

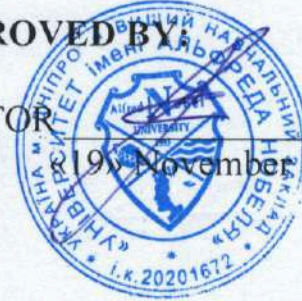


Alfred Nobel
University

Translated from Ukrainian into English
by Vlada Karpenko in accordance with
the original document

APPROVED BY

RECTOR




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19 November 2025

POLICY


**on Anti-Discrimination, Sexual Harassment Prevention
and Equality Support at Higher Educational Institution
“Alfred Nobel University”**

Dnipro

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1. GENERAL PROVISIONS

The Higher Educational Institution “Alfred Nobel University” (hereinafter referred to as the University) recognizes that preventing and combating discrimination, ensuring equal rights and opportunities for women and men, ensuring equal access to education without discrimination on any grounds, fostering respect for human rights and freedoms, and maintaining intolerance toward the humiliation of human honour and dignity, physical or psychological violence, as well as discrimination on any grounds, constitute an integral component of sustainable development, democratic governance, academic freedom and ethical leadership.

Gender equality, non-discrimination and counteracting any manifestations of violence are not merely legal norms, but fundamental principles that define the University's humanistic mission, which is aimed at raising individuals capable of acting responsibly, thinking critically and respecting human dignity and rights.

In accordance with the Strategy of Alfred Nobel University for 2025-2030 (Principle 8. Balance of Interests), all relationships within the University are built upon the principle of a balance of interests, which harmonizes the needs of all parties—owners, partners, managers and employees. The sphere of interests encompasses not only financial aspects but also individual development and satisfaction with moral and psychological factors. This principle is a component of a higher-order principle—the harmonious development of the higher education institution, the individual and the employee.

Furthermore (Principle 9. University as a Territory of Positivity), everyone must be aware of the impact that the internal atmosphere has on the life of the higher education institution and contribute to ensuring that an atmosphere of mutual respect prevails. This does not imply that conflicts cannot occur at the University. However, conflicts must be constructive in nature and contribute to the prosperity of the University.


2. PURPOSE AND OBJECTIVES OF THE POLICY

2.1. The Policy on Anti-Discrimination, Sexual Harassment Prevention and Equality Support at the Higher Educational Institution “Alfred Nobel University” (hereinafter referred to as the Policy) establishes the principles, mechanisms, behavioral standards, accountability and procedures for ensuring gender equality and preventing discrimination, sexual harassment, mobbing, bullying, harassment or other forms of degrading treatment.

2.2. The purpose of the Policy is to ensure a non-discriminatory and tolerant university environment backed by guarantees of legal and institutional protection.

2.3. The objectives of the Policy are:

2.3.1. To create a safe, inclusive, barrier-free environment where every participant in the educational process can freely exercise their rights and realize their potential, regardless of sex, race, ethnic origin, language, age, sexual orientation, gender identity, disability, religious beliefs or other protected characteristics.

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2.3.2. To ensure the principles of equality, non-discrimination and respect for human dignity, thereby enhancing the quality of education, academic integrity and social cohesion within the university environment.

2.3.3. To form a non-discriminatory, tolerant educational space.


2.3.4. To provide guarantees of legal and institutional protection.

3. REGULATORY AND LEGAL FRAMEWORK

The University is guided by the current legislation of Ukraine and international norms: the Constitution of Ukraine, the Labor Code of Ukraine, the Code of Ukraine on Administrative Offenses, the Criminal Code of Ukraine, the Law of Ukraine “On Education”, the Law of Ukraine “On Higher Education”, the Law of Ukraine “On Ensuring Equal Rights and Opportunities for Women and Men”, the Law of Ukraine “On Principles of Preventing and Combating Discrimination in Ukraine”, the Law of Ukraine “On Protection of Personal Data”, the Universal Declaration of Human Rights, the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention), the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), Decree of the Cabinet of Ministers of Ukraine No. 1163-p dated December 20, 2022 “On Approval of the Strategy for the Implementation of Gender Equality in the Field of Education until 2030 and Approval of the Operational Action Plan for 2022-2024 for its Implementation”, Decree of the Cabinet of Ministers of Ukraine No. 260- p dated March 25, 2025 “On Approval of the Operational Action Plan for 2025-2027 for the Implementation of the Strategy for the Implementation of Gender Equality in the Field of Education until 2030”, the National Action Plan for the Implementation of UN Security Council Resolution 1325 “Women, Peace, Security” for the Period until 2025, approved by Decree of the Cabinet of Ministers of Ukraine No. 1544- p dated October 28, 2020, Resolution of the Cabinet of Ministers of Ukraine No. 658 dated June 4, 2025 “On Approval of the Model Program for the Prevention of Violence and Cruel Treatment of Children”, Resolution of the Cabinet of Ministers of Ukraine No. 658 dated August 22, 2018 “On Approval of the Procedure for Interaction of Subjects Exercising Measures in the Field of Preventing and Combating Domestic Violence and Gender-Based Violence”, Recommendation CM/Rec(2019)1 “Preventing and Combating Sexism” adopted by the Committee of Ministers of the Council of Europe on March 27, 2019, Recommendation CM/Rec(2022)16 of the Committee of Ministers of the Council of Europe to Member States on Combating Hate Speech, and other international standards, as well as the University Statute and this Policy.

