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Ethical issues and self-regulation in the Central Asian media: Features and problems

Aina Duishekeeva*

PhD in Philology, Associate Professor
Jusup Balasagyn Kyrgyz National University
720033, 547 Frunze Str., Bishkek, Kyrgyz Republic
<https://orcid.org/0009-0007-7286-1298>

Rakhima Nuriden

PhD in Philological Sciences, Associate Professor
L.N. Gumilyov Eurasian National University
010000, 2 Satpayev Str., Astana, Republic of Kazakhstan
<https://orcid.org/0009-0004-4950-5576>

Nursultan Myktybayev

Postgraduate Student
Jusup Balasagyn Kyrgyz National University
720033, 547 Frunze Str., Bishkek, Kyrgyz Republic
<https://orcid.org/0009-0006-0443-705X>

Nargiza Alieva

Postgraduate Student
Jusup Balasagyn Kyrgyz National University
720033, 547 Frunze Str., Bishkek, Kyrgyz Republic
<https://orcid.org/0009-0003-3277-8116>

Asel Emilbekova

Postgraduate Student
Jusup Balasagyn Kyrgyz National University
720033, 547 Frunze Str., Bishkek, Kyrgyz Republic
<https://orcid.org/0009-0006-8649-1278>

Abstract. The purpose of the study was to assess ethical issues and the effectiveness of media self-regulation mechanisms in Kazakhstan and Kyrgyzstan. The research methodology included the use of methods of content analysis of legislation and activities of media organisations, a case method for analysing specific incidents and international organisations, a statistical approach to the use of digital technologies in Kazakhstan and Kyrgyzstan, and a comparative analysis of self-regulation practices. The main result of this study was the analysis of ethical challenges and practices of self-regulation of journalism in the context of digital transformation in Central Asian countries. The study identified and analysed the problems of disinformation, censorship, and pressure on

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*Corresponding author (duishekeevaaina4@gmail.com)

journalists. The effectiveness of media self-regulation practices was also evaluated using the example of Kazakh and Kyrgyz organisations. It was determined that the spread of the Internet and the development of digital technologies, especially social networks, have become an important channel for the spread of disinformation and propaganda in the Central Asian region. The analysis of the scheme for analysing fact-checking information became a landmark in the study. A comparative analysis of the practices of self-regulation of mass media in Kazakhstan and Kyrgyzstan showed that in Kyrgyzstan, self-regulation of mass media is better developed than in Kazakhstan, due to the active participation of public organisations. However, both countries face restrictions on freedom of speech, in particular, with increased state control of the media, a lack of mediation, and fact-checking mechanisms. The study showed that in order to overcome ethical challenges, it is necessary to increase the media literacy of the population, strengthen media independence and develop effective mechanisms for self-regulation. The results of this study can be used to develop strategies aimed at improving the standards of journalism and ensuring freedom of speech in Central Asian countries

Keywords: fact-checking; censorship; freedom of speech; disinformation; fake news; media literacy

Introduction

In the context of the growing flow of information, the development of digital technologies and the increasing influence of social networks, issues of compliance with ethical standards in journalism are becoming particularly acute. In particular, in the context of political instability and social conflicts, ensuring the safety of journalists and protecting their rights has become critical to preserving freedom of speech and access to reliable information. This requires the creation of effective mechanisms to protect and support media workers, and increased responsibility for attacks on them. Research on these issues is important for ensuring freedom of speech, increasing confidence in the media (mass media), and strengthening democratic institutions in Central Asian countries. A review of recent research on ethical issues and self-regulation in Central Asian media, particularly in Kyrgyzstan and Kazakhstan, revealed a number of common and specific challenges. The study by B. Kurambayev (2020) pointed out that plagiarism in journalism in Central Asia is rampant and encouraged by government mechanisms, leading to a false model of excellence for future journalists and the public. According to B. Kurambayev & E. Freedman (2019), Central Asian journalists exhibit widespread ethical misconduct, including a lack of balance and impartiality, the use of multiple false names, the sale and/or purchase of news, bribery of journalists, etc., which indicates the need to improve ethical standards in journalism to improve public life and potential democracy. In particular, the above-mentioned list of challenges, according to researchers, is most typical for the Kyrgyz media. Thus, the results of the study by S.M. Gabbay (2024) showed that despite gaining independence in 1991 and steps towards democratisation, Kyrgyzstan continues to struggle with serious human rights issues, including restrictions on freedom of speech and interference with freedom of association. However, the Kyrgyz media act as an intermediary between society and the authorities, performing the functions of the "fourth power", despite the pressure of various political forces (Asanova & Eshimkanova, 2024). Accordingly, Kyrgyzstan's political culture and media development have contributed

to the creation of pluralism in the information space, where the media play a role as an intermediary between society and the authorities.

In Kazakhstan, there is a tendency to strengthen state control over the information space, which restricts freedom of speech and media independence. The study by S.B. Ryskeldinova & K.O. Sak (2021) noted that Kazakh media are experiencing difficulties inherited from the Soviet media system, in particular, there are remnants of old structures in the media that hinder and restrict independent journalism. Restrictions on the flow of information and the independence of journalism in Kazakhstan hinder freedom of speech and media independence, which are prerequisites for the development of democracy. L.T. Akilzhanova *et al.* (2023) indicated that the state has strengthened control over information processes to preserve data security in the context of the transition of the Republic of Kazakhstan to the digital economy. The researchers also stressed that the improvement of the situation is possible due to the improvement of information literacy of the population and its support through interaction with civil society organisations and the introduction of publicly available media education programmes. The analysis of these studies revealed a tendency to strengthen state control over the information space of Kazakhstan, which led to restrictions on freedom of speech and independence of the media, and to an increase in cases of censorship and pressure on journalists. N. Nandagopal (2022) stated that media ethics are crucial for proper broadcasting, avoiding misrepresentation, and promoting universal values, truthfulness, accountability, and the rule of law. Therefore, the media must adhere to ethics when collecting and distributing news, ensuring objectivity and fairness in presenting information to society. M. Altintop & G. Bak (2022) noted that self-regulation of new media is crucial because it allows individuals to produce and consume content without a corporate identity, but its effectiveness depends on individual content production and ethical standards. Media literacy skills can help people to fight misinformation and fake news on social

media by reducing polarisation and promoting informed decision-making (Popescu, 2020). Thus, the above-mentioned studies highlighted the role of media ethics and media literacy in ensuring quality journalism and combating disinformation, especially in the context of the development of new media, where self-regulation and ethical standards have become key to the development of an objective and fair information ecosystem.

