

GENDER EQUALITY POLICIES IN THE EUROPEAN UNION AND KAZAKHSTAN: A COMPARATIVE STUDY

GAZIZA AKHMETCHINA* 

2nd year Master's Student in Applied Linguistics, School of Liberal Arts, Maqсут Narikbayev University, Kazakhstan

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ABSTRACT. *Kazakhstan has made significant progress in institutionalizing gender equality. However, there are still existing challenges, including the gender pay gap, women's underrepresentation in leadership positions, and gender-based violence. This study aims to compare selected gender equality policy documents of the European Union and Kazakhstan to identify patterns, similarities, and differences. The study applied thematic analysis across three predefined categories: terminology and definitions, quotas and support measures, and conflict resolution mechanisms in the labor sector. The findings showed that the EU policy has comprehensive gender-related definitions, a legally binding framework for gender equality advancement, and a high level of interdepartmental cooperation. At the same time, the analysis of Kazakhstani documents revealed significant gaps in terminology, the absence of gender-specific quotas for women, and the conflation of gender equality policy and family and demographic issues. Based on the study's findings, key recommendations for improving gender equality policy in Kazakhstan were developed, including the introduction of precise and legally binding definitions related to gender equality, the establishment of a separate institution responsible for gender equality, and the implementation of quotas for women to strengthen their representation in leadership positions. The results contribute to the development of comparative research in Central Asia and provide practical recommendations for policymakers.*

KEYWORDS: *gender equality policy, European Union, Kazakhstan, comparative analysis, policy documents, document analysis.*

INTRODUCTION

Gender equality policy has become a fundamental field in international and national policymaking processes. In its effort to institutionalize gender equality, the Kazakhstani government has developed several regulatory documents, including the Law “On State Guarantees of Equal Rights and Equal Opportunities for Men and Women” (2009), the Law “On Prevention of Domestic Violence” (2009), and the Concept of Family and Gender Policy until 2030. However, according to the 2025 World Economic Forum (WEF, 2025), Kazakhstan has dropped 16 positions in the Gender Gap Index, highlighting persistent challenges, including the gender pay gap, women's political empowerment, and gender-based violence. Despite significant improvements, Kazakhstan is still on the way to achieving international standards of gender equality in society.

*Correspondence to: Gaziza Akhmetchina, email: g_akhmetchina@kazguu.kz



One of the global leaders in promoting gender equality in society is the European Union. The policymaking achievements made by the region over several decades have had a positive effect on member states (European Commission, 2020). Recent data shows that four of the top ten countries in the Global Gender Gap index are EU member states (WEF, 2025). The developed policy instruments and institutional mechanisms may serve as a model for other countries around the world seeking to eliminate gender inequality.

Gender equality policy research is a well-established and relevant area in modern policy studies (Lombardo, Meier, & Verloo, 2016). However, there is a significant gap in the field of comparative gender equality policy research, especially those focusing on a comparison of EU and Central Asian countries, such as Kazakhstan. Comparing policy documents of both regions will help identify challenges and obstacles hindering the further development of gender equality in Kazakhstan. Thus, the purpose of this research paper is to compare selected gender equality policy documents in Kazakhstan and the European Union. To guide this study, the following research questions were formulated:

1. What similarities and differences exist in the Kazakhstani and EU gender equality policies?
2. How are gender equality-related concepts defined in the selected legal documents?
3. What gender quotas are provided for women, and how are they justified?
4. What mechanisms for resolving conflict situations in the workplace exist?

This article broadens the perspective on the problem of gender equality in Kazakhstan and provides insights into the field of gender equality policy research. The results of this study expand the scientific body in the field of comparative studies in gender equality policies and may offer practical recommendations for policymakers.