4. TERMS AND CORE DEFINITIONS

The terminology is used in the sense defined by the relevant regulatory legal acts of Ukraine and international documents.

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Barrier-freeness – the principle of creating an environment in which every person has equal access to opportunities regardless of age, sex, health status or other characteristics; it involves the removal of physical, informational and social obstacles.

Bullying – acts by participants in the educational process consisting of psychological, physical, economic or sexual violence, including through the use of electronic communications media, committed against a person or by such a person against other participants in the educational process, as a result of which harm could be or was caused to the psychological or physical health of the victim.

Victim-blaming – shifting the blame for what happened, specifically for a committed offense, from the perpetrator to the victim.

Gender – socially constructed roles, behaviors, activities and attributes that a given society considers appropriate for women and men.

Gender equality – a state concerning equal rights, responsibilities and opportunities for women and men, which also implies that the interests, needs and priorities of both women and men are taken into account.

Gender-based violence – violence directed against a person because of their sex, or violence that disproportionately affects women.


Gender-sensitive, non-discriminatory speech – the realization of gender equality in written and spoken language, achieved when women and men, as well as individuals who do not fit into the binary gender system, become visible in language as individuals of equal value, dignity, integrity and respect; in particular, this includes the use of feminines (feminine nouns) designating professions, positions, social statuses and types of activities to refer to women.

Gender-sensitive approach – taking into account the specific social, cultural, economic, political and other characteristics of the life conditions and needs of women and men.

Discriminatory expressions – verbal or non-verbal expressions, including those in electronic communications, that demean the dignity of a person or a group of persons based on sex, race, age, sexual orientation, gender identity or other characteristics, which may cause prejudice or create an atmosphere of hostility.

Discrimination – a situation in which a person and/or a group of persons, due to their characteristics of race, skin color, political, religious and other beliefs, sex, age, disability, ethnic and social origin, citizenship, marital and property status, place of residence, language or other characteristics that were, are or could be real or perceived (hereinafter referred to as specific characteristics), experiences restrictions in the recognition, realization or enjoyment of rights and freedoms in any form, except when such restriction has a lawful, objectively justified purpose, the means of achieving which are appropriate and necessary.

Discrimination based on sex – a situation in which a person and/or a group of persons, based on characteristics of sex that were, are or could be real or perceived, experiences restrictions in the recognition, realization or enjoyment of rights and freedoms or privileges in any form established by the Law of Ukraine “On Principles of Preventing and Combating

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Discrimination in Ukraine”, except when such restrictions or privileges have a lawful, objectively justified purpose, the means of achieving which are appropriate and necessary.

Electronic communications – the exchange of information (text messages, photos, videos, audio files, etc.) carried out by means of electronic communication tools such as email, messengers, social networks, mobile applications, online platforms, video calls, etc., particularly those used within and for the purpose of carrying out educational and scientific activities.

Applicant (Complainant) – a person who has submitted a complaint regarding a violation of ensuring equal rights and opportunities for women and men.

Victim-centered (Survivor-centered) approach – a comprehensive approach that involves acknowledging, respecting and protecting the rights and dignity of individuals who have suffered any form of discrimination, sexual harassment or other violations not conforming to the Regulation, by creating sensitive, safe, non-discriminatory response procedures, providing support and preventing re-victimization and re-traumatization, taking into account the needs and vulnerabilities of the victims and understanding the gender-based nature of violence.

Confidentiality – the non-disclosure of any information to any party without the informed consent of the relevant individual; statutory requirements for mandatory reporting constitute an exception to confidentiality.


Conflict of interest – a situation in which a person has a personal interest in the sphere of their professional, educational or representative activities that may affect their ability to act impartially, objectively and in a manner that complies with the principles of equality, non-discrimination and respect for the rights of others.

Perpetrator (Offender) – a person who has committed a violation.

Mobbing – systematic (repeated), prolonged, intentional actions or omissions by an employer, individual employees or a group of employees aimed at humiliating the honor, dignity or business reputation of an employee, including for the purpose of acquiring, changing or terminating their labor rights and duties; it manifests as psychological and/or economic pressure, including through the use of electronic communications, creating a tense, hostile or offensive atmosphere that may lead to the employee underestimating their professional competence.

Hate speech – expressions that incite, promote, disseminate or justify violence, hatred or discrimination against a person or a group of persons due to real or attributed/perceived personal characteristics (status), such as: race, skin color, language, religion, nationality, national or ethnic origin, age, disability, sex, gender identity and sexual orientation.

Mandatory reporting – a statutory requirement to inform authorized bodies or individuals about alleged facts of violations that pose a threat to the safety of the victim and other persons, which constitutes an exception to confidentiality (specifically, measures aimed at protecting minors or those containing signs of an alleged criminal offense subject to public prosecution).

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Person against whom a complaint is filed – a person whose actions or behavior have become the subject of a complaint.

Affirmative actions (Positive actions) – special temporary measures that have a lawful, objectively justified purpose aimed at eliminating legal or factual inequality in the opportunities of women and men regarding the realization of rights and freedoms established by the Constitution and laws of Ukraine.

