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ИНСТИТУТ РЕПОРТАЖЕЙ ВОЙНЫ И МИРА

POLICY BRIEF

based on the Monitoring Report of the Comprehensive Plan for the Protection of Children from Violence, Suicide Prevention and Ensuring Their Rights and Well-Being for 2023-2025 in terms of the work of Psychological Support Centers and psychological services of schools and the Desk Analysis of Documents

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About Author

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About the Private Foundation Just Support

Just Support Private Foundation is a Kazakhstan-based non-profit organization working in the field of violence prevention and the promotion of psychological well-being for children, adolescents, and families. The foundation implements educational and advocacy projects, develops trauma-informed support practices, and contributes recommendations for improving the state system for child rights protection. Since 2018, Just Support has been working comprehensively with families, educators, and professionals, combining scientific approaches, public education, and systemic change. The foundation's flagship project is the Anti-Bullying Community, which unites over 30 experts from 9 regions of Kazakhstan and works to create safe environments in educational institutions.

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IWPR empowers local voices to drive change in countries in conflict, crisis and transition. Where hate speech and propaganda proliferate, and journalists and civic activists are under attack, IWPR promotes reliable information and public debate that makes a difference. With powerful new forms of disinformation driving social division, increasing digital security risks and escalating attacks on journalists, IWPR's mission to empower local voices is more important than ever. IWPR's core work is to strengthen the flow of credible, unbiased information, enabling journalists and civil society to inform, educate and mobilise communities. IWPR empowers societies to find their own solutions, by strengthening local capacity to report on and advocate for accountability, freedom of expression and human rights.

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ist of abbreviations (abbreviations and terms)

CLS&SR GPO RK	Committee on Legal Statistics and Special Accounts of the General Prosecutor's Office of the Republic of Kazakhstan
CPCR ME	Committee for the Protection of Children's Rights of the Ministry of Education
CP	Comprehensive Plan
RK	Republic of Kazakhstan
CPS	Psychological Support Centers
SP	School Psychologists

I ntroduction

Ensuring the rights of children, their safety, and well-being is a priority both for the state policy of Kazakhstan and for the education system as a whole. However, [according to UNICEF](#), in Kazakhstan every second child aged 2 to 14 is subjected to violent forms of discipline within the family. Two-thirds of schoolchildren have experienced or witnessed violence or discrimination from peers or teachers. High levels of violence are also observed in boarding institutions and schools for children with behavioral difficulties. Particularly alarming is the situation with adolescent suicide. According to a review presented by Ranking.kz based on data from the Committee on Legal Statistics and Special Accounts of the General Prosecutor's Office of the Republic of Kazakhstan (CLS&SR GPO RK), in 2023 the number of completed suicides among minors in Kazakhstan increased by 30% compared to 2022¹. [According to the Committee on Legal Statistics and Special Records of the General Prosecutors Office](#), in 2024 the number of completed suicides among minors decreased to 175 cases compared to 204 in 2023. However, the total number of suicide attempts, on the contrary, rose: from 376 cases in 2023 to 453 in 2024. These statistics point to the need for systemic responses and investments in preventive measures, mental health support, and building trust in support services.

Given that the problem of bullying remains systemic, a reassessment of the existing architecture of measures and protection mechanisms is required. In response to these challenges, the Government of the Republic of Kazakhstan approved a Comprehensive Plan for the Protection of Children from Violence, Suicide Prevention, and the Safeguarding of their Rights and Well-Being for 2023–2025 (Resolution No. 748 of August 31, 2023), hereinafter referred to as the CP. According to the CP, safeguarding the rights and interests of children, protecting them from all forms of violence, and preventing self-aggressive behavior became officially recognized priorities of state policy in Kazakhstan.