Most studies on this topic focus on identifying problems, but do not provide a detailed comparative analysis of existing self-regulation mechanisms and their effectiveness. It is not well understood how differences in political culture and legislation affect the media's ability to self-regulate. Therefore, the purpose of this study was to identify key challenges and develop recommendations for improving ethical standards and the effectiveness of self-regulation. The implementation of the goal included the following tasks: to identify the main ethical problems faced by the media in Kyrgyzstan and Kazakhstan, including plagiarism, censorship, disinformation, and corruption; to analyse the existing mechanisms of self-regulation in both countries, including codes of ethics, media councils and other institutions, and evaluate their effectiveness; to carry out a comparative analysis of media self-regulation practices on the example of the countries under study, identifying differences.

Materials and Methods

The analysis of the features of the functioning of ethical problems and practices of self-regulation in the media was based on a study of such countries as Kazakhstan and Kyrgyzstan. The purpose of the study was to use such methods as analysis, case method, comparative analysis, and statistical approach. The content analysis method was used to investigate the legislative framework, codes of ethics, and public organisations regulating media activities in Kazakhstan and Kyrgyzstan. The main sample for this analysis was Kyrgyz organisations, such as Public Association of "Journalists" (2009), Independent union of journalists in the Kyrgyz Republic (IUJKR) (2021) and Media self-regulatory body (n.d.). Kazakh organisations such as Union of Journalists of Kazakhstan (2021), Ministry of Information and Social Development (2022) and Factcheck.kz (n.d.). Code of Ethics of Journalists of the Kyrgyz Republic (2007) and Code of Ethics of Journalists of the Republic of Kazakhstan (2012) were also considered. The main criteria for selecting the above-mentioned organisations were: relevance to the media sphere (direct attitude of organisations to the regulation, protection or support of media activities in both countries), influence on the development of media policy (role in the development of the legislative framework, ethical standards or public opinion regarding the media); diversity of functions (representation of various aspects of self-regulation – protection of journalists' rights, development of professional standards, media literacy and fact-checking), representation of various

stakeholders (interests of journalists, editors, the public, and the state). An additional sample was legislative acts. Among them were the Constitution of the Republic of Kazakhstan (1995) and the Constitution of the Kyrgyz Republic (2021). The source database also included Law of the Republic of Kazakhstan No. 451-I (1999), Law of the Republic of Kazakhstan No. 401-V (2015) and Law of the Republic of Kazakhstan No. 545-IV (2024).

The case method was used to analyse specific international organisations, including the Conference on Security and Co-operation in Europe (1975), Committee to Protect Journalists (2025) and the International fact-checking network (2025). Statistical data on the functioning and use of the Internet among the population in Kazakhstan and Kyrgyzstan provided by S. Kemp (2025a; 2025b), including statistics on users of social networks Facebook, Instagram, LinkedIn, Snapchat, Twitter (X), were also used. The case method was also used to analyse specific incidents, such as the protests in 2020 in Kyrgyzstan and 2022 in Kazakhstan, which allowed illustrating the ethical challenges that journalists face in conditions of political instability. Therefore, some articles from online sources were analysed: The Kyrgyz authorities blocked... (2022), A. Syzdykov (2024) and Freedom House (n.d.). The method of statistical analysis was used to interpret data on the use of the Internet and social networks Facebook, Instagram, Twitter, Snapchat, and LinkedIn in Kazakhstan and Kyrgyzstan. This helped to understand the impact of digital technologies on the information space and identify trends in the spread of disinformation. The method of comparative analysis was used to identify differences and similarities in media self-regulation practices between the two countries – Kazakhstan and Kyrgyzstan, and to assess the effectiveness of the presented practices. The comparative analysis was carried out based on the following features: the legislative framework, existing professional organisations, codes of ethics, self-regulation mechanisms, and the focus of organisations' activities. Approaches to the interpretation of the results obtained were based on the principles of objectivity and impartiality. Information from various sources was critically evaluated and compared to identify patterns and trends. The results of the analysis contributed to the achievement of the research goal, as they allowed assessing the ethical challenges faced by modern journalism in Kazakhstan and Kyrgyzstan. They also provided insight into how self-regulatory practices can help to overcome these challenges and improve the quality of journalism in the region.

Results

Ethical challenges in contemporary journalism in Kazakhstan and Kyrgyzstan

Journalism in Central Asia faces a number of serious ethical challenges that complicate its role as an independent and responsible source of information. Media

ethics plays an important role in maintaining the objectivity of news, protecting the public’s right to information, and building trust in the media (Wang, 2024). One of the main problems is disinformation, which is spread through both conventional media and social networks. False information, fake news, and manipulation of public opinion undermine the credibility of journalism and pose a threat to public stability. A notable example of disinformation was the guide on the October 2020 Kyrgyz political crisis following the parliamentary elections (Kazama, 2024). Then the results of the parliamentary elections caused mass protests, which led to a change of power. During the protests, social networks such as Facebook, Twitter, and Telegram became the main source of information. However, many of the reports were unverified, contradictory, or downright false. Rumours of election fraud, violence, and political intrigue spread. These messages were often emotionally coloured, which contributed to their rapid spread. Disinformation on social media has had a significant impact on public opinion. The dissemination of unverified information was widely accepted as factual, thereby exacerbating social tensions. This complicated the work of journalists and made it difficult to cover events objectively. A similar situation regarding the mass spread of disinformation occurred in Kazakhstan in 2022 – a series of mass protests began due to a sharp increase in prices for liquefied gas, which is used as fuel for cars (Keegan, 2022). However, the protests later became more political in nature, reflecting public discontent with the socio-economic situation, corruption, and authoritarian rule. According to Freedom House (n.d.), during the riots in Kazakhstan, there were significant interruptions in Internet access. In particular, in Almaty, the mobile Internet was completely blocked, indicating that the Kazakh authorities tried to restrict access to information during the riots. Another important challenge is censorship, which can be either direct (state) or indirect (self-censorship, economic pressure). Restrictions on freedom of speech and access to

