
MIRA ALIMBEKOVA*
KASSYMZHANOVA**
AKHYLBEB BAIKENZHEYEV†
IBRAYEV‡



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IBRAYEVA***



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Legal regime of restrictions and benefits of civil servants:

Ethical and normative analysis

* [\[malimbekovaz284@gmail.com\]](mailto:malimbekovaz284@gmail.com) (Khoja Akhmet Yassawi International Kazakh-Turkish University)

** [\[akassymzhanova@outlook.com\]](mailto:akassymzhanova@outlook.com) (L.N. Gumilyov Eurasian National University)

*** [\[a-ibrayeva@hotmail.com\]](mailto:a-ibrayeva@hotmail.com) (Al-Farabi Kazakh National University)

† [\[a.baikenzheyev@outlook.com\]](mailto:a.baikenzheyev@outlook.com) (Academy of the National Security Committee of the Republic of Kazakhstan)

‡ [\[n_ibrayev@hotmail.com\]](mailto:n_ibrayev@hotmail.com) (Q University)

Abstract

This study analyses the legal regime of restrictions and benefits applicable to civil servants in the Republic of Kazakhstan through an ethical and normative lens. Drawing on a comparative examination of civil service regulation in Kazakhstan, Singapore, France, and selected Scandinavian countries, the research identifies distinct models of balancing legal restrictions, ethical standards, and social guarantees. The findings demonstrate that formal compliance with restrictions is strongly associated with the level of ethical culture, systematic ethics education, and the effectiveness of institutional oversight mechanisms. Empirical analysis of disciplinary, ethical, administrative, and corruption-related violations (2019–2023) reveals a statistically significant decline in violations following the introduction of strengthened ethical control instruments, including ethics commissioners and expanded monitoring practices. The study contributes by clarifying how combinations of regulatory enforcement, ethics training, and social guarantees influence professional conduct in the civil service. It proposes evidence-based recommendations aimed at enhancing ethical compliance, strengthening institutional accountability, and improving the coherence of the system of restrictions and benefits in Kazakhstan's civil service.

Keywords: *professional responsibility, corporate culture, social guarantees, ethical training, professional performance*

1 Introduction

The ethical regulation of the civil service remains a persistent and structurally complex problem in contemporary public administration. While legal restrictions imposed on civil servants are commonly justified as instruments for preventing corruption and safeguarding public trust, their effectiveness cannot be assessed independently from the system of benefits, guarantees, and ethical norms that accompany them. In many administrative systems, including that of the Republic of Kazakhstan, this relationship is characterised by a tension

between formal legal compliance and the deeper internalisation of ethical standards. Addressing this tension requires an analytical framework that goes beyond descriptive legal analysis and situates civil service regulation within broader theories of public service ethics and administrative behaviour.

Existing research demonstrates that the effectiveness of ethical regulation depends not only on the precision of legal norms but also on organisational culture, leadership, and professional socialisation. However, much of the current scholarship treats restrictions, benefits, and ethical standards as discrete regulatory instruments rather than as interdependent components of a unified ethical regime. As a result, the mechanisms through which legal restrictions interact with social guarantees and ethical norms to shape civil servants' behaviour remain insufficiently theorised, particularly in post-transition administrative systems.

The study by Madsen (2024) analysed the moral duties of civil servants and their relationship with democratic values. The results showed that the ethical behaviour of civil servants directly affects the level of democratisation of society, and adherence to democratic principles increases public trust in state institutions by 35%. Meyer-Sahling and Mikkelsen (2020) examined the effectiveness of codes of ethics and disciplinary codes in the context of anti-corruption activities. The researchers concluded that the introduction of clear ethical standards and control mechanisms reduces the level of corruption offences by 40% in the first two years after the adoption of the relevant codes.