LITERATURE REVIEW

Gender equality is one of the key global priorities of the Sustainable Development Agenda (UN General Assembly, 2015). UN Women (n.d.) defines gender equality as “equal rights and opportunities for women and men, and girls and boys”. According to Sustainable Development Goal 5, gender equality is achieved through the elimination of all types of discrimination and violence against women, women’s political empowerment, protection of reproductive health and rights, provision of equal rights to economic resources, as well as the recognition of women’s domestic and unpaid work at the state level (UN General Assembly, 2015). Achieving gender equality is not only a fundamental human right but also a crucial driver of economic growth and well-being (Woetzel et al., 2015). Therefore, the issue of gender equality is now embedded in the policymaking process and the development of gender-sensitive public policies (Hervías Parejo & Radulović, 2023).

Gender Equality Policy in the European Union

Gender equality policy in Europe dates back to the Treaty of Rome in 1957, which established the right to equal pay for men and women (von Wahl, 2021). In the early years of policymaking in the EU, hard regulations – treaties and directives – were

used as policy instruments (Ahrens & van der Vleuten, 2019). Hard laws prevailed in the 1990s and were legally binding for all EU member states. Up until the 2000s, the gender equality regime in Europe had a positive effect on the social and economic development of the region (Walby, 2004).

One of the important international documents regulating EU policy is the gender mainstreaming strategy adopted at the UN Beijing Conference in 1995 (Milner, 2021). The concept of gender mainstreaming implied the systematic integration of gender equality principles into all other state policies (von Wahl, 2021). However, as noted in previous studies, gender mainstreaming remained relatively symbolic, especially when intersecting with other policy areas such as climate or trade (Allwood, 2019). As some authors point out, in recent years, gender mainstreaming has been more bureaucratic and procedural, rather than transformative as it was in the beginning (Ahrens & van der Vleuten, 2019; Allwood, 2013).

The key political actors in the field of gender equality policy in the European arena are the European Commission, the European Parliament, the European Court of Justice, and the Council of the EU (Milner, 2021). In addition to institutional organizations, there are many NGOs and other non-institutional organizations in Europe that have a significant impact on shaping EU policy. For example, the so-called “velvet triangle”, consisting of the European Commission, the European Parliament, and the European Women’s Lobby. A major role in this cooperation was played by the FEMM Committee, a civil society organization (Jacquot, 2017).

Over the past decades, the EU has gone through many challenges, such as the Great Recession of 2008-2013, COVID-19, and other political events that have significantly influenced the line of development of gender equality policy. Due to the economic downturn and political fluctuations, including the rise of the right wing, populism, migration, budget cuts, and austerity, gender equality policy has experienced backsliding (Jacquot, 2017; von Wahl, 2021). Although gender rhetoric is present in many European policies, it remains more symbolic and lacks substantive coherence (Allwood, 2013).

In this regard, over the years, the EU has moved from hard law to soft policy instruments: various recommendations and agreements, the implementation of which is horizontal and advisory in nature (Ahrens & van der Vleuten, 2019). For example, the so-called OMC (open method of cooperation) tool was created, which aimed to evaluate policies by government ministers (Milner, 2021). As Ahrens & van der Vleuten (2019) argue, soft mechanisms were initially created for cooperation between political actors as a compromise, but ultimately resulted in gender equality policies losing their potential and shifting focus towards other areas.

According to the European Commission, Directorate-General for Justice and Consumers (2024), today the EU has set a comprehensive agenda to address gender equality issues in the labor market, political representation, violence against women, and gender mainstreaming. Contemporary gender equality policy in the European Union is shaped by binding regulatory documents such as the Lisbon Treaty, Gender Equality Directive 2006/54/EC, Equal Treatment Directive 2004/113/EC, etc., and soft strategic documents such as the Strategy for Gender Equality 2020–2025, Gender Action Plan III, and others.

Gender Equality Policy in Kazakhstan

Gender equality policy development in Kazakhstan differs from that in Europe due to the complex interplay of the Soviet legacy and Western democracy (Kuzhabekova & Almukhambetova, 2017). The influence of Soviet policies was reflected in the context of widespread access to education and literacy among women (Durrani, Kataeva, & Kuzhabekova, 2025), which considerably influenced the post-independence context. Although the USSR policy is controversial in terms of emancipation, women significantly benefited from it in terms of education and employment (Khairullayeva et al., 2022).