Victim (Affected person) – a person who has suffered from discrimination, sexual harassment or other violations.

Re-traumatization – the process of re-experiencing a traumatic event or similar emotional distress, which complicates recovery.

Equality – a principle that guarantees equal rights, opportunities and treatment for all persons regardless of their characteristics.

Witness – a person who knows or may know about the commission of sexual harassment and/or discrimination against another person(s), or who was an eyewitness to the situation.

Sexism – any act, gesture, visual manifestation, spoken or written words, practice or behavior based on the idea that a person or a group of persons is inferior because of their sex, manifesting in the public or private sphere, online or offline, and directed at (or causing): the violation of the inherent dignity or human rights of a person or a group of persons; physical, sexual, psychological or socio-economic harm or suffering to a person or a group of persons; the creation of an intimidating, hostile, degrading or offensive environment; the obstruction of the independence or full enjoyment of human rights by a person or a group of persons; the maintenance and reinforcement of gender stereotypes.

Sexual harassment – actions of a sexual nature (that do not encroach upon the sexual freedom or sexual inviolability of a person), expressed verbally, non-verbally (including through electronic communications) or physically (words, gestures, body movements, touching, patting or other similar actions), which offend or humiliate the dignity of a person and may be accompanied by the creation of an intimidating, hostile, offensive or degrading environment (situation) for them.

Trauma-informed approach – a comprehensive approach that involves understanding and recognizing how trauma can affect a person's behavior, emotional state, learning and social interactions, and is grounded in the principles of respect for the human dignity of victims, creating a safe environment and preventing re-traumatization during the provision of assistance, communication or decision-making.

Harassment – behavior unwanted by a person and/or a group of persons, the purpose or effect of which is to humiliate their human dignity based on specific characteristics or to create a tense, hostile, offensive or disrespectful atmosphere toward such a person or group of persons.

5. POSSIBLE FORMS OF UNACCEPTABLE BEHAVIOR

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An understanding of exactly which actions or expressions are impermissible facilitates prevention, timely response and the building of a culture of respect, equality and mutual support within the academic environment of the University. Unacceptable behavior can manifest in both overt and covert forms; it can occur in both physical and online environments, encompassing verbal and non-verbal acts that can affect the dignity, physical and psychological state, and equal opportunities of all participants in the educational process. The consequences of such actions are invariably harmful to the individual and/or the collective. The definition and identification of unacceptable behavior is the first step toward its prevention and eradication.

An indicative list of examples of such behavior or actions that may be considered manifestations of discrimination and sexual harassment, as well as other behavior contrary to the principles and values defined as key in this Policy:

5.1. Physical and verbal harassment:

5.1.1. Unwanted physical attention or contact, including intrusive invasion of personal space or uninvited physical interference;

5.1.2. Propositions of an intimate nature or unwelcome expressions, comments and innuendos of a sexual nature;

5.1.3. Displaying pornographic or sexually explicit images.

5.2. Discriminatory expressions and attitudes:

5.2.1. Demeaning comments or attitudes toward a person because of their sex, sexual orientation, gender identity, race, nationality, religion, age, disability, physical appearance, political views, social origin, financial status, place of residence or other characteristics.

5.3. Use of hate speech:

5.3.1. Public communication regarding the inability of women or men to perform in certain spheres of activity based on stereotypical notions.

5.4. Discrimination in the educational and professional process:

5.4.1. Prejudiced attitudes toward participants in the educational process based on their sex and/or other protected characteristics;


5.4.2. Distribution of tasks or roles in group work based on stereotypical notions about women and men;

5.4.3. Disregard and disdain for suggestions and opinions expressed by women due to the belief that they cannot be experts in the respective topic (harassment);

5.4.4. Ignoring the career advancement of women compared to men;

5.4.5. Refusal to hire women due to the potential need for pregnancy and childbirth leave, denying them such leave, or denying men and women child-care leave or refusing to hire them due to the potential need for such leave.

Spoken or written expressions, linguistic formulations, as well as visual materials (presentations, slides, infographics, videos, images, examples of texts from public spaces, promotional materials, etc.) containing examples of discriminatory, disrespectful or demeaning language shall not be considered violations if they are used exclusively for

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educational, analytical or research purposes—specifically, to illustrate unacceptable behavior, demonstrate its harm and develop critical thinking.


6. NORMS OF POLICY IMPLEMENTATION

The key norms for implementing the Policy are as follows:

- 6.1. Respect for human dignity, private life and the rights of every person.
- 6.2. Zero tolerance for any forms of discrimination and violence, including sexual harassment.
- 6.3. Ensuring victim-centered and trauma-informed approaches, and preventing re-traumatization.
- 6.4. Presumption of trust toward victims' complaints and ensuring confidentiality.
- 6.5. Institutional sustainability.
- 6.6. Impartial, timely, comprehensive and effective response to complaints.
- 6.7. Ensuring legal relationships and dignified treatment of all participants in the educational process and members of the university community.
- 6.8. Availability of equal access to opportunities for development and the realization of one's own potential.
- 6.9. Adherence to barrier-free and inclusive access to educational and employment opportunities.

