



Darya Vasilenko

Assessing the Extent of Implementation of the Convention on the Elimination of All Forms of Discrimination Against Women

Concluding Observations on Kazakhstan

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Foreword

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- Orr, Kate, *Missing from the Data, Missing from the Law: Indigenous Women and Girls and the Failures of Anti-Trafficking Frameworks in Latin America*. Supervisor: Davinia Gómez Sánchez, Univeristy of Deusto (Bilbao). European Master's Programme in Human Rights and Democratisation (EMA-GC Europe), coordinated by Global Campus of Human Rights Headquarters.

- Vasilenko, Darya, *Assessing the Extent of Implementation of the Convention on the Elimination of All Forms of Discrimination Against Women: Concluding Observations on Kazakhstan*. Supervisor: Aigerim Kussaiynkyzy, Maqsut Narikbayev University (Kazakhstan). The Master's Programme in Human Rights and Sustainability in Central Asia (MAHRS-GC Central Asia), coordinated by the OSCE Academy in Bishkek (AY 2024-26).
- Yisa, Josephine Boye, *A Human Rights-Based Approach to Overfishing in West Africa: Comparative Study of Guinea-Bissau and The Gambia*. Supervisors: Magnus Killander, University of Pretoria and Emmanuel Kasimbazi, Makerere University (Uganda). Master's Programme in Human Rights and Democratisation in Africa, coordinated by Centre for Human Rights, University of Pretoria.

Biography

Darya Vasilenko is a recent graduate from Turkmenistan who completed a Master's degree in Human Rights and Sustainability at the OSCE Academy in Bishkek. Her research focuses on the implementation of international human rights mechanisms, particularly CEDAW recommendations in Kazakhstan. Her research interests include women's rights and gender equality, and she plans to pursue a professional career working on these issues.

This Master's thesis assesses the extent of Kazakhstan's implementation of the recommendations issued by the Committee on the Elimination of Discrimination against Women (CEDAW Committee)¹ in relation to the state party's sixth periodic report,² covering the period from 2019 to 2025. While shadow reports raise concerns across multiple domains, this thesis focuses on two thematic clusters that are consistently identified as priority areas: gender-based violence and participation in political and public life.

The thesis tests the hypothesis that Kazakhstan's compliance with the CEDAW Committee's 2019 Concluding Observations³ demonstrates a strategic emphasis on *de jure*⁴ legal measures over institutional and practical *de facto*⁵ implementation, producing predominantly formal rather than substantive compliance across both issue areas.

Despite the existence of international and regional assessments of Kazakhstan's engagement with the CEDAW Committee's periodic reporting procedure, the scholarly literature remains remarkably underdeveloped in one crucial respect: there is no systematic analysis of how this supervisory mechanism operates *in*

¹ United Nations, Committee on the Elimination of All Forms of Discrimination against Women (CEDAW 2025. Committee) <<https://www.ohchr.org/en/treaty-bodies/cedaw>> accessed 1 July

² Republic of Kazakhstan, 'Sixth Periodic Report Submitted by Kazakhstan Under Article 18 of the Convention, Due in 2023' (2024) UN Doc CEDAW/C/KAZ/6 <<https://digitallibrary.un.org/record/4071031>> accessed 1 June 2025.

³ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic 1 July 2025. Report of Kazakhstan' (2019) UN Doc CEDAW/C/KAZ/CO/5 <<https://digitallibrary.un.org/record/3840014?v=pdf>> accessed

⁴ De jure legal concept that refers to what happens according to the law.

⁵ De facto is used to refer to what happens in practice or in reality.

*concreto*⁶ within the domestic legal order, nor of the key institutional and practical barriers that impede full and effective implementation of the Committee's recommendations. Addressing this gap is essential both for advancing academic debates on the localisation and internalisation of international human rights norms in semi-authoritarian legal systems, and for informing the design of more effective national implementation mechanisms in the field of gender equality.

Methodologically, the thesis applies a qualitative socio-legal research design combining systematic document analysis and semi-structured expert interviews including practicing legal professionals, an international gender expert and women's rights activists engaged in CEDAW monitoring. Documentary sources include Kazakhstan's fifth and sixth periodic reports, the CEDAW 2019 Concluding Observations, shadow reports and other relevant documents produced by non-governmental organisations and international bodies. Implementation is analysed through a three-level framework: legal, institutional and practical, distinguishing *de jure* commitments, enforcement arrangements and *de facto* outcomes.

The hypothesis is partially supported. The findings confirm a strong emphasis on *de jure* legal and policy measures, particularly where CEDAW recommendations can be translated into codifiable and reportable outputs, while practical *de facto* implementation remains the weakest layer. At the same time, Kazakhstan has expanded an extensive institutional infrastructure, suggesting that the core asymmetry lies less in the absence of institutionalisation than in limited conversion capacity: institutional expansion and measurable activity are more visible than stable and consistent *de facto* outcomes. Implementation is therefore best characterised as predominantly partial compliance with uneven practical effectiveness, sustained by selective compliance, fragmented coordination and accountability, weak enforceability of protective tools, informal institutional gatekeeping and constrained domestic mobilisation that keeps compliance strongest in reportable legal/policy changes and institutional arrangements, and weakest in consistent enforceability and practical outcomes.

⁶ In *concreto* assessment involves evaluating a standard by referencing the behaviour of the subject(s) to which the standard applies.

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Table of Abbreviations

CAO	Code of Administrative Offences (Republic of Kazakhstan)
CAREC	Central Asia Regional Economic Cooperation (Program)
CC	Criminal Code (Republic of Kazakhstan)
CEC	Central Election Commission
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CPC	Criminal Procedure Code (Republic of Kazakhstan)
DV	Domestic violence
GBV	Gender-based violence
IPV	Intimate partner violence
LGBT	Lesbian, gay, bisexual, transgender
LGBTQ+	Lesbian, gay, bisexual, transgender, queer (and other identities)
MCI	Monthly Calculation Index
MIA	Ministry of Internal Affairs

NGO	Non-governmental organisation
NPM	National Preventive Mechanism
OECD	Organisation for Economic Co-operation and Development
OHCHR	Office of the United Nations High Commissioner for Human Rights
OSCE	Organization for Security and Co-operation in Europe
PWD	Persons with disabilities
SOPs	Standard operating procedures
UN	United Nations
UNDP	United Nations Development Programme
UNICEF	United Nations Children's Fund
eOtinish	Unified e-appeals system eOtinish
V-Dem	Varieties of Democracy (V-Dem) Institute
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome

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Introduction

Research problem

The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)⁷ is one of the most comprehensive universal human rights treaties devoted to the promotion of gender equality and the protection of women's rights. Adopted by the United Nations (UN) General Assembly in 1979 and in force since 1981, CEDAW imposes legally binding obligations on states parties, which, in accordance with the principle *pacta sunt servanda*,⁸ are required to 'respect, protect and fulfil' women's rights by eliminating both *de jure* and *de facto* discrimination. In many domestic legal orders, including that of Kazakhstan, ratified international treaties form part of the national legal system and may take precedence over conflicting domestic legislation, depending on the constitutional framework governing their application, which formally reinforces the justiciability of CEDAW-based standards. A central compliance mechanism under the Convention is the periodic reporting procedure administered by the Committee on the Elimination of Discrimination against Women (CEDAW Committee). Following its examination of state reports and alternative information (including shadow reports), the Committee adopts Concluding Observations – detailed recommendations that specify the

⁷ Convention on the Elimination of All Forms of Discrimination against Women (adopted 18 December 1979, entered into force 3 September 1981) 1249 UNTS 13 (CEDAW).

⁸ See Vienna Convention on the Law of Treaties (adopted 22 May 1969, entered into force 27 January 1980) 1155 UNTS 331, art 26 (*pacta sunt servanda*). In UN human rights practice, state obligations are commonly framed as duties to respect, protect and fulfil human rights; see Office of the United Nations High Commissioner for Human Rights (OHCHR), 'International Human Rights Law' <www.ohchr.org/en/instruments-and-mechanisms/international-human-rights-law> accessed 24 August 2025.

legislative, institutional and policy measures a state should undertake to remedy structural gender inequalities and bring its legal framework and practice in line with international human rights standards. Although Concluding Observations do not have the same status as CEDAW itself and are generally classified as ‘soft law’, in practice they operate as an authoritative interpretative tool, they guide domestic lawmakers, courts and administrative bodies, and increasingly inform constitutional adjudication and strategic litigation in the field of gender equality.

Kazakhstan, which ratified CEDAW in 1998, has thereby assumed legally binding obligations to uphold the principles of the Convention and to implement its provisions in good faith within its domestic legal order. Notwithstanding the state’s systematic submission of periodic reports to the CEDAW Committee and a series of formal steps towards aligning national legislation with international standards, the actual implementation of these obligations in practice remains limited, inconsistent and, in a number of aspects, rooted in outdated legal and institutional approaches inherited from earlier policy paradigms.

An analysis of shadow reports repeatedly highlights discrepancies between the state’s official narrative and the lived realities of women’s rights protection. While these reports raise concerns across multiple domains, this thesis focuses on two thematic clusters that are consistently identified as priority areas and occur in the reporting cycles, including CEDAW Concluding Observations 2019: (1) gender-based violence (GBV) and (2) women’s participation in political and public life.

This is consistent with Kazakhstan’s performance in international gender indices: in the *Global Gender Gap Index 2025* Kazakhstan ranks 92nd of 148 (score 0.698), while Political Empowerment is the weakest subindex (117th), despite stronger results in Health and Survival (33rd).⁹ Taken together, the discrepancy between official reporting and alternative assessments, alongside persistent outcome gaps, create a compelling basis for an in-depth examination of the degree and levels of implementation of the CEDAW Committee’s recommendations and, by extension, for

⁹ World Economic Forum, *Global Gender Gap Report 2025* (World Economic Forum 2025) <<http://www.weforum.org/publications/global-gender-gap-report-2025/>> accessed 24 August 2025.

a critical assessment of how far the Kazakhstani legal system has progressed or, in some respects, continues to lag behind in ensuring the effective protection of women's rights in line with contemporary international human rights law.

Despite the existence of international and regional assessments of Kazakhstan's engagement with the CEDAW periodic reporting procedure, the scholarly literature remains remarkably underdeveloped in one crucial respect: there is no sustained, systematic analysis of how this supervisory mechanism operates *in concreto* within the domestic legal order, nor of the key juridical and institutional barriers that impede full and effective implementation of the CEDAW Committee's recommendations.

Addressing this gap is essential both for advancing academic debates on the localisation and internalisation of international human rights norms in semi-authoritarian legal systems, and for informing the design of more effective national implementation mechanisms in the field of gender equality. A rigorous doctrinal and socio-legal examination of Kazakhstan's practice under CEDAW can thus contribute simultaneously to theory-building in international human rights law and to evidence-based reform of domestic legislation, institutions and remedies aimed at the protection of women's rights.

Hypothesis

I argue that Kazakhstan's compliance with the CEDAW Committee's 2019 Concluding Observations in the areas of (1) GBV and (2) women's participation in political and public life (2019–2025) is characterised by a strategic emphasis on *de jure* legal measures over institutional change and *de facto* implementation. This pattern suggests a predominant orientation toward formal rather than substantive compliance.

Accordingly, the study expects potential gaps between formal reforms and their translation into implementation structures and practical changes.

The hypothesis led to the formulation of two research questions:

01 — To what extent has Kazakhstan implemented the 2019 CEDAW Concluding Observations in the areas of GBV and participation in political and public life (2019–2025) across legal, institutional and practical dimensions?

02 — What political, institutional and informal-institutional barriers hinder translation from law to practice, and how do key domestic actors assess the implementation of the 2019 CEDAW Concluding Observations in the two issue areas?

Research significance

The significance of this research manifests in three interrelated dimensions: academic contribution, methodological innovation and practical relevance.

First, the thesis addresses a clear lacuna in the existing scholarly literature by providing a targeted, case-specific assessment of the effectiveness of CEDAW in Kazakhstan. Employing compliance theory as its principal analytical framework, the study develops a systematic account of how international human rights obligations are internalised and operationalised within the domestic legal order, with particular emphasis on gender equality norms and their translation into national law, institutions and practice.

Secondly, the analysis of Kazakhstan's implementation of the CEDAW Committee's Concluding Observations exposes a structural gap between the state's international obligations and its domestic practice by disaggregating compliance into three analytically distinct levels: legal, institutional and practical. This tiered approach not only enables a more precise diagnosis of where and how implementation falters, but also underpins the development of visual analytical tools that enhance clarity, transparency and cross-country comparability in future studies of treaty compliance.

Thirdly, the findings generated by this research have direct practical relevance not only for scholars and students working in the fields of human rights and gender studies, but also for policy-makers, international organisations and civil society actors. By pinpointing areas of weak, selective or inconsistent implementation, the study offers evidence-based insights that can inform the

design of targeted reforms aimed at enhancing Kazakhstan's compliance with CEDAW and, more broadly, at strengthening the role of international human rights mechanisms as drivers of substantive political and legal change at the national level.

Literature review

Assessing Kazakhstan's implementation of the CEDAW Committee's Concluding Observations makes sense only against what the compliance literature has established for decades: ratification and reporting do not reliably predict improvements in rights practices.¹⁰ The central puzzle is the distance between formal commitment and substantive implementation changes in legislation, institutions and outcomes which is shaped less by international law 'as such' than by domestic political, legal and societal mechanisms.¹¹ This distance tends to widen in authoritarian and hybrid regimes, where international commitments can be converted into sources of external legitimacy while their domestic bite is contained.¹² In that setting, review procedures periodic reporting and concluding observations matter mainly when domestic actors are able to mobilise them in courts, legislatures and public debate.¹³ Work focused on CEDAW in Central Asia and adjacent

¹⁰ Martha Finnemore and Kathryn Sikkink, 'International Norm Dynamics and Political Change' (1998) 52(4) *International Organization* 887; Thomas Risse and Kathryn Sikkink, 'The Socialization of International Human Rights Norms into Domestic Practices: Introduction' in Thomas Risse, Stephen C Ropp and Kathryn Sikkink (eds), *The Power of Human Rights: International Norms and Domestic Change* (CUP 1999); Oona A Hathaway, 'Do Human Rights Treaties Make a Difference?' (2002) 111(8) *Yale Law Journal* 1935.

¹¹ Beth A Simmons, *Mobilizing for Human Rights: International Law in Domestic Politics* (CUP 2009); Courtney Hillebrecht, *Domestic Politics and International Human Rights Tribunals: The Problem of Compliance* (CUP 2014); Jana von Stein, 'The Engines of Compliance' (2016) 22(2) *European Journal of International Relations* 329.

¹² Risse and Sikkink (n 10); Geoff Dancy and Kathryn Sikkink, 'Ratification and Human Rights Prosecutions: Toward a Transnational Theory of Treaty Compliance' (2012) 44(3) *New York University Journal of International Law and Politics* 751; Xinyuan Dai, *International Institutions and National Policies* (CUP 2014).

¹³ Thalia Gonzalez, 'From Global to Local: Domestic Human Rights Norms in Theory and Practice' (2016) 59 *Howard Law Journal* 373; Courtney Hillebrecht, 'The Domestic Mechanisms of Compliance with International Human Rights Law' (2012) 18(4) *European Journal of International Relations* 631; Yonatan Lupu, 'The Informative Power of Treaty Commitment: Using the Spatial Model to Address Selection Effects' (2013) 67(4) *International Organization* 912.

regions describes a familiar pattern: enthusiastic accession and ‘progressive’ legislation alongside weak or selective enforcement, where women’s rights also serve image-building and controlled liberalisation.¹⁴

The life cycle model of norms helps explain why this separation persists: norms can be gradually adopted, but stall before implementation when internal support is low and incentives are reputational rather than normative.¹⁵ Research on gender equality under undemocratic rule also shows how formal approval of the global framework, CEDAW, the Beijing Platform for Action and UN Security Council Resolution 1325 can coexist with structural obstacles to practical implementation.¹⁶ The concept of ‘erasing gender differences’ reflects a dual logic: visible reforms may indicate modernity, while patriarchal orders remain largely intact.¹⁷ Kazakhstan’s trajectory corresponds to this tension: despite sustained political activity and specialised bodies such as the Presidential Council on Gender Policy, participation in political life remains limited,¹⁸ and regime diagnostics continue to classify the country as an electoral autocracy¹⁹ with limited civic space.²⁰

At the same time, the obstacles are not only institutional. In Central Asia, treaty obligations intersect with re-traditionalisation and entrenched patriarchal norms – illustrated by the subordinate position of *kelin*²¹ and the persistence of harmful practices framed

¹⁴ Vince A Gonzalez, ‘The Effect of CEDAW Ratification in Central Asia’ (2011) 3(5) *Inquiries Journal* 1; Anel Balgabekova, ‘Promoting Women’s Rights in Central Asia: Implications for Democratic Development’ (MA thesis, University of Padua 2022).

¹⁵ Finnemore and Sikkink (n 10); Risse and Sikkink (n 10) 1.

¹⁶ Sarah Sunn Bush and Pär Zetterberg, ‘Gender Equality and Authoritarian Regimes: New Directions for Research’ (2024) 20(1) *Politics & Gender* 212; Mona Lena Krook and Jacqui True, ‘Rethinking the Life Cycles of International Norms: The United Nations and the Global Promotion of Gender Equality’ (2012) 18(1) *European Journal of International Relations* 103; United Nations, ‘Beijing Declaration and Platform for Action’ (Fourth World Conference on Women, Beijing 1995); UN Security Council, Resolution 1325 on Women, Peace and Security (2000) UN Doc S/RES/1325.

¹⁷ Bush and Zetterberg (n 16).

¹⁸ Venera Khairullayeva and others, ‘Gender Policy in Kazakhstan’ (2022) 24(1) *Journal of International Women’s Studies* article 25.

¹⁹ Varieties of Democracy (V-Dem) Institute’s regime typology classifies ‘electoral autocracy’ as a system with *de jure* elections but significant constraints on civil liberties, contestation and/or integrity of electoral processes; for classification criteria see V-Dem, ‘Democracy Report 2025: 25 Years of Autocratization – Democracy Trumped?’ (V-Dem Institute 2025) <www.v-dem.net/documents/60/V-dem-dr_2025_lowres.pdf> accessed 15 November 2025.

²⁰ *ibid.*

²¹ *Kelin* (Kazakh/Kyrgyz usage) refers to a daughter-in-law in the ‘traditional’ household; the term is often used in the literature to discuss gendered hierarchies and ‘traditional’ expectations within extended families in Central Asia.

as ‘tradition’.²² Micro-level work links authoritarian dispositions to hostility toward feminism and ‘benevolent sexism’, while other research suggests that authoritarian orientations can be reinforced as adaptive responses to threat in unequal contexts.²³ Post-Soviet legacies further complicate internalisation: Soviet modernisation expanded formal equality without dismantling patriarchal family structures.²⁴ Informal hierarchies, including clan networks, may provide cohesion yet reproduce gendered inequality, particularly outside major cities,²⁵ and elites may actively produce ‘tradition’ to restrain feminist agendas.²⁶ Peshkova links these dynamics to gendered nation-building and the framing of feminist and LG-BTQ+ identities as ‘Western’, suggesting that even where reforms exist, such as the Domestic Violence Prevention Act 2024, implementation can be constrained by entrenched norms.²⁷ Finally, because accountability depends on domestic uptake, civil society capacity becomes pivotal, yet research describes Kazakhstan’s civic sector as weak and precarious, operating under ‘structural instability’ shaped by legal constraints, surveillance and funding insecurity.²⁸ Under pressure on street mobilisation, activism has partly shifted online, but with recognised limits where change requires enforcement by state institutions.²⁹

²² Galym Zhussipbek and Zhanar Nagayeva, ‘Human Rights of Daughters-in-Law (*Kelins*) in Central Asia: Harmful Traditional Practices and Structural Oppression’ (2021) 40(2) *Central Asian Survey* 222 <<https://doi.org/10.1080/02634937.2020.1850423>>.

²³ Bill E Peterson and Eileen L Zurbriggen, ‘Gender, Sexuality, and the Authoritarian Personality’ (2010) 78(6) *Journal of Personality* 1801 <<https://doi.org/10.1111/j.1467-6494.2010.00670.x>>; Mark J Brandt and P J Henry, ‘Gender Inequality and Gender Differences in Authoritarianism’ (2012) 38(10) *Personality and Social Psychology Bulletin* 1301.

²⁴ Marianne Kamp, ‘The Soviet Legacy and Women’s Rights in Central Asia’ (2016) 115(783) *Current History* 270 <<https://doi.org/10.1525/curh.2016.115.783.270>>.

²⁵ Danielle Kane and Ksenia Gorbenko, ‘States and Women’s Rights in Central Asia’ (unpublished manuscript, Duke University and University of Pennsylvania 2020).

²⁶ Judith Beyer and Peter Finke, ‘Practices of Traditionalization in Central Asia’ (2019) 38(3) *Central Asian Survey* 310 <<https://doi.org/10.1080/02634937.2019.1636766>> accessed 11 June 2026.

²⁷ Svetlana Peshkova, ‘Thinking with Gender about Central Asia’ in Rico Isaacs and Erica Marat (eds), *Routledge Handbook of Contemporary Central Asia* (Routledge 2021) 362; Republic of Kazakhstan, Law No 72-VIII (15 April 2024) ‘On Amendments to Certain Legislative Acts of the Republic of Kazakhstan on Ensuring Women’s Rights and Child Safety’ <<https://adilet.zan.kz/rus/docs/Z2400000072>> accessed 22 December 2025.

²⁸ Ainur Osmanova, ‘Civil Society and Domestic Violence Prevention in Kazakhstan’ [2023] *Central Asian Journal of Social Sciences and Humanities*; Colleen Wood, ‘Between a Rock and a Hard Place: How Kazakhstan’s Civil Society Navigates Precarity’ [2023] *International Labor and Working-Class History* 44.

²⁹ Anaita Azizi, ‘From Social Media to Social Change: Online Platforms’ Impact on Kazakhstan’s Feminist and Civil Activisms’ in Anja Mihr, Paolo Sorbello and Brigitte Weiffen (eds), *Securitization and Democracy in Eurasia* (Springer 2023) 217.

Taken together, the literature suggests that CEDAW-related commitments rarely translate into uniform domestic change: ratification and reporting often coexist with implementation gaps, especially in authoritarian and hybrid regimes where reforms may serve legitimacy while enforcement remains selective.³⁰ Studies on Central Asia further point to the role of re-traditionalisation, informal hierarchies and post-Soviet legacies that can stabilise patriarchal norms even when formal policies look progressive.³¹ At the same time, constrained civil society limits sustained domestic mobilisation around international standards.³² Yet existing work more often describes these dynamics in general terms than it demonstrates, in a systematic and issue-specific way, how a state responds to particular CEDAW Concluding Observations over time, and how implementation differs across legal, institutional and practical levels.³³ By addressing this gap in the case of Kazakhstan, this study provides a clearer basis for assessing what treaty-body monitoring can (and cannot) achieve in an electoral autocracy, where accountability mechanisms and civil liberties remain constrained.³⁴

Theoretical framing

This thesis treats implementation as a multi-stage domestic process in which formal legal regulations may diverge from institutional capacity and daily practice. To capture both the enabling pathways through which international norms can matter and the institutional dynamics that can dilute or block them, the study combines compliance theory with feminist institutionalism.

³⁰ Finnemore and Sikkink (n 10); Risse and Sikkink (n 10); Hathaway (n 10); Simmons (n 11); Hillebrecht, 'The Domestic Mechanisms of Compliance with International Human Rights Law' (n 13); von Stein, 'The Engines of Compliance' (n 11); Dancy and Sikkink (n 12); Xinyuan Dai, 'The Digital Revolution and Authoritarian Resilience' (2014) 25(1) *Journal of Democracy* 15.

³¹ Kamp (n 24); Kane and Gorbenko (n 25); Beyer and Finke (n 26); Zhussipbek and Nagayeva (n 22); Peshkova (n 27).

³² Osmanova (n 28); Wood (n 28); Azizi (n 29).

³³ T Gonzalez (n 13); VA Gonzalez (n 14); Anel Balgabekova, 'Compliance with Women's Rights in Central Asia: Patterns and Challenges' (2022) 4(2) *Central Asian Journal of Human Rights* 45.

³⁴ Khairullayeva and others (n 18); V-Dem Institute (n 19).

The study draws primarily on Beth Simmons' book *Mobilizing for Human Rights: International Law in Domestic Politics*.³⁵ This theory suggests that international norms are not automatically adopted by states. Instead, their effectiveness hinges on their ability to empower internal domestic factors. These factors can include individuals, civil society groups or even specific government agencies that are interested in complying with these international standards.

Within the framework of this theory, Simmons identifies three key internal mechanisms through which international law influences the internal policy of the state and the decision-making process.