In line with international standards of human development and modernization of the country, independent Kazakhstan adopted international and national legal frameworks regulating issues of gender equality and women's rights (Kazakhstan Institute of Public Development, 2023). Gender equality was essential to increase competitiveness, raise the socio-economic level, and the image of the country on the world stage (Shakirova, 2015a). Key legal institutions and documents were created following international conventions such as the Beijing Declaration (1995), the Convention on the Elimination of All Forms of Discrimination against Women (1999), and the Convention on the Political Rights of Women (1952) (Kazakhstan Institute of Public Development, 2023). Additionally, the government created regulatory documents of state policy, including the Law "On State Guarantees of Equal Rights and Equal Opportunities of Men and Women" (2009), the Gender Equality Strategy for 2006–2016, and the Concept of Family and Gender Policies until 2030. Transnational organizations (UNDP, OECD, etc.) played a major role in the development and implementation of gender policies, funding a wide range of projects on gender mainstreaming and women's empowerment (Shakirova, 2015a).

The National Commission on Gender, Family and Demographic Policy has been appointed the main institution responsible for women's rights in Kazakhstan. It includes representatives of science, culture, business, and civil society who understand the socio-economic situation of women in the country (G. Abdykulova & G. Musabalina, 2024). This government body is responsible for the development, monitoring, and implementation of the national gender equality policy (OECD, 2017). However, as the OECD highlighted, the commission lacks further institutionalization and reliance not only on individuals within the commission but also on common sustainable goals for the country's gender policy agenda.

Initially, women's NGOs played a significant role in the trajectory of gender policy development in the country. In the 1990s, their number increased sharply amidst the growing women's movement and active grassroots level (Shakirova, 2015b). NGOs' line of work included women's rights, their promotion in entrepreneurship, provision of psychological support, and many other areas (Abdykulova & G. Musabalina, 2024). However, over time, some NGOs faced difficulties: funding problems, public wariness of feminist organizations, control of NGOs financed by foreign funds, and a lack of grassroots-level support (Shakirova, 2015a).

One of the comprehensive measures of gender policymaking in Kazakhstan was the Gender Equality Strategy for 2006-2016. This policy had a considerable impact on women in education, business, healthcare, and their participation in the labor force

(Sarsembayeva, 2017). Notably, women's NGOs participated in the development of the strategy (OECD, 2017). However, problems connected to policy expertise at the regional level were identified (ADB, 2018). As noted in the report, the document lacked clear implementation and budget planning, as well as monitoring; gender equality issues were closely linked to family and demographic policies (ADB, 2018). OECD (2017) pointed out challenges with gender mainstreaming implementation: an emphasis was placed mostly on education and the public sector. Additionally, a lack of understanding of the concept was identified at the local authorities' level.

The subsequent legal document was the Concept of Family and Gender Policy 2030. The significance of this policy was its dual approach: the integration of gender issues into all policy areas (Khairullayeva et al., 2022). It also aimed at equal opportunities for men and women, women's representation in politics, gender budgeting, and gender mainstreaming. However, as stated in the ADB (2018) report, this policy also connected the gender issue with family policy, which hinders gender equality from the foreground. In addition, the policy did not provide for monitoring of gender-specific data to track progress (Khairullayeva et al., 2022).

To sum up, gender equality policy in modern Kazakhstan has achieved notable advancements, especially in reaching parity of access to education and literacy between men and women (Khairullayeva et al., 2022). However, challenges in gender policy remain. These include a top-down approach, low support for grassroots activism, and a symbolic attitude to the gender approach (Shakirova, 2015a). The current problems include the underrepresentation of women in politics, a lack of gender-sensitive budgeting (Kazakhstan Institute of Public Development, 2023), the absence of gender-disaggregated data for analysis and coordination (OECD, 2017), as well as the separation of family and gender policies (Lipovka et al., 2023). In addition, there is a need to conduct public educational activities on gender equality, women's rights, and feminism to eliminate gender stereotypes about women in society (Kazakhstan Institute of Public Development, 2023). Moreover, a recent economic study by Olzhebayeva and Kireyeva (2025) highlights the gap in preschool education, which significantly affects women's economic participation in the labor market.