information complicate the work of journalists and limit opportunities for objective coverage of events. In Kyrgyzstan, there is a tendency to strengthen state control over the information space. For example, blocking the information resource Azattyk (The Kyrgyz authorities blocked..., 2022). As noted by F.F. Babayev (2024), the media resource Azattyk is known for its objective coverage of events both in the country and in the world, in particular, regarding public life and democratic processes, and has repeatedly faced blocking on the territory of Kazakhstan, especially during periods of political instability or social protests.

Digital technologies and social media can affect the ethical standards of journalism in different ways. On the one hand, they expand the possibilities for obtaining and distributing information, and on the other hand, they make it more difficult to control its reliability and dissemination. As noted by R.S. Zhasylykbaeva et al. (2024), the digital environment has significantly changed the way information is created and disseminated, which affects compliance with ethical standards in journalism. Digital technologies allow journalists to access a wide range of sources of information, which contributes to faster and more comprehensive coverage of events. Social media has become an important tool (Facebook, Instagram, Twitter, Snapchat, LinkedIn) for gathering information, especially in the context of limited access to traditional sources (Blikhar et al., 2023; Andrisano Ruggieri et al., 2024). Digital platforms allow journalists to establish direct contact with their audience, receive feedback, and engage citizens in the news creation process. Interactive formats, such as online broadcasts, surveys, and comments, increase audience engagement and promote citizen journalism. Digital technologies allow independent journalists and bloggers to circumvent censorship and disseminate information that is not available in traditional media. Figure 1 presents a comparative overview of social media platform usage in Kazakhstan and Kyrgyzstan at the start of 2025.

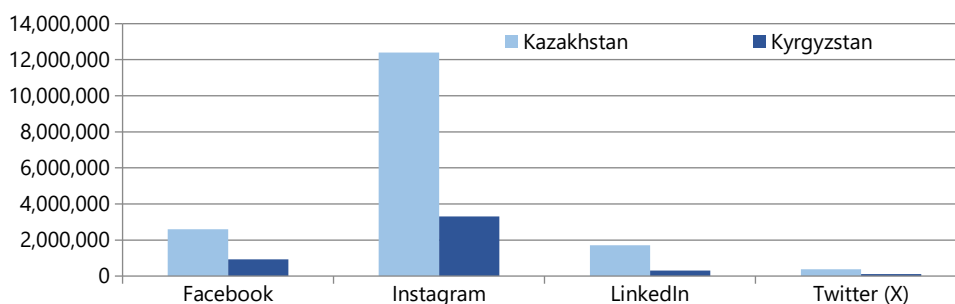


Figure 1. Social network usage statistics at the beginning of 2025

Source: compiled by the authors based on S. Kemp (2025a; 2025b)

As shown in Figure 1, about 93% of the population in Kazakhstan used the Internet, which was 19.2 million people. Over the past year, the number of Internet users increased by 1.3%, that is, by 238 thousand

people. However, more than 7% of the population, namely 1.48 million people, still do not have access to the Internet. At the beginning of 2025, Kyrgyzstan had 6.41 million Internet users, which was 88.5% of the

total population. Social media, including Facebook, Instagram, Twitter, Snapchat, and LinkedIn, have a significant impact on the dissemination of information and the development of media discourse. At the beginning of 2025, about 15.7 million Kazakh adults were active users of social networks. Instagram is the dominant social network in both countries, indicating the growing importance of visual content in the region. Facebook is much more popular in Kazakhstan than in Kyrgyzstan. Social networks are important in disseminating information and shaping media discourse in both countries. Social media raises concerns about privacy, security, and ethics, and to balance these concerns, attention must be paid to data monetisation, algorithmic bias, and misinformation (Rajagopal *et al.*, 2024). The lack of effective mechanisms for verifying information and the low level of media literacy of the population complicate the fight against disinformation. Digital technologies pose risks to privacy breaches and cyberbullying, especially against journalists who investigate or criticise the authorities. Anonymity on the Internet contributes to the spread of hate speech and aggression. The use of artificial intelligence to create news and analyse data raises new ethical questions related to objectivity, transparency, and responsibility. Digital technologies are changing the business model of traditional media, which creates financial difficulties and can affect the independence of editorial offices. It is necessary to develop effective mechanisms for self-regulation and raise ethical standards of journalism in the context of digital transformation. The impact of digital technologies on the ethical standards of journalism is a dynamic process that requires constant analysis and adaptation.

In the context of political instability and social conflicts, journalists face special ethical challenges. Conflict-sensitive journalism involves journalists being aware of the potential impact of their materials on conflict escalation. It emphasises the need for balanced coverage of events, avoiding hate speech and stereotypes. An example is projects that support journalists in conflict zones by teaching them methods of conflict-sensitive coverage. In conflict situations, protecting information sources becomes critical. Journalists should take steps to ensure the anonymity of sources that may be at risk. International organisations such as Reporters Without Borders support journalists in protecting their sources (A guide to journalism safety organizations, 2022). In conflict situations, disinformation can spread very quickly, which complicates the work of journalists. International organisations and media initiatives are developing tools and methods for fact-checking and combating disinformation. Organisations such as the International fact-checking network (2025) coordinate fact-checking activities around the world. Committee to Protect Journalists (2025) provide support to journalists working in hazardous environments. They provide security training, legal assistance, and document attacks on

journalists. Conference on Security and Co-operation in Europe (1975) publishes manuals for journalists working in conflict zones, which set out the rules for safe work. Journalists must comply with international humanitarian law governing coverage of armed conflicts. This includes a ban on propaganda of war, incitement to hatred and the dissemination of information that could harm the civilian population. Modern media face challenges in creating accurate and ethical news, as fake news is readily available, and regulators must set standards and protect the public from bad journalism (Frost, 2021). To overcome these challenges, it is necessary to increase the level of media literacy of the population, strengthen media independence, and develop effective mechanisms for self-regulation. It is also important to ensure the safety of journalists and protect their rights.