01 — *Agenda setting* – International treaties raise specific issues on the national agenda, making them visible and encouraging governments to respond publicly, thereby creating potential reputational costs for non-compliance.

02 — *Litigation opportunities* – Treaties provide internal groups with new legal tools and arguments to challenge discriminatory practices in national courts or through international/regional mechanisms.

03 — *Domestic mobilisation* – The ratification of treaties stimulates and empowers civil society groups, non-governmental organisations (NGOs) and activists to organise, lobby and pressure their governments to comply with their obligations.

Simmons' three mechanisms serve as an explanatory lens to discuss the findings at the legal, institutional and practical levels. Table 1 demonstrates which indicators of effectiveness and limitations were applied on each level of the findings.

³⁵ Simmons (n 11).

Simmons' mechanism (could be applied on any level: legal/ institutional/practical)	Indicators of effectiveness (supporting compliance)	Indicators of limited/absent effectiveness (challenging compliance)
Agenda setting	Inclusion of the issue in official plans/strategies and/or legislative initiatives. Government actors are compelled to publicly justify their position and respond to demands on the issue.	The issue remains peripheral and appears only sporadically or in reaction to events. Authorities can dismiss demands at low political cost (ie, without pressure).
Litigation opportunities	Existence of usable legal 'hooks' and procedures that domestic actors can employ (complaints mechanisms, petitions, administrative/ electoral appeals, ombudsperson routes, etc). Evidence that these avenues are actually used, or at least credible confirmation (in reports/interviews) that they function in practice.	The state retains tight control over whether treaty-based norms are enforceable domestically (eg, requiring separate implementing legislation or restricting direct applicability). Accountability avenues exist 'on paper' but do not produce meaningful results or create real legal/political risk for the state.
Domestic mobilisation	Ratification/commitments are perceived by domestic actors as a resource and leverage for pushing reforms. Domestic coalitions emerge or strengthen to demand implementation and reforms. Domestic actors perceive reform as more feasible because the commitment signals the presence of internal supporters of change.	Mobilisation does not increase because actors do not treat the commitment as a credible signal or doubt its significance. Pressure weakens due to fragmentation among actors and/or constraints on civic space. Ratification does not change actors' expectations about the likelihood of reform or implementation.

Table 1. Indicators for B Simmons' mechanisms (elaborated by the author)

The second theoretical framework is feminist institutionalism (FI). This framework helps analyse how gender relations are embedded in the structure of political institutions and how these institutions reproduce gender inequality, even in the presence of

progressive laws.³⁶ Unlike compliance theory, which focuses on enabling domestic mechanisms, feminist institutionalism focuses on resisting change, explaining why formal laws and international norms are often not implemented in practice.

Key feminist institutionalism concepts include:

Gendered institutions – institutions are not neutral ‘machines’, but social structures that reproduce patriarchal norms through formal and informal rules.³⁷

‘Logic of appropriateness’ – institutions operate according to unwritten rules that define ‘what is normal’ for men and women.³⁸ For example, in many contexts, it is considered ‘normal’ for men to dominate decision-making, while women are expected to be ‘modest’ and ‘non-confrontational’.

Informal institutions – formal laws are often undermined by informal practices, such as cultural norms, clan loyalties or bureaucratic inertia.³⁹ For example, a law on domestic violence may exist, but police may refuse to intervene because ‘it’s a family matter’.

Thus, feminist institutionalism offers an analytical lens to distinguish between international obligations and their practical implementation. The effectiveness of CEDAW’s realisation is shaped not only by formal norms, but also by their interaction with entrenched and informal gender stereotypes embedded within Kazakh institutions.⁴⁰

The theory shows that the lack of substantive internalisation is not just a political choice, but a structural obstacle. Deep rooted informal institutions – such as patriarchal norms in the police/judicial system or traditional gender roles – can systematically neutralise the potential of Simmons’ mechanisms. In particular, these informal institutions block litigation opportunities and hinder the effectiveness of domestic mobilisation, as activists have to fight not only government repression, but also entrenched socio-cultural norms.

³⁶ Fiona Mackay, Meryl Kenny and Louise Chappell, ‘New Institutionalism Through a Gender Lens: Towards a Feminist Institutionalism?’ (2010) 16(5) International Political Science Review 573.

³⁷ *ibid.*

³⁸ Louise Chappell, ‘Comparing Political Institutions: Revealing the Gendered “Logic of Appropriateness”’ (2006) 2(2) Politics & Gender 223.

³⁹ Georgina Waylen, ‘Informal Institutions, Institutional Change, and Gender Equality’ (2013) 6(1) Political Research Quarterly 25.

⁴⁰ *ibid.*

Consequently, the success of CEDAW implementation depends not only on the existence of formal rules, but also on how they interact with deep-rooted informal gender norms embedded in Kazakhstan's institutions.⁴¹ Without taking into account these dynamics, formal reforms risk remaining on paper, without changing the real distribution of power and the practices of the daily functioning of institutions.

Methodology

Research design

This study adopts a qualitative socio-legal research design. It combines (1) systematic document analysis and (2) semi-structured expert interviews to assess Kazakhstan's implementation of the CEDAW Committee's 2019 Concluding Observations across three analytically distinct levels: legal (*de jure*), institutional and practical *de facto*.

The use of three data sources enables triangulation and strengthens the credibility of findings. Documentary materials capture official narratives and formal reforms, while interviews and shadow reports, as well as additional reports from international organisations or NGOs provide contextual interpretation and help identify informal practices and implementation gaps that may not be visible in official documents.

Case selection

Kazakhstan has been chosen as the case study for this research, as it demonstrates a unique example of a human rights protection system functioning under conditions of 'polycrisis'.⁴² Periods of political turbulence serve as a 'stress test' for the state, revealing the resilience of human rights mechanisms when national security becomes a primary concern of the authorities. The period under review (2019–2025) is characterised by an unprecedented concentration of such challenges: ranging from the power

⁴¹ Waylen (n 39).

⁴² Thomas Homer-Dixon and others, 'A Polycrisis of Global Risks' (Cascade Institute 2022).

transition and systematic bans on peaceful women's marches⁴³ to the 'January' events (2022), which constituted a critical test for compliance with international recommendations.⁴⁴ The relevance of this case study is once again highlighted by recent negative trends, as evidenced by Kazakhstan's significant regression in the World Economic Forum's *Global Gender Gap* index for 2025, where the country dropped 16 positions to 92nd place out of 148 in the world.⁴⁵

Thematic scope: GBV and participation in political and public life

These two thematic clusters were selected purposefully for several reasons. First, they recur across Kazakhstan's CEDAW reporting cycles and occupy a prominent place in the CEDAW Committee's 2019 Concluding Observations.⁴⁶ Also, the salience of GBV is reflected in the Committee's follow-up procedure, which requested additional information on selected recommendations in this area after the 2019 review.⁴⁷ Political Empowerment remains its weakest subindex (117th),⁴⁸ which keeps women's participation in political and public life analytically salient alongside GBV. Taken together, these recurrent emphases provide a coherent entry point for assessing implementation over time. Also, both areas are amenable to a structured three-level assessment because they generate traceable legal reforms, institutional arrangements and observable practice-level outcomes, allowing the study to distinguish formal alignment from effective implementation.

⁴³ Amnesty International, 'Kazakhstan: Authorities Must Stop Targeting Peaceful Activists' [*Amnesty International*, 12 January 2022] <<https://www.amnesty.org.au/kazakhstan-authorities-must-release-arbitrarily-detained-protestors-and-respect-human-rights-amid-ongoing-unrest/>> accessed 10 November 2025.

⁴⁴ Human Rights Watch, 'Kazakhstan: Killings, Excessive Use of Force in Almaty' (*Human Rights Watch*, 26 January 2022) <<https://www.hrw.org/news/2022/01/26/kazakhstan-killings-excessive-use-force-almaty>> accessed 1 November 2025.

⁴⁵ World Economic Forum (n 9).

⁴⁶ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (2019) UN Doc CEDAW/C/KAZ/CO/5 <<https://digitallibrary.un.org/record/3840014?v=pdf>> accessed 1 July 2025.

⁴⁷ *ibid* para 53.

⁴⁸ World Economic Forum (n 9).

Data collection and data analysis strategy

This study is based on a combination of documentary analysis and semi-structured interviews.

Document analysis includes the following documents:

Time period	Document title/description
2019/2025	Kazakhstan's fifth and sixth Periodic Reports to the CEDAW Committee
2019	Concluding Observations of the CEDAW Committee on Kazakhstan's fifth Report
2019–2025	Shadow reports submitted by NGOs and other civil organisations
2019–2025	Reports and analytical studies from the United Nations, including UN Human Rights Mechanisms and other international organisations on women's rights in Kazakhstan and related issues
2019–2025	Laws, policy documents and government strategies adopted in Kazakhstan following the issuance of the CEDAW Committee's 2019 Concluding Observations
2019–2025	Reports and materials by domestic oversight and monitoring bodies (eg, the Human Rights Commissioner/Ombudsperson and other national monitoring institutions)
2021–2022/2025	CEDAW procedure materials following the 2019 Concluding Observations (State follow-up information/submission, CEDAW follow-up assessment/letter and CEDAW Replies/updates within the monitoring cycle)

Table 2. Key documents: CEDAW Concluding Observations implementation in Kazakhstan (2019–2025)

By analysing these documents, the study highlights key CEDAW Committee's recommendations made at different points in time and assesses the extent to which Kazakhstan has incorporated these recommendations into its national policy, legislation and how they are implemented in practice.

The analytical strategy proceeded in three interconnected stages:

Data coding. Relevant segments of interview transcripts and documentary material were systematically coded in accordance with a codebook derived from Simmons' three domestic compliance mechanisms and the three levels of implementation: legal, institutional and practical. Then the patterns in the encoded material were combined into analytically significant topics, following the logic of thematic analysis.⁴⁹ In the final stage, these thematic patterns were interpreted in light of the central hypothesis and the combined framework of compliance theory and feminist institutionalism, with a view to assessing the extent to which the empirical findings corroborate or challenge the initial assumptions about the predominantly formal character of Kazakhstan's implementation of CEDAW.

The study applies a coding strategy with explanatory framing. Firstly, the data are encoded by levels of implementation (legal/*de jure*, institutional and practical/*de facto*). Secondly, identified findings interpreted through the Simmons' mechanisms (see Table 1).

Operationalisation: three levels of implementation

To assess the implementation of CEDAW Committee Concluding Observations (2019), in a structured and comparable manner, the study uses three levels of analysis:

- 01 —The *legal level (de jure)* reflects changes in legislation, mandatory regulations and official political commitments.
- 02 —The *institutional level* reflects the existence and functioning of implementation mechanisms, including mandates, coordination mechanisms, procedures, resource provision and enforcement capacity.
- 03 —The *practical level (de facto)* covers the observed results and practices on the ground, based on available indicators, reports and interviews.

This three-level structure is used to avoid conflating legal reform with implementation in practice and to identify where, and at what level, compliance breaks down.

⁴⁹ Virginia Braun and Victoria Clarke, 'Using Thematic Analysis in Psychology' (2006) 3(2) Qualitative Research in Psychology 77.

Operationalisation: the CEDAW 2019 Concluding Observations

All relevant recommendations contained in the CEDAW Committee's 2019 Concluding Observations were systematically mapped to the applicable implementation levels – legal, institutional and/or practical, depending on the type of action prescribed. Recommendations with multiple components were disaggregated into sub-elements and mapped accordingly to reflect their full scope (see Appendices A and B).

Implementation at each applicable level was then assessed on a three-category scale: implemented/partially implemented/not implemented.⁵⁰ This assessment is necessarily evidence-based and interpretive, reflecting the information available in the analysed documents and interviews rather than an objective measure of implementation in all respects. The resulting implementation tables are in Appendices A and B, as well as in Chapters 2 and 3.

In-depth interviews with experts

To complement documentary analysis, the study conducts semi-structured in-depth interviews with seven expert respondents using purposive sampling to capture diverse perspectives across the three implementation levels. The interview pool includes: two representatives of international organisations in Kazakhstan, two women's rights activists, one international gender expert and two practicing legal professionals. This approach is intended to secure a diversity of perspectives and to capture assessments of CEDAW Committee's concluding observations implementation across the legal, institutional and practical levels of compliance.

Seven interviews were conducted, five via Google Meet and two in written form via email. Each on-line interview lasted approximately one hour. With the prior informed consent of participants, audio recordings were made for the sole purpose of accurate transcription and subsequent analysis; confidentiality and anonymisation were ensured in accordance with standard research ethics requirements. The interview guidelines were tailored to the

⁵⁰ Implemented: Assigned when evidence confirms the completion of the required action at the specific level (eg, a law is passed, or a budget is allocated).
 Partially Implemented: Assigned when initial steps are taken but remain incomplete, fragmented or lack sufficient enforcement power to move to the next level of compliance.
 Not Implemented: Assigned when no verifiable evidence of action was found in the analysed documents or expert testimonies for that specific level.

professional profile of each expert, and the questions focused on the implementation of CEDAW obligations at the level of lawmaking, institutional practice and day-to-day rights protection. The written responses were followed up with clarifying questions via email to ensure the same depth as oral interviews

While anonymisation was offered to all participants, two respondents explicitly consented to being identified by name in the thesis: Aida Alzhanova (international gender expert) and Gulzada Serzhan (lesbian feminist activist from Almaty, Kazakhstan). All other respondents chose to remain anonymous and are referenced using non-identifying descriptors. For confidentiality and consistency, interview materials are cited using respondent codes (INT1–INT7).⁵¹

Ethical considerations

This thesis was written in accordance with the ethical standards of academic research. The following principles were followed to ensure ethical behaviour:

- 01 —Periodic reports were analysed transparently and objectively, without distorting information.
- 02 —Reports are treated as official documents, and any interpretations or conclusions are supported by evidence and clearly stated.
- 03 —Informed consent was obtained from all respondents, which clearly stated the purpose of the study, the voluntary nature of participation, the right to withdraw at any time and the measures taken to ensure anonymity and confidentiality.

⁵¹ Interview with Aida Alzhanova (INT1), international gender expert (December 2025); Interview with Gulzada Serzhan (INT2), lesbian feminist activist from Almaty, Kazakhstan (December 2025); Interview with anonymous respondent (INT3), representative of an international organisation in Kazakhstan (December 2025); Interview with anonymous respondent (INT4), women's rights activist (December 2025); Interview with anonymous respondent (INT5), representative of an international organisation in Kazakhstan (December 2025); Interview with anonymous respondent (INT6), practising legal professional (December 2025); Interview with anonymous respondent (INT7), practising legal professional (December 2025).

04 —Interviewees were informed of the potential risks and benefits of participation. Particular care was taken to avoid causing harm or distress to participants, especially when discussing sensitive topics.

05 —All the original data (audio recordings and original transcripts) were stored on a password-protected encrypted device and will be permanently deleted/destroy after the successful defence of the thesis.

06 —The research was conducted transparently and objectively, without conflict of interest, and accurately reflecting the views of all stakeholders. All sources of information are properly cited and validated.

Taking into account the political situation in Kazakhstan, I considered the potential risks for the study participants and for myself and held appropriate measures to reduce these risks. Particular attention was marked to ensuring that the questions focused on institutional dynamics and political barriers, avoiding personalised political criticism in order to reduce the potential risks of retaliation for participants. By adhering to these ethical principles, this research contributes to a better understanding of women's rights and the implementation of CEDAW Committee's Concluding Observations 2019 in Kazakhstan.

1. Evolution of women's rights and the legal framework in Kazakhstan

This chapter analyses the development of women's rights in Kazakhstan, with the focus on the domestic legal framework in two fields: GBV and women's participation in political and public life. Building upon the broader international and post-Soviet context presented in the introduction and literature review, including Kazakhstan's ratification of CEDAW⁵² and the accompanying scholarly debates on compliance, this chapter shifts the focus to the domestic legal architecture that shapes the practical realisation of women's rights in these domains.

By tracing the evolution of the legal framework in the specified policy areas, this chapter aims to clarify the structural context within which domestic actors operate. This legal mapping is crucial for assessing the scope and limitations of women's rights in Kazakhstan and for interpreting subsequent findings on institutional practices and the implementation of the CEDAW Committee's concluding observations on a practical level.

1.1 Evolution of women's rights: from international to domestic context

To assess the current legal framework and its responsiveness to CEDAW monitoring, it is necessary to trace how women's rights and gender policy have evolved in Kazakhstan since independence. After obtaining independence in 1991, Kazakhstan has

⁵² Convention on the Elimination of All Forms of Discrimination against Women (adopted 18 December 1979, entered into force 3 September 1981) 1249 UNTS 13 <www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women> accessed 20 July 2025.

consistently demonstrated a commitment to international human rights norms, including women's rights. Kazakhstan acceded to the main UN instruments on gender equality, such as CEDAW in 1998 without reservations, thereby formally accepting comprehensive obligations to eliminate discrimination against women in all spheres of life.⁵³ In 2001, Kazakhstan further confirmed its willingness to be monitored under stronger enforcement mechanisms by ratifying the Optional Protocol to the CEDAW, which allows individual complaints and inquiries in cases of grave or systematic violations.⁵⁴ In addition, Kazakhstan has ratified other international instruments specifically addressing women's rights, including the UN Conventions on the Political Rights of Women and on the Nationality of Married Women,⁵⁵ as well as several ILO conventions, including the Equal Remuneration Convention.⁵⁶ Kazakhstan's broader treaty engagement is also reflected in estimates that the country has joined more than 60 international human rights treaties that affect women's rights.

Beyond the CEDAW Convention, Kazakhstan positions itself as aligned with the broader UN gender equality agenda. Kazakhstan adopted the 1995 Beijing Declaration and Platform for Action and, in its national reviews submitted to the Commission on the Status of Women and UN Women, explicitly presents its gender policy as grounded in the commitments undertaken under both the Beijing framework and CEDAW.⁵⁷ Since 2015 Kazakhstan has also implemented the 2030 Agenda for Sustainable Development, treating Sustainable Development Goal 5 on gender equality as

⁵³ CEDAW (n 52) arts 2–3.

⁵⁴ Office of the United Nations High Commissioner for Human Rights, 'Ratification Status for Kazakhstan: Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women' https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Lang=en&Treaty=CEDAW-OP accessed 13 June 2026.

⁵⁵ Convention on the Political Rights of Women (1953) 193 UNTS 135, United Nations Treaty Collection, Chapter XVI-1 https://treaties.un.org/pages/ViewDetails.aspx?chapter=16&clang=en&mtdsg_no=XVI-1&src=TREATY accessed 13 June 2026.

⁵⁶ Equal Remuneration Convention, 1951 (No 100), International Labour Organization, available at ILO NORMLEX https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C100 accessed 13 June 2026.

⁵⁷ UN Women, 'Kazakhstan: Beijing+25 National Review' (2020) <http://www.unwomen.org/sites/default/files/Headquarters/Attachments/Sections/CSW/64/National-reviews/Kazakhstan_en.pdf> accessed 15 October 2025.

one of its priority goals.⁵⁸ The country submitted its first Voluntary National Review in 2019 and a second in 2022, both of which highlight legal and policy measures to address discrimination and GBV and to increase women's participation in decision-making.⁵⁹

These international commitments have been accompanied by the creation of specialised national institutions and policy frameworks aimed at promoting gender equality and fulfilling relevant commitments. In December 1998, a presidential decree established the National Commission on Women's Affairs, Family and Demographic Policy under the President of Kazakhstan, intended to coordinate state efforts in the field of gender equality and family policy and to serve as the main coordinating body for cooperation with international organisations.⁶⁰ In 1999, a National Action Plan on improving women's status was adopted, which one of the main goals to eradicate stereotypes regarding women's roles.⁶¹

Since then, Kazakhstan has also developed a number of policy documents explicitly framed as implementing its international obligations, including the Law 'On State Guarantees of Equal Rights and Equal Opportunities of Men and Women' of 8 December 2009 and, more recently, the Concept of Family and Gender Policy in the Republic of Kazakhstan until 2030, approved by

⁵⁸ United Nations, 'UN Kazakhstan Annual Results Report' 2021 <<https://kazakhstan.un.org/sites/default/files/2022-04/UN%20Kazakhstan%202021%20Annual%20Result%20Report.pdf>> accessed 15 October 2025; CAREC Program, 'Family and Gender Policies Concepts in the Republic of Kazakhstan' (2022) <www.carecprogram.org/uploads/RGEG_2022_KAZ_Gender_ENG.pdf> accessed 15 October 2025.

⁵⁹ United Nations, 'Voluntary National Review 2022: Kazakhstan' <<https://hlpf.un.org/sites/default/files/vnrs/2022/VNR%202022%20Kazakhstan%20Report%20English.pdf>> accessed 15 October 2025; United Nations, 'Kazakhstan - Voluntary National Review 2022' (United Nations) <<https://hlpf.un.org/countries/kazakhstan/voluntary-national-review-2022>> accessed 15 October 2025; UNDP Kazakhstan, 'Second Voluntary National Review of Kazakhstan Presented at the UN High-Level Political Forum' (UNDP, 15 July 2022) <<http://www.undp.org/kazakhstan/news/second-voluntary-national-review-kazakhstan-presented-un-high-level-political-forum>> accessed 15 October 2025.

⁶⁰ Decree of the President of the Republic of Kazakhstan No 4176 'On the National Commission on Family and Women Affairs under the President of the Republic of Kazakhstan' (22 December 1998) <https://adilet.zan.kz/rus/docs/U980004176> accessed 15 June 2026; Organisation for Economic Co-operation and Development (OECD), 'Gender Equality in Kazakhstan' (OECD 2017) <www.oecd.org/eurasia/competitiveness-programme/central-asia/Gender-equality-Kazakhstan.pdf> accessed 20 October 2025; CAREC Program (n 58).

⁶¹ Venera Khairullayeva and others, 'Gender Policy in Kazakhstan' (2022) 24(1) Journal of International Women's Studies article 25 <<https://vc.bridgew.edu/jiws/vol24/iss1/25>> accessed 20 October 2025.

Presidential Decree No 384⁶² and later revised (including a new edition introduced by Presidential Decree No 853 of 1 April 2022).⁶³ Corresponding with these international frameworks, Kazakhstan adopted the Gender Equality Strategy for 2006–2016, aligning it with key global commitments such as CEDAW, the Beijing Declaration and Platform for Action, and broader development agendas.⁶⁴ During this same period, the country also introduced sector-specific legislation, including the Law on the Prevention of Domestic Violence, which is positioned as part of this wider policy and legal framework.⁶⁵

Since 1991, Kazakhstan has adopted numerous measures to advance women's rights and gender equality. As we can observe from these policy and legal developments, they demonstrate the state's commitment to developing women's rights and international standards. However, to assess how these commitments function at the domestic level, this chapter shifts from international obligations to the domestic legal framework in two key areas: the regulation of GBV and the promotion of women's participation in political and public life.⁶⁶

1.2 Legal framework on GBV: evolution and compliance with CEDAW Committee's Concluding Observations

This section presents and analyses the domestic legal amendments Kazakhstan has introduced to combat GBV since its independence. It also evaluates the extent to which the country has implemented the CEDAW Committee's Concluding Observations related to GBV from 2019 to 2025 at the legal level.

⁶² Law of the Republic of Kazakhstan No 223-IV (8 December 2009) 'On State Guarantees of Equal Rights and Equal Opportunities of Men and Women'; Presidential Decree No 384 (6 December 2016) 'On the Concept of Family and Gender Policy in the Republic of Kazakhstan until 2030' <<https://adilet.zan.kz/eng/docs/U1600000384>> accessed 20 October 2025.

⁶³ Presidential Decree No 384 (n 62); Presidential Decree No 853 (1 April 2022) 'On Amendments to the Concept of Family and Gender Policy in the Republic of Kazakhstan until 2030' <<https://adilet.zan.kz/>> accessed 20 October 2025.

⁶⁴ Khairullayeva and others (n 61).

⁶⁵ *ibid.*

⁶⁶ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (2019) UN Doc CEDAW/C/KAZ/CO/5 <<https://digitallibrary.un.org/record/3840014>> accessed 1 June 2025.