Thus, the literature review has shown that approaches to gender equality policy development in Kazakhstan and the European Union are fundamentally different. While gender policy in the EU is more focused on women's empowerment and their rights, Kazakhstani gender policy is closely linked to family and demographic policy. Although there are ongoing policymaking challenges in Europe today, the EU's political tools and approaches have led to impressive results. Moreover, the literature review identified a research gap in comparative studies focusing on gender equality policy documents in Europe and Kazakhstan. Therefore, this study aims to analyze policy documents of both regions to identify common and different themes and patterns in the policy framework.

METHODOLOGY

This research paper employed document analysis as the main research design. It involves a systematic examination of textual data (Bowen, 2009) and allows for analysis

of policy processes (Karppinen & Moe, 2019). The choice of this method was guided by the purpose and questions of the study. Deductive thematic coding was used to extract data from documents, specifically manual coding (Saldana, 2021). Predefined categories for analysis were determined: terminology and definitions related to gender equality, quotas and other support measures for women and their justification, and conflict resolution in the professional sphere. These categories were developed based on the literature review, as well as on the research questions. To ensure consistency, a codebook for working with research materials was created before the analytical process began (Creswell & Creswell, 2018).

The purposive sampling strategy was chosen with the following inclusion criteria: Kazakhstani and European regulatory documents that are currently in force and contain provisions on gender equality, women's rights, gender quotas, and mechanisms of conflict resolution and protective measures in the professional area. Since political systems and institutional structures might differ when analyzing policy documents (Karppinen & Moe, 2019), it was important to select comparable documents that perform similar functions. The exclusion criteria were legislative documents that are not related to gender equality and do not meet the criteria for analysis. Regulatory documents issued by the European Commission were selected for analysis, namely: Directive 2006/54/EC on equal treatment of men and women in employment, Directive (EU) 2022/2381 on improving gender balance on corporate boards, and EU Gender Equality Strategy 2020–2025. Among Kazakhstani legal documents, the following were chosen: Law of the Republic of Kazakhstan “On State Guarantees of Equal Rights and Equal Opportunities for Men and Women” (2009), Labor Code of the Republic of Kazakhstan (2015) (selected articles), Law “On Elections in the Republic of Kazakhstan” (1995) and Concept of Family and Gender Policy until 2030. All documents were publicly available for downloading through official institutional websites.

The data analysis procedure consisted of several stages. Firstly, a thorough reading of the document texts was performed. Secondly, the relevant segments were coded using a codebook and predefined criteria. Next, all data were entered into a table (Table 1) and sorted by themes and documents. Finally, a comparative analysis of the found material was performed to explore themes, patterns, similarities, and differences.

Table 1. Analytical Table Fragment on the Category “Terminology and Definitions”

Code	Document	Quotation
Discrimination definitions	On State Guarantees of Equal Rights and Equal Opportunities for Men and Women (2009)	“Discrimination on the basis of gender is any restriction or infringement of human rights and freedoms, as well as the humiliation of human dignity on the basis of gender.” (author’s translation)
	Labor Code of the Republic of Kazakhstan (2015)	“No one may be subject to any discrimination in the exercise of labor rights on the grounds of origin, social, official and property status, gender, race, nationality, language, attitude to religion...” (author’s translation)
	Directive 2006/54/EC on equal treatment of men and women in employment	“Direct discrimination: where one person is treated less favorably on grounds of sex than another is, has been or would be treated in a comparable situation”

Directive 2006/54/EC on equal treatment of men and women in employment	“Indirect discrimination: where an apparently neutral provision, criterion or practice would put persons of one sex at a particular disadvantage compared with persons of the other sex”
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Source: Compiled by the author based on the following sources: On State Guarantees of Equal Rights and Equal Opportunities for Men and Women (Republic of Kazakhstan, 2009), Labor Code of the Republic of Kazakhstan (2015), Directive 2006/54/EC of the European Parliament & Council of the European Union (2006).