Practices of self-regulation of the work of journalists and mass media in Kyrgyzstan

In Kyrgyzstan, the activities of mass media are regulated at the legislative level by a number of laws that define the rights and obligations of journalists, and impose restrictions on the dissemination of certain information. Among them are the Law of The Kyrgyz Republic No. 938-XII (1992) (defines the legal basis for the activities of mass media, the procedure for their creation and registration, the rights and obligations of journalists), Constitution of the Kyrgyz Republic (2021) (guarantees freedom of speech and the press, prohibits censorship) and Law of the Kyrgyz Republic No. 161 (2025) (regulates the dissemination of false information, establishes responsibility for its dissemination). Self-regulation of new media is crucial because it allows individuals to produce and consume content without a corporate identity, but its effectiveness depends on individual content production and ethical standards (Altintop & Bak, 2022). There are professional organisations in Kyrgyzstan that promote media self-regulation, in particular, the Public Association of "Journalists" (2009). The Public Association of "Journalists" in Kyrgyzstan is one of the key organisations promoting the development of independent and responsible journalism in the country. The main aspect of this organisation's activities is the protection of the rights of journalists, providing legal and other support in cases of violation of their rights, speaking out against censorship, pressure on the media and harassment of journalists, seeking respect for freedom of speech. The organisation also conducts trainings, seminars, and other educational events for journalists aimed at improving their professional level and ethical standards. The organisation participates in media self-regulation processes, contributing to the creation and functioning of independent media councils and ethics commissions. It also promotes the development of independent self-regulatory mechanisms, such as media councils and ethics commissions, which help to resolve conflicts between the media and the public. In particular, the organisation

monitors violations of the rights of journalists and mass media during elections. The Public Association of "Journalists" (2009), like other media institutions in Kyrgyzstan, faces such problems as restrictions on freedom of speech, pressure from government agencies, and insufficient funding. Despite this, the organisation continues to play an important role in protecting the rights of journalists and supporting the development of independent and responsible journalism in the country.

Another significant organisation is the IUJKR (2021), a professional association of journalists working in various media outlets in Kyrgyzstan. IUJKR protects the rights and interests of journalists, provides legal support in cases of their violation and contributes to improving working conditions. The organisation actively responds to the facts of pressure, harassment and censorship against journalists, publishing statements, and appeals to the authorities. IUJKR also promotes the professional level of its members by organising trainings, seminars and other educational events, and actively participates in media self-regulation processes, supporting the creation and operation of independent media councils and ethics commissions. It is worth noting that the IUJKR, like other media organisations in Kyrgyzstan, faces various challenges, including restrictions on freedom of speech, pressure from the authorities, and insufficient funding. Nevertheless, the organisation continues to play an important role in protecting the rights of journalists and promoting the development of independent and responsible journalism in the country. In 2024, at the initiative of the IUJKR, the Ethics Council of the Union of Journalists was established. The Ethics Council serves to increase the professional responsibility and quality of journalism in the media environment, and to strengthen public trust. In particular, the council should ensure compliance with journalistic ethics based on appeals from the public or media representatives; make independent and fair decisions in resolving controversial cases in the media sphere; organise trainings, seminars, discussions on ethical principles for journalists; monitor the compliance of materials published in the media with ethical standards. The creation of this council will make a significant contribution to the professional development of journalists and increase public confidence in the media. In order to effectively resolve complaints about the work of the media, the Republican Congress of Journalists established the Media self-regulatory body (n.d.). This commission, as a press self-regulatory body, focuses on reviewing and deciding complaints concerning materials published in the media of Kyrgyzstan. Its main function is to resolve complaints from readers, viewers, and listeners about the compliance of articles or television (TV) and radio programmes with ethical standards of journalism. Journalists themselves believe that their activities should be regulated by ethical norms and rules. The commission strives for a civilised resolution of conflicts between the media and their audience, avoiding legal proceedings.

The decision of the Media self-regulatory body (n.d.) is an instrument of public influence on those media outlets that violate journalistic ethics. These decisions can be made public both in the media that have received a complaint, and in other media to inform the public about cases of violation of professional ethics by individual journalists or editorial offices. In addition, all decisions made are sent to higher education institutions in the country of education for use by journalism teachers. The Commission's activities are aimed at achieving the following goals: establishing an equal and constructive dialogue between the parties to the conflict; ensuring the precise definition of contested actions and formulating decisions that can serve as precedents in the future; and also contributes to the development of responsible journalistic ethics; building trust in the media; and establishing the principle of freedom of speech in Kyrgyzstan. The country's print and broadcast media have effective self-regulation mechanisms, among which the Code of Ethics of Journalists of The Kyrgyz Republic (2007) occupies an important place. This code is actively distributed in the journalistic environment, becoming the subject of regular discussions and study. The code clearly defines the inadmissibility of using mass media to the detriment of public interests, human, and civil rights. In particular, propaganda of war, violence, and racial, national, sexual, gender, regional, religious, sexual, and social intolerance is prohibited. An important aspect of the code is the requirement to clearly distinguish between facts, opinions, and assumptions in journalistic materials. The journalist is obliged to avoid publishing deliberately false information, and if an error is detected, immediately correct it. The code also emphasises the need for a balanced representation of the positions of opponents, including those who have become the object of criticism. It was also necessary to note the introduction of the activities of the Media Policy Institute, which introduces a procedure for resolving legal discussions through mediation aimed at coordinating the interests of conflicting parties to reach a mutually acceptable agreement (Focus on Kyrgyzstan..., 2023). Although the activities of mediators in the country previously had no legislative regulation, Law of the Kyrgyz Republic No. 161 (2017) was adopted, which entered into force on February 11, 2018. Media Policy Institute (MPI) is a non-profit organisation dedicated to the protection of freedom of speech and the development of independent media (Focus on Kyrgyzstan..., 2023). The institute is dedicated to protecting freedom of speech. The MPI actively monitors and analyses legislation related to freedom of speech and the media. The organisation provides legal support to journalists and media outlets that face violations of their rights. MPI is also engaged in the development of independent media, in particular, MPI conducts trainings and seminars for journalists aimed at improving their professional level. In addition, the organisation is engaged in analytical activities: MPI conducts research and analysis

of the media environment in Kyrgyzstan; the organisation publishes reports and analytical materials, drawing the attention of the public and the international community to problems in the media environment.