The key measures for implementing the CP include: the development of methods for early detection and response to cases of bullying, cyberbullying, and violence; the establishment of Psychological Support Centers in the regions; the launch of the 111 contact center; the introduction of anti-bullying programs and personal safety lessons in schools. As part of the Comprehensive Plan, the establishment of Psychological Support Centers (PSCs) was initiated, which serve as an infrastructural and content base for supporting school psychological services and providing consultations to children and their families.

¹ <https://ranking.kz/reviews/socium/za-posledniy-god-kolichestvo-samoubiystv-sredi-podrostkov-vyroslo-pochti-na-tret.html>

According to official data from the Committee for the Protection of Children's Rights of the Ministry of Education (CPCR), as of November 2024, 468 specialists were working in PSCs, and by February 2025, according to the Scientific and Practical Institute for Child Well-Being Orken, the number increased to 595 specialists. In total, 20 Psychological Support Centers are functioning nationwide, acting as regional hubs in the system for the prevention of violence and bullying.

The implementation of the CP is accompanied by the development and introduction of a significant number of departmental regulatory documents. During a desk analysis, 13 key acts adopted by the ministries of education, health, culture, digital development, and internal affairs were reviewed. The central document is Joint Interagency Order No. 742/515/531-KK/386/917 of December 2023, which establishes the Algorithm for Identifying and Assisting Minors Subjected to Violence, Bullying, or Cyberbullying. This order attempts to link the actions of schools, police, PSCs, guardianship bodies, and healthcare into a unified system. Together with Order No. 506 of the Minister of Education of the Republic of Kazakhstan of December 21, 2022, "On the Approval of Rules for the Prevention of Child Bullying," they form the core description of how this system should function. Their content covers interagency response algorithms, the activities of PSCs, schools, the 111 contact center, and also regulates the authority of regional commissioners for children's rights. However, despite institutional progress, the actual implementation of these provisions remains fragmented.

A comprehensive analysis of existing orders and methodologies, including Interagency Order No. 742/515/531-KK/386/917 of December 2023, Ministry of Education Order No. 506 of 21.12.2022, and the provisions of Article 127-2 of the Administrative Code of the Republic of Kazakhstan, shows:

- a lack of consistency in defining coordinators and mechanisms of interagency cooperation;
- regulatory documents not being adapted to changes in legislation;
- formalization of actions without the necessary resource support, especially at the level of Regional Commissioners for Children's Rights (RCCR), school psychologists, and PSCs;
- a high risk of shifting responsibility between agencies.

In practice, these factors reduce the motivation of implementers, hinder the early detection of cases of violence, and aggravate the consequences for affected children, particularly in vulnerable and remote communities.

This document (policy brief) has been prepared to develop practical recommendations based on a comprehensive analysis and evaluation of the effectiveness of the Comprehensive Plan, as well as the existing orders and methodologies, including Interagency Order No. 742/515/531-KK/386/917 of December 2023, Ministry of Education Order No. 506 of 21.12.2022, and the provisions of Article 127-2 of the Administrative Code of the Republic of Kazakhstan.

The policy brief is addressed to:

- state structures responsible for decision-making and overseeing the implementation of the Comprehensive Plan, capable of resolving regulatory inconsistencies for its effective execution (Ministry of Education of the Republic of Kazakhstan, Committee for the Protection of Children's Rights of the Ministry of Education of the Republic of Kazakhstan, and other state agencies);
- state structures and bodies responsible for the enforcement of regulatory documents within the framework of the Comprehensive Plan (local executive bodies, Ministry of Internal Affairs of the Republic of Kazakhstan—as one of the parties interacting with PSCs and schools through the juvenile police—as well as PSCs and general education institutions whose staff are involved in responding to violence, bullying, and cyberbullying);
- independent organizations engaged in monitoring, advocacy, and work with children (Regional Children's Ombudsmen, the Commissioner for Children's Rights in Kazakhstan, human rights NGOs, teachers' unions, independent media, and experts);
- other stakeholders interested in the effective implementation of the Comprehensive Plan for the protection of children from violence, suicide prevention, and ensuring their rights and well-being for 2023–2025, particularly in terms of the work of PSCs and school psychological services.