7. PRINCIPLES OF POLICY IMPLEMENTATION

- 7.1. Formation and systemic development of an inclusive educational environment with zero tolerance for discrimination and gender-based violence, including sexual harassment.
- 7.2. Promoting awareness among participants in the educational process and the entire university community regarding the fight against discrimination and gender-based violence, including sexual harassment, and supporting equality.
- 7.3. Preventing instances of discrimination and/or sexual harassment, operating effective and sustainable mechanisms for responding to such cases, and supporting victims.
- 7.4. Transparent procedures for protection against discrimination and sexual harassment, adhering to fairness and a gender-sensitive approach.
- 7.5. Adherence to confidentiality, objectivity, impartiality and fairness in the complaint review process.
- 7.6. Prevention of any negative consequences for applicants, victims or witnesses (specifically, the creation of a hostile atmosphere and harassment (mobbing, bullying), dismissal of employees from work, obstruction of higher education students in passing exams or other assessment activities, persecution, retaliation or intimidation by the person against whom the complaint was filed, etc.).
- 7.7. Increasing trust in the University, strengthening its authority and positive image as a progressive, safe institution open to cooperation, both within the state and within the international educational space.

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8. SCOPE OF THE POLICY

8.1. The Policy applies to all forms of interaction carried out within the educational, scientific, labor, cultural, administrative and informational environment of the University. It extends to both face-to-face (in-person) and remote interaction, including electronic communications and public social networks.

8.2. The application of the approaches and measures provided for by this Policy is carried out throughout the entire period of study of higher education students, including during vacations, internship or pre-diploma practical training, participation in academic mobility programs, as well as during the performance of other types of educational activities or duties related to the educational process.

8.3. The Policy applies to everyone:

8.3.1. Higher education students at all levels, representatives of student self-government bodies, student initiatives and associations;

8.3.2. University employees, including scientific, scientific-pedagogical and pedagogical workers, management, members of collegial and advisory bodies, administrative staff, as well as other employees of structural subdivisions;

8.3.3. Other persons participating in the activities of the University, including practitioners involved in the educational process within study programs, part-time instructors, freelance employees, partners, applicants (prospective students), consultants, contractors, volunteers, members of alumni associations, representatives of the public sector and visitors.

8.4. The Policy is mandatory for execution by all structural subdivisions of the University, regardless of their status, level of autonomy or type of activity.


9. ORGANIZATIONAL STRUCTURE OF THE POLICY IMPLEMENTATION

9.1. In order to create a transparent, sensitive and fair procedure that protects the rights of all parties, fosters trust in institutional response mechanisms and guarantees safety, confidentiality and respect for the dignity of every person seeking help, the University operates the Service for Understanding and Support (the Service) and the Commission for Reviewing Complaints Regarding Discrimination, Sexual Harassment and Equality Support (the Commission).

9.1. Within the system of counteracting and preventing manifestations of discrimination and sexual harassment and supporting equality, the University operates the **Service for Understanding and Support** (hereinafter referred to as the Service)—a special advisory body that promotes the formation of a non-discriminatory culture and ensures structured, sensitive responses in accordance with the principles of equality, human dignity and fairness.

9.2. The Service consists of representatives of the administration, student self-government, scientific-pedagogical staff, gender experts, psychologists and lawyers.

9.2.1. The composition of the Service is gender-balanced and is approved by an order of the University Rector for a term of three years with the possibility of renewal.

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9.2.2. If necessary, external independent experts, representatives of the state and public sectors working in the field of gender equality and counteracting discrimination, violence (specifically gender-based violence) and sexual harassment, as well as the Education Ombudsman, may be involved in the work of the Service upon consent if a request is received.

9.3. Among the representatives of the Service, members elect the Head of the Service, the Deputy Head of the Service and the Secretary of the Service. The Head of the Service represents the Service in interaction with other bodies of the University, signs documents adopted by the Service and acts as the contact person for the Service. The vote of the Head of the Service is decisive in the event of an equal number of votes for and against.

9.4. The Service carries out its work in the format of quarterly meetings (in-person and/or remote format). Each meeting of the Service is recorded in Minutes signed by the Head and the Secretary of the Service. The Secretary of the Service is appointed at its first meeting from among the members of the Service by a simple majority vote. The Secretary is responsible for keeping the minutes of the meetings and tracking the documentation of the Service. The results of the Service's activities are summarized annually in an annual report published on the official website of the University.


9.5. Members of the Service undergo periodic training or professional development on issues related to combating violence (including gender-based violence), sexual harassment and discrimination, as well as ensuring equality and a safe, non-discriminatory educational environment.

9.6. Within their competence, the Head of the Service conducts a gender impact assessment on equality when adopting regulations, decisions and procedures. This means they determine the direct or indirect impact (positive, negative or neutral), as well as short-term and long-term consequences of such regulations, decisions and procedures of the higher education institution on the status of women and men, girls and boys, in order to timely detect and eliminate imbalances and to prevent and counteract gender inequality.

9.7. Within their competence, the Head of the Service supports and encourages measures for the implementation of the Policy and removes barriers to their realization, including: insufficient awareness among staff/employees, a culture of silence or toleration of violations, lack of effective response procedures, conflicts of interest when reviewing complaints, the presence of stereotypes and prejudices within the collective, lack of training and development of relevant competencies, fear of reprisals or stigmatization, limited resources or failure to designate responsible persons, etc.