Ayubayeva et al. (2021) conducted a comprehensive study of the relationship between anti-corruption legislation and the formation of the professional image of civil servants in Kazakhstan. The results of their research demonstrated that the optimisation of anti-corruption laws has a direct impact on public perception of public officials. In particular, the introduction of transparent control mechanisms increased the level of trust in civil servants by 28% within three years after the introduction of the new legislation. The researchers also determined that regulation of decision-making procedures reduced the number of complaints against civil servants by 35%.

Junusbekova (2016) conducted an analysis of the system of motivation of civil servants in the context of ethical requirements of the Kazakh civil service model. The study determined that the introduction of a differentiated incentive system that accounts for ethical compliance increased job satisfaction among civil servants by 42%. In addition, a direct correlation was found between the level of financial incentives and compliance with ethical standards – in units with higher salaries, the number of ethical violations was 31% lower.

Pelizzo and Knox (2021) conducted a large-scale study of the impact of ethical norms on the effectiveness of public administration in Kazakhstan. Their results showed that the implementation of ethical standards improved the quality of public services by 38%. The impact of ethical norms on the speed of management decision-making was particularly noticeable, which increased by 25% while improving their quality by 33%.

Svara (2021), exploring the theoretical foundations of ethical regulation, developed an innovative model for assessing the ethical behaviour of civil servants. The application of this model in pilot projects has shown a 45% increase in the accuracy of ethical violation detection and a 37% improvement in preventive measures. The researchers also found that a comprehensive approach to ethical regulation reduces the risk of conflicts of interest by 41%.

Dixon and Frolova (2013) determined in a study on the hierarchical model of the state apparatus that modernisation following modern ethical requirements significantly increases the efficiency of governance. In particular, the introduction of ethical standards at all levels of the hierarchy increased the speed of decision-making by 29% and improved the quality of interdepartmental cooperation by 34%. The researchers also determined that clear regulation

of ethical standards reduced the number of official abuses by 38%.

Emrich-Emrich-Bakenova (2009) and Bokayev et al. (2023) studied the trajectory of civil service development in Kazakhstan and the prospects for increasing its innovation potential. Their research showed that the introduction of meritocratic principles in the civil service system of Kazakhstan increased the efficiency of government agencies by 45%, and professional development programmes increased the level of innovation activity of civil servants threefold compared to 2000. Steel and Warner (1993) conducted a comparative analysis of bureaucratic attitudes in different countries, which allowed them to identify universal principles of ethical regulation. The results showed that, regardless of cultural differences, three key factors determine the effectiveness of ethical regulation: transparency of decision-making procedures, clarity of accountability mechanisms and the level of professional training of civil servants.

To address this gap, the present study adopts an explicit theoretical framework grounded in normative theories of public service ethics. Central to this framework is the concept of public service as a value-driven practice, rather than a purely rule-bound administrative function. The study draws primarily on the theoretical contributions of Denhardt and Denhardt (2015), whose model of New Public Service conceptualises civil servants as ethical actors oriented towards serving the public interest, rather than merely executing legal mandates. This perspective is particularly relevant for analysing ethical regulation, as it foregrounds responsibility, accountability, and moral judgement as core elements of administrative professionalism.

Denhardt's framework is complemented by broader ethical-administrative theories that emphasise integrity, organisational culture, and leadership responsibility (Cooper, 2012). Together, these approaches provide a normative lens through which restrictions and benefits can be understood not as isolated regulatory tools, but as instruments that either reinforce or undermine ethical self-regulation within the civil service. By integrating these theories, the study moves beyond formal legal analysis and examines how ethical norms are institutionalised, interpreted, and operationalised in practice.

Within this framework, the article pursues a dual objective. First, it critically examines the legal regime of restrictions and benefits for civil servants in Kazakhstan in light of international experience, identifying structural strengths and normative inconsistencies. Second, it evaluates how different models of ethical regulation, exemplified by Singapore, France, and the Scandinavian countries, align legal enforcement with ethical education and social guarantees. The central analytical assumption is that ethical compliance is most sustainable when legal restrictions are balanced by transparent benefits and embedded within a coherent ethical culture supported by institutional mechanisms.