It should be emphasised that mediators are capable of resolving disputes arising from a variety of contexts, including civil, family, labour, and certain criminal law matters. Over the years, the media representative has mediated numerous media cases. Among the conflicting parties between which mediation was conducted were, in particular, the newspapers "MSN" and "Slovo Kyrgyzstana"; "MercyCo International" and the newspaper "Moskovsky Komsomolets in Kyrgyzstan"; the Independent newspaper "Tribuna" and the Central Election Commission of the Kyrgyz Republic; the newspaper "Batken Tani" and the information and analytical department of the Central Election Commission of the Kyrgyz Republic; the TV and radio company "Piramida" and the company "Areopag" (Media Invest) (Kyrgyzstan tightens control..., 2025). MPI initiated a public commitment by a conscientious member of the media community of Kyrgyzstan to increase the responsibility of media managers for creating the safest possible working conditions for their employees and for compliance with generally accepted international and national standards of journalistic activity and ethics. This commitment is a volun-

tary act of media managers and representatives and is of a recommendatory nature, being open for signature by all media managers. In 2010, the MPI held a series of talks and meetings with media representatives and managers, emphasising the importance of making every effort to ensure the safety of journalists and comply with generally recognised professional standards. In 2018, the foundation launched Factcheck.kg, Kyrgyzstan's first independent online platform for verifying and refuting false information, manipulation, and propaganda (Requirements and criteria for..., 2022). This project became a pioneer in the genre of fact-checking, which was previously little known in the country. Through Factcheck.kg, the term "fact-check" has become familiar to journalists, and the number of materials based on information verification has increased in the media. The range of expert fact-checkers and organisations that implement verification skills has also expanded. The Factcheck.kg (n.d.) team consists of experienced journalists specialising in various socially important topics. The project's mission is to counter disinformation and improve media literacy among both professional journalists and a wide audience. The goal is to combat false information, manipulation and propaganda, and distribute high-quality and reliable content. Table 1 shows the criteria and operation process of the "Factcheck" section.

Table 1. Information analysis scheme in the "Factcheck" section

Stage	Criteria/Actions	Description
1	Material selection criteria	Availability of facts for verification; public dissemination of information; public significance; request from readers
2	Object of investigation	Public statements; high-profile facts
3	Essence of the question	Informational preamble with explanations
4	Evidence and arguments	Facts, statistics, documents from open sources; expert information with documentary confirmation
5	Verdict	True, untrue, half-true, not proven, manipulation; a brief reasoned explanation

Source: compiled by the authors based on Requirements and criteria for the selection... (n.d.)

Table 1 demonstrates a structured fact-checking process. The first stage emphasises the importance of selecting materials that are verifiable and socially significant and widespread in the public space. This ensures a focus on relevant and important topics of public interest. Identifying the object of an investigation (a public statement, a high-profile fact) helps focusing efforts on specific statements. The use of open official sources and expert opinions with documentary evidence ensures objectivity and reliability. "Verdict" provides a clear conclusion with a reasoned explanation, which makes the process transparent and understandable for the audience. Thus, Table 1 demonstrates the high standards of journalism that are used to verify information, which contributes to improving the media literacy of society and combating disinformation. In general, the above-mentioned structure of the "Factcheck" section provides high-quality and reliable

verification of information, which is important for maintaining trust in the media.

Practices of self-regulation of journalists and mass media in Kazakhstan

In Kazakhstan, the activities of mass media are regulated both by law and through various state and public organisations. Media self-regulation is an effective tool for protecting users' rights, but it is not enough to prevent the emergence and dissemination of false information and hostile rhetoric (Lee, 2023). The key government body that determines and implements state policy in the information and social development sphere is the Ministry of Information and Social Development (MISD) (2022). This body plays a central role in shaping the strategy and directions for the development of the country's information space. The main functions of MISD include the development and implementation of

the state information policy aimed at developing the information space of Kazakhstan, and monitoring compliance with media legislation. An important area is the regulation of media activities, which covers licensing of TV and radio companies and supervision of their work, and the regulation of Internet resources, in particular social networks. The development of information infrastructure is another significant aspect of MISD's activities. The ministry promotes the development of information and communication technologies and increased public access to the Internet. Ensuring information security is also a priority area, so MISD participates in the development and implementation of measures to protect the state's information space from disinformation and propaganda. In addition, MISD actively supports the development of civil society in Kazakhstan, providing support to non-governmental organisations. The ministry is also engaged in strengthening interethnic and interfaith harmony by promoting dialogue between various ethnic and religious groups. MISD is also responsible for youth policy, within which the ministry develops and implements state youth policy, and supports youth initiatives.