9.8. Heads of structural subdivisions and heads of departments are obliged to respond in a timely manner to violations of ensuring equal rights and opportunities for women and men, and to take necessary measures to prevent and counteract them and avoid their repetition in the future. In the event that self-regulation is impossible, they must immediately forward the matter to higher officials or relevant departments of the University.

9.9. The active participation of employees and students in the work of the Service is taken into account when forming the individual (working) workload of employees,

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determining evaluation criteria within the internal education quality assurance system, as well as when calculating the rating of students.

10. FUNCTIONS OF THE SERVICE FOR UNDERSTANDING AND SUPPORT

With the aim of effectively implementing the anti-discrimination policy and ensuring equality, the Service performs the following functions:

10.1. Disseminates information within the university environment regarding the Policy on Anti-Discrimination, Sexual Harassment Prevention and Equality Support.

10.2. Conducts training for participants in the educational process on preventing discrimination, violence (specifically gender-based violence) and sexual harassment, and ensuring equality.

10.3. Provides informational and advisory support to participants in the educational process regarding the prevention of discrimination, violence (specifically gender-based violence) and sexual harassment.

10.4. Develops an annual plan of activities aimed at raising awareness about combating discrimination and violence (specifically gender-based violence) and monitors its implementation.

10.5. Receives and participates in the review of complaints regarding facts of discrimination, violence (specifically gender-based violence) and sexual harassment.

10.6. Conducts surveys within the University regarding the status of compliance with ensuring equal rights and opportunities for women and men, the effectiveness of protection mechanisms against violations, etc.

10.7. Requests information from heads of departments, heads of structural subdivisions and persons authorized to carry out educational and awareness-raising activities regarding the implementation status of planned activities, identified obstacles and suggestions for improving work.


10.8. Monitors academic and labor processes for the presence of discriminatory practices.

11. OPERATING PROCEDURE OF THE COMMISSION FOR REVIEWING COMPLAINTS REGARDING DISCRIMINATION, SEXUAL HARASSMENT AND EQUALITY SUPPORT

In order to ensure a timely response upon receipt of a complaint(s), the Commission for Reviewing Complaints Regarding Discrimination, Sexual Harassment and Equality Support operates at the University.

11.1. The Commission for Reviewing Complaints Regarding Discrimination, Sexual Harassment and Equality Support (the Commission) is a body whose activities are aimed at the timely, impartial and confidential review of complaints related to discrimination, sexual harassment and other relevant violations.

11.2. The Commission is appointed by an order of the University Rector for a term of three years with the possibility of renewing its membership.

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11.3. The membership of the Commission must include representatives from the following categories: – student self-government bodies; – scientific-pedagogical and scientific workers (including at least one representative from the employees' trade union organization, if available); – other university employees (taking into account trade union representation, if available); – persons responsible for counteracting discrimination, gender-based violence and sexual harassment, or gender experts; – representatives of the institution's administration; – delegates from student self-government (for example, the student rights ombudsman); – representatives of the legal service; – psychologists.

11.4. External independent experts—representatives of the state or public sector working in the field of gender equality or anti-discrimination—may be involved in the Commission. They may operate on a permanent basis or be invited as needed.

11.3.1. The composition of the Commission is gender-balanced. All members have an equal right to vote.

11.3.2 The number of Commission members is not limited, but a balance between the representation of students, faculty and administration is maintained.

11.3.3 The Commission is competent (has a quorum) if at least 50% of its members are present at the meeting.

11.4. Organization of the Commission’s Activities

11.4.1. From among its members, the Commission elects:

- The Chair of the Commission – coordinates activities, represents the Commission within the University and signs documents;
- The Deputy Chair – performs duties in the absence of the Chair;
- The Secretary – keeps minutes of meetings and is responsible for documentation.

11.4.2. The vote of the Chair of the Commission is decisive if the number of votes “for” and “against” is equal.

11.4.3. The Commission conducts meetings in face-to-face (in-person) or remote formats. Each meeting is documented with Minutes signed by the Chair and the Secretary.

11.4.4. To review a specific complaint, the Chair designates a rapporteur who prepares materials, presents findings and answers questions from the Commission members.

11.5. Powers of the Commission

11.5.1. Receives, registers and reviews complaints regarding discrimination, sexual harassment and other violations.


11.5.2. Conducts an internal investigation or an adaptive response procedure, depending on the preference (will) of the complainant.

11.5.3. Hears the parties and witnesses, analyzes materials and makes decisions.

11.5.4. Provides recommendations to the university management regarding disciplinary or organizational measures.

11.5.5. In case of detecting signs of a criminal offense – informs the management of the need to notify law enforcement authorities.

11.5.6. Ensures the tracking of complaints, decisions and reporting on the results of activities.

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11.5.7. May involve specialists in the fields of law, psychology, social work and gender issues.

11.5.8. Ensures adherence to the principles of objectivity, impartiality, confidentiality and a victim-centered (survivor-centered) approach.

11.6. Conflict of Interest

11.6.1. If a member of the Commission develops a conflict of interest regarding a specific complaint, they shall be recused (suspended) from its review by a decision of the Commission.