The document contains specific proposals for eliminating regulatory contradictions, clarifying the functions of coordinators, strengthening interagency coordination, and ensuring sustainable resource support for the child protection system against violence.

1. Recommendations for state bodies responsible for decision-making and overseeing the implementation of the Comprehensive Plan, capable of resolving regulatory contradictions for its effective implementation

1.1 To ensure terminological consistency and eliminate contradictions between key regulatory acts:

1.1.1 Consolidate the provisions of Order No. 506 of the Minister of Education of the Republic of Kazakhstan of December 21, 2022, "On the Approval of Rules for the Prevention of Child Bullying," and the Interagency Order "Methodology for Early Detection and Assistance to Minors Subjected to or Witnessing Violence, Bullying, or Cyberbullying" (hereinafter – the Methodology) into a single document, incorporating a comprehensive mechanism for prevention, identification, response, and follow-up.

1.1.2 Provide a clear definition of the coordinator for child protection from violence within educational institutions, assigning the key coordinating role to the Deputy Director for Educational Work rather than to a teacher or psychologist (whose functions differ).

1.1.3 Introduce a requirement for every educational institution to develop internal policies and procedures for the prevention, reporting, and investigation of various forms of violence, including bullying.

1.1.4 Define the term "violence," its different forms, and develop algorithms for addressing each form, including violence committed by teachers.

1.1.5 Update both documents to reflect the introduction of Article 127-2 of the Administrative Code of the Republic of Kazakhstan (2024), which criminalizes bullying, as well as to include definitions of violence and mechanisms for responding to its different forms, including teacher-perpetrated violence.

1.2 To comprehensively strengthen the regulatory framework and interagency response mechanisms to cases of violence and bullying:

1.2.1 Designate a single coordinating body for interagency cooperation (e.g., CPCPR or Orken), responsible for notifying all relevant bodies, managing internal communication channels/systems, and collecting and processing statistical data.

1.2.2 Assign to the 111 contact center the function of coordination and notification of all authorized bodies, as stipulated in the Methodology.

1.2.3 Clearly and in detail define within the Methodology the composition, accountability, and authority of the mobile group (para. 26).

1.2.4 Supplement the Methodology with qualification requirements for individuals authorized to conduct interviews with children affected by violence, bullying, or cyberbullying, and require educational institutions to provide regular training for staff designated to carry out such interviews (para. 35).

1.2.5 Amend Order No. 190 of May 11, 2020, “On Certain Issues of Pedagogical Ethics,” and the Methodology for Response, to require inclusion of representatives from supervisory authorities (prosecutor's office) and the Department for Quality Control in Education in the Pedagogical Ethics Council.

1.2.6 Amend the Methodology to stipulate that when a legal representative of a child victim of bullying, or the child themselves, appeals to law enforcement bodies, police officers are obliged to initiate an administrative case under Article 127-1 of the Administrative Code (Bullying), where grounds exist (para. 19).

1.2.7 Introduce a unified digital platform for PSC staff and school psychologists with a standardized set of diagnostic tools, enabling more effective work and generating comparable data on children's psychological health across regions of Kazakhstan.

1.3 To regulate mechanisms of referral and consent:

1.3.1 Standardize the procedures for referring children from schools to PSCs.

1.3.2 Supplement the joint unified algorithm with possible reporting channels for violence, bullying, and cyberbullying, such as oral reports to a responsible staff member, message boxes, institutional websites, email, or chatbot—ensuring confidentiality and proper documentation of all cases.

1.3.3 Clearly define within the interagency cooperation algorithm the authorized state body responsible for coordinating interagency cooperation and monitoring the actions of all parties involved.

1.3.4 Refine requirements regarding parental consent for psychological support. For PSCs, include provisions allowing services without parental consent in specific cases (e.g., suicide risk). For school psychologists, review rules on consent to make them simpler and more flexible, while still compliant with legislation.

