range of aggressive actions aimed at a student in order to humiliate and intimidate him, including through the Internet.</u></p> <ul style="list-style-type: none"> <li>- physical violence (blows, kicks, damage to personal belongings, etc.);</li> <li>- психологическое насилие (угрозы, запугивание, оскорбление, изоляция);</li> <li>- other forms of influence that violate the student's personal boundaries and dignity (spreading rumors, forcing them to act against their will, etc.).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>problems in child-parent, family relationships, individual and personal characteristics of the child (character accentuation, lack of conflict resolution skills, low level of empathy,</p>                                                                          | <p>depressions, dependent behavior, eating disorders, loss of self-confidence, negative self-image, anxiety, distress, feeling of powerlessness, defenselessness, propensity to commit offenses/crimes, destruction, auto-aggression, self-harm, suicidal behavior.</p> |

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|  |  | conformity<br>(changing<br>behavior under<br>group pressure),<br>the need for<br>entertainment,<br>The desire for<br>revenge, envy ,<br>experiencing your<br>own inferiority,<br>Striving for<br>excellence. |  |
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**Appendix 2**  
to the Student safeguarding policy  
of the Autonomous Educational Organization  
"Nazarbayev Intellectual Schools"

**Professional responsibility of branch employees, volunteers, and employees of school service providers to implement student protection policies**