One of the main activities of MISD is the state regulation of television and radio broadcasting and mass media. This includes monitoring compliance with legislation, issuing licenses, and other regulatory functions. An important aspect of the committee's work is international cooperation in the field of mass media, which contributes to the exchange of experience and implementation of international standards in the media space of Kazakhstan. The main laws governing mass media activities in Kazakhstan include the Constitution of the Republic of Kazakhstan (1995), Law of the Republic of Kazakhstan No. 451-I (1999), Law of the Republic of Kazakhstan No. 545-IV (2024). Kazakhstan has a number of public organisations that protect the rights of journalists and freedom of speech. These organisations monitor violations of journalists' rights, provide legal assistance, and work to improve the media literacy of the population. Club of editors-in-chief is a voluntary public association of editors-in-chief and media managers of Kazakhstan (Kudrenok, 2015). The main goal of this association is to promote effective competition between the media, strengthen interethnic harmony and stability in society. The club consists of more than 300 editors-in-chief and media managers of Kazakhstan. The club organises meetings of editors-in-chief with the first heads of state to understand the processes taking place in the country. The club promotes the exchange of experience between

editors-in-chief. The club deals with the development of the media industry. The club of editors-in-chief plays an important role in the media space of Kazakhstan, contributing to the development of professional journalism and strengthening ties between the media. The Union of Journalists of Kazakhstan (2021) plays an important role in the country's media space, focusing on protecting the rights of journalists and supporting the development of high-quality and ethical journalism. The organisation actively protects the rights of journalists, providing legal and other support in cases of their violation, and also opposes censorship, pressure on the media and harassment of journalists, seeking respect for freedom of speech. To improve the professional standards of journalists, the union organises trainings, seminars, and other educational events. It is also involved in the development and dissemination of ethical codes and standards of journalism, promoting media self-regulation through the creation and support of independent media councils and ethics commissions. In addition, the union establishes a dialogue between the media, the public, and the authorities on ethical journalism. A relevant aspect of the union's activities is cooperation with international organisations engaged in the protection of freedom of speech and the development of journalism. This helps to exchange experience, receive support, and promote the implementation of international standards of journalism in Kazakhstan. Code of Ethics of Journalists of the Republic of Kazakhstan (2012) is an important tool for regulating the professional behaviour of journalists in the country. It sets standards for the collection, processing and dissemination of information, and defines the relationships between journalists, information sources and the public. The main principles of the Code of Ethics of Journalists of the Republic of Kazakhstan include the desire for accuracy and reliability in messages, objectivity and impartiality, responsibility to the public, respect for privacy, compliance with the laws of Kazakhstan and professional solidarity. Journalists should check information from multiple sources, avoid conflicts of interest, be aware of the impact of their messages on society, and avoid spreading information that may cause harm. The Code of Ethics of Journalists of the Republic of Kazakhstan is an important tool for ensuring high-quality and responsible journalism. It helps journalists to make ethical decisions and maintain high standards of professional behaviour. In Astana, media experts discussed topical issues related to the ethics of media workers and proposed a number of measures to address these problems (Table 2).

Table 2. Proposals for addressing media ethics issues in Kazakhstan

No.	Proposals
1	Strengthen teaching the basics of professional ethics at universities; conduct training sessions and seminars; review and strengthen the Code of Ethics of Journalists of the Republic of Kazakhstan (2012)
2	Create an Institute of news ombudsmen in editorial offices; create press councils that would include representatives of civil society, media experts and ombudsmen from influential media outlets

No.	Proposals
3	Introduce restrictions on media coverage of violence; conduct legal trainings for journalists
4	Separate ethical principles for journalists and editorial offices; develop ethical principles for the field of artificial intelligence
5	Develop basic principles of media in Kazakhstan; create a public committee on media self-regulation
6	Stress the importance of verifying information
7	Share the results of the analysis of training programmes for journalists
8	Create a council on ethics for journalists
9	Make a "round table" regular for discussing current issues in the field of mass media

Source: compiled by the authors based on Alikhan Smailov instructs to widely discuss... (2022)

Analysis of Table 2 showed that the participants of the round table made a number of proposals aimed at improving professional standards and improving media self-regulation. Among the key initiatives: strengthening ethics teaching at universities, conducting trainings for journalists, revising the Code of Ethics, creating the Institute of news ombudsmen and press councils, limiting coverage of violence, developing ethical principles for artificial intelligence, and creating a public committee on media self-regulation and a Council on ethics for journalists. In addition to government regulation, there are also public ones, such as the KazMediaNetwork, and Factcheck.kz (n.d.). KazMediaNetwork, founded in 2021, focuses on the development of basic media principles in Kazakhstan and the creation of a public committee on media self-regulation (The first Public Committee..., 2021). Their activities are aimed at

raising professional standards of journalism, promoting ethical behaviour in the media space, and ensuring media transparency and responsibility. KazMediaNetwork aims to create a platform where journalists, media experts, and members of the public can work together to solve ethical problems and improve the quality of information. FactCheck.kz is engaged in fact-checking and combating disinformation in Kazakhstan. Their activities are aimed at verifying the accuracy of information distributed in the media and social networks, identifying and refuting fake news and disinformation, and improving the media literacy of the population. Both organisations contribute to raising ethical standards, combating disinformation, and developing high-quality journalism in the country. Table 3 provides a comparative analysis of media self-regulation practices in Kyrgyzstan and Kazakhstan.

Table 3. Comparative analysis of media self-regulation practices in Kyrgyzstan and Kazakhstan

Criteria	Kyrgyzstan	Kazakhstan
Legislative framework	Constitution of the Kyrgyz Republic (2021), Law of The Kyrgyz Republic No. 938-XII (2023), Law of the Kyrgyz Republic No. 161 (2025)	Constitution of the Republic of Kazakhstan (1995), Law of the Republic of Kazakhstan No. 451-I (1999), Law of the Republic of Kazakhstan No. 545-IV (2024), Law of the Republic of Kazakhstan No. 401-V (2015)
Professional organisations	Public Association of "Journalists" (2009), IUJKR (2021), Media Policy Institute	Club of editors-in-chief, Union of journalists of Kazakhstan (2021), KazMediaNetwork, FactCheck.kz (n.d.), MISD (2022)
Codes of Ethics	Code of Ethics of Journalists of the Kyrgyz Republic (2007), Ethics Council of the UJKR	Code of Ethics of Journalists of the Republic of Kazakhstan (2012)
Self-regulation mechanisms	Media self-regulatory body (n.d.), Mediation (Media Policy Institute), public commitment of a bona fide member of the media community	Limited, mostly voluntary
Focus of organisations' activities	Protection of the rights of journalists, improving professional standards, developing media literacy, Factcheck.kg (n.d.)	Strengthening competition between media outlets, interethnic harmony, development of the media industry protection of journalists' rights

Source: compiled by the authors based on T. Kudrenok (2015), The first Public Committee... (2021), Requirements and criteria for the selection... (2022), Focus on Kyrgyzstan... (2023), Factcheck.kg (n.d.), Factcheck.kz (n.d.)