1.3.5 Add to the Methodology the requirement that every case be officially registered, with notification provided to the reporting party and the legal representatives of the affected child (para. 18).

1.4 To increase transparency while protecting the rights of the child:

1.4.1 Exclude or strictly limit the requirement to publicly inform the media about cases of bullying and violence, in order to avoid retraumatization and violations of victims' rights.

1.4.2 Divide the operational response algorithm to violence, bullying, and cyberbullying into two separate procedures: 1) domestic violence against a child, and 2) bullying, cyberbullying, and violence against a child outside the family. Include additional algorithms for other forms of violence.

1.5 To strengthen the legal and institutional protection of specialists:

1.5.1 Establish a Republican Coordination Center for the Development of PSCs (with the involvement of school psychologists), responsible for collecting and analyzing statistics, monitoring gaps, coordinating interregional practice-sharing, conducting training, and creating a unified methodological base. Alternatively, assign coordination functions to CPCR or Orken.

1.5.2 Include in regulatory acts (particularly the draft Law on Psychological Assistance, the Response Methodology, and the School Psychological Service Order) a provision allowing for emergency psychological assistance to children (up to 5 sessions) without prior parental consent in crisis cases.

1.5.3 Ensure legal protection for specialists providing such assistance (including those working via hotlines or online), such as protection from harassment and online threats, supervision, and legal support in cases involving violence, as well as support through professional unions.

1.5.4 In collaboration with the Ministry of Labor and Social Protection of Kazakhstan, introduce regulatory provisions:

- on permissible workloads and functions of PSC and school psychology staff;
- prohibiting the involvement of school psychologists in non-specialist duties (e.g., monitoring, running extracurricular clubs, substituting teachers);
- on mechanisms for protecting specialists from pressure and burnout (regular supervision, anonymous appeals).

1.6 To standardize the work of Psychological Support Centers:

1.6.1 Conduct an audit of job responsibilities and administrative burdens of PSC staff and school psychologists. Amend orders on school psychologist duties accordingly.

1.6.2 Eliminate duplication of functions and review the remuneration system to account for workload, irregular hours, and crisis response duties (compared with school psychologists).

- 1.6.3 Approve a unified standard for PSC activities, including:
- criteria for service delivery (anonymity, confidentiality);
 - standards for recording consultations (in-person, online, group);
 - algorithms for cooperation with school psychologists, schools, guardianship bodies, police, and healthcare;
 - qualification requirements for consultants and crisis psychologists;
 - procedures for hotline operation (excluding the use of personal phone numbers).

1.7 To ensure the education system aligns with practical needs:

1.7.1 Develop a model profile for psychologists, requiring higher education institutions to revise curricula to strengthen practical training, include practice-oriented modules, ensure mandatory supervision during studies, and prepare specialists for PSCs with a distinct professional profile.

1.7.2 Conduct an independent evaluation of state professional development programs (Orleu, Orken), with the option to recognize certificates from alternative courses.

1.7.3 Introduce modular training programs on key topics of the Comprehensive Plan (bullying, cyberbullying, violence, suicidal behavior) with practice-oriented content.

1.7.4 Regularly organize training on applying up-to-date regulatory frameworks and operational algorithms (orders, methodologies, referral schemes).

1.8 To improve material and technical resources:

1.8.1 Ensure all PSCs are provided with suitable premises and basic equipment (including telephone systems, safe spaces, and offices for in-person and remote consultations).

1.8.2 Support the expansion of branch networks in sparsely populated and remote settlements, taking into account principles of territorial accessibility and social vulnerability of the population.

These recommendations are aimed at removing systemic and regulatory barriers to the implementation of the Comprehensive Plan and at strengthening the resilience of mechanisms for child protection.