The contribution of this study lies in its theoretical clarification of the relationship between ethics, law, and incentives in civil service regulation. By explicitly situating the analysis within a normative public service ethics framework, the article offers a structured basis for interpreting empirical findings and formulating recommendations. This approach not only advances the academic discussion on civil service ethics but also provides a conceptual foundation for evaluating ongoing reforms in Kazakhstan and comparable administrative systems.

2 Materials and methods

2.1 *Research design and scope*

This study employs a comparative normative–legal research design combined with secondary empirical analysis of official statistical data. The research focuses on the formal legal and

ethical regulation of restrictions and benefits applicable to civil servants, analysed through legislation, ethical codes, and institutional frameworks. The purpose of the methodological design is to identify patterns, models, and correlations in ethical regulation rather than to evaluate the effectiveness of policy implementation at the organisational or individual level.

Accordingly, the study does not examine the practical implementation of ethical norms at the level of individual agencies or officials, nor does it rely on interviews, surveys, or ethnographic observation. The analysis is confined to documented legal frameworks, institutional arrangements, and officially reported violation statistics, which allows for cross-country comparison but limits conclusions regarding everyday administrative practice.

2.2 Country selection and comparative rationale

The comparative analysis includes Kazakhstan, Singapore, France, and selected Scandinavian countries (Sweden, Norway, and Denmark). Country selection was conducted using a most-different systems design, intended to capture contrasting models of ethical regulation within public administration.

Kazakhstan represents a post-transition administrative system undergoing institutional reform, where ethical regulation has been actively formalised through legal instruments such as the Code of Ethics and the institution of ethics commissioners. Singapore exemplifies a centralised, meritocratic governance model characterised by strict legal restrictions combined with extensive social guarantees and mandatory ethics training. France represents a legalistic continental European model, where ethical conduct is primarily regulated through administrative law, codified deontology, and independent oversight mechanisms. Scandinavian countries (Sweden, Norway, Denmark) illustrate a trust-based model that relies more heavily on ethical education, professional autonomy, and self-regulation than on coercive legal controls.

This selection enables analytical comparison across distinct administrative traditions, such as managerial, legalistic, and cultural-normative, allowing the study to identify how different configurations of restrictions and benefits are embedded in broader ethical frameworks. The aim is not to rank systems but to extract analytically transferable principles relevant to the Kazakhstani context.

2.3 Data sources

The study draws on three primary categories of sources. The first category consists of normative legal acts and ethical codes governing the conduct of civil servants. These include the Ethical Code of Civil Servants of the Republic of Kazakhstan (2022) and the Law of the Republic of Kazakhstan 'On the Civil Service' (2015), which together form the core of the national regulatory framework. For the comparative component, the analysis also incorporates the Code of Conduct for Public Servants of Singapore as reflected in the OECD Public Governance Reviews (2023), the General Code of Civil Service (2024), as well as ethical and administrative acts regulating public service in Sweden, Norway, and Denmark. These documents provide the formal legal and normative basis for examining restrictions, benefits, and ethical obligations across different administrative models.

The second category comprises official statistical and analytical reports that document patterns of ethical, disciplinary, administrative, and corruption-related violations, as well as broader governance indicators. This includes data published by the Agency of the Agency of the Republic of Kazakhstan for Civil Service Affairs (2024), analytical materials from the OECD Public Governance Reviews, reports issued by Transparency International (2020), and

indicators from the World Bank (2020). These sources are used to trace dynamics over time and to support the empirical component of the analysis through officially reported data.

The third category includes peer-reviewed academic literature, which is employed to contextualise the legal and statistical findings and to interpret observed trends in ethical regulation, disciplinary practices, and public service motivation. Scholarly sources provide the theoretical and analytical background necessary for engaging critically with normative frameworks and comparative models of civil service ethics. All data sources used in the study are secondary and publicly available. The research does not involve primary data collection, such as interviews, surveys, or field observations.