11.6.2. If necessary, a temporarily recused member may be replaced by a representative from the same category (for example, from the student body or the trade union).

11.6.3. If the conflict of interest concerns the head of the institution who makes decisions based on the review results, the decision shall be made by a deputy or another authorized person.

12. PROCEDURE FOR INTERACTION BETWEEN POLICY IMPLEMENTATION BODIES WITHIN THE UNIVERSITY

12.1.1. To ensure the effective implementation of the Policy, two interconnected bodies operate at the University: the Service for Understanding and Support and the Commission for Reviewing Complaints Regarding Discrimination, Sexual Harassment and Equality Support.

12.1.2. The Service and the Commission act within their competence, interacting on the basis of the principles of trust, impartiality, confidentiality, human rights, gender equality and the rule of law.


12.1.3. Both bodies are accountable to the Rector of the University and cooperate with other structural subdivisions, including the legal department and the psychological support center.

12.2. Powers of the Service for Understanding and Support.

12.2.1. The Service performs preventive, advisory and mediation functions aimed at preventing conflicts and developing a culture of respect, equality and a safe university environment.

12.2.2. Main objectives of the Service:

- carrying out information, educational and awareness-raising activities regarding non-discrimination, gender equality and preventing sexual harassment;
- providing primary psychological, advisory and informational assistance to victims or witnesses;
- facilitating mediation and restoring understanding between the parties in case of conflicts or misunderstandings, provided this does not conflict with the interests of the victim;
- conducting anonymous surveys and monitoring the atmosphere of safety and equality within the university environment;

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- transferring requests/complaints to the Commission (with the consent of the complainant) if there are signs of discrimination, sexual harassment or other violations;
- participating in the development of educational activities, trainings and campaigns on issues of ethical interaction and tolerance.

12.2.3. The Service does not conduct official investigations, does not make disciplinary decisions and does not have the power to impose sanctions.

12.2.4. All activities of the Service are based on the principles of voluntariness, neutrality, safety and confidentiality.

12.3. Powers of the Commission for Reviewing Complaints.

12.3.1. The Commission is an official collegial body of the University that ensures the procedural review of complaints, the conduct of investigations and the adoption of findings regarding cases of discrimination, sexual harassment or other forms of violation of rights and dignity.

12.3.2. Main objectives of the Commission:

- receiving, registering and reviewing complaints from higher education students, employees and other members of the university community;
- conducting internal investigations, including interviewing the parties, analyzing evidence and preparing findings;
- providing recommendations to the administration regarding disciplinary or organizational measures;
- interacting with law enforcement authorities if signs of a criminal offense are detected in a request/complaint;
- maintaining a register of requests/complaints and reporting on the results of activities;
- ensuring objectivity, fairness and equal treatment for all parties.

12.3.3. The Commission has the right to:

- initiate internal (official) investigations;
- request written explanations from persons whose actions became the subject of a complaint;
- apply to the administration regarding temporary safety measures for victims;
- recommend adjustments to internal procedures or training programs with the aim of eliminating discriminatory practices.


12.3.4. The Commission makes decisions collegially, by a majority vote of the members present, and documents them in the minutes.

12.4. Interaction between the Service and the Commission

12.4.1. The Service and the Commission act in a coordinated manner, ensuring a unified response system where each body performs its own role: The Service → prevention → support → mediation; The Commission → review → investigation → decision.

12.4.2. A request/complaint may be submitted to either of the bodies, provided that:

if the situation does not require an official investigation, the Service may provide support, advice or organize mediation;

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if the situation shows signs of a violation of rights, the Service (with the consent of the complainant) transfers the materials to the Commission for official review.

12.4.3. The Service may participate in the meetings of the Commission with an advisory vote, ensuring a victim-centered and trauma-informed approach.

12.4.4. The Commission may recommend that the Service provide further psychological or advisory support to victims after the investigation is completed.

12.4.5. The coordinated work of both bodies is aimed at creating a safe, inclusive and fair university environment in which every participant in the educational process feels protected, respected and trusted.

13. RESPONSE MECHANISMS AND SUPPORT FOR VICTIMS

13.1. An effective response to cases of discrimination, sexual harassment and other forms of gender-based violence requires not only clear procedures but also a sensitive approach to all participants in the process. Of particular importance is ensuring support for victims who may experience psychological stress, fear of potential consequences or distrust toward the system.

13.1.1. Every participant in the educational process, employee or other person who believes they have experienced discrimination, sexual harassment, psychological or any other type of violence has the right to submit a request or a complaint to the Commission for Reviewing Complaints or to the Service for Understanding and Support.

13.1.2. A request/complaint is a manifestation of trust, and therefore it must be reviewed in adherence to the principles of confidentiality, impartiality and respect for the dignity and safety of the complainant.

13.1.3. The submission of a request or a complaint is not limited by any statute of limitations.

13.2. Rights of the Complainant.

13.2.1. The complainant has the following rights during the review procedure of a complaint regarding discrimination, sexual harassment or other violations of the principle of equal rights and opportunities for women and men:

13.2.2. To submit a complaint in a convenient manner (in writing, via email, through an online form, etc.) regarding facts of discrimination, including on the grounds of sex/gender, sexual harassment or other behavior that contradicts the principle of equality.