2. Recommendations for state bodies and agencies responsible for the enforcement of regulatory documents within the framework of the Comprehensive Plan

2.1 Given the need to ensure legal certainty in initiating cases of bullying:

2.1.1 Ensure the systematic application of Article 127-2 of the Administrative Code of the Republic of Kazakhstan (liability for bullying and cyberbullying) when a report is filed by a child, a legal representative, a school, or other sources.

2.1.2 The Ministry of Internal Affairs should provide training for Juvenile Police Inspectors and local district inspectors at the territorial level and develop internal guidelines for the initial classification of incidents.

2.2 To ensure effective interaction between schools, PSCs, and law enforcement bodies:

2.2.1 Establish working protocols for information exchange between educational institutions, PSCs, and Juvenile Police Units, including through a digital platform.

2.2.2 Designate responsible contact persons from each side.

2.2.3 Develop formats and timelines for notification, including through duty units.

2.3 To ensure effective work of PSC specialists and school psychologists:

2.3.1 Clearly delineate the duties of psychologists and avoid assigning them non-specialist functions.

2.3.2 Organize systematic professional development for PSC specialists according to their specialization, as well as for school psychologists.

2.3.3 Introduce regular supervision and intervention sessions at the regional and national level, with options for online formats.

2.3.4 Develop and introduce a unified list of recommended training programs, managed by the coordination center.

2.3.5 Establish a mandatory methodological professional development day for PSC staff, similar to that for school psychologists.

2.3.6 Ensure consistent knowledge of all current orders and methodologies provided for in the Comprehensive Plan, as well as legal documentation, by PSC staff and school psychologists through mandatory briefing sessions and online access to materials.

2.3.7 Provide training for school psychologists in the use of digital tools and their legal aspects (confidentiality, data storage, etc.).

2.3.8 Guarantee conditions under which a child or parent can receive assistance without a referral from the school, particularly in situations where the school itself may be the source of the problem (e.g., bullying by a teacher or concealment of an incident).

2.3.9 Ensure equal access of private schools to state initiatives, including their inclusion in training courses, mailing lists, platforms, and professional communities.

3. Recommendations for independent organizations engaged in monitoring, advocacy, and work with children within the framework of the Comprehensive Plan

3.1 For monitoring the implementation of the Comprehensive Plan, taking into account territorial and social inequality:

3.1.1 Continue regular monitoring of the implementation of the Comprehensive Plan at the regional level (availability of PSCs, work of school psychologists, response to bullying).

3.1.2 Initiate monitoring with the preparation of a public report assessing whether the practices of PSCs and school psychologists comply with principles of fairness, territorial accessibility, and the prevention of formalization.

3.2 For oversight of state obligations:

3.2.1 Conduct independent assessments of the fulfillment of obligations by state bodies.

3.2.2 Track the extent to which recommendations on amendments to legislative and regulatory acts have been implemented.

3.3 For advancing public interests:

3.3.1 Advocate for the elimination of regulatory contradictions in legislative acts developed within the framework of the Comprehensive Plan.

3.3.2 Publicly raise the issue of protecting school psychologists and PSC staff from overwork and being assigned non-specialist functions.

3.3.3 Initiate discussions on sectoral council and ministry platforms and work to secure legal recognition of supervision and professional support mechanisms.

3.3.4 Conduct surveys, focus groups, and interviews with adolescents and families to identify the actual level of trust in PSCs, school services, and the police.

3.4 To expand public discussion on bullying, violence, and the role of the education system:

3.4.1 Initiate the creation of media materials based on facts, as well as on feedback and comments from children and specialists themselves.

3.4.2 Use media and expert platforms to analyze not only individual cases but also systemic problems (e.g., the dependency of psychologists on school principals, the absence of an independent pathway for assistance, etc.).

3.4.3 Promote the inclusion of child safety issues in the agenda of elected bodies, parent associations, and school communities.

These recommendations are aimed at strengthening the role of civil society in policy implementation and ensuring that child protection mechanisms are transparent, accountable, and not merely formal.

List of references

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