1.2.1 Legal framework in Kazakhstan addressing GBV (1997–2025)

The legal *de jure* foundation in Kazakhstan for regulating GBV was formed mainly through sectoral regulation and package amendments, rather than through a single consolidated ‘end violence against women/girls and GBV’ law (see Appendix A, Table A1). At the constitutional level, this area relies on general guarantees of equality and non-discrimination, whereas GBV is regulated on the basis of criminal law, criminal procedure law, administrative liability and a separate preventive framework on domestic violence.⁶⁷

The initial stage (late 1990s–2000s) can be characterised as the formation of the criminal-law and procedural framework. At this stage, the main legal instruments for countering violent and sexualised crimes were primarily established in the Criminal Code and the Criminal Procedure Code, which define offence categories, investigative procedures and the procedural status of participants in criminal proceedings.⁶⁸

A substantial legal shift occurred in 2009 with the adoption of a specialised preventive framework in the form of the Law ‘On Prevention of Domestic Violence’.⁶⁹ This law established a separate regulatory basis for prevention and protection measures against domestic violence, setting legal definitions and preventive mechanisms, and also defined the responsibilities of authorised bodies within this sphere.⁷⁰ Subsequent changes strengthened this law through targeted legislative amendments⁷¹ (see Appendix A, Table A1).

⁶⁷ Constitution of the Republic of Kazakhstan (adopted 30 August 1995) art 14 <<https://www.akorda.kz/en/constitution-of-the-republic-of-kazakhstan-50912>> accessed 2 November 2025; Criminal Code of the Republic of Kazakhstan No 226-V (3 July 2014) <<https://adilet.zan.kz/eng/docs/K1400000226>> accessed 2 November 2025; Criminal Procedure Code of the Republic of Kazakhstan No 231-V (4 July 2014) <<https://adilet.zan.kz/eng/docs/K1400000231>> accessed 2 November 2025; Code of Administrative Offences of the Republic of Kazakhstan No 235-V (5 July 2014) <<https://adilet.zan.kz/eng/docs/K1400000235>> accessed 2 November 2025.

⁶⁸ *ibid.*

⁶⁹ Law of the Republic of Kazakhstan ‘On Prevention of Domestic Violence’ No 214-IV (4 December 2009) <<https://adilet.zan.kz/eng/docs/Z090000214>> accessed 2 November 2025.

⁷⁰ *ibid.*

⁷¹ Law of the Republic of Kazakhstan No 175-V (18 February 2014), amending the Law of the Republic of Kazakhstan ‘On Prevention of Domestic Violence’ No 214-IV (4 December 2009) <<https://adilet.zan.kz/eng/docs/Z090000214>> accessed 2 November 2025.

The period 2013–2016 is characterised by additional regulation through subordinate legal acts that established the provision of services to those affected. In particular, binding standards for the provision of special social services were adopted through a ministerial order establishing minimum requirements for such services in the relevant sector⁷² (see Appendix A, Table A1).

The period 2017–2023 is characterised by further delineation between criminal and administrative liability for certain acts associated with violence. At this stage, the legal response combined criminal-law provisions and mechanisms of administrative liability, while the Administrative Offences Code retained a significant role in the regulatory design for certain categories of conduct⁷³ (see Appendix A, Table A1).

In 2024, legislative changes were adopted in the form of a package law devoted to ensuring women's rights and children's safety, which introduced further adjustments across several legislative acts.⁷⁴ As a package law, this act introduced changes across several codes and laws, restructuring the legal model of liability and protective measures: in particular, it returned to the criminal-law sphere certain acts previously treated as administrative, that is, it ensured the recriminalisation of battery and intentional infliction of minor bodily harm, while also refining related protective and response measures in adjacent provisions.⁷⁵

⁷² Order of the Minister of Health and Social Development of the Republic of Kazakhstan No 1079 (21 December 2016) 'On Approval of the Standard for the Provision of Special Social Services' <<https://adilet.zan.kz/eng/docs/V1600014701>> accessed 22 March 2026.

⁷³ Criminal Code of the Republic of Kazakhstan No 226-V (n 67); Code of Administrative Offences of the Republic of Kazakhstan No 235-V (n 67).

⁷⁴ Law of the Republic of Kazakhstan No 72-VIII (15 April 2024) 'On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Issues of Ensuring the Rights of Women and the Safety of Children' <<https://adilet.zan.kz/rus/docs/Z2400000072>> accessed 22 December 2025.

⁷⁵ *ibid.*

Finally, the period 2024–2025 reflects an expansion of the legal toolkit beyond domestic violence through thematic laws and the development of criminal legislation. Kazakhstan adopted a separate law on countering human trafficking⁷⁶ and introduced stalking as an independent offence in the Criminal Code.⁷⁷

Overall, the GBV-oriented legal base in Kazakhstan developed as a combination of the preventive domestic-violence law and subsequent legislative and subordinate measures in the criminal, procedural and administrative domains, while later amendments broadened the scope of regulation to related forms of violence and exploitation.

1.2.2 Implementation of the CEDAW Committee Concluding Observations on a legal level 2019–2025: GBV

In its 2019 concluding observations on Kazakhstan’s fifth periodic report, the CEDAW Committee acknowledged that a policy and institutional framework on domestic-violence prevention exists, but emphasised that persistent legal and enforcement gaps continue to undermine effective protection from GBV. The Committee’s concerns included: (i) the 2017 decriminalisation of minor bodily harm and battery, which had been used in practice to address domestic violence; (ii) the continued absence of a consent-based legal definition of rape; (iii) the tendency to treat domestic violence as a ‘private matter’; (iv) the limited effectiveness of eviction orders; (v) police and institutional practices oriented toward reconciliation; and (vi) unequal access to protection and services for women in vulnerable situations, including women living with HIV and transgender women.⁷⁸

Against this baseline, the implementation record for 2019–2025 (see Appendix A, Table A2) shows a pattern of selective compliance: reforms have been more visible where the required changes align with a ‘toughening sanctions’ agenda, whereas

⁷⁶ Law of the Republic of Kazakhstan No 110-VIII (5 July 2024) ‘On Counteracting Trafficking in Persons’ <<https://adilet.zan.kz/eng/docs/Z2400000110>> accessed 22 March 2026.

⁷⁷ Law of the Republic of Kazakhstan No 210-VIII (16 July 2025) ‘On Amendments to Certain Legislative Acts of the Republic of Kazakhstan on Optimizing Criminal Legislation’ (introducing Criminal Code art 115-1 ‘Stalking’) <<https://adilet.zan.kz/eng/docs/K1400000226>> accessed 22 March 2026.

⁷⁸ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 66) para 25(a)–(h).

recommendations requiring a structural and normative shift (consent-based sexual autonomy, intersectional protection and international standard-setting, ratifying ‘Istanbul Convention’⁷⁹) have encountered stronger resistance.⁸⁰ This is most clearly reflected in recommendation 26(a), which links three legal obligations: domestic violence should be specifically criminalised, prosecuted *ex officio*⁸¹ and sanctioned with penalties commensurate with the gravity of abuse.⁸²

As set out in Section 1.2.1, the April–June 2024 legislative package shifted key forms of battery and minor bodily harm from the administrative to the criminal track and increased available sanctions.⁸³ From a compliance perspective, this constitutes the clearest movement toward the sanctions limb of recommendation 26(a). However, the recommendation remains only partially implemented because Kazakhstan still lacks a standalone, context-sensitive domestic violence offence capable of capturing coercive control and patterned partner abuse, while accountability remains dispersed across multiple provisions rather than organised around an integrated violence against women and girls framework.⁸⁴ Consistent with this assessment, in the follow-up procedure the CEDAW Committee reiterated concerns that reconciliation is still prioritised in some domestic-violence cases and that reforms continue to imply treatment of domestic violence as ‘mere administrative offences’, concluding that recommendation 26(c) was only partially implemented.⁸⁵

⁷⁹ Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul, 11 May 2011, CETS No 210) (entered into force 1 August 2014) <https://rm.coe.int/168008482e> accessed 11 June 2026.

⁸⁰ *ibid* para 26(a), (b), (i), (k).

⁸¹ ‘Ex officio’ prosecution means that criminal proceedings can be initiated by competent authorities irrespective of a victim’s complaint/withdrawal; this contrasts with private or private-public prosecution models where initiation typically depends on a complaint.

⁸² Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 66) para 26(a).

⁸³ Law No 72-VIII (n 74); Aida Alzhanova, ‘Analytical Report on the Implementation of International Human Rights Standards in the Legislation of the Republic of Kazakhstan on Domestic Violence’ (Institute of Social Policy 2025).

⁸⁴ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 66) para 26(a).

⁸⁵ Committee on the Elimination of Discrimination against Women, ‘Follow-up to the Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (2022) UN Doc CEDAW/C/KAZ/FCO/5, paras 2–3.

A similar pattern applies to the preventive/protective dimension under recommendation 26(e) (eviction-type measures and perpetrator programmes). Although protection orders exist in law, their practical effectiveness is challenged by enforcement gaps. Recent national data suggest both the scale of reliance on this tool and its vulnerability to non-compliance: over the last four years more than 381,000 protection orders were issued, and approximately one in ten, 38,161, were violated.⁸⁶ This evidence supports the CEDAW Committee's recurrent point that formal legal availability does not in itself guarantee safety, particularly when monitoring, follow-up and coordinated institutional response remain inconsistent; accordingly, the legal-level trajectory is best characterised as partial implementation rather than full compliance.

By contrast, the clearest case of non-implementation remains the CEDAW Committee's demand to revise the rape provision toward a consent-based definition. Recommendation 26(b) requires revision of the rape definition to centre the absence of consent.⁸⁷ In its 2021 follow-up submission, the state argued that rape is 'already based on the lack of consent', since the definition is contained in article 120 of the Criminal Code.⁸⁸ However, the CEDAW Committee rejected this position in 2022, finding that the state had not revised article 120 in line with the recommendation, had taken no action and provided vague and incomplete information; it therefore classified recommendation 26(b) as not implemented and assessed the quality of information as unsatisfactory.⁸⁹

The CEDAW Committee's intersectional bodily-autonomy recommendation 26(i) is likewise assessed as not implemented (see Appendix A, Table A2). The recommendation requires criminalisation and prosecution of forced sterilisation and forced abortion, abolition of mandatory gender reassignment surgery in law and practice, and the elimination of barriers to justice and reparation.⁹⁰ In 2022, the CEDAW Committee again found that the state had taken no action, highlighting the lack of information on

⁸⁶ Alzhanova (n 83).

⁸⁷ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 66) para 26(b).

⁸⁸ Republic of Kazakhstan, 'Information Provided by Kazakhstan on Follow-Up to the Concluding Observations of the Committee on the Elimination of Discrimination against Women' (2021) UN Doc CEDAW/C/KAZ/FCO/5, para 3.

⁸⁹ Committee on the Elimination of Discrimination against Women, 'Follow-up to the Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 85) para 1.

⁹⁰ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 66) para 26(i).

criminalising forced sterilisation/abortion and abolishing mandatory surgery, and again rated the information as vague and incomplete.⁹¹ While Kazakhstan's sixth periodic report provides information on general rules on abortion-related offences and on surgical sterilisation in health legislation, this does not, as framed by the CEDAW Committee, substitute for criminalisation and prosecution of forced practices or for removing medicalised legal barriers affecting transgender persons⁹² (see Appendix A, Table A2).

Finally, international standard-setting remains unfulfilled. The CEDAW Committee recommended accelerating ratification of the Istanbul Convention.⁹³ Kazakhstan's 2025 replies to the list of issues confirm that ratification had not occurred and that the state remained at a 'preparation' stage, including a formal request to extend the period for accession⁹⁴ (see Appendix A, Table A2).

Kazakhstan's legal-level implementation of CEDAW Concluding Observations for 2019–2025 is considered as fragmented (see Appendix A, Table A2): recommendations focused on sanctions and certain protective tools (26(a), 26(c), 26(e), 26(f)) are best classified as partially implemented, while the consent-based rape definition (26(b)), the intersectional bodily-autonomy cluster (26(i)) and Istanbul Convention ratification (26(k)) remain not implemented. In total, out of the seven recommendations assessed (see Appendix A, Table A2), four are partially implemented and three are not implemented; none can be classified as fully implemented at the legal level during the reporting cycle. The CEDAW Committee's own follow-up assessment reinforces this categorisation by explicitly rating 26(b) as not implemented and 26(c) as partially implemented, while also maintaining a strict assessment of 26(i) as not implemented.⁹⁵

⁹¹ Committee on the Elimination of Discrimination against Women, 'Follow-up to the Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 85) paras 2–3.

⁹² Republic of Kazakhstan, 'Sixth Periodic Report Submitted by Kazakhstan Under Article 18 of the Convention, Due in 2023' (2024) UN Doc CEDAW/C/KAZ/6; Code of the Republic of Kazakhstan No 360-VI (7 July 2020) 'On Public Health and Healthcare System', art 151 <<https://adilet.zan.kz/eng/docs/K2000000360>> accessed 23 March 2026; Criminal Code of the Republic of Kazakhstan No 226-V (n 67) art 319.

⁹³ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 66) para 26(k).

⁹⁴ Committee on the Elimination of Discrimination against Women, 'Replies of Kazakhstan to the List of Issues and Questions in Relation to its Sixth Periodic Report' (2025) UN Doc CEDAW/C/KAZ/RQ/6, para 23(d).

⁹⁵ Committee on the Elimination of Discrimination against Women, 'Follow-up to the Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 85) paras 1–3.

1.3 Analysis of legal framework in Kazakhstan and assessing the extent of implementation of CEDAW Committee's Concluding Observations: participation in political and public life

This section presents and analyses the domestic legal amendments regarding women's participation in political and public life since independence. It also evaluates the extent to which the country has implemented the CEDAW Committee's Concluding observations in this area from 2019 to 2025 at the legal level.

1.3.1 Legal framework in Kazakhstan: participation in political and public life (1997–2025)

Kazakhstan's legal-level approach to women's participation in political and public life has evolved through a layered sequence of constitutional guarantees, international human-rights commitments, institutional gender machinery and later electoral/party-law packages, rather than through a single comprehensive statute on women's political participation (see Appendix A, Table A3). Kazakhstan's framework for participation in political and public life is grounded in constitutional rights and later developed through electoral and party regulation. The 1995 Constitution establishes the general right to participate in state affairs most directly through the rights to vote and to stand for election and affirms equality and non-discrimination, providing the domestic legal basis for subsequent measures aimed at equal participation for men and women.⁹⁶

The first phase 1995–2001 can be described as rights formalisation and external standard-setting. At the national level, constitutional guarantees enshrined participation and equality as enforceable rights;⁹⁷ internationally, accession to CEDAW in 1998 positioned Kazakhstan within a treaty framework that treats equal participation in political and public life as a core obligation. Ratification of the Optional Protocol to CEDAW in 2001 then strengthened the accountability environment by enabling individual communications to the UN Committee in cases of alleged rights

⁹⁶ Constitution of the Republic of Kazakhstan (n 67) arts 14 and 33.

⁹⁷ *ibid.*

violations.⁹⁸ In analytical terms, this phase created a normative and accountability baseline: participation rights were recognised, and the state accepted external scrutiny, but this did not yet translate into binding internal rules that would structurally increase women's representation.

The period 1998–2016 is characterised by the adoption of policy instruments and equality guarantees without the introduction of electoral nomination mechanisms. During this time, the state established a national gender policy coordination body and adopted the Gender Equality Strategy 2006–2016, which set a quantitative target of 30% women in decision-making positions.⁹⁹ The 2009 Law on State Guarantees of Equal Rights and Equal Opportunities further codified equality principles and linked them to rights in public service and electoral participation.¹⁰⁰

One important legal shift occurred in 2020, when amendments to the electoral and party laws introduced a mandatory requirement for a 30% quota for party lists (originally formulated as a general quota for women and youth) and required compliance with the requirements for list formation and registration procedures.¹⁰¹ This marked the transition from political goals to feasible procedural obligations under the electoral law. In parallel, the 2020 Law on Peaceful Assemblies revised the legal conditions for exercising the right to peaceful assembly, which constitutes a legally recognised form of participation in public life beyond elections.¹⁰²

⁹⁸ Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (adopted 6 October 1999, entered into force 22 December 2000) 2131 UNTS 83; United Nations, 'Status of Ratification: Optional Protocol to CEDAW' (*UN Treaty Body Database*) <https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Treaty=CEDAW-OP&Lang=en> accessed 23 March 2026.

⁹⁹ Decree of the President of the Republic of Kazakhstan No 4153 (22 December 1998) 'On the National Commission on Women's Affairs, Family and Demographic Policy under the President of the Republic of Kazakhstan'; CAREC Program(n 58).

¹⁰⁰ Law of the Republic of Kazakhstan No 223-IV (n 62).

¹⁰¹ Constitutional Law of the Republic of Kazakhstan No 335-VI (25 May 2020) 'On Amendments and Additions to the Constitutional Law of the Republic of Kazakhstan "On Elections in the Republic of Kazakhstan"'; Law of the Republic of Kazakhstan No 336-VI (25 May 2020) 'On Amendments and Additions to the Law of the Republic of Kazakhstan "On Political Parties"' <<https://adilet.zan.kz/eng/docs/Z0200000344>> accessed 23 March 2026.

¹⁰² Law of the Republic of Kazakhstan No 333-VI (25 May 2020) 'On the Procedure for Organizing and Holding Peaceful Assemblies in the Republic of Kazakhstan' <<https://adilet.zan.kz/eng/docs/Z2000000333>> accessed 23 March 2026.

The period 2021–2023 included legislative refinement of 30% quota compliance mechanisms, expansion of the quota logic beyond the registration of lists to the stages that affect the distribution of mandates and the composition of elected bodies.¹⁰³ During the same reform cycle, the quota was reformulated as a cumulative requirement applicable to women, youth and persons with disabilities (PWD).¹⁰⁴

Finally, the post-2023 measures include the adoption of a Government Action Plan for 2024–2027 to implement the Concept of Family and Gender Policy until 2030.¹⁰⁵ As a subordinate normative instrument, the Action Plan specifies responsible agencies, timelines and performance indicators for participation-related measures. While it does not amend electoral nomination rules, it provides an administrative-legal framework for implementing the previously adopted policy objectives.¹⁰⁶

Kazakhstan's legal system in political and public life has been strengthened over time, moving from general constitutional rights and international obligations to more specific and feasible mechanisms for regulating elections and parties. The most significant *de jure* change is the introduction of quotas and related further amendments in 2020–2023.

¹⁰³ Constitutional Law of the Republic of Kazakhstan 'On Elections in the Republic of Kazakhstan' (adopted 28 September 1995, as amended by Law No 335-VI (2020), Law No 41-VII (2021) and Law No 105-VII (2022)) <<https://adilet.zan.kz/eng/docs/Z950002464>> accessed 23 March 2026.

¹⁰⁴ *ibid*; Law of the Republic of Kazakhstan 'On Political Parties' (as amended) <https://adilet.zan.kz/eng/docs/Z020000344_compare/kaz> accessed 23 March 2026.

¹⁰⁵ Resolution of the Government of the Republic of Kazakhstan No 759 (18 September 2024) 'On Approval of the Action Plan for 2024–2027 to Implement the Concept of Family and Gender Policy in the Republic of Kazakhstan until 2030' <<https://adilet.zan.kz/rus/docs/P2400000759>> accessed 23 March 2026; Presidential Decree No 384 (n 62).

¹⁰⁶ *ibid*.

1.3.2 Implementation of the CEDAW Committee Concluding Observations on a legal level 2019–2025: participation in political and public life

In its concluding observations on Kazakhstan's fifth periodic report, the CEDAW Committee highlights some progress, specifically an increase in the representation of women in the judiciary, at various levels of the executive branch, as well as in political parties. However, the Committee stresses that the changes achieved remain fragmented and have not yet led to sustainable equality in decision-making.

A major concern is the decision to postpone achieving the target of 30% of women in leadership positions until 2030. The CEDAW Committee points out that this deadline is inconsistent with the previous strategy, which envisaged achieving this goal by 2016, as well as the ambitions of the Sustainable Development Goals, focused on equal representation. In the CEDAW Committee's opinion, such a postponement could weaken the dynamics of change and undermine the effectiveness of the target itself.

In addition, there remains a significant underrepresentation of women in key sectors and high-level positions, in particular at the ministerial level, in the diplomatic service, in the armed forces and in local government. A similar situation is observed in the Senate and among the heads of local representative bodies (*maslikhats*). Thus, despite the presence of women in the political space, their participation in key decision-making and in the centres of power is still limited.

This is also related to the position of women in political parties: their participation in the leadership structures of the parties, where decisions are made on nominating candidates and allocating resources for campaigns, remains insufficient. The CEDAW Committee also draws attention to the lack of disaggregated data on women's political participation (based on age, ethnicity and region), which makes it difficult to monitor progress and take targeted measures in the most vulnerable areas.

Finally, an important structural obstacle remains the persistence of discriminatory gender stereotypes that continue to limit women's participation in political and public life. Collectively, these issues form the basis for a subsequent legal analysis aimed at assessing the potential of the current regulatory framework to accelerate women's access to decision-making mechanisms and

eliminate remaining imbalances. In this regard, the CEDAW Committee issued six specific recommendations and also recalls its previous recommendation.¹⁰⁷ Only the legal-level recommendations are considered and analysed in this chapter.¹⁰⁸

This subsection assesses, at the *de jure* level, the legislative and policy measures adopted in 2019–2025 in response to CEDAW Committee recommendations on women’s participation in political and public life,¹⁰⁹ and in particular, the introduction of 50% quotas and incentives for political parties – with legislative and policy measures taken by the state party during the reporting period. The analysis finds partial legal implementation: while several binding legislative and policy instruments were adopted, the measures do not fully correspond to the specific quantitative and institutional elements contained in the CEDAW Committee Concluding Observations 2019.

The CEDAW Committee explicitly recommended revising the Concept of Family and Gender Policy with a view to establishing 50% quotas for women’s representation in all spheres of life. However, the national policy instruments adopted and referenced by the state party maintain a lower quantitative benchmark than parity.

The main strategic document, the Concept of Family and Gender Policy until 2030, was revised, and, in particular, Presidential Decree No 853 (1 April 2022) set out the Concept in a new edition, retained a policy target of 30% for women’s representation at decision-making levels within the state apparatus and the quasi-public sector by 2030, instead of adopting the recommended parity goal.¹¹⁰ This target is further operationalised by Government Decree No 759 (18 September 2024), approving an implementation plan of 46 measures aimed at achieving exactly this lower indicator.¹¹¹

¹⁰⁷ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Combined Third and Fourth Periodic Reports of Kazakhstan’ (2014) UN Doc CEDAW/C/KAZ/CO/3-4, para 23 <<https://adilet.zan.kz/eng/docs/O1400000001>> accessed 23 March 2026.

¹⁰⁸ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 66) paras 30/23.

¹⁰⁹ *ibid* para 30.

¹¹⁰ Presidential Decree No 853 (n 63).

¹¹¹ Resolution of the Government of the Republic of Kazakhstan No 759 (n 105).

From a legal perspective, maintaining the 30% figure represents a *de jure* discrepancy with the Committee's specific quantitative recommendation. Although the government argues this is a 'step-by-step' approach to equality, the legislative fixation of the 30% target until 2030 actually postpones the legal pursuit of parity for another decade. Consequently, this recommendation is assessed as partially implemented: the state has integrated quota goals into mandatory national legislation, but rejected the substantive standard 50% necessary to eliminate systemic barriers to women's leadership.

The state party's response to the recommendation on the introduction of incentives for political parties was characterised by the adoption of mandatory legal requirements instead of incentive measures.¹¹² In the period from 2020 to 2023, Kazakhstan adopted a number of amendments to the Constitutional Law 'On Elections' and the Law 'On Political Parties', which fundamentally changed the electoral landscape. The introduction of quotas began with Law No 335-VI (2020), which made it mandatory to comply with a 30% quota on party lists. Subsequently, this rule was strengthened by Law No 41-VII (2021), which extended the quota for the distribution of parliamentary mandates, preventing parties from placing women at the end of the lists. Finally, Law No 105-VII (2022) expanded the quota categories to include PWD.¹¹³

Despite these procedural improvements, the legislation established a combined quota for 'women, youth and PWD' rather than a special gender quota. This 'mixed category' approach creates a legal loophole that undermines the purpose of the recommendation. According to the current legislation (Law No 157-VII), a political party can technically fulfil the obligation of a 30% quota by nominating predominantly young men or men with disabilities, thereby marginalising female candidates, while remaining in full compliance with the law.¹¹⁴

¹¹² Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 66) para 30(b).

¹¹³ Constitutional Law of the Republic of Kazakhstan 'On Elections in the Republic of Kazakhstan' (n 103).

¹¹⁴ Law of the Republic of Kazakhstan No 157-VII (5 November 2022) 'On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan' <<https://adilet.zan.kz/rus/docs/Z22000000157>> accessed 25 March 2026.

This legislative design reflects the rejection of prioritising gender as a separate category of underrepresentation. As a result, the practical impact of these laws turned out to be limited: according to the results of the 2023 elections, women made up only 18.37% of deputies of the *Mazhilis* and 21.02% in local *maslikhats* figures that significantly fall short even of the 30% target set by the state.

The most important component of the CEDAW Committee's recommendation on the introduction of incentives for parties to promote women to leadership positions and governing bodies within party structures remains virtually unregulated in the legal field.