| Name of the position, structural unit                                                     | Function name                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| Head of branch/School principal                                                           | <ul style="list-style-type: none"> <li>• Provides general guidance on the protection and safety of students of the branch;</li> <li>• Ensures the implementation of the Student safeguarding policy at the branches, provides conditions and procedures for monitoring the prevention and response to cases of violence against students;</li> <li>• Pays attention to the protection and safety of students from violence and allocates resources within the branch.</li> <li>• Coordinates the involvement of branch employees, legal representatives of students, the local and school community, and other organizations in the field of student protection and safety.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| An employee of the branch responsible for staffing/HR officer                             | <ul style="list-style-type: none"> <li>• When hiring employees and volunteers at the branch, it checks the identity of employees, their mental and physical health, the right to work at school, previous employment history, as well as checks for offenses and illegal actions against children (for example: fraud, corruption, abuse of power) in the past.</li> <li>• Introduces employees to regulatory legal acts, including newly adopted normative documents on the rights of the child, the Code of Ethics of AEO "Nazarbayev Intellectual Schools", Student Safeguarding Policy at the branches of AEO "Nazarbayev Intellectual Schools" and other normative documents on child protection</li> <li>• Receives reports/information on cases of student abuse being considered against a school employee and coordinates the response to such incidents together with the Responsible Person for Child Protection</li> <li>• Informs the AEO HR department about cases of student abuse based on the results of an investigation and action against a school employee, including information about a school employee who resigned of his own volition, who has been repeatedly reported to have violated the code of ethics, non-compliance with preventive measures specified in this Policy. in order to take preventive measures in order to avoid re-employment in the branches of AEO;</li> <li>• Maintains contact with the branch's School Security Service during investigations into incidents of student abuse by a school employee.</li> </ul> |
| An employee of a branch responsible for ensuring the legality of its activities           | <ul style="list-style-type: none"> <li>• Participates in informing and training employees of the branch, legal representatives on the protection and safety of students;</li> <li>• Is a member of the School Security Service of the branch;</li> <li>• Participates in the investigation of incidents and violations of the Student Safeguarding Policy in compliance with the principle that the investigation is focused on victims, respecting their rights to safety, confidentiality, and respect;</li> <li>• Ensures compliance with the legality of procedures related to Student Safeguarding Policy, identification, and incident response.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Branch employees, volunteers, employees of organizations providing services at the school | <ul style="list-style-type: none"> <li>• Receive training on safeguarding students and ensure that the Student Safeguarding Policy is supported and implemented;</li> <li>• Participate in awareness-raising activities on the prevention of cases of abuse, ensuring the protection and safety of students, and educational activities;</li> <li>• Comply with the Code of Ethics, requirements and provisions of this Policy;</li> <li>• Recognize signs of student abuse, report cases of student abuse, suspicions of such cases, and "low-level" concerns to the Student Protection Officer;</li> <li>• Facilitate the work of the School Security Service;</li> <li>• Participate in the implementation of the support plan/program in order to provide assistance and support to students;</li> <li>• Monitor "gray areas" on the territory and in the school building, where students can lock each other up, use psychoactive substances, conflict, be humiliated, intimidated, harassed (under stairwells, recreation areas, attics, toilets, basements, utility rooms, etc.);</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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| Security/safety personnel | <p>Provide:</p> <ul style="list-style-type: none"> <li>• checking documents and registering visitors and school volunteers in the Register, issuing a recognisable visitor badge and escorting them around the school and in the dormitory upon prior agreement with the school staff.;</li> <li>• control over Face ID pass of school employees and students or availability of passes for school employees and students;</li> <li>• control of 'grey areas' on the territory and in the school building where students may lock each other up, use psychoactive substances, have conflicts, be humiliated, intimidated, harassed (under stairwells, recreational areas, attics, toilets, basements, utility rooms, etc.);</li> <li>• video surveillance in open areas (classrooms, corridors, canteen, library and other classrooms);</li> <li>• Controlling and preventing visitors from using the school's student toilet facilities.</li> </ul> |
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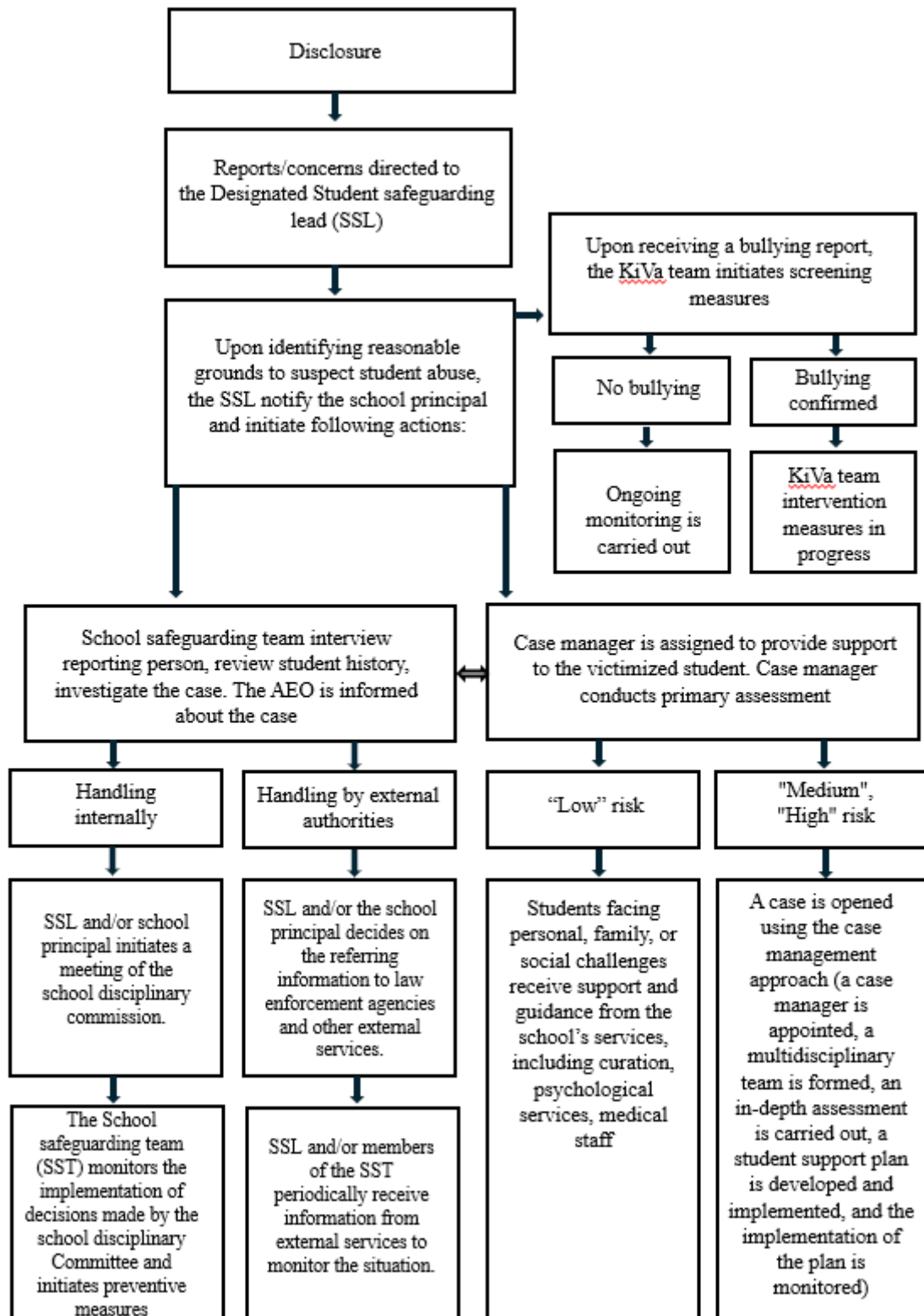
**Instructions for visitors to the branches  
of the AEO "Nazarbayev Intellectual Schools"**