2.4 Methods of analysis

Several complementary methods were applied in the study to ensure analytical depth and methodological coherence. The comparative legal method was used to examine similarities and differences in legal restrictions, systems of benefits, and ethical oversight mechanisms across the selected countries. This method made it possible to identify distinct regulatory models and to assess how various administrative traditions structure the balance between ethical obligations and legal constraints.

The formal-legal method enabled a systematic examination of legal norms governing conflicts of interest, disciplinary liability, ethical obligations, and institutional control mechanisms. Through close analysis of statutory provisions, ethical codes, and regulatory acts, this method ensured consistency in interpreting the legal foundations of civil service ethics and clarified the scope and content of formal restrictions and responsibilities. The systemic-structural method was applied to identify relationships between ethical norms, institutional oversight arrangements, and systems of social guarantees within each civil service model. This approach allowed the study to move beyond isolated legal provisions and to analyse how ethical regulation functions as an integrated system shaped by interdependent legal, institutional, and normative elements.

In addition, quantitative analysis of secondary data was used to examine trends in officially recorded ethical, disciplinary, administrative, and corruption-related violations in Kazakhstan for the period 2019–2023. This analysis relied on publicly available statistics and was employed to identify patterns over time and to explore associations between institutional reforms and changes in the incidence of recorded violations. The statistical analysis treated reported violations as a finite analytical dataset derived from the total population of civil servants. Descriptive statistics were used to identify trends, while inferential techniques (χ^2 test for trend and Pearson correlation) were applied to assess the statistical significance of observed changes over time and their association with institutional reforms.

2.5 Analytical limitations

Several limitations arise from the chosen methodology. First, the reliance on official statistics and legal documents means that informal practices, unreported violations, and contextual enforcement dynamics are not captured. Second, the temporal scope (2019–2023) restricts the ability to assess long-term institutional effects. Third, while comparative, the study does not aim to provide exhaustive global coverage but rather analytically selected cases. These limitations are acknowledged as inherent to a normative-legal and document-based research design and inform the cautious interpretation of findings.

3 Results and discussion

3.1 *Ethical principles and regulatory framework of the civil service*

The ethical principles of civil servants' activities are a fundamental element of the effective functioning of the state apparatus and the formation of public trust in government institutions. The study of the ethical aspects of the civil service is of relevance in the context of the formation of democratic principles of public life and counteraction to corruption in the structure of public administration.

The theoretical analysis demonstrated that the ethical component of the civil service covers a wide range of issues, from the value basis for managerial decision-making to the formation of the professional culture of employees. At the same time, the anti-corruption orientation of ethical norms is of particular importance, since ethical standards of behaviour are a preventive mechanism in preventing corruption offences. A comprehensive study of the ethical foundations of the state apparatus demonstrates their multidimensional nature, including the relationship between civil servants and citizens, professional interaction within the teams of public administration bodies, as well as the formation of personal moral qualities of government officials. An important aspect is professionalism as a moral quality of a civil servant, which directly affects the quality of performance of official duties (Bazakeeva, 2023; Usabalieva, 2022). In the context of the transformation of the public administration system, the role of ethical education and raising the level of moral culture of civil servants is growing. This is determined by the fact that the effectiveness of public administration largely depends on compliance with ethical principles and norms that ensure constructive interaction between the government and society.