A review of the adopted laws No 335-VI, No 336-VI and No 41-VII shows that the reforms focused exclusively on the external representation of parties (electoral lists), and not on their internal democratic structures.¹¹⁵ There are no legislative norms requiring gender balance in central committees, political bureaus or executive bodies of political parties. The state report notes that women make up about 30% of party members, but does not provide any legal instruments to encourage their promotion to the party leadership.

Moreover, the government did not introduce financial incentives (for example, state funding linked to gender balance), which was implied by the recommendation. Instead, the focus remained on punitive measures (denial of registration) for electoral lists. Regulation of online campaigning ensures transparency of tariff formation, but does not constitute a positive measure to increase the visibility of women candidates.¹¹⁶

In summary, the legal implementation of the recommendations on political participation is assessed as partially implemented. The state has successfully created a mandatory legal infrastructure for quotas, moving from voluntary measures to mandatory legislative requirements.¹¹⁷ However, the refusal to fix the

¹¹⁵ Constitutional Law No 335-VI (n 101); Law No 336-VI (n 101); Constitutional Law of the Republic of Kazakhstan No 41-VII (24 May 2021) 'On Amendments and Additions to the Constitutional Law of the Republic of Kazakhstan "On Elections in the Republic of Kazakhstan"' <<https://adilet.zan.kz/rus/docs/Z2100000041>> accessed 25 March 2026.

¹¹⁶ Constitutional Law of the Republic of Kazakhstan No 156-VII (5 November 2022) 'On Amendments and Additions to the Constitutional Law of the Republic of Kazakhstan "On Elections in the Republic of Kazakhstan"' <<https://adilet.zan.kz/rus/docs/Z2200000156>> accessed 25 March 2026.

¹¹⁷ Constitutional Law No 335-VI (n 101); Constitutional Law No 41-VII (n 115).

target of parity 50% in the Concept of Family and Gender Policy and the dilution of electoral quotas through the ‘mixed category’ mechanism hinder the full realisation of women’s political rights. The legal framework continues to regulate access to the ballot, but stops short of regulating the power structures within political parties necessary to achieve *de facto* equality.¹¹⁸

2. Analysis of institutional and practical level of implementation CEDAW Committee Concluding Observations on Kazakhstan 2019–2025: GBV and participation in political and public life

This chapter assesses Kazakhstan's implementation of the CEDAW Committee's 2019 recommendations at two levels: institutional and practical *de facto*. The institutional-level assessment examines whether the institutional framework is in place (mandates, coordination/SOPs, reporting and case-tracking channels, service infrastructure, training and oversight). The practical-level assessment examines how these mechanisms operate in real practice, drawing on official materials, expert interviews (INT1–INT7)¹¹⁹ and shadow/alternative reports.¹²⁰

¹¹⁹ Interview with Aida Alzhanova (INT1), international gender expert (December 2025); Interview with Gulzada Serzhan (INT2), lesbian feminist activist from Almaty, Kazakhstan (December 2025); Interview with anonymous respondent (INT4), women's rights activist (December 2025); Interview with anonymous respondent (INT5), representative of an international organisation in Kazakhstan (December 2025); Interview with anonymous respondent (INT6), practising legal professional (December 2025); Interview with anonymous respondent (INT7), practising legal professional (December 2025).

¹²⁰ Kazakhstan Feminist Initiative 'Feminita', 'List of Issues and Issues Prior to Reporting of Kazakhstan for CEDAW's 93rd Pre-Session and the CEDAW's 91st Session of the Pre-sessional Working Group' (submission to the UN Committee on the Elimination of Discrimination against Women, May 2025); Eurasian Harm Reduction Association (EHRA) and others, 'Review of Kazakhstan under the Convention on the Elimination of All Forms of Discrimination against Women: Shadow Report Ahead of the List of Issues' (submission to the UN Committee on the Elimination of Discrimination against Women, 23 May 2025); Equality Now and others, 'Information on Kazakhstan for Consideration by the Committee on the Elimination of Discrimination against Women at Its Pre-Sessional Working Group' (submission to the UN Committee on the Elimination of Discrimination against Women, 23 May 2025); Eurasian Women's Network on AIDS and others, 'Shadow Report on Violence and Discrimination against Women Living with HIV in Kazakhstan' (submission to the UN Committee on the Elimination of Discrimination against Women, 2025); Coalition of women-led organisations, 'Shadow Report on Kazakhstan' (submission to the UN Committee on the Elimination of Discrimination against Women, 2025).

2.1 Institutional-level assessment: GBV

The institutional implementation of the CEDAW Committee's recommendations on GBV in Kazakhstan shows notable capacity building particularly through expanded reporting channels, protection-related instruments and a growing service infrastructure but with uneven operationalisation across regions and institutions¹²¹ (see Appendix B, Table B1). While multiple actors are formally involved (law enforcement, social services, crisis centres, hotlines, health and education institutions), expert evidence and alternative reports points to fragmented coordination and limited standardisation of interagency procedures, especially outside major urban centres.¹²² Accordingly, institutional reforms are often visible and measurable (new units, platforms, protocols and growth in service statistics), yet their institutional effectiveness remains conditioned by frontline discretion, interagency coordination and the availability of victim-centred services across localities.¹²³

Reporting channels and registration (CEDAW Committee 2019, paragraph 26(d))

At the institutional level, Kazakhstan's response to recommendation 26(d) can be described as an expansion of formal 'entry points' for complaints and case registration, primarily through digital and low-threshold channels (for example, eOtinish and hotlines/urgent contact channels) (see Appendix B, Table B1).¹²⁴ In official reporting, this expansion is presented as a sign of greater 'trust' and reduced barriers to reporting (see Appendix B, Table B1).¹²⁵ The key institutional issue, however, is not the number of channels but whether complaints are converted into predictable

¹²¹ Commissioner for Human Rights of the Republic of Kazakhstan, 'Report on the Activities of the Human Rights Commissioner in the Republic of Kazakhstan in 2024' (25 March 2026; Bur Astana 2025) <<http://www.gov.kz/memleket/entities/ombudsman/documents/details/825810?lang=en>> accessed 25 March 2026. National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan, 'Gender Statistics' (2024) <<https://gender.stat.gov.kz/page/frontend/detail?id=94&slug=-79&catid=4&lang=ru>> accessed 25 March 2026.

¹²² Interview with anonymous respondent (INT5) (n 119); Aida Alzhanova, 'Analytical Report on the Implementation of International Human Rights Standards in the Legislation of the Republic of Kazakhstan on Domestic Violence' (Institute of Social Policy 2025).

¹²³ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT5) (n 119); Alzhanova (n 122).

¹²⁴ Commissioner for Human Rights (n 121) 15.

¹²⁵ *ibid.*

administrative action. If the institutions responsible for follow-up action retain wide discretion or remain oriented toward reconciliation, more channels can increase visibility without a comparable increase in protection.¹²⁶ Institutional responsiveness improves when a report is translated into verifiable procedural duties: mandatory registration, review deadlines and oversight triggers, rather than remaining within a ‘private conflict’ frame.¹²⁷ The absence of unified interagency SOPs/algorithms further aggravates this problem, when police, social services and medical institutions follow different protocols, case trajectories become inconsistent across regions and agencies, which reduces the predictability of protection.¹²⁸ Therefore, institutional effectiveness depends less on access to reporting itself than on whether the system standardises the pathway from ‘complaint to action’ across localities.¹²⁹

Protection measures and perpetrator programmes (CEDAW Committee 2019, paragraph 26(e))

Official data emphasise the routine use of protection orders and related judicial restrictions, whereas eviction and behavioural change programmes are less institutionalised as default tools for physical separation and risk reduction¹³⁰ (see Appendix B, Table B1). Institutionally, this suggests that the system is stronger in formalising decisions than in providing the implementation infrastructure and stable interagency coordination needed for separation and rehabilitation at scale. This reflects a broader ‘system’ problem: in the absence of a single coordinating centre and unified SOPs among key implementers, measures that require follow-up and resources are adopted less consistently and become less routinised, especially outside major cities.¹³¹ The fact that psychocorrection and reintegration are simultaneously framed as priorities ‘for the future’ supports the interpretation that perpetrator programmes remain peripheral rather than system-wide¹³² (see Appendix B, Table B1). Interview evidence aligns with this reading by linking uneven uptake of ‘stronger’ measures to variation in institutional readiness and capacity across localities.¹³³

¹²⁶ Alzhanova (n 122); Interview with anonymous respondent (INT5) (n 119).

¹²⁷ Interview with anonymous respondent (INT4) (n 119).

¹²⁸ Alzhanova (n 122); Interview with anonymous respondent (INT5) (n 119).

¹²⁹ Interview with anonymous respondent (INT5) (n 119).

¹³⁰ Commissioner for Human Rights (n 121).

¹³¹ Alzhanova (n 122); Interview with anonymous respondent (INT5) (n 119).

¹³² Commissioner for Human Rights (n 121).

¹³³ Interview with anonymous respondent (INT5) (n 119).

Police accountability and oversight mechanisms (CEDAW Committee 2019, paragraph 26(f))

Regarding recommendation 26(f), the accountability architecture formally includes tools that could limit discretion at the frontline (digital traceability of complaints, specialised units and monitoring instruments) (see Appendix B, Table B1). Expert assessments, however, indicate that formal safeguards do not always prevent institutional passivity, especially where ‘reconciliation’ practices and informal norms continue to shape responses.¹³⁴ The main institutional question is therefore not whether control tools exist, but whether they can change everyday routines. If a complaint is not registered or is not turned into a formally trackable procedure, oversight mechanisms do not effectively ‘activate’, and cases can be informally closed through non-formal settlement.¹³⁵ By contrast, accountability becomes operational when GBV cases are treated as compliance objects: they are registered, deadlines apply, follow-up steps are documented and deviations (refusal to accept a complaint, delays, pressure to reconcile) become verifiable breaches.¹³⁶ In other words, the key divide is between a ‘family matter’ frame that allows administrative compromise and a procedural frame in which responsibility is documentable and subject to oversight.¹³⁷

Service infrastructure, sustainability and territorial access (CEDAW Committee 2019, paragraph 26(g))

Institutional implementation of recommendation 26(g) is constrained not so much by formal recognition of services in law and reporting, but by the design and sustainability of the service model and its territorial distribution. Official documents emphasise expansion and funding, yet expert assessment shows that access to shelters and crisis services remains much more difficult outside major cities, while financing is unstable – undermining equal protection across regions (see Appendix B, Table B1).¹³⁸ A key mechanism producing instability is the state social procurement model: short-term contracts (often one year) and performance logic focused on quantitative outputs rather than long-term rehabilitation reduce service continuity, staff stability and

¹³⁴ Alzhanova (n 122).

¹³⁵ Interview with anonymous respondent (INT5) (n 119).

¹³⁶ *ibid.*

¹³⁷ *ibid.*

¹³⁸ Commissioner for Human Rights (n 121) 6, 18; Alzhanova (n 122).

planning capacity in crisis centres.¹³⁹ As a result, a predictable gap emerges between the ‘existence of infrastructure’ and the real availability of assistance, reproducing regional inequality and weakening the universality of protection required by CEDAW.¹⁴⁰

Training, survivor-centred standards and independent monitoring (CEDAW Committee 2019, paragraphs 26(h) and 26(j))

Institutional implementation of Recommendations 26(h) and 26(j) remains partial because expansion of training and oversight often takes the form of output metrics (training coverage and the presence of monitoring tools) without ensuring consistent survivor-centred practice or enforceable corrective change (see Appendix B, Table B1).¹⁴¹ Official narratives stress prevention, risk identification and alignment with international standards¹⁴² (see Appendix B, Table B1), whereas expert assessment points to irregular and project-based training, leaving competence uneven across institutions and regions.¹⁴³ The deficit is not only quantitative but also substantive: protocols sensitive to the needs of women with disabilities and women living with HIV are not consistently embedded, and limited system-wide survivor-centred training for police and medical workers reproduces risks of victim blaming, coercive or invasive procedures and secondary victimisation.¹⁴⁴ Interviews confirm that the lack of mandatory standards and unified procedures makes the quality of response dependent on the specific institution and staff, especially in rural areas.¹⁴⁵ A similar logic applies to monitoring: formal tools (video surveillance and preventive visits) expand procedural oversight, but a protective effect appears only when recommendations lead to enforceable change adjustments in practice, accountability consequences and resource decisions rather than remaining compliant ‘on paper’¹⁴⁶ (see Appendix B, Table B1).

Vulnerable groups, non-discriminatory access and the state-civil society interface

¹³⁹ Alzhanova (n 122).

¹⁴⁰ *ibid*; Commissioner for Human Rights (n 121); Interview with anonymous respondent (INT5) (n 119).

¹⁴¹ Alzhanova (n 122).

¹⁴² Commissioner for Human Rights (n 121) 18–19.

¹⁴³ Alzhanova (n 122).

¹⁴⁴ Equality Now and others (n 120).

¹⁴⁵ Interview with anonymous respondent (INT5) (n 119).

¹⁴⁶ *ibid*.

Within the official frame, the state presents service expansion and universal access to protective and support measures as core elements of its response¹⁴⁷ (see Appendix B, Table B1). A cross-cutting institutional weakness, however, is the selective accessibility of protection for women facing intersecting vulnerabilities, which conflicts with CEDAW's non-discrimination logic. Service institutions are often not adapted to women with disabilities (lack of physical accessibility) and may exclude women living with HIV or women with dependencies through internal rules and refusal practices, leaving them without protection in situations of acute risk.¹⁴⁸ At the level of planning and monitoring, the absence of specific indicators for key groups (for example, women who use drugs and sex workers) renders their risks institutionally 'invisible' within implementation and reporting cycles, weakening monitoring where barriers are greatest.¹⁴⁹ Moreover, institutional harm can be reproduced by state structures themselves: health-care and police institutions may become sources of violence or coercion, while lack of confidentiality for women living with HIV and for lesbian, bisexual, queer and transgender women (LBQT women) creates a risk of disclosure when seeking protection, thereby discouraging access to justice.¹⁵⁰ Finally, trends of shrinking civic space including 'foreign funding registries' and refusals to authorise peaceful assemblies such as women's marches undermine the institutional bridge between the state and civil society and weaken channels through which vulnerable groups and NGOs can signal implementation gaps and demand accountability.¹⁵¹

Overall, institutional implementation of the CEDAW recommendations on GBV remains partial: despite expanded reporting channels and a wider set of response instruments, the system remains fragmented due to the lack of unified SOPs and stable

¹⁴⁷ Commissioner for Human Rights (n 121).

¹⁴⁸ Equality Now and others (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120).

¹⁴⁹ Coalition of women-led organisations (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120).

¹⁵⁰ Coalition of women-led organisations (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

¹⁵¹ Eurasian Harm Reduction Association (EHRA) and others (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

interagency coordination, an unstable service funding model and insufficient standardisation of survivor-centred practice, which disproportionately deepens inequality of access for vulnerable groups.¹⁵²

2.2 Institutional-level assessment: participation in political and public life

At the institutional level, the implementation of the CEDAW recommendations on women's participation in political and public life can be assessed by whether a functioning 'implementation architecture': mandates and targets, procedures and enforcement, coordination mechanisms, resource provision and capacity-building, and monitoring. Across 2019–2025, Kazakhstan expanded an infrastructure regarding women's participation in political and public life through quotas, commissions, action plans, training programmes and statistical and analytical systems. (see Appendix B, Table B2). Yet, when considered together, the design reveals an implementation asymmetry: formal mechanisms have expanded faster than enforcement and accountability instruments capable of translating formal mechanisms into measurable outcomes.

Target-setting and policy mandates (CEDAW Committee 2019, paragraph 23(a))

CEDAW positions parity 50% as the benchmark for women's equal participation in elected and appointed decision-making bodies.¹⁵³ Kazakhstan's policy framework includes measurable indicators and institutionalised monitoring and reporting, including a Government Action Plan with 46 measures adopted in 2024 to operationalise the Concept of Family and Gender Policy until 2030.¹⁵⁴ Coordination arrangements also formalise civil-society involvement: representatives of human-rights NGOs

¹⁵² Alzhanova (n 122); Interview with anonymous respondent (INT5) (n 119); Equality Now and others (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120); Coalition of women-led organisations (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

¹⁵³ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (2019) UN Doc CEDAW/C/KAZ/CO/5, para 23(a) <<https://digitallibrary.un.org/record/3840014>> accessed 1 June 2025.

¹⁵⁴ Republic of Kazakhstan, 'Sixth Periodic Report Submitted by Kazakhstan Under Article 18 of the Convention, Due in 2023' (2024) UN Doc CEDAW/C/KAZ/6, para 4(b) <<https://digitallibrary.un.org/record/4071031>> accessed 1 June 2025.

participate in the National Commission on Women's Affairs and in evaluations of state obligations.¹⁵⁵ The core mandate-level gap, however, lies in the target parameter itself: official documents frame the strategic goal as 30% women's participation in decision-making by 2030 rather than parity.¹⁵⁶ The CEDAW Committee previously raised concerns about postponing even the 30% benchmark and noted inconsistency with the parity logic of Sustainable Development Goal target 5.5.¹⁵⁷ Institutionally, this creates a restrictive effect, and monitoring procedures can function well, but it tracks progress toward the state's 30% target rather than the 50% parity benchmark.

Quota design and electoral enforcement (CEDAW Committee 2019, paragraph 23(b))

Institutional implementation under recommendation (b) is most visible in electoral-cycle procedures and compliance oversight. Legal amendments introduced a minimum 30% presence of women and youth on party lists, and later reserved 30% of parliamentary seats for PWD, women and youth, with compliance supervised by the Central Election Commission.¹⁵⁸ Expert interview confirms nonetheless points to a structural bottleneck in this design, quotas can operate primarily as requirements for list composition rather than as guarantees of final representation, while the mixed quota model (women/youth/PWD) may dilute gender-equality prioritisation even when publicly framed as a women's quota.¹⁵⁹ A related institutional vulnerability concerns intra-party ranking practices, where formal list compliance with list requirements can coexist with the placement of women in non-outcome-oriented positions in the absence of binding internal rules and enforceable placement safeguards.¹⁶⁰

¹⁵⁵ Committee on the Elimination of Discrimination against Women, 'Replies of Kazakhstan to the List of Issues and Questions in Relation to its Sixth Periodic Report' (2025) UN Doc CEDAW/C/KAZ/RQ/6, para 4(d).

¹⁵⁶ *ibid* para 10(a).

¹⁵⁷ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (2019) UN Doc CEDAW/C/KAZ/CO/5, para 22(c) <<https://digitallibrary.un.org/record/3840014?v=pdf>> accessed 1 July 2025.

¹⁵⁸ Committee on the Elimination of Discrimination against Women, 'Replies of Kazakhstan to the List of Issues and Questions in Relation to its Sixth Periodic Report' (n 155) para 10(a).

¹⁵⁹ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT5) (n 119); Interview with anonymous respondent (INT6) (n 119).

¹⁶⁰ Interview with anonymous respondent (INT4) (n 119); Alzhanova (n 122).

Beyond formal entry rules, informal party ‘rules-in-use’ shape access to financing, support networks and agenda-setting. Interview evidence describes structural barriers to resources and real influence even after formal requirements are met.¹⁶¹ Weak institutionalisation of intra-party gender policy further sustains a gap between ‘entry’ (quota/visibility) and ‘advancement’ (access to decision-making). Expert assessments suggest that most parties lack stable internal gender-equality strategies; limited exceptions (such as the women’s wing of Amanat) are often described as symbolic and not associated with changes in internal power distribution.¹⁶² In institutional terms, parties remain key gatekeepers: without internal rules that structure promotion, access to resources and placement in winnable positions, quotas can coexist with persistent male dominance in party decision centres.¹⁶³

Capacity-building and leadership pipelines (CEDAW Committee 2019, paragraph 23(c))

Recommendation 23(c) calls for building women’s political skills so that formal rules translate into competitive participation. Between 2019 and 2025, Kazakhstan expanded institutional channels for leadership training via both state institutions and civil society. The sixth periodic report describes a national network of women’s leadership schools involving nearly 70 NGOs and clubs for women politicians operating in all 17 regions.¹⁶⁴ The Academy of Public Administration reports gender-equality training for civil servants, exceeding 1,200 trainees across 2020–2022.¹⁶⁵ The state also references capacity-building under the ‘Tomiris’ programme, including training more than 50 trainers in 2022 and continuing activities in 2023.¹⁶⁶ At the same time, experts frame a consolidation problem, many initiatives rely on project cycles and external support, and a coherent national policy that systematises

¹⁶¹ Interview with anonymous respondent (INT4) (n 119).

¹⁶² Alzhanova (n 122).

¹⁶³ Kazakhstan Feminist Initiative ‘Feminita’ (n 120); Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT3), representative of an international organisation in Kazakhstan (December 2025).

¹⁶⁴ Republic of Kazakhstan, ‘Sixth Periodic Report’ (n 154) art 3.

¹⁶⁵ *ibid.*

¹⁶⁶ *ibid.*

advancement across levels and evaluates impact beyond activity indicators is described as insufficiently consolidated. Institutionally, the core limitation is the absence of a consolidated national advancement framework with impact evaluation beyond activity indicators.¹⁶⁷

Data, research infrastructure and monitoring capacity (CEDAW Committee 2019, paragraph 23(d))

Recommendation 23(d) concerns systematic collection of disaggregated data. Kazakhstan emphasises a statistical infrastructure: the Bureau of National Statistics publishes the annual compendium 'Women and Men in Kazakhstan' and maintains a dedicated 'Gender statistics' section on its website.¹⁶⁸ The state also reports expanded analytical tools, including a 2022 project focusing on 'the impact of ethnicity, region and class' through a 'Gender-specific needs and requirements map'.¹⁶⁹ A strong institutional marker is the formalisation of research support through a Consortium under the National Commission, uniting 15 research institutes to conduct gender audits and analytics, alongside the introduction of a Gender Equality Certification Programme.¹⁷⁰ However, expert assessments point to limits in monitoring usability, data are often insufficiently disaggregated (eg, by age, ethnicity, disability and decision-making level), fragmented across agencies and not consolidated into a single accessible public system, limiting transparency, comparability and evidence-based oversight.¹⁷¹ These limitations also contribute to 'blind spots' in monitoring women's participation across intersecting vulnerabilities.¹⁷²

Regional disparities and local coordination (CEDAW Committee 2019, paragraph 23(e))

¹⁶⁷ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT5) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119); AT Serikzhanova and others, 'Women's Political Participation in Kazakhstan: Regional Aspects' (2024) 27(3) *Russia in the Global World* 106.

¹⁶⁸ Republic of Kazakhstan, 'Sixth Periodic Report' (n 154) para 3.

¹⁶⁹ *ibid.*

¹⁷⁰ Republic of Kazakhstan, 'Replies of Kazakhstan to the List of Issues and Questions in Relation to its Sixth Periodic Report' (2025) UN Doc CEDAW/C/KAZ/RQ/6, para 4(c).

¹⁷¹ Interview with Aida Alzhanova (INT1) (n 119); Interview with Gulzada Serzhan (INT2) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

¹⁷² Coalition of women-led organisations (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

Recommendation 23(e) concerns regional disparities in representation. Institutionally, the state highlights multi-level governance and local coordination, including regional commissions under *akims*,¹⁷³ women politicians' clubs operating across all 17 regions, and non-staff advisers to *akims* on gender equality positioned as local coordination capacity linked to regional commissions.¹⁷⁴ Scholarly analysis nonetheless documents persistent regional disparities and cases where women's presence in certain public positions is minimal or absent, reinforcing the institutional challenge of equal 'absorption capacity' across localities.¹⁷⁵ Institutionally, similar formal platforms can yield divergent outcomes depending on local resources, political practices and the sustainability of support mechanisms.

Information environment, civic participation and external accountability (CEDAW Committee 2019, paragraph 23(f))

Recommendation 23(f) addresses awareness-raising and the normative environment. Kazakhstan's sixth periodic report notes that a national media plan is implemented to raise awareness of women's equal participation.¹⁷⁶ The Women, Peace and Security (WPS) architecture provides an additional institutional channel: an action plan implementing UN Security Council Resolution 1325 and related resolutions was approved for 2022–2025, covering women's participation, awareness-raising and cooperation with civil society.¹⁷⁷ Government replies also describe systematic training of journalists and press services with UN Women and partners, reporting more than 1,000 trained specialists in 2025 and approval of a media literacy plan.¹⁷⁸ The same source states that in 2024 Kazakhstan 'updated' the National Action Plan under UN Security Council Resolution 1325 and launched a second plan starting in 2025, expanding tasks from 16 to 34 measures.¹⁷⁹ Institutionally, overlapping plan cycles and numbering can complicate traceability and public oversight, raising a governance-transparency

¹⁷³ The head of local government, acting as a mayor or governor for cities, districts or regions, and as the president's representative, managing local executive bodies and interacting directly with citizens, with recent reforms introducing direct elections for some *akims*.