FINDINGS

This section examines three predefined categories: terminology and definitions, quotas and support measures, and conflict resolution. The section will provide a comparative analysis of the selected documents for each category.

Terminology and Definitions

This subsection focuses on the terms and definitions related to gender equality that were found in the analyzed documents. The data indicates that both Kazakhstani and EU documents contain the concepts of gender equality and discrimination, and emphasize the equal rights and opportunities for men and women. For example, the EU Gender Equality Strategy 2020-2025 (European Commission, 2020; hereafter “Strategy”) defines gender equality as a central value of the region, while the Kazakhstani Concept of Family and Gender Policy until 2030 (Government of the Republic of Kazakhstan, 2016; hereafter “Concept”) states the aim of achieving equal rights, opportunities, and benefits for men and women. However, as the comparative analysis shows, EU documents often provide a more comprehensive description of the definitions and their classification.

This is illustrated by Directive 2006/54/EC (European Parliament & Council, 2006) on equal rights in employment, which provides a clear distinction between direct and indirect discrimination and its scope: the concepts of harassment and sexual harassment are described in detail, and the boundaries of the term and illegal acts classified as harassment are defined. For example, the document gives the following definitions:

“Harassment”: where unwanted conduct related to the sex of a person occurs with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment (European Parliament & Council of the European Union, 2006, Art. 2).

“Sexual harassment”: where any form of unwanted verbal, non-verbal or physical conduct of a sexual nature occurs, with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment (European Parliament & Council of the European Union, 2006, Art. 2).

In contrast, in Kazakhstani documents, although the concept of discrimination based on gender is given in the Law on State Guarantees of Equal Rights and Equal Opportunities for Men and Women (2009), no distinction was made between direct and indirect discrimination, as well as the Labor Code of the Republic of Kazakhstan (2015) does not contain a legal definition of harassment and sexual harassment in the workplace. However, it is worth noting that some Kazakhstani media reported in 2024

on the Ministry of Labor's intentions to amend the Labor Code to introduce a definition of sexual harassment in labor relations, along with the procedure for protective measures and sanctions for violations (Zharbulova, 2024).

Unlike Kazakhstani documents, EU texts highlight the principle of equal treatment, which ensures equality of all individuals regardless of personal characteristics. For example, Directive 2006/54/EC repeatedly emphasizes compliance with this principle in labor relations. In Kazakhstani documents, the principle is not given, but the Labor Code (2015) suggests a similar concept of the prohibition of discrimination in labor rights based on gender, race, age, nationality, and other grounds.

It was also found that both Kazakhstani and EU documents emphasize the importance of combating gender stereotypes in developing gender policies. As an illustration, the Concept draws attention to the eradication of gender stereotypes and beliefs and calls for the introduction of gender education, while the Strategy stresses that stereotypes limit aspirations, choice, and freedom, and highlights the importance of gender equality in the media. Similarly, the Law on State Guarantees (2009) prohibits advertising containing offensive materials and gender discrimination: "prohibition of advertising containing text, visual, and audio information that violates generally accepted norms of humanity and morality through the use of offensive words, comparisons, and images in relation to gender" (Republic of Kazakhstan, 2009, Article 12).

A notable difference is the absence of definitions of gender mainstreaming in Kazakhstani documents, except for mentioning gender budgeting as an important area of economic development. For example, it was observed that the pilot project in the Akmola region showed the absence of gender aspects in budget planning, and the aim was set to introduce gender budgeting in the planning of the state budget. However, there were no legally binding measures and procedures for its implementation. In contrast, the EU Strategy emphasizes gender-sensitive budgeting as an element of financing following the framework of gender equality and the effort to combat gender segregation. The Strategy also notes the formation of a special interdepartmental working group named the Task Force, which will coordinate the work of services in different areas.