13.2.3. To submit any available materials that confirm the alleged violation.

13.2.4. To involve witnesses who can confirm the fact of the violation.

13.2.5. To receive clarifications from the Commission regarding the complaint review procedure, legal consequences and possible forms of response.

13.2.6. To participate in the meetings of the Commission (in person or remotely) in cases where it is necessary to clarify additional information, while ensuring confidentiality and minimizing the risk of re-traumatization.

13.2.7. To demand adherence to confidentiality regarding all information obtained during the complaint review process, as well as after the completion of the procedure.

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13.2.8. To receive information about the status and stage of the complaint review.

13.2.9. To provide additional information or explanations upon the request of the Commission.

13.2.10. To choose the form of response or the situation resolution procedure (mediation, disciplinary measures, recommendation-based decision, etc.), provided it is permitted by internal procedures.

13.3. Rights of the Person Against Whom a Complaint is Filed. The person against whom a complaint is filed has the right:

13.3.1. To provide their written or oral explanations regarding the situation described in the complaint, without disclosure of the complainant's personal data.

13.3.2. To submit materials or documents that refute the allegations or clarify the circumstances of the case.

13.3.3. To involve witnesses who can confirm or refute the stated facts.

13.3.4. To receive clarifications from the Commission regarding the complaint review procedure and the potential consequences of the decision made.

13.3.5. To participate in the meetings of the Commission if it is necessary to clarify additional information or specify details of the complaint.

13.3.6. To be informed about the stages of the complaint review.

13.4. In case of disagreement with the Commission's decision, the complainant and/or the person against whom the complaint is filed have the right to submit a written refutation (appeal) to the head of the educational institution within 10 days from the date the decision was made.

13.5. In the event of a complaint relating to materials of the educational process (for example, curricula, textbooks or content) which, in the complainant's opinion, contain signs of discrimination or violate the principle of equality, but do not concern the behavior of a specific individual, the Commission shall review such a complaint taking into account the scope of the complainant's rights defined above.

14. PROCEDURE FOR SUBMITTING REQUESTS AND COMPLAINTS

14.1. Methods of Submitting a Complaint.


14.1.1. A complaint can be submitted in one of the following ways:

in written form (in person or through the university chancellery marked “Confidential. To the Commission for Reviewing Complaints”);

in electronic form – to the official email address of the Commission or through a specially designated electronic trust box (suggestion box);

through anonymous channels of information collection (via the physical “Trust Box”), if the complainant is not ready to disclose their personal data;

by means of an oral request to a member of the Service for Understanding or the Commission with a request for assistance in drafting the complaint.

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14.1.2. If a request/complaint is submitted to the Service for Understanding, it provides primary support and, with the consent of the complainant, transfers the materials to the Commission.

14.2. Requirements for the Content of a Complaint.

14.2.1. A complaint must contain the following data:

the surname, first name and, optionally, contact information of the complainant;

the date and time the complaint was drafted;

a description of the situation which, in the complainant’s opinion, contains signs of a violation;

data about the person (or persons) against whom the complaint is filed (if known);

materials or evidence that can confirm the circumstances (if available);

information about witnesses (if available).

14.2.2. If a complaint is submitted in written form, it must be signed by the complainant.

14.2.3. If a complaint is submitted anonymously, the Commission may choose not to conduct an investigation in the absence of necessary information, but it shall enter the information into the Log of Requests and Complaints (Appendix A) and may take such data into account for planning preventive activities.

15. PROCEDURE FOR REGISTRATION AND REVIEW OF REQUESTS AND COMPLAINTS

15.1. All requests and complaints are subject to registration in a special log or electronic register of the Commission.

15.2. The Chair must convene a meeting of the Commission within 3 days from the moment of receiving the notification. The Secretary of the Commission must register the notification in the corresponding log, indicating the date of its receipt, the full name (surname, first name and patronymic) of the complainant and a short summary.

15.3. Access to information is restricted exclusively to the members of the Commission.


15.4. After registration, the Chair of the Commission designates a rapporteur who prepares the materials for review.

15.5. The Chair must convene a meeting of the Commission within 3 days from the moment of receiving the notification. The Secretary of the Commission must register the notification in the corresponding log, indicating the date of its receipt, the full name (surname, first name and patronymic) of the complainant and a short summary of the facts.

15.6. Preliminary review of the request/complaint. Within three working days after registration, the Chair of the Commission or an authorized member conducts an initial assessment of the request/complaint with the aim of:

- verifying whether it falls within the competence of the Commission;

- determining the need for urgent or temporary measures (for example, suspension, change of educational or working environment);

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- establishing whether the request/complaint requires consultation with other structural subdivisions (legal department, psychological service, faculty administration, etc.).

15.7. Initiation of an investigation. If, based on the results of the preliminary review, the request/complaint shows signs of a violation of ethical principles, equality or discriminatory actions, the Commission makes a decision to conduct an internal investigation. The parties to the conflict and the administration of the respective subdivision shall be informed in writing about the commencement of the investigation.

15.6. Conducting the investigation. The standard period for an investigation is up to 10 working days, and in complex or multi-episode cases, it may take up to 30 calendar days by decision of the Chair of the Commission with notification to the parties or be extended up to 45 calendar days.