The analysis of the Ethical Code of Civil Servants of the Republic of Kazakhstan (2022) revealed a comprehensive approach to the legal regulation of ethical behaviour of civil servants in Kazakhstan. The document establishes the legal framework for ethical behaviour, defining the key principles of government service and the mechanisms for their implementation. The Code sets out the fundamental legal principles of government service, including legality – compliance with the Constitution, laws and other regulatory acts of the Republic of Kazakhstan; good faith – professional conduct; fairness – impartial decision-making; transparency – openness of actions and decisions to the public; client focus – provision of quality public services. An important aspect of legal regulation is the establishment of clear regulatory restrictions for civil servants (Nielsen-Pincus et al., 2017). In particular, the Code prohibits the use of official positions for personal gain (Article 5), obtaining unlawful benefits (Article 6), and public expression of opinions contrary to public policy (Article 8). The legal regulation of the prevention of conflicts of interest is given special attention. The Code establishes the obligation of civil servants to take measures to prevent conflicts between personal interests and official duties (Article 7). A significant innovation in the system of legal regulation of ethical behaviour was the introduction of the institution of the Ethics Commissioner.

According to the Code, the Ethics Commissioner has the following powers: monitoring compliance with the Code, providing advisory assistance, reviewing appeals on violations of ethical standards, and initiating disciplinary proceedings against violators (Article 11). The Code establishes a clear system of legal liability for violations of ethical standards, providing for disciplinary measures. This ensures the effectiveness of the mechanism for monitoring compliance with ethical standards and creates legal grounds for bringing violators to justice. The document also regulates disciplinary aspects of civil service, establishing requirements for appearance, rules of behaviour in the team and standards of conduct outside the service (Articles 9-10). This approach ensures the formation of a holistic legal status of a civil servant.

The analysis of the Code demonstrates the balance of legal regulation of ethical behaviour of civil servants, which is manifested in the combination of mandatory norms with mechanisms for the formation of a positive ethical culture through education and prevention of violations. Such a system creates an effective legal framework for the development of a professional government service focused on serving the public interest and adherence to high ethical standards.

The study has shown that the effectiveness of compliance with the legislative regulation of restrictions directly depends on the level of ethical culture and systematic ethical training of civil servants. This conclusion is confirmed by Ayubayeva et al. (2021), who established the relationship between social norms and the level of professional security as key factors in the formation of ethical behaviour. The research demonstrated that the effectiveness of ethical norms largely depends on their integration into the overall human resources management system. Akosa et al. (2019), studying the implementation of a code of conduct for civil servants, also emphasised the importance of a systematic approach. This study has expanded this understanding by demonstrating specific mechanisms of the relationship between ethical norms and HR policy, which suggests the introduction of an integrated approach to ethical regulation.

3.2 International experience in regulating civil service ethics

The variation among national models of civil service regulation arises from multiple factors, including differences in legal frameworks, ethical traditions, and social determinants of governance. These elements shape not only the formal legal regulations but also the deeply embedded cultural norms of responsibility, public trust, and administrative accountability, leading to the development of distinct ethical regimes. While the legal codes in countries such as Singapore, France, and Scandinavian nations share common principles, their implementation diverges due to the varied moral philosophies and societal expectations regarding the state's role and the duties of its citizens. This reflects the importance of contextual factors in determining the success or failure of each model.

Singapore's Code of Conduct for Civil Servants (OECD Public Governance Reviews, 2023) presents a strict regulatory approach, including a ban on receiving gifts, restrictions on political activities, and mandatory income declarations. However, this rigid structure is balanced by a robust system of social guarantees, which includes comprehensive health insurance, pension benefits, and educational opportunities for civil servants' families. The success of this system can be attributed to the institutional support provided through mandatory ethical training, which underscores the government's commitment to maintaining integrity in public service.

In contrast, France's Deontology Code of the Public Service (Government of France, 2024) emphasises detailed restrictions concerning conflicts of interest, concurrent employment, and post-employment engagements. A notable feature of the French system is the independent oversight provided by ethics control officers, who ensure compliance with ethical standards and provide guidance. The benefits system in France strikes a balance between tangible incentives, such as pensions and subsidies, and intangible ones, including flexible working hours and additional leave, which serve to motivate civil servants while maintaining ethical standards.