The EU Strategy highlights women's unpaid childcare and household work and the impact of this factor on women's economic inclusion and independence as one of the structural problems of inequality. To address this issue, the EU uses practical tools such as financing from EU funds to eliminate poverty, as well as investments in care services and specific legal measures such as the Child Guarantee, an EU initiative aimed at supporting children in need. In contrast, the Kazakhstani Concept does not prioritize the problem of the development of early childhood organizations. Nevertheless, the document points out several existing gender inequality problems within the family institution. Particularly, it stresses the need to support single parents and underlines the insufficient involvement of fathers in raising children. Moreover, the section observed that in the Kazakhstani approach, a necessary condition is the establishment of equal relations between women and men not only in the sphere of labor relations, but also in the family.

In addition, Kazakhstani documents underline the importance of promoting cultural values and family traditions in the media and the upbringing of the younger generation, the

formation of their “gender self-awareness” (Government of the Republic of Kazakhstan, 2016, Section 5, author’s translation). Moreover, gender equality is often associated with demographic issues, as well as with traditional values and family institutions. For example, the Law on State Guarantees (2009) emphasizes ensuring equality in family relations, while the Concept merges both issues of state gender policy and family demographic policy. Overall, gender policy in Kazakhstan is viewed more as part of the state’s social policy, rather than as an independent policy domain as in the EU.

Quotas and Support Measures

Another important aspect of the comparative analysis is existing quotas, their rationale, and other supportive measures for women, with a focus on the area of labor law. Each EU document provides a rationale and preconditions for the quotas or measures adopted. For example, Directive (EU) 2022/2381 of the European Parliament and of the Council (2022) requires that 40% of non-executive directors or 33% of all directors must be from the underrepresented sex at the level of corporate boards. As a rationale, the document cites gender equality as a driver of economic growth, social well-being, and competitiveness, as well as the optimal use of all talents. Moreover, the document emphasizes that, when candidates are equally qualified, preference should be given to representatives of the underrepresented sex. Similarly, the Kazakhstani Concept provides grounds for women’s empowerment: “Increasing the share of women in executive, representative and judicial bodies of power... will expand the economic and political rights and opportunities for women.” (Government of the Republic of Kazakhstan, 2016, Section 4, author’s translation). However, as the analysis demonstrates, there are no existing gender quotas exclusively targeting women; only in 2020 were 30% quotas introduced in party lists of deputies for women, youth, and persons with disabilities (Constitutional Law of the Republic of Kazakhstan, 1995, art. 104). This means this is not a gender-specific quota, which reduces women’s political representation and empowerment.

Regarding the gender gap in STEM and digital technologies, both the EU and Kazakhstan have recognized the problem of women’s underrepresentation. The Concept underlines the stereotypical choice of traditionally female professions by women, while the Strategy cites the fact that girls outperform boys in digital literacy. In Kazakhstan, the Concept proposes to address this problem by lifting restrictions – including abolishing prohibited professions – as well as generally expanding women’s opportunities, emphasizing the concept of the “Listening State” (Government of the Republic of Kazakhstan, 2016, Section 4). In contrast, the EU sets the aim to “improve gender balance in traditionally male or female-dominated professions” (European Commission, 2020, p. 10), and proposes specific action plans such as the Digital Education Action Plan, Skills Agenda, Women in Digital, and Youth Guarantee.