*This Instruction is mandatory reading for all visitors to Nazarbayev Intellectual schools, including legal guardians of students, AEO employees, representatives of external organizations/institutions (collectively referred to as "visitors").*

1. Access to school premises is permitted only with advance coordination through the school administration or designated staff members.
2. To schedule appointments with school personnel (teachers, class curators, psychologists, or administrators), visitors must contact the relevant party in advance via phone/email, confirm the time, location, and purpose of the meeting.
3. Upon arrival at the scheduled time, visitors must present government-issued ID to security personnel, register their visit in the visitor logbook.
4. All visitors must remain accompanied by security staff or a school employee while on campus.
5. Conferences with teachers are permitted exclusively during non-instructional hours, or designated break periods.
6. The school employee hosting a pre-arranged meeting must:
  - inform the security service and school administration about the scheduled visit in advance;
  - personally meet the visitor at the agreed time;
  - escort the visitor back to the security registration desk after the meeting concludes;
  - accompany the visitor to any school facilities (e.g., restrooms and other places) and ensure their return to the designated exit point.
7. If the visitor does not have a prior agreement, the school employee:
  - informs the school management and administration about the purpose of the meeting with the visitor;
  - gets permission to visit, meet.
8. Entry to the school without prior arrangement or registration is permitted in the following cases:
  - parent-teacher meetings;
  - participation in parent programs;
  - emergency situations related to a student's health;
  - open house days;
  - school celebrations and events.
9. The following actions are strictly prohibited for all visitors:
  - disrupting classes by summoning teachers or students during instructional time (except in emergencies);
  - recording videos or taking photos on school premises (unless pre-approved by administration);
  - bringing hazardous items, including sharp/piercing objects, pepper spray, any other dangerous substances;
  - bringing food/drinks, specifically homemade meals, carbonated beverages, fast food, cream-filled pastries (unless pre-authorized by administration);
  - smoking or consuming alcohol anywhere on school grounds.

**Individuals who refuse to present valid identification (passport/national ID) and provide a clear purpose for their visit, will be denied entry to school premises.**

### Response protocol for reports of abuse and student support



**Appendix 5**  
to the Student safeguarding policy  
of the Autonomous Educational Organization  
"Nazarbayev Intellectual Schools"

**A log of reports and incidents of student abuse for the period from \_\_\_\_\_ to \_\_\_\_\_**

| № | Date of receipt of the message | Date of incident(s) | Full name, position/status of the person who reported the incident/suspicious | Information about the victim |            |        | Type of violence |          |               |        |                  |                           | The offender /aggressors |                             |                   |                            | Place of incident |         |                                      | Taken measures                        |                    |                   |                           | The outcome                                                                        |                                         |                                           |
|---|--------------------------------|---------------------|-------------------------------------------------------------------------------|------------------------------|------------|--------|------------------|----------|---------------|--------|------------------|---------------------------|--------------------------|-----------------------------|-------------------|----------------------------|-------------------|---------|--------------------------------------|---------------------------------------|--------------------|-------------------|---------------------------|------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------|
|   |                                |                     |                                                                               | Student's full name          | age/claims | gender | bullying         | physical | psychological | sexual | neglect of needs | Other (specify in detail) | Student                  | employee/supplier/volunteer | Parents/guardians | others (specify in detail) | At school         | At home | In another place (specify in detail) | Psychological, pedagogical assistance | Medical assistance | Social assistance | Other (specify in detail) | Case review: investigation within the school or referred to external organizations | organizations where the victim was sent | organizations where the offender was sent |