15.7. The investigation includes:

15.7.1. Interviewing the parties, witnesses and other involved persons;

15.7.2. Gathering and analyzing documentary, digital or other evidence;

15.7.3. Conducting expert consultations with lawyers, ethics specialists, psychologists (“Nobel Mental Health”) or external gender experts;

15.7.4. Drafting an analytical finding (conclusion) on the presence or absence of a violation of non-discrimination principles.

15.8. Decision-making.

15.8.1. Upon completion of the investigation, the Commission makes a decision by a majority vote of the members present at the meeting.

15.8.2. The decision is documented in the minutes of the meeting, which are signed by the Chair and the Secretary of the Commission and stored in the University administration.

15.9. Based on the results of the review, the Commission may:

15.9.1. Provide recommendations to the administration regarding the elimination of detected violations or deficiencies in internal procedures;

15.9.2. Propose holding a mediation meeting through the Service for Understanding;

15.9.3. Submit a proposal to the Rector on the application of administrative or disciplinary measures against the persons who committed the violation;


15.9.4. In cases where the actions or omissions of persons show signs of an administrative or criminal offense,

15.10. The Commission has the right to apply directly to law enforcement authorities with an appropriate statement or notification regarding the detected facts.

15.11. All parties to the request/complaint must be informed of the investigation results in written or electronic form within 5 working days after the Commission makes its decision.

15.11.1. At the same time, the confidentiality of personal data and adherence to ethical communication standards shall be ensured.

15.12. The complainant or the person regarding whom the decision was made has the right to submit an appeal to the Rector of the University within 10 calendar days from the moment of notification of the Commission's decision.

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15.12.1. The Rector may establish a temporary appeal group or initiate a re-review of the case with the participation of an external expert.

15.12.2. The submission of a complaint to the Commission, its decision or the order of the head of the institution does not deprive the parties of the right to apply to other authorized bodies—in particular, to:

- the Ukrainian Parliament Commissioner for Human Rights (Ombudsman);
- the National Police of Ukraine (in cases of offenses);
- the Court;
- the State Service of Education Quality of Ukraine (regarding violations of educational standards);
- other competent authorities in accordance with the current legislation.

15.13. The Commission assesses risks and ensures a safe environment for the victim.

15.13.1. Temporary measures: suspension, change of schedule, restriction of contact.

15.14. Principles of reviewing complaints. During the review of complaints, the Commission and other participants in the process are obliged to adhere to the following principles:

Confidentiality – information obtained during the review of complaints is not subject to disclosure to third parties.

Impartiality – all participants in the process have equal rights and opportunities.

Good faith – submitting reliable materials and explanations for review.

Safety – preventing the re-traumatization of the victim.

Trust and respect – a sensitive attitude towards all participants in the process.

15.15. Information support for complainants

15.15.1. Every person has the right to receive clarifications from a member of the Commission or the Service for Understanding regarding: the procedure for submitting and reviewing a complaint; the rights and guarantees of the victim; possible forms of response.

15.15.2. The Commission ensures feedback with the complainant – notifying them of the receipt of the complaint, the stages of its review and the results of the decision made.


15.16. Ensuring confidentiality.

15.16.1. The Commission and all persons involved in the process are obliged to maintain the confidentiality of data that became known to them during the review of the complaint.

15.16.2. Disclosure of confidential information constitutes grounds for disqualifying such a person from participating in the review of complaints and may entail disciplinary consequences.

16. DETERMINATION OF LIABILITY AND DISCIPLINARY MEASURES

16.1. Guilty persons shall bear disciplinary, administrative or criminal liability in accordance with the legislation.

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16.2. Disciplinary measures: oral/written warning, reprimand, suspension, deprivation of benefits/privileges, termination of the employment contract, expulsion/dismissal from the University.

17. DATA PROCESSING, STORAGE AND CONFIDENTIALITY

17.1. Data is processed in accordance with the legislation on personal data protection.

17.2. Access is restricted to authorized persons of the Commission; any influence on these persons is prohibited.

18. MONITORING, EFFECTIVENESS EVALUATION AND REPORTING

18.1. Monitoring of the Policy’s effectiveness is conducted annually based on key indicators:

- the number of complaints and the results of their review;
- participation in trainings and campaigns;
- implementation of the Commission’s recommendations;
- raising awareness among higher education students and employees.

18.2. The results of the monitoring are published on the University’s website.

19. FINANCIAL SUPPORT, RESOURCE ALLOCATION AND IMPLEMENTATION

19.1. Funding for the Policy’s activities is provided through:
the University budget;
grants and international programs;
partner contributions and charitable initiatives.

19.2. Resources are provided for:
education and training;
psychological and legal support;
conducting information campaigns;
implementation of digital tools for monitoring and evaluation.

19.3. Responsible subdivisions ensure:

- 19.1.1. funding;
 - 19.1.2. human resources;
 - 19.1.3. informational and technical support for the implementation of the Policy.
- 19.4. Implementation is monitored and controlled by the Head of the Service.

20. PROCEDURE FOR REVIEW AND AMENDMENT

20.1. The Policy is reviewed at least once every three years or as necessary.

20.2. Proposals for amendments are submitted to the Service or the Rector; they are approved by the University administration after consultations with the Commission.