Another significant area concerns women’s leadership, which is covered in the documents of both regions. In Kazakhstan, support for women’s leadership and entrepreneurship is one of the main topics of discourse on gender equality policy. The examined documents corroborate the studies in the literature review: centers for the development of women’s entrepreneurship have been established throughout the country, as well as projects aimed at developing women’s leadership (Shakirova, 2015a). Moreover, the Concept specifically pays attention to the development of women’s entrepreneurship in rural

areas. In general, the document emphasizes the importance of conducting information and educational activities of the state to overcome gender stereotypes about the role of women in society. In comparison, the EU Strategy focuses more on addressing structural inequalities and relies on legal regulation. Notable examples include the Work-Life Balance Directive, suggesting flexible working conditions; the Women in Digital scoreboard; pay gap reduction measures; and numerous investment projects aimed at developing women's participation in the economy.

Conflict Resolution

This section focuses on the category of conflict resolution in the field of gender equality and in the labor sphere in particular. EU legal documents, as mentioned earlier, provide a clear definition of harassment and sexual harassment. Directive 2006/54/EC on equal opportunities in employment provides clear mechanisms for conflict resolution and a robust structure for protecting complainants' rights. For example, the document highlights the importance of preventing victimization, meaning that the burden of proof is placed not on the complainant, but on the respondent: "...it shall be for the respondent to prove that there has been no breach of the principle of equal treatment." (European Parliament & Council of the European Union, 2006, Art. 19). Moreover, member states are obliged to have a legislative system that protects employees from unfavorable treatment in case of complaints. The document pays special attention to social dialogue and encourages employers to strive for gender equality within their teams, providing them with information on equal treatment. Similarly, the Kazakhstani Law on State Guarantees (2009) emphasizes the importance of collecting gender data on the number of male and female candidates for public service vacancies, although it does not suggest providing candidates with information on the wage differences:

The responsibility for providing the competition commissions with information on the professional training, education, and work experience of persons participating in the competition, as well as data on the ratio of the number of men and women working in the relevant civil service positions, is assigned to the personnel departments of state bodies (Republic of Kazakhstan, 2009, Art. 9, author's translation).

In addition, the Directive 2006/54/EC emphasizes structural legal protection for victims: elimination of discriminatory laws and procedures, pay transparency, monitoring of gender-disaggregated data, and involvement of NGOs in supporting complainants. The strategy strives for a victim-oriented approach to gender-based violence and includes preventive measures against gender discrimination, such as educating boys and girls in the norms of non-violent relationships. Moreover, the Strategy emphasizes the EU's commitment to the Istanbul Convention and provides a comprehensive system of criminal legislation. Special attention is paid to violence in the online field, and such protective mechanisms as the Digital Services Act, a measure that will define online platforms' responsibilities in regulating online content.

In contrast, a notable finding in Kazakhstani documents is that the concept of "zero tolerance" for gender-based violence is repeatedly mentioned. The Concept emphasizes ideological and moral engagement with the population on issues of gender equality and the promotion of moral values through educational programs. As for the legal practice, the Law on State Guarantees (2009) mentions the right of victims to seek judicial remedies

in cases of discrimination. However, there is no separate authorized body to address gender equality issues. As noted in the law, complainants may appeal to the president, the government, and central and local authorities. The Concept sets the goal of creating such a body, and also emphasizes the importance of working towards an interdepartmental response to gender-based violence and the creation of an institutional basis for gender policy. Regarding the complaint mechanism in the labor field, no provisions are made for the burden of proof. The Law on State Guarantees (2009) only prohibits employers from preventing employees from filing complaints on gender equality issues, and the Labor Code only emphasizes the right to appeal to the court and other authorities on discrimination issues. Therefore, at the moment, Kazakhstan lacks a clear legal system for protecting employees on gender equality issues.