¹⁷⁴ Republic of Kazakhstan, 'Sixth Periodic Report' (n 154) para 3; Republic of Kazakhstan, 'Replies of Kazakhstan' (n 170) para 4(d).

¹⁷⁵ Serikzhanova and others (n 167).

¹⁷⁶ Republic of Kazakhstan, 'Sixth Periodic Report' (n 154) para 7.

¹⁷⁷ *ibid* para 8.

¹⁷⁸ Republic of Kazakhstan, 'Replies of Kazakhstan' (n 170) para 9(h).

¹⁷⁹ *ibid* para 4(g).

issue even where policy intent is formally articulated.¹⁸⁰ At the same time, alternative sources report pressures on civic activism (including feminist and LGBTQ+ initiatives), such as barriers affecting civic participation and constraints on public assemblies, which weaken external feedback and public accountability mechanisms that often identify implementation failures not captured by formal reporting.¹⁸¹

Alternative sources further indicate limited institutional mechanisms supporting political participation for women with intersecting vulnerabilities (including women living with HIV, LGBTQ+ women and women with disabilities), resulting in *de facto* exclusion from political processes and support agendas, contrary to CEDAW's non-discrimination logic.¹⁸² This exclusion interacts with broader institutional constraints (party gatekeeping, limited disaggregation and civic-space pressures), reinforcing unequal participation pathways for groups that already face higher barriers to representation.

Overall, Kazakhstan's institutional implementation of CEDAW on women's participation in political and public life (2019–2025) is characterised by an expanded formal 'equality infrastructure', but a persistent gap between mandates and guaranteed outcomes due to target-setting below parity, list-focused and mixed-quota design, intra-party gatekeeping, monitoring-limited data, regional asymmetries and constraints on civic participation.¹⁸³

¹⁸⁰ Republic of Kazakhstan, 'Sixth Periodic Report' (n 154) para 8; Republic of Kazakhstan, 'Replies of Kazakhstan' (n 170) para 4(g).

¹⁸¹ Kazakhstan Feminist Initiative 'Feminita' (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120).

¹⁸² Coalition of women-led organisations (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

¹⁸³ Interview with Aida Alzhanova (INT1) (n 119); Interview with Gulzada Serzhan (INT2) (n 119); Interview with anonymous respondent (INT4) (n 119); Republic of Kazakhstan, 'Sixth Periodic Report' (n 154); Republic of Kazakhstan, 'Replies of Kazakhstan' (n 170); Serikzhanova and others (n 167); Kazakhstan Feminist Initiative 'Feminita' (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120).

2.3 Practical level of implementing CEDAW recommendations: GBV

Section 2.1 mapped these reforms at the institutional level; this section focuses on how these measures perform in practice and whether they generate predictable protection outcomes. After 2024, reforms are framed as a shift from treating violence as a ‘family conflict’ to a public, human-rights-based response, with expanded response tools and service infrastructure.¹⁸⁴

Police response and case handling in practice (CEDAW Committee 2019, paragraph 26(f))

As discussed in Section 2.1, the institutional architecture remains fragmented; at the practical level this translates into territorially uneven enforcement and inconsistent qualification of similar cases.¹⁸⁵ Since 2024, legal mechanisms for protection against GBV have been strengthened and formally exist, but their actual effectiveness remains limited primarily due to weak law enforcement practices. At the same time, interviews emphasise the persistence of a significant ‘administrative residue’ and inertia of previous response routines: formal criminalisation does not automatically eliminate *de facto* under-enforcement.¹⁸⁶

Reporting, registration and case processing in practice (CEDAW Committee 2019, paragraph 26(d))

The official framework highlights the diversification of reporting channels primarily hotlines and digital entry points.¹⁸⁷ However, expert assessments state that the expansion of input channels does not equal the expansion of protection if the initial response remains discretionary or ‘reconciliation oriented’. The practical risk here is the gap between increased visibility and reliability of results: appeals may be recorded through new channels, but victims continue to face pressure to withdraw their reports, delays or procedural ‘exits’ from responsibility that undermine protection.¹⁸⁸ The data also show that oversight and support

¹⁸⁴ Commissioner for Human Rights (n 121).

¹⁸⁵ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT3) (n 163); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

¹⁸⁶ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT5) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

¹⁸⁷ Commissioner for Human Rights (n 121).

¹⁸⁸ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

agencies primarily complaints to the prosecutor's office and legal support from crisis centres/NGOs, often produce more tangible results than repeated appeals to the police, which highlights the weak capacity of initial response mechanisms to transform.¹⁸⁹ Shadow reports confirm this observation, shifting the focus from 'access to reporting' to the procedural conditions under which a report leads to investigation and protection, especially for vulnerable groups and in regions with weak aid infrastructure.¹⁹⁰

Ex officio initiation and case continuation in practice (CEDAW Committee 2019, paragraphs 26(d) and 26(f))

The most significant for practical implementation is the inconsistency of the *ex officio* principle.¹⁹¹ Officially, the institutional expansion of instruments can be presented as providing such 'due diligence' (see Chapters 1 and 2). However, interviews indicate that even if there are formal grounds for initiating investigation without a report, it remains rare, and in reality, the initiative still lies with the woman. In case of refusal or fear of the victim, the proceedings may be terminated even if there are medical certificates and documented injuries, which reproduces the logic of a 'private conflict' rather than a public interest and protection of human rights.¹⁹²

Shadow reports explain this gap by a procedural and normative design of the response system: conciliatory 'exits' and procedural structures allowing termination remain, which structurally increases pressure from the relatives, society and the alleged aggressor and reduces the likelihood of an investigation in a situation of expected refusal by the victim.¹⁹³ In terms of triangulation, the tools of the state do exist *de jure*, but in practice *de facto*, procedural 'loopholes' allow violence to be made a subject of negotiation, leaving it a 'private matter'.¹⁹⁴

¹⁸⁹ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT4) (n 119); Interview with anonymous respondent (INT5) (n 119).

¹⁹⁰ Equality Now and others (n 120); Eurasian Women's Network on AIDS and others (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120).

¹⁹¹ The CEDAW standard requires the state to initiate an investigation if there are objective signs of violence, without requiring the victim to initiate the process.

¹⁹² Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

¹⁹³ Equality Now and others (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

¹⁹⁴ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119); Equality Now and others (n 120); Kazakhstan Feminist Initiative 'Feminita' (n 120).

Protection measures in practice: protection orders and related restrictions (CEDAW Committee 2019, paragraph 26(e))

Official materials emphasise the scope of the protective regulations and interpret them as a basic protective tool.¹⁹⁵ Expert data does not dispute the promptness of protection orders, but identifies execution as the ‘weak link’ of the system. Issuance of these orders does not guarantee security: despite the large number of protection orders issued (around 100,000 annually), about one in ten is violated, and violations do not always lead to increased protection or a real escalation of responsibility. The reasons again lie in practices: lack of uniform procedures, weak monitoring and lack of intersectoral coordination, which shifts *de facto* control to the victim, who is forced to repeatedly contact the police ‘with every violation’, especially in regions with limited assistance infrastructure.¹⁹⁶ Shadow reports confirm this conclusion: the ‘formal accessibility’ of a measure does not meet CEDAW standards if it does not provide sustainable protection and predictable consequences for violations.¹⁹⁷

Eviction as a protection measure in practice (CEDAW Committee 2019, paragraph 26(e))

Eviction demonstrates a similar asymmetry: it is officially recognised as a measure, but remains underused as a sustainable ‘default’ protection mechanism.¹⁹⁸ Triangulation allows us to interpret this as follows: ‘paper-based’ tools can scale, whereas sustained physical separation and security require a coordinated resource response, which remains uneven between regions so far.¹⁹⁹

Services and support measures in practice: shelters, crisis centres and referral pathways (CEDAW Committee 2019, paragraph 26(g))

¹⁹⁵ Commissioner for Human Rights (n 121).

¹⁹⁶ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT4) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

¹⁹⁷ Equality Now and others (n 120).

¹⁹⁸ Commissioner for Human Rights (n 121).

¹⁹⁹ Eviction-related restrictions remain rarely used in court practice: courts applied a prohibition of cohabitation or removal from the shared residence in 506 cases (2022) and 226 cases (January–July 2023); following the 2024 reform, temporary eviction of up to 30 days was applied in 44 cases (2024). Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119); Equality Now and others (n 120); Commissioner for Human Rights (n 121).

Government reporting highlights the expansion of the network of services and indicates significant amounts of funding.²⁰⁰ At the same time, shadow reports capture the capacity gap, which is the gap between the regulatory protection model and the actual availability of resources. There is a lack of round-the-clock services, shelters, free legal aid and comprehensive medical and psychological support, as well as territorial uneven access, which is most acute outside major cities.²⁰¹ Expert materials confirm this conclusion: there are fewer crisis centres in the regions, fewer trained specialists and a weaker NGO presence, so victims are more likely to be left unaccompanied and without legal assistance. Thus, service expansion is not disputed, but its effect is qualified: it occurs alongside structural shortages and territorially unequal protection outcomes.²⁰²

Sexual violence case processing in practice: legal standards and procedures (CEDAW Committee 2019, paragraphs 26(h) and 26(j))

For sexual violence, triangulation reveals the sharpest discrepancy. In the presence of official statements about legal norms and institutional measures, expert assessments indicate that the lack of a consent-based definition of rape continues to shift investigation and judicial assessment towards ‘resistance/threats/helplessness’ rather than voluntary consent. This reproduces victim blaming, reduces the likelihood of convictions, and increases the risk of secondary victimisation.²⁰³ Shadow reports confirm this and document practices that reinforce secondary victimisation (investigative experiments, confrontations, interrogations without privacy and invasive ‘hymen examinations’ that rarely have evidentiary value), showing that barriers are embedded simultaneously ‘in law and practice’ and that survivor-centred standards are

²⁰⁰ Commissioner for Human Rights (n 121).

²⁰¹ Equality Now and others (n 120).

²⁰² Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119); Equality Now and others (n 120).

²⁰³ Interview with Aida Alzhanova (INT1) (n 119); Interview with Gulzada Serzhan (INT2) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

not institutionalised uniformly.²⁰⁴ In addition, the absence of a consent-based definition complicates the proof in practice, since the investigation focuses on the set of ‘evidence’ rather than on the fact of the lack of consent.²⁰⁵

Access to protection in practice for vulnerable groups (CE-DAW Committee 2019, paragraphs 26(g) and 26(j))

Shadow reports, along with expert interviews, record the selectivity of protection through persistent barriers for vulnerable groups: women living with HIV describe repeated refusals in shelters/crisis centres and the lack of HIV-sensitive procedures (including direct service responses: ‘do not work with such categories of clients’),²⁰⁶ which reproduces the ‘invisibility’ of violence and the gap between the declared universality of assistance and the real availability of protection.²⁰⁷ Women with disabilities face stigma, non-accessible reporting and mechanisms, and practices that effectively devalue their testimony,²⁰⁸ women who use drugs avoid reporting for fear of stigma and police abuse, and shelters often exclude them, which further ‘filters’ access to protection.²⁰⁹ In sum, this shows that the moralising/stigmatising lens can work as

²⁰⁴ Equality Now and others (n 120).

²⁰⁵ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT4) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

²⁰⁶ Coalition of women-led organisations (n 120) draws on 130 in-depth interviews with women living with HIV across seven regions of Kazakhstan (sample recruited via primary DV-risk screening). The submission documents that women living with HIV were formally excluded from access to crisis centres until mid-2023, and that *de facto* refusals and exclusionary practices persist after the repeal (June 2023), alongside the absence of HIV-sensitive procedures and effective referral pathways between AIDS centres and crisis services. It also highlights police victim blaming and pressure to withdraw complaints, low help-seeking driven by distrust/shame/fear and a structural vulnerability mechanism: Article 118 CC (criminalising HIV exposure/transmission) can be weaponised by abusive partners to deter reporting.

²⁰⁷ Eurasian Women’s Network on AIDS and others (n 120).

²⁰⁸ Equality Now and others (n 120).

²⁰⁹ Eurasian Harm Reduction Association (EHRA) and others (n 120) relies on an online survey of 177 women plus a focus group (n=5) and consultations. The submission documents that GBV is widely experienced yet under-reported due to stigma and fear of police abuse, and that shelters/crisis services often exclude women who use drugs, effectively filtering access to protection. It records cases where responses are reduced to ‘preventive conversations’ and complaints are discouraged or closed through reconciliation logic, alongside reports of police violence/extortion, and confidentiality risks, including alleged disclosure of sensitive medical data (including HIV status) to law enforcement. The submission further notes that administrative/criminal measures linked to drug use (including in private spaces, eg, arts 440-1 of the Code of Administrative Offenses) can increase vulnerability and reduce help-seeking.

a practical filter within the response system and widen the gap between the claimed universality of support and the actual selectivity of protection, contradicting the CEDAW standard on non-discriminatory access to protection.²¹⁰

Access to protection in practice for LGBT women (CEDAW Committee 2019, paragraphs 26(g) and 26(j))

Also, on a practical level, LGBT women's access to protection from GBV is ideologically filtered out: under the influence of pro-Russian anti-gender movements,²¹¹ a framework is being formed in which only women leading 'traditional' lifestyles deserve protection from domestic violence (DV) in the Saltanat Law²¹², which excludes LGBT women from the category of 'legitimate victims' and increases the probability of rejection/lack of support when contacting.²¹³

Overall, the practical implementation of CEDAW recommendations on GBV in Kazakhstan demonstrates a discrepancy between measurable institutional 'outputs' and uneven protection outcomes. While official reports emphasise the expansion of tools and infrastructure triangulation with expert interviews and shadow reports points to persistent 'bottlenecks': an 'administrative residue' and entrenched routine response practices; the rare cases of ex officio initiation in practice; procedural 'exits' through termination or reconciliation; gaps between the issuance and enforcement of protection measures; and resource and territorial inequalities, with particularly pronounced barriers in cases of sexualised

²¹⁰ Interview with Gulzada Serzhan (INT2) (n 119); Equality Now and others (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120); Eurasian Women's Network on AIDS and others (n 120).

²¹¹ 'Russian anti-gender movements' refers to state-aligned conservative mobilisation that frames 'gender ideology' and LGBTQ+ equality as a foreign (Western) threat to 'traditional values', and uses this framing to delegitimise feminist and anti-discrimination agendas (Emil Edenborg, 'Anti-Gender Politics as Discourse Coalitions: Russia's Domestic and International Promotion of "Traditional Values"' (2023) 70(2) *Problems of Post-Communism* 175 <https://doi.org/10.1080/10758216.2021.1987269> accessed 15 June 2026). In 2019–2025, this discourse was reinforced through major legal and policy shifts most visibly the 2020 constitutional turn to 'traditional family values', the 2022 expansion of the 'LGBT propaganda' ban to all age groups and the 2023 Supreme Court decision branding the so-called 'international LGBT movement' as 'extremist', which has enabled intensified enforcement (Human Rights Watch, 'Russia: Expanded "Gay Propaganda" Ban Progresses Toward Law' (25 November 2022) <https://www.hrw.org/news/2022/11/25/russia-expanded-gay-propaganda-ban-progresses-toward-law> accessed June 2026).

²¹² BBC News, 'Saltanat Nukenova: The politician, the astrologer and a murder that could change Kazakhstan' (25 May 2024) <https://www.bbc.com/news/world-asia-69014056> accessed 11 June 2026.

²¹³ Interview with Gulzada Serzhan (INT2) (n 119).

violence.²¹⁴ Evidence on vulnerable groups suggests that stigma and moralising frameworks can ‘filter’ access to protection including for LBTQ+ women in ways that are in tension with CEDAW’s non-discrimination standard.²¹⁵

2.4 Practical level of implementing CEDAW recommendations on participation in political and public life

Representation outcomes and the parity benchmark (CEDAW Committee 2019, paragraph 23(a)(b))

For quota and electoral measures, a central practical indicator is women’s representation in elected bodies after the introduction and expansion of quota mechanisms. Following the 2023 elections, women accounted for 18 of 98 elected deputies of the *Mazhilis* (18.37%) and 786 of 3,415 elected members of *maslikhats* (21.02%).²¹⁶ These figures suggest that the current design more reliably delivers procedural compliance (for example, formally correct lists) than a substantive equality in the actual representation.²¹⁷

Quota and electoral-cycle effects in practice (CEDAW Committee 2019, paragraph 23(b))

The limited practical effect is closely related to the quota’s design. Under the ‘mixed’ quota (women/youth/PWD), the threshold can be met without a meaningful increase in women’s representation: in practice, the quota functions as a requirement for list composition rather than as a guarantee of the final outcome.

²¹⁴ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119); Equality Now and others (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120); Eurasian Women’s Network on AIDS and others (n 120); Kazakhstan Feminist Initiative ‘Feminita’ (n 120); Commissioner for Human Rights (n 121).

²¹⁵ Interview with Gulzada Serzhan (INT2) (n 119); Equality Now and others (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120); Eurasian Women’s Network on AIDS and others (n 120).

²¹⁶ Data based on the final results of the 2023 parliamentary and local elections published by the Central Election Commission of Kazakhstan.

²¹⁷ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT3) (n 163); Interview with anonymous respondent (INT4) (n 119); Interview with anonymous respondent (INT6) (n 119); Interview with anonymous respondent (INT7) (n 119).

As a result, the rule may exist and be formally complied with, yet its transformative effect remains weak particularly where parties use list-ranking strategies and control the allocation of campaign resources.²¹⁸

Intra-party gatekeeping and promotion dynamics (CEDAW Committee 2019, paragraph 23(b))

With regard to women's political advancement, parties serve as 'gatekeeping' institutions that regulate access to influence and candidacies. Even when formal rules exist, parties control candidate recruitment, list formation and ranking, campaign financing and internal promotion. Shadow reporting notes the closed nature of party structures for women and the lack of mechanisms that would make access to leadership positions systematic rather than symbolic. In this setting, quota procedures can coexist with persistent male dominance in party decision-making centres,²¹⁹

Data availability and monitoring usability in practice (CEDAW Committee 2019, paragraph 23(d))

With respect to the recommendation on systematic data collection, compliance can be described as largely formal: official statistics are collected, and some indicators are published by the Bureau of National Statistics, the Central Election Commission and relevant state bodies; in some cases, regional breakdowns are available. However, the practical usefulness of this compliance for monitoring and for evidence-based complaints or submissions remains limited. Data are often not sufficiently disaggregated by key characteristics (age, ethnicity, disability and, in some cases, level of decision-making), and they remain fragmented across different institutions. In the absence of a single public portal, some indicators must be searched for across multiple government websites or reconstructed from separate publications and press releases. This reduces comparability, weakens transparency and complicates public oversight as well as the development of targeted measures to address regional disparities.

Training and leadership development in practice (CEDAW Committee 2019, paragraph 23(c))

²¹⁸ Kazakhstan Feminist Initiative 'Feminita' (n 120) question 12; Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT4) (n 119); Interview with anonymous respondent (INT5) (n 119).

²¹⁹ Kazakhstan Feminist Initiative 'Feminita' (n 120) question 12; Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT3) (n 163); Interview with anonymous respondent (INT4) (n 119).

Regarding training (political leadership, campaigning, negotiation skills), the practical question is whether visible measures training programmes, leadership schools and support initiatives translate into sustained advancement of women into politics and managerial positions. Interviews indicate that initiatives often remain project-based and fragmented, with uneven institutionalisation and differing regional ‘absorption capacity’. This means that the existence of programmes and participation figures does not automatically produce measurable electoral or personnel outcomes.²²⁰

More broadly, additional support measures such as mentorship, leadership development or financial incentives for women candidates exist, but are described as fragmented and unsystematic. Their coverage is limited, they are weakly institutionalised and they do not offset pronounced regional disparities, particularly at the level of local representative bodies.²²¹

In this context, the role of political parties as the main ‘channels’ (or barriers) for women’s advancement is especially important. According to the interview, only one party – ‘Amanat’ has formally established a ‘women’s wing’ and provides training for women through the Tomiris programme.²²² At the same time, this activity is characterised as largely symbolic and not supported by a clearly articulated gender policy within the party programme. In general, gender equality as an independent policy direction is often absent from party programmes.²²³

An exception is the Nationwide Social Democratic Party (OSDP), whose programme includes a section on gender policy in the social sphere. In the interview, this is linked to OSDP’s membership in the Socialist International and its orientation towards standards associated with international democratic and human-rights communities.²²⁴

Regional disparities and participation conditions (CEDAW Committee 2019, paragraph 23(e))

²²⁰ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT5) (n 119); Interview with anonymous respondent (INT7) (n 119); Serikzhanova and others (n 167).

²²¹ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT3) (n 163).

²²² The ‘Tomiris’ Women’s Leadership Academy was launched by the Amanat party to train female politicians, focusing on project management and political technologies.

²²³ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT3) (n 163); Interview with anonymous respondent (INT4) (n 119).

²²⁴ *ibid.*

A further practical constraint concerns the civic space in which women's political participation is formed and sustained. The *Feminita* shadow report documents obstacles affecting women's/feminist and LGBTQ+ organisations, including repeated refusals of registration, administrative pressure and refusals to authorise peaceful assemblies. EHRA describes a broader context of shrinking civic space, including the stigmatisation of NGOs as acting in 'foreign interests' and systematic refusals by local authorities to approve events organised by women's movements. These conditions raise the 'cost of participation' (time, risks and barriers) and create a chilling effect on mobilisation, advocacy and public contestation of discriminatory norms processes that are necessary if formal standards are to translate into real influence and power.²²⁵

Finally, interviews underline the persistence of gender stereotypes as an informal 'filter' affecting recruitment, the public legitimacy of women candidates and women's willingness to enter political competition. In such conditions, information campaigns and training remain necessary but insufficient: without accountability mechanisms and changes inside party structures (as well as a protected civic space), stereotypes continue to reproduce the gap between formal inclusion and real access to decision-making centres.²²⁶

Overall, practical implementation in this area reflects a recurring imbalance: infrastructure and procedures develop faster than the instruments that can secure the final outcome substantive representation and influence. The gap is sustained by a mixed quota architecture²²⁷ focused on list requirements rather than guaranteed outcomes; party gatekeeping and weak institutionalisation of gender policy within parties; fragmented support measures, especially at the regional level; and a constricted civic space and informal norms that increase the costs of women's political participation.

²²⁵ Kazakhstan Feminist Initiative 'Feminita' (n 120); Eurasian Harm Reduction Association (EHRA) and others (n 120).

²²⁶ Interview with Aida Alzhanova (INT1) (n 119); Interview with anonymous respondent (INT4) (n 119); Serikzhanova and others (n 167).

²²⁷ The quota mandates a 30% aggregate share for women, youth and persons with disabilities on party lists, but does not specify a mandatory percentage for each category individually.

2.5 International monitoring and external assessments

In addition to internal legal and institutional changes, the implementation of Kazakhstan's commitments to ensure gender equality is assessed by international monitoring bodies and organisations. These external assessments serve as a structured starting point for distinguishing between progress in formal frameworks and continued practical constraints in the two areas addressed in this paper: GBV and women's political participation.

In the GBV domain, the CEDAW Committee's follow-up assessment of selected 2019 recommendations is especially indicative because it formally classifies implementation levels. Regarding recommendation 26(b) on revising the rape definition toward an absence-of-consent standard, the Committee notes that Kazakhstan has not revised the relevant Criminal Code provision in line with the recommendation and concludes that the state has taken 'no action', rating the recommendation as 'not implemented'.²²⁸ Regarding recommendation 26(c), which calls for reviewing the bill on countering domestic violence to ensure compliance with CEDAW and more effective prevention and protection, the CEDAW Committee acknowledges amendments introduced in the Criminal Code and the Code of Administrative Offences, but remains concerned that the 2009 Domestic Violence Prevention Act has not been reviewed for CEDAW compliance, that reconciliation may still be prioritised in some domestic-violence cases, and that the reform logic continues to imply treatment of domestic violence as 'mere administrative offences'; the recommendation is therefore assessed as only 'partially implemented'.²²⁹ The follow-up assessment also identifies implementation shortcomings for recommendation 26(i) (forced sterilisation and abortion, mandatory gender reassignment surgery and barriers to justice), noting gaps in information on criminalisation and prosecution of forced practices, with specific concern for women with disabilities.²³⁰

²²⁸ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 153) para 1.

²²⁹ *ibid* para 2.

²³⁰ *ibid* paras 2–3.