Table 3 highlighted that Kazakhstan demonstrated a more centralised and institutionally regulated model of self-regulation, whereas Kyrgyzstan demonstrated a more diversified and civil society-oriented self-regulatory environment. This contributes to the development of

mediation and fact-checking mechanisms, and focuses on protecting the rights of journalists and improving media literacy. In Kazakhstan, self-regulation is mostly limited and voluntary. More emphasis is placed on state regulation, where organisations focus on developing the

media industry. However, there is an increase in state control over the information space, which limits the independence of the media. Consequently, Kyrgyzstan has more developed media self-regulation practices compared to Kazakhstan, where state regulation plays a dominant role. However, both countries face challenges related to restrictions on freedom of speech and pressure on independent media. Based on the comparative analysis of media self-regulation systems in Kazakhstan and Kyrgyzstan, several structural weaknesses were identified in both countries. In Kazakhstan, the main issue is the highly centralised nature of media governance, which limits the institutional autonomy of professional media organisations and reduces the practical effectiveness of ethical codes, making them largely formal and declarative. In Kyrgyzstan, although a more pluralistic institutional environment exists, including complaint commissions and media policy organisations, their effectiveness is constrained by fragmented coordination, lack of unified reporting standards, and absence of systematic performance evaluation. In both countries, a shared problem is the voluntary nature of ethical compliance and the absence of binding enforcement mechanisms, which significantly weakens self-regulation in a highly digitised information environment characterised by widespread social media influence and high internet penetration. Another key finding is the gap between formal regulatory frameworks and practical implementation. In Kazakhstan, media organisations often operate in close interaction with state institutions, which reduces independence and limits transparency in decision-making processes related to ethical regulation (Karassayev *et al.*, 2023). In Kyrgyzstan, although institutions such as media complaint bodies and professional unions are active, there is no consolidated system for tracking the implementation of their decisions, including the proportion of cases resolved and the level of compliance by media outlets. In both countries, fact-checking initiatives exist, but they remain fragmented and lack standardised national-level integration, which reduces their overall impact on combating disinformation. These systemic issues indicate that current self-regulatory mechanisms function more as advisory systems rather than enforceable governance tools.

The findings of D.A. Craig (2021) showed that the existing framework of media ethics should be applied to social media practices in order to solve the problems of cross-cultural verification, countering misinformation in the communication network. Exploring the integration of artificial intelligence into media, O. Al-Zoubi *et al.* (2024) determined that journalists face ethical challenges when implementing artificial intelligence in editorial offices, such as data bias, privacy violations, and a lack of legislation and international regulations. The results of the above-mentioned studies coincide with the position of this study in the context of the global nature of problems related to disinformation, censorship, and ethical challenges in journalism, especially in the context of digital

transformation. According to the results of this study, access to the Internet and the development of digital technologies, in particular, social networks such as Facebook, Instagram, Twitter, Snapchat, LinkedIn, have become a powerful tool for spreading disinformation and propaganda in the region. According to this, the low level of media literacy of the population makes them vulnerable to manipulation, which undermines confidence in traditional media. P. Idiongo (2024) noted that fake news has significantly undermined public confidence in traditional media, with younger, less media-literate people being hit harder, and trust in politically polarised and less regulated regions significantly declining. The researcher noted that comprehensive strategies are needed to overcome the impact of fake news and media literacy programmes for society. L. Levi (2020) pointed out that it is necessary to expand media literacy to help citizens understand the structure and functioning of democracy, promote critical thinking, and reduce the vulnerability of the mainstream press to information manipulation. N.M. Lee (2018) argued that one of the most important strategies for dealing with threats on the Internet is digital media literacy training. Ultimately, it is crucial for combating fraud and misinformation, but there is a need for more research on effective educational interventions for adults. According to M. Tomšič (2023), the quality of media communication directly affects the level of media literacy of the population, that is, the ability of people to critically comprehend and analyse messages distributed by both traditional and online media. According to the researcher, media literacy is a key tool for protecting against negative phenomena in the media space, such as disinformation and fake news, and also increases the resilience of citizens to political messages that exploit elements that often underlie populist politics. The analysis of the above studies confirmed the conclusions of this study, made in the context of Central Asia, on the impact of digital technologies on the spread of disinformation and the need to improve media literacy. Therefore, the need to adapt journalistic practices and improve media literacy are key factors for maintaining public confidence in the media.

This study indicated that there is a shortage of independent fact-checking organisations in Central Asia. However, there is now a tendency to increase fact-checking restrictions in the world as a whole. E. Humprich (2019) noted that fact-checking has become important, so news outlets and independent organisations are involved in debunking information. However, the effectiveness of fact-checking depends on the ability of fact-checking organisations to gain the trust of the audience through the transparency of their working methods. The study by P. Ferracioli *et al.* (2022) indicated that fact-checkers play an important role in various media systems, and their work is influenced by the professional culture and features of the media system, which can potentially lead to new levels of competition in journalism. According to S. Tejedor *et al.* (2024), fact-checking

and research on fake news in the social sciences, shows that Europe and the United States are leading the way, with universities in the United States accepting the largest number of researchers working on the topic. Results of the study by S. Singh *et al.* (2024) showed that independent fact-checking organisations show a shift away from political neutrality by selectively debunking false news and presenting information that affects consumers' perception of news. Fact-checking organisations strive to provide accurate information and hold public figures and media networks accountable for mistakes and false statements during crises such as the coronavirus (Bouli-fa, 2021). Results of the study by M.A. Amazeen (2017) showed that fact-checking is spreading around the world as a tool for building democracy, appearing where democratic institutions are perceived as weak or under threat, similar to the growth of consumer reform movements. This is conditioned by the fact that politics is increasingly using strategies organised by consultants and marketing and advertising agencies, an example of which is the Brexit referendum. However, before fact-checking can effectively inform people, it must first gain a foothold in the structural environment (Ginters & Revathy, 2021). The analysis of the above papers coincides with the position of this study on the growing role and number of fact-checking organisations in the world. This section of the study highlighted the role of fact-checking in providing accurate information during crises and as a tool for building democracy. Overall, research has shown that there is a global trend towards their development. It was also found that the threats faced by journalism (censorship, disinformation, etc.) need to be addressed. It was determined that, despite the efforts of public organisations, the effectiveness of media self-regulation remains limited, which indicates the need for further development of self-regulation mechanisms and improving media literacy of the population.