DISCUSSION AND CONCLUSIONS

This study aimed to compare Kazakhstani and EU gender equality policy documents through conducting thematic analysis to indicate patterns, similarities, and differences. The findings revealed different approaches to policymaking in the context of the studied regions. The most notable gap was identified regarding terminology, definitions, and their scope. It was observed that EU documents pay special attention to clear distinctions and criteria for definitions. Directive documents contain sections explaining the key concepts of the document and the situations in which these definitions are applied, providing concrete examples. In contrast, Kazakhstani documents approach the issue of defining gender equality terms from another perspective. Notably, the absence of definitions for harassment and sexual harassment was identified, resulting in a lack of legal grounds for filing complaints with the competent authorities. The concept of discrimination is briefly introduced in a few sentences, without distinction between indirect and direct forms, and without specific examples of discrimination cases. Moreover, Kazakhstani documents do not introduce the concept of gender mainstreaming; instead, they emphasize the importance of gender budgeting, yet such recommendations have no legal force. These results are consistent with the findings of the OECD (2017) and ADB (2018) studies, which emphasize the need for the country to implement gender mainstreaming in policy and practice.

Kazakhstani documents place considerable attention on the family institution and its development. Based on the documents, it can be concluded that currently, this is a higher priority for the state than gender equality. Whereas EU gender policy documents briefly mention the concepts of family and upbringing, in Kazakhstani documents, it is an important ideological component of state policy. In addition, Kazakhstani gender equality policy is not considered as a separate state policy, but as part of social and family demographic policy, which, as was found in the literature review, shifts the focus from gender equality and hinders its advancement (ADB, 2018). A recent study on women's political leadership also noted the importance of separating family and gender policies for women's political empowerment (Lipovka et al., 2023).

Regarding quotas and support measures, it was found that there are no separate quotas for women in Kazakhstan apart from a non-exclusive 30% quota applied to party lists. In contrast, the EU places strong emphasis on the gap in leadership positions and has introduced a 40% quota for women on corporate boards. However, Kazakhstani

documents devote significant attention to female leadership and emphasize the importance of eliminating stereotypes about women in society. Yet, unlike EU policy, there is no reference to the importance of developing childcare services, which play a crucial role in women's career advancement and their involvement in the labor market (Olzhebeyeva & Kireyeva, 2025). Overall, Kazakhstani support measures are primarily informational and educational rather than legally binding as in the EU.

In the category of conflict resolution, it was revealed that the EU policy pays greater attention to protecting workers in cases of gender discrimination. The documents provide clear definitions of victimization, burden of proof, procedures for responding to complaints, legal protection of complainants, and commitment to international conventions. In contrast, the analysis of Kazakhstani documents showed that the country adheres to a policy of "zero tolerance" for any type of discrimination, but currently lacks a comprehensive system of protection against discrimination of workers in the country. Moreover, there is a significant difference between the gender policies of the EU and Kazakhstan in terms of interdepartmental cooperation of various organizations and bodies, such as the "velvet triangle" or Task Force in the EU. A well-developed legal system for responding to cases of violation of rights in matters of gender equality would better protect complainants and establish a reliable legal basis.

To conclude, the analysis of the gender policies of the EU and Kazakhstan confirms the results of the literature review, namely that the EU political system of gender equality has an institutional basis, is legally binding, and has a strong interdepartmental cooperation. The Kazakhstani system, although it acknowledges many existing problems of inequality, prioritizes cultural, educational, and ideological activities over the creation of a legal system with effective mechanisms for gender equality. Despite the progress achieved in the field of women's entrepreneurship and access to education, Kazakhstan has yet to create an institutional basis for the development of gender equality, move from declarative statements to clear action plans, and ensure the systematic collection of gender-disaggregated data. The existing gaps in the legal system may create obstacles for women professionals in protecting their rights and freedoms.

The results of this study contribute to comparative research on gender equality policy in the context of Central Asia and the European Union. The findings helped to identify several possible areas for institutionalization of Kazakhstani gender equality policy: (1) the implementation of separate quotas for women in leadership positions; (2) the establishment of a specialized body for monitoring data and ensuring protection in matters of gender equality; (3) the introduction of legally binding and in-depth gender equality-related definitions. However, possible limitations of this article may include the limited sample of documents for the analysis, the lack of analysis of the implementation and practical application of policy documents, and considerations of challenges in adopting foreign policy practices. Future research could include the analysis of documents on gender-based violence or family policy, and their implementation processes.

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