International organisations' analytical reports similarly emphasise the gap between legislative change and effective protection. UNICEF's Situation Analysis frames the April 2024 legislative package as an 'important step forward', but states that further measures are needed 'in accordance with international human rights standards', including criminalising domestic violence as a stand-alone offence to ensure that psychological and sexual violence within the family are properly investigated and prosecuted.²³¹ The same report summarises the limited national evidence base on prevalence and help-seeking and notes that 17% of ever-partnered women aged 18–74 had experienced physical and/or sexual intimate partner violence (IPV) in their lifetime, while only five% reported current physical and/or sexual violence.²³² It also documents low recourse to formal authorities: among survivors of physical and/or sexual IPV, only 8% reported to the police and 3% to a health worker/doctor, while 51% told no one.²³³ In a related rights-based framing, Human Rights Watch notes that Kazakhstan 'still has not criminalized domestic violence ... as a stand-alone offence', underscoring continued reliance on fragmented provisions rather than a context-specific domestic-violence offence.²³⁴

In the political participation domain, election-monitoring assessments highlight a similar pattern: the existence of procedural or quota-based tools alongside limited representation outcomes. In its final report on Kazakhstan's 2023 early parliamentary elections, Organization for Security and Co-operation in Europe (OSCE) and the Office for Democratic Institutions and Human Rights concludes that women 'remained underrepresented', noting that women comprised 29% of candidates in the proportional-race lists (and 20% in majoritarian contests), and that women won 18 seats in the *Mazhilis* (18%).²³⁵ International development actors likewise describe women's representation as comparatively

²³¹ UNICEF, 'Situation Analysis of Children and Adolescents in Kazakhstan 2024' (UNICEF 2025) 62.

²³² *ibid* 63.

²³³ *ibid*.

²³⁴ Human Rights Watch, 'Kazakhstan: New Law to Protect Women Improved, but Incomplete' (*Human Rights Watch*, 23 April 2024) <<http://www.hrw.org/news/2024/04/23/kazakhstan-new-law-protect-women-improved-incomplete>> accessed 23 March 2026.

²³⁵ Organization for Security and Co-operation in Europe/Office for Democratic Institutions and Human Rights, 'Republic of Kazakhstan Early Parliamentary Elections, 19 March 2023: Final Report' (2023) <<http://www.osce.org/sites/default/files/f/documents/c/9/538392.pdf>> accessed 23 March 2026.

low: United Nations Development Programme (UNDP) reports that the share of women in parliament ‘currently stands at only 18.9 percent’, while UN Women country data records women holding 19.4% of seats in parliament (as of February 2024).²³⁶

²³⁶ UNDP, ‘Deputy Resident Representative’s Speech at the Parliamentary Commission Meeting on Monitoring the Implementation of the Sustainable Development Goals’ (15 October 2024) <<http://www.undp.org/kazakhstan/speeches/undp-deputy-resident-representatives-speech-parliamentary-commission-meeting-monitoring-implementation-sustainable-development>> accessed 23 March 2026; UN Women, ‘Kazakhstan Country Data’ <<https://data.unwomen.org/country/kazakhstan>> accessed 23 March 2026.

3. Analysis of the findings and discussion

This chapter identifies a systematic implementation asymmetry: reforms at the *de jure* level and institutional expansion are more visible than stable *de facto* outcomes in both GBV policy and women's participation in political and public life. Drawing on compliance theory and feminist institutionalism, the chapter interprets this asymmetry and traces the domestic barriers that mediate implementation and shape how key actors evaluate compliance.

3.1 The extent of implementation of the CEDAW Committee's Concluding Observations on Kazakhstan, 2019–2

3.1.1 Legal level

At the legal *de jure* level (2019–2025), Kazakhstan's implementation of the CEDAW concluding observations is best characterised as compliance through formal legal adjustment. The state has been most responsive where recommendations can be translated into discrete statutory amendments, liability thresholds or policy targets that are straightforward to codify and easy to document in official reporting. By contrast, recommendations that require conceptual redefinition, most notably a consent-based approach to sexual autonomy, intersectional bodily integrity safeguards and explicit alignment with international standards, remain weakly internalised in domestic law. The central finding, therefore, is that legal implementation is visible without being consistently normative: it changes legal form and liability

pathways, but does not reliably reset the underlying legal standards against which protection and equality are assessed. This creates a recurring bottleneck in the sequence ‘normative standard → legal definition → enforceable obligation’, which helps to explain why *de jure* compliance remains uneven.²³⁷

GBV

In the GBV domain, legal progress has largely taken the form of sanction and liability-oriented reforms rather than a consolidated statutory framework treating violence against women as a coherent legal category. The decisive issue is not the presence of legal change but its direction: the system more readily tightens punishment or reallocates responsibility across offences than it clarifies the normative content of protection what counts as violence and consent, and what constitutes state failure to protect. This is why politically salient reforms can strengthen deterrence while leaving the legal architecture structurally incomplete. Domestic violence remains regulated through dispersed provisions, and the law still relies on general criminal law categories rather than a unified offence structure capable of capturing coercive control and patterns of intimate partner abuse.²³⁸ The clearest indicator of this normative limit is the treatment of sexual violence. A consent-based definition requires reconstituting the legal concept of rape itself. This is precisely the area the CEDAW Committee assessed as ‘not implemented’ in its follow-up, despite broader legislative activity elsewhere.²³⁹ In legal terms, the GBV trajectory is therefore moves toward deterrence but normatively constrained:

²³⁷ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (2019) UN Doc CEDAW/C/KAZ/CO/5, paras 26(b), 26(i), 26(k) <<https://digitallibrary.un.org/record/3840014?v=pdf>> accessed 1 July 2025; Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (2019) UN Doc CEDAW/C/KAZ/CO/5, paras 1-3 <<https://digitallibrary.un.org/record/3840014?v=pdf>> accessed 1 July 2025.

²³⁸ Law of the Republic of Kazakhstan ‘On Prevention of Domestic Violence’ No 214-IV (4 December 2009) <<https://adilet.zan.kz/eng/docs/Z090000214>> accessed 2 November 2025; Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 237) para 25(a)–(h).

²³⁹ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 237) para 1.

amendments can modify penalties and procedural tracks, yet key conceptual reforms those that would embed sexual autonomy and intersectional protection as enforceable standards remain largely unfulfilled.²⁴⁰

Women's participation in political and public life

A comparable pattern emerges in the political and public participation domain. Kazakhstan has codified quota mechanisms and procedural rules that structure nomination and mandate allocation. This constitutes meaningful *de jure* movement because quotas are among the few instruments capable of altering descriptive representation through law (see Appendix A, Table A3). The core legal vulnerability, however, lies in the distinction between regulating inputs and guaranteeing outcomes. Mixed-category quota design allows formal compliance with list requirements while leaving substantial discretion over whether women's representation improves in practice. Moreover, the law largely stops short of regulating intra-party gatekeeping – the organisational sites where candidacies and leadership trajectories are determined. In strategic-policy terms, this input bias is reinforced by target setting: by operationalising a 30% benchmark rather than parity, domestic frameworks normalise a lower ceiling as legally sufficient, even where CEDAW's benchmark points to 50% as the appropriate standard.²⁴¹ In legal terms, the state has institutionalised participation tools while leaving the distribution of power inside parties and parity as a binding *de jure* standard only weakly constrained.

Taken together, the legal findings suggest that the core *de jure* implementation problem is not legislative inactivity, but how legal alignment is designed. Kazakhstan's legal system can generate measurable outputs especially around sanctions, procedures and quota rules, yet it is less consistent in internalising the normative standards that would make protection and parity legally

²⁴⁰ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 237) paras 1–3.

²⁴¹ *ibid* paras 22(c), 30; Presidential Decree No 853 (1 April 2022) 'On Amendments to the Concept of Family and Gender Policy in the Republic of Kazakhstan until 2030' <<https://adilet.zan.kz/>> accessed 20 October 2025; Resolution of the Government of the Republic of Kazakhstan No 759 (18 September 2024) 'On Approval of the Action Plan for 2024–2027 to Implement the Concept of Family and Gender Policy in the Republic of Kazakhstan until 2030' <<https://adilet.zan.kz/rus/docs/P2400000759>> accessed 23 March 2026.

non-negotiable. Legal implementation thus sets the conditions for the broader asymmetry: it supplies formal instruments that can be reported and applied, while leaving unresolved the conceptual and standard-setting reforms that would anchor substantive compliance across institutional and practical levels.

3.1.2 Institutional level

At the institutional level (2019–2025), Kazakhstan’s implementation of the CEDAW recommendations is best understood as compliance through institutionalisation. The state has actively expanded the policy infrastructure: channels of access, service provision, plans, procedures, training and statistical instruments, yet this infrastructure appears primarily geared toward administrative legibility and reporting, rather than toward securing outcomes as a matter of routine. The central finding is therefore that institutional implementation is productive without being consistently transformative: it makes reforms visible and measurable, but not automatically effective. This creates a persistent bottleneck in the sequence ‘mandate → mechanism → guaranteed result’, which helps to explain why compliance remains predominantly partial.²⁴²

GBV

In the field of GBV, institutional progress has taken the form of an expanded capacity to receive complaints and demonstrate activity. New entry points, the growth of service infrastructure and the formalisation of response standards allow the state to document coverage and development.²⁴³ The decisive issue, however, is not the scale of infrastructure but its conversion capacity, its ability to translate complaint registration into protection. A structural

²⁴² Aida Alzhanova, ‘Analytical Report on the Implementation of International Human Rights Standards in the Legislation of the Republic of Kazakhstan on Domestic Violence’ (Institute of Social Policy 2025); Commissioner for Human Rights of the Republic of Kazakhstan, ‘Report on the Activities of the Human Rights Commissioner in the Republic of Kazakhstan in 2024’ (Astana 2025) <<http://www.gov.kz/memleket/entities/ombudsman/documents/details/825810?lang=en>> accessed 25 March 2026; Republic of Kazakhstan, ‘Sixth Periodic Report Submitted by Kazakhstan Under Article 18 of the Convention, Due in 2023’ (2024) UN Doc CEDAW/C/KAZ/6, para 4(b) <<https://digitallibrary.un.org/record/4071031>> accessed 1 June 2025.

²⁴³ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 237) paras 26(d)–(h); Commissioner for Human Rights (n 242).

gap emerges here: the system scales what can be readily processed through documentation and routine administration (orders, procedures, indicators) more easily than what reduces risk in concrete terms (sustained separation, monitoring of compliance, perpetrator rehabilitation and credible accountability for police performance). As a result, institutional change increases the visibility of violence and the points of contact available to victims, while leaving protection dependent on territorial differences, inter-agency coordination and frontline discretion; on that basis, institutional compliance in the GBV domain is more accurately characterised as partial.²⁴⁴

Women's participation in political and public life

A comparable pattern appears in the area of women's participation in political and public life. Kazakhstan has assembled a dense 'equality infrastructure' (coordination bodies, plans, NGOs involvement, training initiatives and statistical tools), but the institutional design largely supports procedural implementation without entrenching parity as a binding output of the system.²⁴⁵ The principal institutional vulnerability lies in the weak link between input-oriented measures and outcomes: rules and programmes can shape visibility and participation, yet they do not necessarily unsettle party gatekeeping or turn quota arrangements into a reliable guarantee of representation. In institutional terms, the state has strengthened the governance of equality policy. However, the structure of political selection and power distribution insufficiently affected; institutional compliance in this sphere therefore remains partial and constrained by an implicit 'ceiling'.²⁴⁶

Taken together, the institutional findings suggest that the core implementation problem is not the absence of institutions, but the design of institutional effectiveness. The system can generate measurable forms of progress, yet it is less consistent in producing enforceable effects risk reduction in GBV and sustained gains in representation. Institutional implementation thus reproduces the broader asymmetry: it translates *de jure* change into

²⁴⁴ Alzhanova (n 242); Commissioner for Human Rights (n 242).

²⁴⁵ Committee on the Elimination of Discrimination against Women, 'Concluding Observations on the Fifth Periodic Report of Kazakhstan' (n 237) paras 23(a)–(f).

²⁴⁶ Alzhanova (n 242); AT Serikzhanova and others, 'Women's Political Participation in Kazakhstan: Regional Aspects' (2024) 27(3) *Russia in the Global World* 106.

governance routines without removing the dependence of outcomes on coordination, territorial capacity and incentives for implementation, keeping the overall record within a regime of partial compliance.²⁴⁷

3.1.1.3 Practical level

At the practical *de facto* level, the findings indicate that implementation is best characterised as formal availability without reliable effect. Kazakhstan can point to visible legal tightening and an expanding institutional architecture, yet triangulated evidence shows that the practical operation of these tools is shaped by persistent procedural bottlenecks, discretion at first response and unequal service capacity across regions. The central finding is therefore that practical implementation remains uneven not because mechanisms are absent, but because the system lacks the conditions that translate formal rights into routine protection and equal access. This produces a recurring gap in the sequence ‘rule → procedure → enforceable outcome’: the state can scale outputs that are administratively countable, while outcomes remain contingent on street-level practice, coordination and resources.²⁴⁸

²⁴⁷ Committee on the Elimination of Discrimination against Women, ‘Concluding Observations on the Fifth Periodic Report of Kazakhstan’ (n 237); Republic of Kazakhstan, ‘Sixth Periodic Report’ (n 242); Republic of Kazakhstan, ‘Replies of Kazakhstan to the List of Issues and Questions in Relation to its Sixth Periodic Report’ (2025) UN Doc CEDAW/C/KAZ/RQ/6.

²⁴⁸ Interview with Aida Alzhanova (INT1), international gender expert (December 2025); Equality Now and others, ‘Information on Kazakhstan for Consideration by the Committee on the Elimination of Discrimination against Women at Its Pre-Sessional Working Group’ (submission to the UN Committee on the Elimination of Discrimination against Women, 23 May 2025); Eurasian Harm Reduction Association (EHRA) and others, ‘Review of Kazakhstan under the Convention on the Elimination of All Forms of Discrimination against Women: Shadow Report Ahead of the List of Issues’ (submission to the UN Committee on the Elimination of Discrimination against Women, 23 May 2025); Eurasian Women’s Network on AIDS and others, ‘Shadow Report on Violence and Discrimination against Women Living with HIV in Kazakhstan’ (submission to the UN Committee on the Elimination of Discrimination against Women, 2025); Kazakhstan Feminist Initiative ‘Feminita’, ‘List of Issues and Issues Prior to Reporting of Kazakhstan for CEDAW’s 93rd Pre-Session and the CEDAW’s 91st Session of the Pre-sessional Working Group’ (submission to the UN Committee on the Elimination of Discrimination against Women, May 2025); Commissioner for Human Rights (n 242).

GBV

In the GBV domain, the decisive practical issue is the conversion capacity of the response system: its ability to translate complaint reporting and formal measures into sustained safety. After 2024, official discourse narrative emphasises a shift from ‘family conflict’ to a public, rights-based response supported by measurable indicators.²⁴⁹ In practice, however, the evidence points to a dual effect of legal tightening: stronger sanctions increase the formal gravity of cases, yet do not automatically displace inherited administrative routines and reconciliation-oriented practices. Where standard operating procedures (SOPs) and inter-agency protocols remain weak, similar cases are qualified inconsistently across regions. Under these conditions, the practical effectiveness of reforms depends heavily on local discretion and the willingness of agencies to coordinate.²⁵⁰

The most consequential gap concerns the inconsistent application of the *ex officio* principle. Although a due diligence model presupposes state-initiated action, interviews and shadow reporting indicate that proceedings still often depend on the victim’s persistence; termination routes and conciliatory ‘exits’ allow violence to remain subject to negotiation and weaken the state’s capacity to act in the public interest.²⁵¹ In this configuration, expanded reporting channels can increase visibility without increasing protection: complaints may be registered through hotlines and digital platforms, but victims continue to encounter withdrawal pressure, delays and procedural case attrition, especially in low-capacity regions.²⁵² The same logic appears in the use of protection orders. High issuance volumes do not translate into stable security where monitoring is weak and violations do not trigger predictable escalation; the burden of enforcement shifts back on to the victim, who must repeatedly re-contact the police to activate

²⁴⁹ Commissioner for Human Rights (n 242).

²⁵⁰ Interview with Aida Alzhanova (INT1) (n 248); Equality Now and others (n 248); Kazakhstan Feminist Initiative ‘Feminita’ (n 248).

²⁵¹ *ibid.*

²⁵² Interview with Aida Alzhanova (INT1) (n 248); Interview with anonymous respondent (INT4), women’s rights activist (December 2025); Interview with anonymous respondent (INT7), practising legal professional (December 2025); Equality Now and others (n 248); Eurasian Women’s Network on AIDS and others (n 248); Eurasian Harm Reduction Association (EHRA) and others (n 248).

protection.²⁵³ Eviction and physical separation demonstrate the same asymmetry: they exist as measures but remain underused because they require coordinated resource response rather than paper-based processing.²⁵⁴

Service provision reveals the structural underpinning of this gap: expansion is real, but territorial accessibility and continuity remain uneven, so the protective effect of the system varies dramatically depending on the locality. Shadow reporting and interviews identify shortages in round-the-clock services, shelters, legal aid and comprehensive medical and psychological support outside major cities, producing unequal protection outcomes even under formally universal standards.²⁵⁵ The sharpest discrepancy concerns sexual violence, because of the absence of a consent-based rape definition, practice continues to be organised around resistance and evidentiary expectations that foster victim blaming and secondary victimisation; shadow reports document investigative and medical practices that remain incompatible with survivor-centred standards.²⁵⁶ Finally, practical implementation is filtered by stigma: vulnerable groups including women living with HIV, women with disabilities, women who use drugs and LGBT women face informal exclusion and procedural barriers that contradict the non-discrimination standard embedded in CEDAW's framework.²⁵⁷

Participation in political and public life

In the participation domain, practical implementation shows a comparable pattern of input compliance with limited redistribution of power. Formal equality infrastructure quota rules, training initiatives, reporting routines and coordination mechanisms have

²⁵³ Interview with Aida Alzhanova (INT1) (n 248); Interview with anonymous respondent (INT4) (n 252); Interview with anonymous respondent (INT3), representative of an international organisation in Kazakhstan (December 2025); Equality Now and others (n 248).

²⁵⁴ Interview with Aida Alzhanova (INT1) (n 248); Equality Now and others (n 248); Commissioner for Human Rights (n 242).

²⁵⁵ Interview with Aida Alzhanova (INT1) (n 248); Interview with anonymous respondent (INT5), representative of an international organisation in Kazakhstan (December 2025); Interview with anonymous respondent (INT3) (n 253); Equality Now and others (n 248).

²⁵⁶ Interview with Aida Alzhanova (INT1) (n 248); Equality Now and others (n 248).

²⁵⁷ Interview with Gulzada Serzhan (INT2), lesbian feminist activist from Almaty, Kazakhstan (December 2025); Equality Now and others (n 248); Eurasian Harm Reduction Association (EHRA) and others (n 248); Eurasian Women's Network on AIDS and others (n 248).

expanded, yet observed outcomes remain modest. The 2023 election results illustrate this gap: women's representation in elected bodies remains below parity and, in practice, the system delivers procedural correctness more reliably than substantive equality in representation.²⁵⁸ The main practical gap lies in the quota's mixed design and its operational focus on list composition. Parties can meet the threshold while using ranking strategies and resource allocation to limit women's electoral competitiveness; thus, compliance is achieved at the level of formal inputs rather than guaranteed outputs.²⁵⁹

The deeper constraint is party gatekeeping. Parties control recruitment, list formation, financing and internal promotion; where internal gender policy is weak or symbolic, training and leadership programmes remain supply-side measures with limited capacity to alter selection outcomes.²⁶⁰ Data production shows a further practical limit: statistics exist, but fragmentation and insufficient disaggregation reduce their utility as accountability tools, weakening public oversight and the design of targeted interventions. Finally, the enabling environment remains restrictive. Shadow reports describe shrinking civic space, administrative pressure on women's and feminist organisations, and barriers to peaceful assembly, raising the cost of participation and dampening mobilisation. In such conditions, awareness-raising and training are necessary but insufficient; stereotypes continue to operate as informal filters on recruitment and legitimacy, sustaining the gap between formal inclusion and access to decision-making centres.²⁶¹

Taken together, the practical-level findings complete the implementation asymmetry: legal change and institutional outputs are visible, yet effectiveness depends on whether procedures remove discretionary 'exits', enforcement is standardised and monitored, services are territorially accessible and party gatekeeping

²⁵⁸ Interview with Aida Alzhanova (INT1) (n 248); Interview with anonymous respondent (INT4) (n 252); Interview with anonymous respondent (INT7) (n 252).

²⁵⁹ Kazakhstan Feminist Initiative 'Feminita' (n 248); Interview with Aida Alzhanova (INT1) (n 248); Interview with anonymous respondent (INT5) (n 255) Interview with anonymous respondent (INT3) (n 253).

²⁶⁰ Interview with Aida Alzhanova (INT1) (n 248); Serikzhanova and others (n 246).

²⁶¹ Kazakhstan Feminist Initiative 'Feminita' (n 248) question 12; Eurasian Harm Reduction Association (EHRA) and others (n 248); Interview with Aida Alzhanova (INT1) (n 248); Serikzhanova and others (n 246).

and civic-space constraints are sufficiently contained. Where these conditions remain weak, compliance is strongest in what can be counted and reported and weakest in what must be delivered as routine protection and meaningful access to decision-making.²⁶²

Analysis of these three level of implementation allows to answer the research question 1:

To what extent has Kazakhstan implemented the 2019 CEDAW Concluding Observations in the areas of GBV and participation in political and public life (2019–2025) across legal, institutional and practical dimensions?

Answering the research question, it was found that Kazakhstan's implementation of the 2019 CEDAW Concluding Observations in the areas of GBV and women's participation in political and public life (2019–2025) is uneven and predominantly partial across legal, institutional and practical levels. Implementation is strongest where recommendations can be translated into codifiable and reportable outputs (statutory amendments, procedural rules, quota provisions, plans and indicators) and weakest where compliance requires the internalisation of higher protection/parity standards and their reliable conversion into outcomes.

At the *de jure* legal level, reforms are most visible in sanction and procedure-oriented changes and in quota mechanisms, while core standard-setting reforms, most notably a consent-based rape definition and stronger constraints on intra-party gatekeeping, remain weak. Institutionally, Kazakhstan has expanded substantial equality and service infrastructure, but its conversion capacity is limited: institutions increase administrative legibility and measurable activity more reliably than they secure predictable protection and parity outcomes. At the *de facto* level, implementation remains most fragile and territorially uneven, shaped by frontline discretion, coordination bottlenecks, uneven service provision and persistent gatekeeping dynamics.

²⁶² Interview with Aida Alzhanova (INT1) (n 248); Interview with Gulzada Serzhan (INT2) (n 257); Equality Now and others (n 248); Eurasian Harm Reduction Association (EHRA) and others (n 248); Eurasian Women's Network on AIDS and others (n 248); Kazakhstan Feminist Initiative 'Feminita' (n 248); Commissioner for Human Rights (n 242).

In summary, Kazakhstan's CEDAW implementation (2019–2025) is characterised by a three-level asymmetry: visible *de jure* codification, productive but non-transformative institutionalisation and uneven *de facto* effectiveness.

3.2 Structural barriers to the implementation of the 2CEDAW Concluding Observations

This thesis applies a combined analytical lens that links why CEDAW recommendations are translated into domestic legal and institutional responses to why such responses often fail to produce effective implementation in practice. First, drawing on Simmons' compliance theory, CEDAW is treated not as self-executing law but as a catalyst whose impact depends on the domestic mechanisms: agenda-setting, litigation opportunities and domestic mobilisation, through which international commitments can generate internal pressure, usable legal 'hooks' and reform coalitions across the legal, institutional and practical levels.

Second, feminist institutionalism is used to explain the constraints on implementation: even where formal rules exist, gendered institutions, informal rules and a 'logic of appropriateness' can reproduce unequal power relations, undermine the transformative potential of formal reforms and limit translation from law-on-the-books to law-in-action.

The identified implementation asymmetry reflects a stable structural pattern rather than an accidental gap between the *de jure* and *de facto* levels. International standards can trigger domestic legal and institutional responses, but their transformative effects tend to be constrained by (a) selective political responsiveness and (b) gendered rules-in-use that shape how formal norms are interpreted and (c) applied in law enforcement and organisational selection. These constraints are reflected in the subsequent discussion of agenda-setting, litigation opportunities, domestic mobilisation and gendered informal institutions across GBV and political participation.

During the period under review, the most visible changes in the GBV field emerge primarily through agenda-setting. The most significant *de jure* shift followed a ‘focusing event’ (the Saltanat Nukenova case),²⁶³ when the issue became publicly unavoidable and opened a window for reform. However, the content of these reforms’ points to a selective translation of international norms into domestic law. Priority is given to measures that are easier to frame politically and administratively as toughening liability or strengthening sanctions. By contrast, reforms that would require a deeper normative reconstruction of protection standards most notably, a consent-based definition of sexual violence is still not changed in domestic legal system.