■ Conclusions

According to the study, it was determined that journalism in Central Asia faces a number of serious ethical challenges that significantly affect its role as an independent and responsible source of information. Among them are disinformation and fake news, censorship and restrictions on freedom of speech, conflicts of interest and privacy violations, the influence of digital technologies, insufficient level of media literacy, ethical challenges in conditions of political instability and social conflicts. In the course of the study, it was determined that in order to overcome these challenges, it is necessary to increase the level of media literacy of the population, strengthen the independence of the media, develop effective mechanisms for self-regulation, ensure the safety of journalists and protect their rights. The study revealed that Kyrgyzstan has a relatively developed system of self-regulation of mass media,

which is based on legislative norms and active activities of public organisations, for example, the Public Association of "Journalists", IUJKR. It was determined that these independent organisations defend the rights of journalists, promote their professional level and participate in the creation of self-regulation mechanisms, such as media councils and ethics commissions. An analysis of media self-regulation practices in Kazakhstan revealed that control over the activities of journalists and mass media occurs both through legislative norms and with the participation of state and public structures. Among the public organisations operating in Kazakhstan, the Club of editors-in-chief, the Union of journalists of Kazakhstan, and others were highlighted, which contributed to strengthening effective competition between the media and the development of professional journalism, and the Union of journalists of Kazakhstan focuses its activities on protecting the rights of journalists and supporting the development of high-quality and ethical journalism. A comparative analysis of self-regulation practices revealed that Kyrgyzstan has a more developed system of self-regulation, characterised by active participation of public organisations and the presence of mediation and fact-checking mechanisms. In Kazakhstan, self-regulation is mostly limited and voluntary, with a greater emphasis on state regulation. It was determined that both countries face challenges related to restrictions on freedom of speech and pressure on independent media. In Kazakhstan, there is a tendency to strengthen state control over the information space, which limits the independence of the mass media. The research process was complicated by the fact that the study was based on available data and information at the time of its implementation. Therefore, changes in legislation, technology, or the political situation may affect the relevance of conclusions. For further research and improvement of the available results of the study, it is recommended to expand the geographical focus, including other Central Asian countries (Tajikistan, Turkmenistan, Uzbekistan) in the study for comparative analysis and identification of regional trends, and to conduct a comparative analysis with the countries of Europe and America. In addition, it will expand the analysis of digital technologies by examining the impact of artificial intelligence, social media algorithms, and other digital technologies on ethical standards of journalism.

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Етичні питання та саморегулювання в медіа Центральної Азії: особливості та проблематика

Айна Дуйшекеєва

Кандидат філологічних наук, доцент
Киргизький національний університет імені Жусупа Баласагіна
720033, вул. Фрунзе, 547, м. Бішкек, Киргизька Республіка
<https://orcid.org/0009-0007-7286-1298>

Рахіма Нуріден

Кандидат філологічних наук, доцент
Євразійський національний університет імені Л.М. Гумільова
010000, вул. Сатпаєва, 2, м. Астана, Республіка Казахстан
<https://orcid.org/0009-0004-4950-5576>

Нурсултан Миктибаєв

Аспірант
Киргизький національний університет імені Жусупа Баласагіна
720033, вул. Фрунзе, 547, м. Бішкек, Киргизька Республіка
<https://orcid.org/0009-0006-0443-705X>

Наргіза Алієва

Аспірант
Киргизький національний університет імені Жусупа Баласагіна
720033, вул. Фрунзе, 547, м. Бішкек, Киргизька Республіка
<https://orcid.org/0009-0003-3277-8116>

Асель Емільбекова

Аспірант
Киргизький національний університет імені Жусупа Баласагіна
720033, вул. Фрунзе, 547, м. Бішкек, Киргизька Республіка
<https://orcid.org/0009-0006-8649-1278>

Анотація. Метою дослідження було оцінити етичні проблеми та ефективність механізмів саморегуляції медіа в Казахстані та Киргизстані. Методологія включала застосування методів контент-аналізу законодавства та діяльності медіаорганізацій, кейс-методу для аналізу конкретних інцидентів та міжнародних організацій, статистичного підходу до використання цифрових технологій у Казахстані та Киргизстані, а також порівняльного аналізу практик саморегуляції. Головним результатом дослідження став аналіз етичних викликів та практик саморегуляції журналістики в умовах цифрової трансформації країн Центральної Азії. У роботі виявлено та проаналізовано проблеми дезінформації, цензури та тиску на журналістів. Ефективність практик саморегуляції медіа оцінювалась на прикладі казахських та киргизьких організацій. Встановлено, що поширення Інтернету та розвиток цифрових технологій, зокрема соціальних мереж, стали важливим каналом поширення дезінформації та пропаганди в регіоні. Аналіз схеми перевірки фактів став ключовим етапом дослідження. Порівняльний аналіз практик саморегуляції ЗМІ показав, що в Киргизстані саморегуляція медіа розвинена краще, ніж у Казахстані, завдяки активній участі громадських організацій. Проте обидві країни стикаються з обмеженнями свободи слова, зокрема через посилений державний контроль медіа, відсутність механізмів медіації та фактчекінгу. Дослідження продемонструвало, що для подолання етичних викликів необхідно підвищувати медіаграмотність населення, зміцнювати незалежність медіа та розвивати ефективні механізми саморегуляції. Результати можуть бути використані для розробки стратегій, спрямованих на підвищення стандартів журналістики та забезпечення свободи слова в країнах Центральної Азії

Ключові слова: перевірка фактів; цензура; свобода слова; дезінформація; фейкові новини; медіаграмотність