Litigation opportunities appear to be a limited and structurally weakened channel. Formal legal tools exist, but their coercive force and the predictability of outcomes are insufficient to ensure the automatic conversion of commitments into stable practical effects. In the GBV sphere, procedural configurations persist in which state due diligence does not take the form of consistent and unconditional public response. In many cases, proceedings still depend on the victim’s statement rather than on a stable *ex officio* logic of state action. As well as the absence of a consent-based definition, it complicates the legal process for the victim, because court requires physical proof of evidence. In the participation in political and public life, a legal contestation also shows limited effectiveness: attempts to use courts to protect freedom of association do not restore the violated right, which weakens the role of courts as a ‘legal hook’ for implementation.

Domestic mobilisation is present, but it also reveals clear constraints. Mobilisation can be seen in the activity of human rights and feminist actors, yet its sustainability is limited by institutional and repressive barriers.²⁶⁴ Reported cases include criminal prosecution related to rights-based activism (including the ‘Nemolchi’ case), as well as systematic administrative and legal obstacles to the formalisation of organisations, such as repeated refusals of registration and sanctions for ‘unregistered association’

²⁶³ The Guardian, ‘Kazakh Court Jails Former Minister for 24 Years for Brutal Murder of Wife’ (14 May 2024) <https://www.theguardian.com/global-development/article/2024/may/14/kazakh-court-jails-former-minister-for-24-years-for-brutal-of-wife> accessed 15 June 2026.

²⁶⁴ Colleen Wood, ‘Between a Rock and a Hard Place: How Kazakhstan’s Civil Society Navigates Precarity’ (2023) *International Labor and Working-Class History* 103:1–18 <https://doi.org/10.1017/S0147547923000157> accessed 15 June 2026.

activity. In Simmons' theory, this demonstrates that the main channel through which international norms should translate into sustained domestic pressure and reform coalitions operates under high costs and significant vulnerability.

From a feminist institutionalist perspective, the gap between 'law-on-the-books' and 'law-in-action' in GBV persists because formal rules are introduced into an already gendered institutional order. In practice, they are filtered through informal institutions, including a 'logic of appropriateness' and implicit standards of victim 'worthiness' or 'legitimacy'. These rules-in-use shape how street-level actors interpret and apply the law: discretion, reconciliation-oriented practices and pressure to withdraw complaints can become organisationally 'appropriate' ways to reduce conflict, manage workload and preserve the status quo. At the same time, stigma and moral criteria operate as gatekeeping mechanisms. As a result, protection that is formally universal becomes selective in practice, especially for vulnerable groups, thereby reproducing inequality without any explicit rollback of formal guarantees.

In political participation, feminist institutionalism likewise helps explain the gap between formal 'inputs' and actual 'outputs'. Gendered and informal institutions shape a logic of appropriateness for party recruitment and leadership. Under quota rules, formal compliance can increase women's presence on party lists, but it does not guarantee a redistribution of power in the arenas where strategic decisions are made. This is because key selection decisions remain governed by parties' rules-in-use centralised internal discretion and informal promotion practices rather than transparent procedures which structurally limits the emergence of new leadership. As a result, quotas may secure compliance at the level of formal rules, while gatekeeping continues to control competitiveness and influence, stabilising gender hierarchy without directly violating formal requirements.

Triangulating the theoretical account with seven semi-structured expert interviews conducted in December 2025 (INT1–INT7) reinforces the same overarching pattern: implementation of the 2019 CEDAW Concluding Observations in Kazakhstan is stronger in formal outputs than in reproducible protection outcomes, with the main deficits emerging at the level of institutional routines and day-to-day enforcement.

Experts explain this gap through a combination of partial legal design, fragmented implementation architecture without a clearly empowered lead institution and uneven operational capacity and procedures across regions, which together make survivor-centred responses dependent on local discretion rather than standardised practice. In addition, several interviews highlight the political sensitivity of ‘gender’ as a policy category: respondents report a growing avoidance and delegitimisation of ‘gender’/‘feminism’ in official communication, often replaced by neutralised terms (for example, ‘family values’ or ‘women and children’). This discursive shift is not treated as merely symbolic; experts argue it reduces conceptual clarity and, importantly, weakens measurement, budgeting and accountability for discrimination-based obligations under CEDAW. Finally, respondents link limited ‘conversion’ from commitments to practice to a constrained accountability environment, including selective consultation practices and administrative barriers affecting civil society mobilisation on socially sensitive issues.

Taken together, the combined use of these two theories suggests that the CEDAW recommendations are most likely to translate into measurable legal and institutional responses when they are consistent with the internal agenda and prevailing institutional logic, especially through changes based on sanctions and procedures. However, where implementation requires (i) a normative shift in standards (sexual autonomy/consent), (ii) a stable conversion of legal tools into protection or (iii) a redistribution of power within organisations (party gatekeeping), informal filters and constraints on mobilisation and legal contestation become decisive. This keeps implementation in a mode of partial compliance and helps explain why progress is most visible at the level of formal measures, while remaining unstable and uneven at the level of outcomes.

Therefore, the observed asymmetry is not the result of isolated failures. It is reproduced through recurring structural barriers that systematically weaken Simmons’ three domestic mechanisms and are reinforced through gendered rules-in-use.

In terms of research question, these barriers can be summarised as follows:

01 — Selective compliance and a bounded reform agenda

As a result, selective implementation reflected in uneven compliance across recommendation types leaves reforms that require revision of core legal standards (notably a consent-based definition of rape and the bodily-autonomy cluster). The absence of these standards sustains practices inconsistent with a survivor-centred approach and weakens *de facto* protection.

02 — Limited conversion capacity and fragmented accountability

Responsibilities are dispersed across multiple actors and administrative levels without a consistently empowered coordinating centre; in the absence of stable inter-agency procedures (including SOPs) and standard implementation protocols, this produces territorially uneven implementation and unequal access to protection infrastructures and participation-enabling mechanisms.

03 — Weak enforceability and low predictability of protection and remedies

The existence of legal mechanisms does not ensure reliably reproducible outcomes: protective measures are frequently breached and insufficiently monitored, *ex officio* responses remain limited in practice, and reparations are not institutionalised as a predictable pathway for restoring violated rights. This reduces the practical leverage of *de jure* reforms.

04 — Informal institutional constraints and organisational gatekeeping (rules-in-use)

Formal rules are filtered through entrenched informal practices that shape (i) who is recognised as a legitimate claimant and (ii) who gains meaningful access to organisational resources and decision-making arenas. In political participation, intra-party selection procedures and informal networks' structure candidate competitiveness and promotion, so that descriptive representation can increase without a corresponding redistribution of influence. In GBV governance, informal norms and street-level discretion can translate formal guarantees into selective practice through victim blaming, secondary victimisation and reconciliation-oriented routines, thereby weakening the practical uptake of rights-based standards.

05 — Limited bottom-up accountability due to constrained domestic mobilisation

Domestic mobilisation does not consistently generate sustained monitoring, reputational pressure and follow-up that would raise the costs of partial implementation over time. Civic actors face high participation costs and organisational precarity (including pressure on activism and barriers to organisational formalisation), while consultative mechanisms tend to remain selective and often have limited impact on policy design and enforcement priorities particularly for regional, feminist and LGBTQ+ organisations. As a result, the political and reputational costs of incomplete implementation are reduced, allowing formal compliance to persist alongside limited substantive change.

3.6 Hypothesis assessment

I hypothesised that Kazakhstan's compliance with the CEDAW Committee's 2019 Concluding Observations in the areas of (1) GBV and (2) women's participation in political and public life (2019–2025) is characterised by a strategic emphasis on *de jure* legal measures over institutional change and *de facto* implementation. This pattern suggests a predominant orientation toward formal rather than substantive compliance.

The hypothesis is partially supported. The findings confirm a strong emphasis on *de jure* legal and policy measures, particularly where CEDAW recommendations can be translated into codifiable and reportable outputs (sanctions, procedures, quota rules), while practical *de facto* implementation remains the weakest layer, producing uneven and territorially contingent outcomes in both GBV and women's political participation. However, the evidence does not fully support the claim that engagement at the institutional levels consistently weaker than at the *de jure* level: Kazakhstan has also expanded an extensive institutional 'equality infrastructure' (coordination bodies, plans, training, service and reporting mechanisms). The core asymmetry therefore lies less in the absence of institutionalisation than in its limited conversion capacity institutions increase administrative legibility and measurable activity more reliably than they secure predictable protection and parity outcomes. Overall, the pattern supports the broader assumption of predominantly formal rather than substantive compliance.

4. Conclusion

The period under review is marked by visible policy activity and heightened public salience around GBV, including a reform window opened by a focusing event that placed violence against women at the centre of public debate. At the same time, the institutional architecture of gender equality governance continued to expand through plans, coordination bodies, training programmes, service mechanisms and reporting routines. These developments create favourable conditions for observable reform, yet they do not, by themselves, ensure that formal measures translate into routine and predictable outcomes.

The central empirical conclusion of the thesis is a systematic implementation asymmetry. Across both GBV and political participation, *de jure* reforms and institutional expansion are more visible than stable and consistent *de facto* outcomes. Implementation is therefore best characterised as predominantly partial compliance: the state is capable of adopting legal changes and institutionalising governance routines, but practical effectiveness remains uneven and territorially contingent. Substantively, compliance is strongest where recommendations can be translated into codifiable and reportable outputs discrete legislative amendments, procedural tracks, targets and administratively legible indicators and weakest where implementation requires normative internalisation and reliable conversion into outcomes.

At the legal level, implementation is most accurately described as compliance through formal legal adjustment. The state demonstrates capacity to codify changes in sanctions, liability pathways and quota rules. The principal legal constraint, however, concerns the anchoring of core standards. In the GBV domain, progress has tended to be sanction- and liability oriented rather than oriented toward consolidating a coherent legal framework

that embeds sexual autonomy and intersectional safeguards as enforceable standards. The continued absence of a consent-based definition of rape illustrates the limits of standard-setting reform even amid broader legal activity. In political participation, quota rules constitute meaningful *de jure* movement, but the legal design remains input-oriented: mixed-category quotas and limited regulation of intra-party selection allow formal compliance without establishing parity as a binding output benchmark.

At the institutional level, implementation is best understood as compliance through institutionalisation. The 'equality infrastructure' has expanded and produces measurable activity: access channels, service provision mechanisms, training initiatives and statistical tools. The decisive limitation is conversion capacity. Institutions appear better equipped to scale what is administratively legible and documentable than to secure outcomes as a matter of routine. In GBV governance, this manifests as a gap between complaint registration and sustained protection. In political participation, it manifests as a weak link between programmes that expand participation inputs and the organisational sites where influence is actually determined.

At the practical *de facto* level, implementation is best described as formal availability without reliable effect. In the GBV domain, the principal bottlenecks are procedural and organisational: discretionary first response, unstable inter-agency coordination and unequal regional service capacity. Particularly consequential is the inconsistent application of an *ex officio* logic: case trajectories often continue to depend on victims' persistence and remain vulnerable to termination, delays and procedural attrition. Protection measures especially where monitoring is weak do not deliver predictable escalation and sustained safety. In the participation domain, practical compliance continues to operate primarily through input fulfilment: parties can meet quota thresholds while limiting women's competitiveness through list ranking and resource allocation, while intra-party gatekeeping constrains women's access to decision-making arenas.

The thesis hypothesised that Kazakhstan's compliance with the CEDAW Committee's 2019 Concluding Observations in the areas of (1) GBV and (2) women's participation in political and public life (2019–2025) is characterised by a strategic emphasis on *de jure* legal measures over institutional change and *de facto* implementation, resulting in predominantly formal rather than

substantive compliance. The hypothesis is partially supported. The findings confirm a strong emphasis on formal legal and policy measures where recommendations can be codified and reported, and they confirm that practical implementation remains the weakest layer. However, the institutional level is not best described as weak or absent: Kazakhstan has developed substantial equality and service infrastructure. A more accurate inference is that the principal asymmetry concerns effectiveness, not institutional presence. Institutionalisation increases administrative legibility and measurable activity more reliably than it secures predictable protection and parity outcomes.

The explanatory contribution of the thesis lies in specifying how partial compliance is produced when international recommendations interact with domestic compliance mechanisms and gendered rules-in-use. Drawing on Simmons' compliance theory and feminist institutionalism, the findings show that formal measures can be adopted and institutionally routinised, yet outcomes remain contingent on whether core standards are anchored as controlling benchmarks, whether institutions can convert procedures and mandates into guaranteed results, and whether informal gatekeeping and constraints on domestic mobilisation are sufficiently contained to prevent formal rights from becoming selectively implemented in practice. In this sense, the *de jure-de facto* gap is not reducible to isolated failures; it reflects recurrent structural conditions that shape the practical uptake of reforms across both clusters.

Several limitations should be noted. First, the study covers two clusters within a single CEDAW implementation cycle. This design enables depth on cross-level asymmetry but limits generalisation to the full scope of CEDAW obligations. Second, while the thesis relies on triangulation of documentary sources, shadow reports and expert assessments, it does not incorporate comprehensive administrative data that would allow systematic modelling of case trajectories (eg, initiation, termination, enforcement of protective measures and timelines) or a full reconstruction of party recruitment and promotion pathways. Third, the analysis is constrained by fragmented and insufficiently disaggregated public statistics, which reduces the precision of subnational comparison. Fourth, the study does not aim to estimate the causal effect of

particular reforms; rather, it identifies recurring constraints that mediate implementation. Accordingly, the findings are strongest in explaining why formal reforms do not reliably convert into outcomes, rather than isolating the net impact of any single measure.

Future research could extend this framework to other CE-DAW domains (including SRHR, employment and intersecting discrimination), deepen subnational implementation tracing through systematic regional comparison and incorporate administrative data on case processing and enforcement of protective tools. In the participation domain, further work could examine party gatekeeping using organisational data and internal selection procedures, linking formal quota compliance to actual trajectories into decision-making centres. Comparative research across other semi-authoritarian contexts would also help test whether the combination of limited conversion capacity, rules-in-use and constrained mobilisation produces similar compliance patterns beyond Kazakhstan.

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Appendix A

Table A1. Legal reforms: GBV in Kazakhstan (1995–2025)

Year	Legal act (official title / number)	Type	What changed (GBV relevance)
1995	Constitution of the Republic of Kazakhstan (art 14)	Constitution	Equality before law; non-discrimination including by sex (legal basis for gender-equality/GBV protections).
1997	Criminal Code (16 July 1997) No 167-I	Code	Criminal-law basis for prosecuting sexual and other violent crimes (incl. GBV-relevant offences).
1997	Criminal Procedure Code (13 Dec 1997) No 206-I	Code	Procedural framework for investigation/prosecution; victim/participant protections in proceedings.
2007	Law (27 July 2007) No 314-III amending administrative liability in ‘family/domestic relations’	Law (amendments)	Strengthened/introduced administrative offence approach for ‘family and domestic relations’ misconduct (UN Women references this as an Admin Code article item).
2009	Law on Prevention of Domestic Violence (4 Dec 2009) No 214-IV	Law	Define DV (physical, psychological, sexual, economic); introduces protective/preventive tools (protection orders; behavioural restrictions; duties of state bodies).
2009	Law on State Guarantees of Equal Rights and Equal Opportunities (8 Dec 2009) No 223-IV	Law	Framework duties and principles supporting gender equality (enabling environment for GBV prevention).
2011	Code on Marriage (Matrimony) and Family (26 Dec 2011) No 518-IV	Code	Family-law framework relevant to protection of children/family members.
2013	Law amending legislation on countering trafficking in persons (4 July 2013) No 127-V	Law (amendments)	Expanded/updated anti-trafficking provisions across legislation (GBV-relevant area).
2014	Law on amendments to legislative acts on counteracting domestic violence (18 Feb 2014) No 175-V	Law (amendments)	Targeted strengthening/tuning of the domestic-violence legal framework and related acts.

Year	Legal act (official title / number)	Type	What changed (GBV relevance)
2014/ 2015	Criminal Procedure Code (newer CPC architecture in force mid-2010s; reflected in official/secondary compilations)	Code	Modernised procedural rules relevant to GBV case handling (UN Women lists 'New Criminal Procedure Code' in 2015).
2016	Ministerial Order approving the Standard for Special Social Services to Domestic-Violence Victims (21 Dec 2016) No 1079; later marked invalidated/updated)	Mandatory by-law	Binding minimum service standards for DV victim support services (shelter/crisis-centre type services).
2017	Law (3 July 2017) No 84-VI reforming law-enforcement legislation	Law (amendments)	Decriminalised battery/minor harm by removing them from the Criminal Code and shifting to administrative handling (major rollback for GBV deterrence).
2023	Law amending the Administrative Offences Code (20 Apr 2023) No 227-VII	Law (amendments)	Adjusted administrative liability articles used for violence in family/domestic settings (pre-2024 alignment).
2023	Law amending multiple acts incl. the Domestic Violence Prevention Law (20 Apr 2023) No 226-VII; (effective 1 Jul 2023)	Law (amendments)	Introduced amendments affecting the DV prevention statute (legal update wave prior to 2024 package).
2024	Law (15 Apr 2024) No 72-VIII on women's rights & child safety	Law (amendments package)	Re-criminalised battery/minor harm; amended multiple codes in Criminal Code/laws impacting GBV protection; entered into force June 2024.
2024	Law (15 Apr 2024) No 73-VIII amending the Administrative Offences Code (women/children safety)	Law (amendments)	Harmonised administrative law after re-criminalisation; also added new administrative protections (eg, bullying/cyberbullying of minors noted in official reporting).
2024	Law on Counteracting Trafficking in Persons (5 July 2024) No 110-VIII	Law	Standalone anti-trafficking statute (prevention, protection, coordination; GBV-relevant).
2025	Amendments to Law No 214-IV (DV Prevention Law) by Law No 172-VIII (15 Mar 2025)	Domestic violence/ IPV	Updates specific provisions in the consolidated DV law (competences/budget-related wording reflected in the updated text).

Year	Legal act (official title / number)	Type	What changed (GBV relevance)
2025	Amendments to Law No 214-IV (DV Prevention Law) by Law No 203-VIII (30 Jun 2025)	Domestic violence/ IPV	Updates the consolidated DV law, including provisions affecting definitions and/ or protection-order related norms (as shown in the updated text).
2025	Law No 210-VIII (16 Jul 2025) 'On Amendments... on Optimizing Criminal Legislation'	Stalking; forced/ coerced marriage; kidnapping-related GBV	Introduces Criminal Code (Republic of Kazakhstan) (CC) art 115-1 'Stalking' and criminal law changes addressing coercion into marriage/kidnapping practices.

Source: The table content is compiled by the author from UN Women, 'Global Database on Violence against Women' (2024); National legislation of the Republic of Kazakhstan (1995—2025).

Table A2. Legal implementation assessment: GBV (2019–2025)

Rec No	a)
Recommendation (verbatim)	Review its current legislation, including the Criminal Code, the Code of Administrative Offences and the law on domestic violence, to ensure that domestic violence is specifically criminalised, can be prosecuted ex officio and is sanctioned with appropriate penalties commensurate with the gravity of the abuse
Legal (evidence)	1. DV is not criminalised as a standalone, context-sensitive 'domestic violence' offence: CC arts 108-1 and 109-1 do not require a domestic context (they criminalise conduct generally). 2. Ex officio prosecution is not ensured: arts 108-1(1)/109-1(1) are private-public prosecution; initiation generally requires a complaint (CPC art 32(3)), with limited exceptions for prosecutor initiation (CPC art 32(4)). 3. Sanctions/penalties: CC art 108-1(1): fine up to 200 Monthly Calculation Index (MCI), or other penalties incl arrest up to 50 days; CC art 109-1(1): fine up to 80 MCI or arrest up to 25 days; art 109-1(2): arrest 30–50 days. Increased prison terms (eg, art 106 now 3–8 years instead of restricted liberty options). 4. 2024 'sanctions turn': following the November 2023 Nukenova case and public mobilisation, April 2024 amendments recriminalised battery and intentional minor bodily harm; the June 2024 Law 'On Ensuring Women's Rights and Children's Safety' entered into force, shifting away from warnings/fines/short detention to criminal penalties ranging from 80–1000 MCI and up to 2 years' imprisonment; 'harm to health' was removed from Code of Administrative Offences (Republic of Kazakhstan) (CAO) art 73, transferring these acts into criminal law (Alzhanova 2025). 5. Early enforcement indicators show case reallocation: H1 2024 registered 11,319 administrative cases (minor bodily harm) and 12,367 (battery); H2 2024 saw ~7,000 criminal cases opened under these categories, with reported declines in DV-related complaints (-24%) and DV killings (60 → 41). 6. Despite recriminalisation, an 'administrative remainder' persists: >74.3k administrative offences per year are still recorded under CAO art 73 (insults, humiliation, property damage), evidencing continued fragmentation.
Score	Partially implemented

Rec No	b)
Recommendation (verbatim)	Revise article 109 of the Criminal Code to base the definition of rape on the absence of consent and align it with the Convention and the Committee's jurisprudence under the Optional Protocol
Legal (evidence)	1. CC art 120 defines rape through use/threat of violence or exploitation of the victim's helpless state, rather than a general 'absence of consent' definition. 2. Updates after 2022: 3. Law of 15 April 2024: Amended art 120 (Rape) to eliminate the possibility of reconciliation between the victim and the perpetrator. However, the definition of rape in art 120 remains unchanged and is not fully based on the 'absence of consent' standard required by the Convention.
Score	Not implemented 2022 Committee comment: state party has not revised Criminal Code art 120; information provided is vague and incomplete quality of information unsatisfactory (CEDAW Committee 2022)

Rec No	c)
Recommendation (verbatim)	Review the bill on countering domestic violence with a view to ensuring its compliance with the Convention, in order to effectively prevent and combat all forms of GBV against women and protect victims
Legal (evidence)	1. State response: CC art 110 reclassified as semi-public prosecution; police now handle evidence collection. 2. Minimum sentence for aggravated cases increased from 3 to 4 years. 3. Administrative Code art 73: arrest term extended from 3 to 5 days. 4. Arts 73-1 and 73-2 (domestic violence) split; fines removed, arrests introduced. 5. Planned reforms include: • Improving coordination between agencies. • Limiting or abolishing reconciliation-based case closures (arts 73, 73-1, 73-2). • Expanding local inspectors' powers to issue protection orders. • Amending the 2009 DV Prevention Act (art 20) to add restrictions Updates after 2022: 1. Revised Principles (art 4): Officially established the 'primacy of human rights and freedoms over the interests of the family', shifting the legal focus from family preservation to victim safety (directly addressing CEDAW concerns) (Law No 226-VII, 20 April 2023). 2. Expanded Definitions: Introduced the legal definition of 'sexual harassment' (acts of a sexual nature), broadening the scope of combatting GBV. 3. Art 73-1 and 73-2 were excluded from the CAO (Law No 73-VIII, 15 April 2024). CAO provisions previously used to address domestic-violence-related conduct were removed from the administrative law framework and no longer apply as separate administrative offences. 4. Proposed legal adjustments to account for psychological factors, as well as economic and digital pressure (including cyber surveillance and the non-consensual dissemination of intimate materials).
Score	Not implemented 2022 Committee comment: Some amendments noted, but the state party has not reviewed the 2009 Domestic Violence Prevention Act in line with the recommendation (except plans to amend art 20); concerns remain that reconciliation is prioritised and that domestic violence cases are treated as administrative offences → quality of information partially satisfactory (CEDAW Committee) Partially implemented 2025

Rec No	e)
Recommendation (verbatim)	Ensure the timely and effective issuance, implementation and monitoring of eviction orders and the timely and effective implementation and monitoring of rehabilitation programmes for perpetrators
Legal (evidence)	1. CAO art 54(2): as part of 'special requirements to behavior', the court may (exceptionally) prohibit the aggressor from cohabiting in the dwelling with the victim for up to 30 days. 2. Law of 20 April 2023 CAO art 461: violation of protective measures/order can result in administrative arrest up to 10 days (repeat: up to 20 days). 3. Order of the Minister of Health No 48 (2024): Standardised the rules for psychocorrection, legally operationalising the mandatory rehabilitation process for perpetrators. (Implementation of rehabilitation programmes).
Score	Partially implemented
Rec No	f)
Recommendation (verbatim)	Ensure that all cases involving GBV against women are effectively investigated and that perpetrators are prosecuted ex officio and punished with appropriate sanctions, give priority to criminal proceedings over reconciliation and ensure that police officers who fail to take action or deter victims from filing complaints are held accountable
Legal (evidence)	1. Ex officio prosecution is not guaranteed: arts 108-1(1)/109-1(1) are private-public prosecution (CPC art 32(3)), so cases generally start only on the victim's complaint; prosecutor-initiated proceedings without a complaint are possible only in limited CPC art 32(4) exceptions. 2. Priority of Criminal Proceedings: CC art 68 restricts reconciliation-based release only in specified categories, including cases linked to repeat termination via reconciliation for offences under art 108-1/109-1; it is not a general ban for all GBV cases. 3. Police Accountability: Gap: No DV-specific 'failure to respond' offence is cited here; accountability relies on general service-crime provisions such as CC art 370 (inaction in service, incl. by law enforcement) and CC art 371 (negligence) This does not create an automatic, DV-specific duty-to-act enforcement mechanism.
Score	Partially implemented

Rec No	i)
Recommendation (verbatim)	Ensure that forced sterilisation and abortion are criminalised and perpetrators prosecuted, abolish mandatory gender reassignment surgery, in law and in practice, identify and eliminate the barriers preventing victims from gaining access to justice in rural and urban areas and ensure that all victims have access to effective reparation, including compensation
Legal (evidence)	1. Constitutional guarantees: right to health, equality before the law, right to defence and qualified legal assistance. 2. Abortion: no need for further criminalisation, as illegal abortion is already punishable under Criminal Code art 319. 3. Sterilisation: governed by Health Code (7 July 2020), art 151 — requires informed consent, procedure by licensed medical institutions and prior warning on irreversibility. 4. Access to justice: equal procedural rights in civil cases; no court complaints received on gender-based denial of justice; general complaint mechanisms available. 5. Rules regarding medical examination for gender reassignment (Order of the Minister of Health No KR DSM-170/2020) still imply medical interventions for legal recognition, contrary to the recommendation.
Score	Not implemented 2022 Committee comment: Information provided does not address criminalisation of forced sterilisation/abortion or prosecution of perpetrators; no information on steps to abolish mandatory gender reassignment surgery or to ensure access to justice and effective reparation (incl. compensation) → information is vague and incomplete, quality unsatisfactory (CEDAW Committee)
Rec No	k)
Recommendation (verbatim)	Accelerate the ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence
Legal (evidence)	1. Kazakhstan had not acceded by 23 April 2025 (expiry of the initial invitation period) and formally requested a two-year extension (letter of 3 April 2025) to complete internal processes.
Score	Not implemented

Table A3. Legal reforms: women's participation in political and public life in Kazakhstan (1997–2025)

Year	Legal Act (Title, Number, Date)	Type of Act	Summary of Changes (Impact on Women's Participation)
1995	Constitution of the Republic of Kazakhstan	Constitution	Art 33: Establishes the right of citizens to participate in governance, vote and be elected. Art. 14: Guarantees equality of rights and freedoms regardless of gender (constitutional foundation).
1998	Law No 248-I of 29 June 1998 on the Accession to the Convention on the Elimination of All Forms of Discrimination against Women	Law (Ratification)	Kazakhstan undertakes international obligations to eliminate discrimination, including art 7 (participation in public and political life).
1998	Presidential Decree No 4162 of 19 November 1998 on the National Commission on Women and Family-Demographic Policy	Presidential Decree	Establishes an institutional mechanism for promoting women in decision-making processes (consultative-advisory body).
2001	Law No 219-II of 4 July 2001 on Ratification of the Optional Protocol to the Convention	Law (Ratification)	Women are granted the right to submit individual complaints to the UN Committee in cases of violations of their political and other rights (accountability mechanism).
2002	Law No 344-II of 15 July 2002 on Political Parties	Law	Provides a legal framework for political parties. Limitation: High registration threshold (50,000 members) hindered the formation of new parties, including women-led ones.
2005	Presidential Decree No 1677 of 29 November 2005 approving the Gender Equality Strategy (2006–2016)	Strategy	Approves a long-term national strategy for gender equality. For the first time, a specific target is introduced: 30% women's representation in decision-making roles.
2009	Law No 223-IV of 8 December 2009 on State Guarantees of Equal Rights and Opportunities	Law	Establishes legal guarantees for gender equality across all spheres, prohibits gender-based discrimination and defines mechanisms for equality. Art 10: Equal access to public service. Art 11: Equal rights to vote and be elected (no quotas).

Year	Legal Act (Title, Number, Date)	Type of Act	Summary of Changes (Impact on Women's Participation)
2016	Presidential Decree No 384 of 6 December 2016 on the Family and Gender Policy Concept to 2030	Concept	Confirms the 30% target for women in executive, legislative and judicial authorities by 2030.
2020	Constitutional Law No 335-VI of 25 May 2020 on Amendments to the Law on Elections	Constitutional Law (Amendments)	Quota 1.0: Parties must include at least 30% women and youth under 29 in their lists (combined). Applied only during list registration.
2020	Law No 336-VI of 25 May 2020 on Amendments to the Law on Political Parties	Law (Amendments)	Lowered registration threshold from 40,000 to 20,000 members. Mandated 30% quota compliance in party list formation (art 15-1).
2020	Law No 333-VI of 25 May 2020 on Peaceful Assemblies	Law	Introduced a notification-based system for assemblies. Legally enabled greater civic activism, including women's marches.
2021	Constitutional Law No 41-VII of 24 May 2021 on Further Election Law Amendments	Constitutional Law (Amendments)	Quota 1.5 (Implementation): Closed legal gap. Ensured 30% quota also applies when mandates are distributed, not just during registration (art 97-1).
2022	Constitutional Law No 156-VII of 5 November 2022 (effective from 2023)	Constitutional Law (Amendments)	Quota 2.0 (Expansion/Dilution): 30% quota now applies collectively to women, youth and PWD. Risk: parties may comply without nominating women.
2022	Law No 157-VII of 5 November 2022 on Implementing the President's Address	Law (Amendments)	Reduced party registration threshold to 5,000 members. Amended art 15-1 to fix the new quota formula (women + youth + PWD).
2023	Enforcement of Law No 156-VII provisions (1 January 2023)	Electoral System	Introduced mixed electoral system for Mazhilis: 70% party lists/30% single-member districts. Enabled women to run as independent candidates.
2024	Government Resolution No 759 of 18 September 2024 on the Action Plan for 2024–2027	Government Resolution	Operationalises Concept-2030. Contains 46 measures to reduce gender stereotypes, expand economic opportunities and support women's leadership.

Source: The table content is compiled by the author from UN Women, 'Global Database on Violence against Women' (2024); National legislation of the Republic of Kazakhstan, 1995–2025.

Table A4. Legal implementation assessment: women’s participation in political and public life in Kazakhstan (2019–2025)

Rec No	a)
Recommendation (verbatim)	Review the concept for family and gender policy with a view to setting 50% quotas for the representation of women in all areas of life
Legal (evidence)	1. Decree of the President of the Republic of Kazakhstan No 53 (1 April 2022) established a target indicator to increase the proportion of women in the leadership of the quasi-public sector and at decision-making levels within the state apparatus to 30% by 2030. 2. Government Resolution of the Republic of Kazakhstan No 759 (18 September 2024) approves an implementation plan for the Concept/ policy framework: 46 measures, including measures aimed at reducing stereotypes, expanding opportunities and supporting women's leadership.
Score	Partially implemented

Rec No	b)
Recommendation (verbatim)	Introduce incentives for political parties to promote women in senior positions and governing bodies within their party structures and for increasing the visibility of women candidates during election campaigns
Legal (evidence)	1. The Constitutional Law of the Republic of Kazakhstan No 335-VI (25 May 2020) 'On Amendments to the Constitutional Law of the Republic of Kazakhstan "On Elections in the Republic of Kazakhstan- obliges political parties to include at least 30% of women and youth, under the age of 29, in their electoral lists"'. 2. The Law 'On Political Parties' No 336-VI (25 May 2020) – when registering party lists of candidates for deputies of the Mazhilis of Parliament and maslikhats (local representative bodies), political parties are required to include women and youth (persons under the age of 29) in them. Their combined share should be at least 30% only at the stage of list formation. 3. The Constitutional Law No 41-VII of the Republic of Kazakhstan (24 May 2021) – this law fixed a 30% quota for women and youth at the level of the entire electoral process in the allocation of mandates. 4. The Constitutional Law of the Republic of Kazakhstan No 105-VII (7 February 2022) 'On Amendments and Additions to Certain Constitutional Laws of the Republic of Kazakhstan'. If the previous laws (of 2020 and 2021) established a 30% quota for only two groups: women and youth, this law added a third category to them-persons with disabilities. 5. Constitutional Law of the Republic of Kazakhstan No 156-VII (5 November 2022) introduced a mixed electoral system and the right to self-nomination in single-member constituencies, which opened up channels for women, youth and PWD to participate directly in elections, regardless of party lists. 6. Law of the Republic of Kazakhstan No 157-VII (5 November 2022) lowered party registration threshold further (5,000 members) and aligned party-law rules with the updated quota formula (women+youth+PWD as a combined group). 7. Constitutional Law No 156-VII (5 November 2022) introduced regulation of election campaigning on online platforms by amending the Constitutional Law (28 September 1995) 'On Elections in the Republic of Kazakhstan', art 28(3). The amendment requires users of online platforms to (i) provide a place/time for posting campaign materials on a contractual basis and (ii) publish and submit information on prices/tariffs and conditions to election commissions (Central Election Commission/territorial commissions).
Score	Partially implemented

Appendix B

Institutional-level implementation assessment

Table B1. Institutional implementation assessment: GBV in Kazakhstan (2019–2025)

Rec No	d)
Recommendation (verbatim)	Encourage the reporting of all forms of GBV against women and girls, including domestic and sexual violence
Institutional level (evidence)	1. Unified e-appeals system eOtinish (2021) as an institutional digital channel for submitting and tracking appeals/complaints to public authorities (including GBV cases). 2. Trainings/outreach by police: more than 52,000 'lectures, workshops and training sessions' (at educational institutions). 3. Topic: 'legal topics, including the protection of women from violence'. 4. '111' Contact Center in 2023 for assistance to victims of domestic violence and children. In 2025, QR codes have been introduced in all educational institutions for instant communication with this line, which directly encourages young people and women to report problems. 5. Transition to a 'detection-based' registration model officially reported as a key factor in increasing trust and petition numbers (Ombudsman Report, Geneva 2025).
Score	Partially implemented

Rec No	e)
Recommendation (verbatim)	Ensure the timely and effective issuance, implementation and monitoring of eviction orders and the timely and effective implementation and monitoring of rehabilitation programmes for perpetrators;
Legal (evidence)	1. Police issued 83,998 (2022), 87,846 (2023) and 85,035 (2024) restraining/ protection orders. 2. By police request, courts imposed 12,357 (2022), 15,411 (2023) and 18,572 (2024) 'special requirements', including 9,229 (2023). 3. Eviction-related restriction (ban on cohabitation): Courts applied a prohibition of cohabitation/removal from the shared residence in 506 cases (2022) and 226 cases (Jan-Jul 2023). 4. Following the 2024 reform,²⁶⁵ temporary eviction up to 30 days was applied in 44 cases (2024). 5. Pilot on rehabilitation/psych correction of aggressors: from 1 March 2023, the MIA and akimats (Astana, Almaty, Pavlodar) launched a pilot with an ODARA risk assessment; voluntary psych corrective trainings (anger/aggression control) were offered to identified persons 'prone to domestic violence'. State acknowledges the lack of systemic rehabilitation, listing 'Offender Psycho-correction programmes' as a priority in the 'Future Plans' strategy for 2025-2026 (Ombudsman Report, Geneva 2025).
Score	Partially implemented
Rec No	f)
Recommendation (verbatim)	Ensure that police officers who fail to take action or deter victims from filing complaints are held accountable
Institutional level (evidence)	6. Digital trace (eOtinish/ERDR): every '102' call is automatically logged; non-registration or deletion without an official report is system-flagged. 7. Body-worn cameras: mandatory on DV calls; missing footage or recorded pressure to 'reconcile' triggers an internal review by the MIA Department of Own/Internal Security (DSB). 8. Specialised units (MIA): dedicated Protection of Women from Violence units (PZZhN, RU: ПЗЖН) oversee/audit district and patrol officers' handling of DV cases.
Score	Partially implemented

²⁶⁵ Republic of Kazakhstan, Law No 72-VIII (15 April 2024) 'On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Ensuring Women's Rights and Children's Safety' < <https://cis-legislation.com/document.fwx?rgn=157936> > accessed 22 December 2025.

Rec No	g)
Recommendation (verbatim)	Strengthen the availability and accessibility, through funding from the state budget, of long-term and short-term shelters, medical and psychological care and legal assistance, in urban and rural areas, to all women who are victims of, or who are at risk of, GBV, regardless of whether they are living with HIV/AIDS or are engaging in prostitution
Legal (evidence)	1. The total number of crisis-centres increased from 33 (2019) to 44 (2021) and remained around 42–44 (2022–2023). 2. The Commissioner for Human Rights explicitly identified ‘Expanding rural hotlines and local crisis centers’ as a key strategic goal, indirectly confirming current coverage gaps in rural areas (Ombudsman Report, Geneva 2025). 3. Specialised police units for the protection of women from violence expanded significantly: 119 staff (2019–2020) → 248 (2021–2022) → 256 (2023–2024) 4. Short-term shelter function within FSCs (2024 Rules): the unified Rules for the Activity of Family Support Centers introduce emergency placement for persons showing signs of domestic violence, including temporary accommodation for up to one month (≈30 days). 5. Funding (2022): crisis-centres are fully funded from local budgets; 1,156,593,000 tenge allocated for maintenance (government-reported). 6. Service package/accessibility (2023): shelters provide eight types of special social services (incl medical, psychological and legal support). 7. Family Support Centers (FSCs) — coverage/urban–rural access: the state reports 136 Family Support Centers in operation (55 urban/81 rural) with a plan to expand the network to all districts by 2027. 8. Monitoring: routine monitoring of special social service providers; video surveillance coverage reported. 9. Independent oversight: NPM monitors special social services at crisis centres.
Score	Partially implemented

Rec No	h)
Recommendation (verbatim)	Provide mandatory training on the prevention and detection of, as well as a gender and victim-centred response to, all forms of GBV, paying particular attention to protecting confidentiality, and align the standard procedure for providing special social services to victims of domestic violence with international standards
Institutional level (evidence)	10. Training has been provided to >3,000 judges, additional multi-sector trainings conducted with OSCE/UN support. However, the training is project-based. 11. By 2024, over 10,500 specialists (police, judges, medical professionals, social workers) will have been trained, in cooperation with the OSCE, the UN and NGOs, using methodological guidelines. 12. More than 360 female investigators have been recruited to the police with victims of sexual offences against women and minors to ensure confidentiality. 13. In Kazakhstan, with the support of UNFPA, a project was launched in 2021 to implement the first national clinical protocol for the health care system to respond to GBV, including training for primary health care workers. 14. Kazakhstan launched the 'Pilot Project for the Provision of Comprehensive Assistance to Victims of Sexual Violence through Specialized Centres'; memorandums of understanding (MoUs) were signed with 52 centres nationwide and 149 investigations were conducted (including 117 involving minors); by 2025, the state reported a single-window ('one-stop shop') principle in crisis centres and MoUs with 63 centres. involving women (including 117 minors). 15. The state reports that the National Preventive Mechanism (NPM) monitors organisations providing specialised social services in crisis centres, adding a layer of independent oversight of assistance delivery standards. 16. Strengthening the professionalisation of the social-services workforce by maintaining a register of social workers and introducing standardised retraining programmes in 14 universities, aimed at improving service quality and ensuring a more victim-centred, consistent response across providers.
Score	Partially implemented

Rec No	j)
Recommendation (verbatim)	Ensure that all institutions in which women with disabilities live are effectively monitored by independent authorities in order to prevent violence and abuse
Legal (evidence)	1. NPM conducts preventive visits to closed institutions, including organisations providing special social services and compulsory treatment, ie, settings relevant for women with disabilities living in residential care: in 2019 – 495 preventive visits, in 2020 – 516, resulting in 3,319 recommendations; in 2024: monitoring covered 489 institutions within the mandate, including 79 social protection organisations and 49 healthcare organisations/3,254 recommendations were made, of which 25% were marked as implemented, with the rest still under consideration. 2. Since 2021, Kazakhstan has required all medical and social institutions, including boarding schools for the elderly and people with disabilities, be equipped with video surveillance cameras. 3. On 1 January 2025, any organisation in Kazakhstan providing social services to women with disabilities must have a license, one of the conditions for obtaining which is a properly functioning video surveillance system to ensure security.
Score	Partially implemented

Source: The table content is compiled by the author from CEDAW, 'Replies to the list of issues' (2025); OHCHR, 'Follow-up Letter' (2022); Law of the Republic of Kazakhstan 2019–2025.

Table B2. Institutional implementation assessment: women's participation in political and public life in Kazakhstan (2019–2025)

Rec No	a)
Recommendation (verbatim)	Review the concept for family and gender policy with a view to setting 50% quotas for the representation of women in all areas of life
Institutional level (evidence)	1. 2022 – Updated the Family and Gender Policy framework to 2030 and its Implementation Plan; introduced/continued annual monitoring and annual public reporting on the competent body's website.²⁶⁶ 2. 2022–2023 National Commission on Women's Affairs (under the President): Reviewed implementation of the 2030 framework at Commission meetings; ensured coordination/oversight, including NGO participation. 3. 2024 — Government Resolution No 759 approved a Step-by-Step Action Plan (46 measures) to operationalise the 30% target.
Score	Partially implemented

²⁶⁶ Committee for Youth and Family Affairs of the Ministry of Culture and Information of the Republic of Kazakhstan, 'Documents' (Unified Platform of Internet Resources of State Bodies) 1 <<https://www.gov.kz/memleket/entities/fam/documents/1?lang=ru>> accessed 10 December 2025.

Rec No	b)
Recommendation (verbatim)	Introduce incentives for political parties to promote women in senior positions and governing bodies within their party structures and for increasing the visibility of women candidates during election campaigns
Legal (evidence)	1. Police issued 83,998 (2022), 87,846 (2023) and 85,035 (2024) restraining/ protection orders. 2. By police request, courts imposed 12,357 (2022), 15,411 (2023) and 18,572 (2024) 'special requirements', including 9,229 (2023). 3. Eviction-related restriction (ban on cohabitation): Courts applied a prohibition of cohabitation/removal from the shared residence in 506 cases (2022) and 226 cases (Jan-Jul 2023). 4. Following the 2024 reform,²⁶⁷ temporary eviction up to 30 days was applied in 44 cases (2024). 5. Pilot on rehabilitation/psych correction of aggressors: from 1 March 2023, the MIA and akimats (Astana, Almaty, Pavlodar) launched a pilot with an ODARA risk assessment; voluntary psych corrective trainings (anger/aggression control) were offered to identified persons 'prone to domestic violence'. State acknowledges the lack of systemic rehabilitation, listing 'Offender Psycho-correction programmes' as a priority in the 'Future Plans' strategy for 2025-2026 (Ombudsman Report, Geneva 2025).
Score	Partially implemented

²⁶⁷ Republic of Kazakhstan, Law No 72-VIII (15 April 2024) 'On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Ensuring Women's Rights and Children's Safety' < <https://cis-legislation.com/document.fwx?rgn=157936> > accessed 22 December 2025.

Rec No	c)
Recommendation (verbatim)	Provide training to women on political leadership, campaigning and negotiation skills
Legal (evidence)	1. 2019–2025 Local executive bodies (Akimats)/NGO network: Institutionalised regional women's leadership schools (≈70 NGOs) and clubs of women politicians operating in all 17 regions as permanent platforms for training/mentorship and political skills development. 2. 2020–2022 Academy of Public Administration: Institutionalised mandatory gender equality modules for civil servants; trained over 1,200 officials. 3. 2022–2025 Amanat Party Academy/UN Women: Launched and scaled the 'Tomiris' Leadership Project. Annually trains 200–300 women politicians; completion is now a criterion for internal party promotion. 4. 2025: Launched the 'Börte' School of Political Leadership, specifically focusing on strategic thinking and media relations for female party members. 5. 2025 – Alliance of Women's Forces: Conducted training cycles at the School of Women's Political Leadership, focusing on crisis management (working with provocations) and SMM promotion. 6. 2025 – Academy of Public Administration: The Center for Electoral Training held specialised seminars to upgrade the qualifications of election process participants (focus on state apparatus capacity).
Score	Partially implemented
Rec No	d)
Recommendation (verbatim)	Ensure the collection of data, disaggregated by age, ethnic group and region, on the participation of women in political and public life
Legal (evidence)	1. 2019–2025 – Bureau of National Statistics publishes gender statistics and notes that the statistical collection 'Women and Men of Kazakhstan' is released/posted as an official publication; state report also references regular 'Women and Men of Kazakhstan' compendium as institutional output. 2. 2022 – Disaggregation extension (ethnicity/region/class): 'Gender Needs and Requirements Map' measuring impact of ethnicity, region and class. 3. 2023–2025 National Commission (under the President): Established a Consortium of 15 research organisations to conduct gender audits, gender expertise, analytical monitoring tools and a Gender Equality Certification Program (institutional research/monitoring mechanism supporting evidence-based policy).
Score	Partially implemented

Rec No	e)
Recommendation (verbatim)	Take effective measures to address regional disparities in the political representation of women, including by encouraging their active political participation
Legal (evidence)	1. 2019–2025 Akimats/NGO network: Established and maintained clubs of women politicians in all 17 regions to encourage women's political participation and reduce regional gaps in representation. 2. 2024 – Local Executive Bodies (Akimats): Introduced the position of non-staff advisers on gender equality to regional Akims to coordinate local policy implementation.
Score	Partially implemented
Rec No	f)
Recommendation (verbatim)	Raise awareness among political leaders and the general public that the full, equal, free and democratic participation of women on an equal basis with men in political and public life is a requirement for the full implementation of the human rights of women.
Legal (evidence)	1. 2023 – State information policy instruments: annual media plans and state information work — in uploaded replies, the government reports 1,105 materials (TV/radio/online/print/social) as an institutionalised awareness mechanism. 2. 2024 – Government of RK (UN Security Council Resolution 1325 framework): Updated the National Action Plan on implementation of UN Security Council Resolution 1325 to strengthen women's participation in peacebuilding and related awareness/capacity measures. 3. 2025 – National Commission/Alliance of Women's Forces: organised the 'BeWoman Asia' International Forum (Sept 2025) and media campaigns for Beijing+30 to shift public discourse on women's political role. 4. 2025 (Oct) – Expert Community/MPs: Convened the I National Congress on Women's Political Leadership. This created a new high-level institutional platform for consolidating the women's political agenda. 5. 2025 (Dec) – Busan Global Women's Policy Network: Participation in the forum on exchanging experiences between Central Asia and ASEAN. This integrates Kazakhstan into the international institutional network of female politicians. 6. 2025 – Government of RK (UN Security Council Resolution 1325 framework): Launched the second National Action Plan (from 2025) expanding measures from 16 to 34, including training of journalists/civil servants, public monitoring, women's leadership initiatives and other institutional awareness components.
Score	Partially implemented

Source: The table content is compiled by the author from CEDAW, 'Replies to the list of issues' (2025); OHCHR, 'Follow-up Letter' (2022); Law of the Republic of Kazakhstan 2019–2025.

Appendix C

C.1. Respondent list and coding

Table C1. List of interview respondents

Code	Respondent (as cited in thesis)	Date
INT1	Aida Alzhanova (international gender expert)	Dec 2025
INT2	Gulzada Serzhan (lesbian feminist activist, Almaty, Kazakhstan)	Dec 2025
INT3	Anonymous respondent (representative of an international organisation in Kazakhstan)	Dec 2025
INT4	Anonymous respondent (women's rights activist)	Dec 2025
INT5	Anonymous respondent (representative of an international organisation in Kazakhstan)	Dec 2025
INT6	Anonymous respondent (practicing legal professional)	Dec 2025
INT7	Anonymous respondent (practicing legal professional)	Dec 2025

C.2. Respondent list and coding

Semi-structured interviews were tailored to respondents' professional profiles but followed a common analytical frame: assessment of CEDAW implementation across legal, institutional and practical levels.

The thematic emphasis by group was as follows:

01 — International organisations (INT3, INT5)

- Implementation architecture (mandates/targets, coordination, resources, accountability)
- Monitoring and data (reporting routines, data quality and usability for accountability)

02 — Gender expert (INT1)

- Women's political participation (quota design, party gatekeeping, representation outcomes)
- Implementation architecture (how formal mechanisms translate – or fail to translate – into substantive change)

03 — Women's rights/feminist activism (INT2, INT4)

- Civil society space and external accountability (enabling environment, constraints on advocacy/feedback loops)
- Access to protection and enforcement in practice (including GBV-related implementation barriers)

04 — Legal professionals (INT6, INT7)

- Access to justice and enforcement (procedural bottlenecks, remedies, implementation in practice, incl. GBV)
- Regional disparities in implementation (variation in practice across regions and institutions)



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