Scandinavian countries, such as Sweden (European Commission, 2023) and Norway (Leadership in Norway's Civil Service Plans/strategy, 2008), adopt a more decentralised approach, where the ethical regulation of civil servants is characterised by self-regulation and personal responsibility. Ethical education and the cultivation of a professional culture are central to

the Scandinavian model, which is supported by a flexible system of social benefits aimed at professional development. In this context, the absence of stringent restrictions is offset by the high level of ethical awareness and personal responsibility among civil servants, reflecting a more mature ethical culture.

Thus, the comparative analysis demonstrates that different countries adopt varying models of combining restrictions and benefits in civil service regulation. Kazakhstan and Singapore prioritise strict restrictions, complemented by extensive social guarantees. On the other hand, France and the Scandinavian countries emphasise self-regulation, ethics education, and flexible incentive systems. These differences are deeply rooted in each country's unique cultural, historical, and administrative contexts. The success of each model is contingent upon its alignment with the underlying moral and societal structures, highlighting the importance of considering contextual factors when evaluating the effectiveness of civil service ethics regulations.

In general, it is possible to state that the effectiveness of legislative regulation of restrictions and privileges of civil servants depends on a comprehensive approach that combines regulatory regulation, institutional mechanisms and proper social security based on ethical responsibility (European Commission, 2023 – Sweden). In the context of legislative regulation of restrictions and benefits for civil servants, ethical and normative analysis reveals a complex system of regulation of professional behaviour in different countries. In the UK, there is a complete ban on the participation of senior officials in any form of political activity, although these restrictions are less strict for the middle and lower ranks of the civil service (Emrich-Bakenova, 2009).

Historically, the formation of the international civil service began with the creation of the Universal Postal Union in 1874-1875, which laid the foundation for the formation of modern standards of ethics in government service (Janenova and Knox, 2019a). In the nineteenth century, the functions of civil servants were limited mainly to maintaining law and order and basic economic regulation, which subsequently necessitated the creation of specialised administrative courts to hear citizens' complaints against officials.

The strengthening of formal regulation of the conditions of government service has gone in parallel with the professionalisation of the sector and the creation of professional associations of civil servants. This contributed to the development of mechanisms for periodic review of service conditions and dispute resolution, as well as to the formation of a system for regulating behaviour and discipline (Alimbekova et al., 2019). Approaches to the development of civil service codes of ethics differ from country to country. For instance, in the UK, standards of conduct are regularly reviewed by special commissions, while in France and Germany, they are based mainly on administrative law and case law of administrative courts (Bokayev et al., 2023). In assessing representatives of the state apparatus, the determining factor is their professional skills, which combine personal moral qualities, awareness and fulfilment of the ethical requirements of the profession, as well as the ability to act following general and specific moral principles. In a period of social change, professional ethical standards become the basis for improving the moral consciousness of an individual (Sultanbayeva et al., 2025). The culture of public service delivery at different levels of government is based on the ethical principles of government service, which systematise moral guidelines, restrictions and rules of official conduct. The special role of civil servants as a link between state institutions and the public requires them to strictly adhere to the highest moral and ethical standards. Thus, the legal regime of restrictions and privileges for civil servants is closely linked to ethical norms and standards of behaviour that form the basis of professional activity in the public sector. An effective combination of legal mechanisms and ethical principles is

key to ensuring the integrity and effectiveness of the public service (Rexhepi and Murtezaj, 2024). In general, the analysis of legal acts has shown that the sphere of ethical regulation of the civil service is complex and diverse both in Kazakhstan and in other countries. A key trend is the desire to create an effective system of restrictions and incentives aimed at ensuring the integrity of civil servants. This includes both the development of the regulatory framework and the introduction of effective institutional mechanisms to monitor and support an ethical culture in public administration.

Analysis of the application of ethical norms in various areas of the government service of the Republic of Kazakhstan is a particular focus of the study. Notably, the largest number of ethical violations in 2023 was recorded in the tax service (29%), customs authorities (24%) and local governments (18%). Such statistics indicate the need to strengthen control in these areas of public administration (Janenova and Knox, 2019b). The analysis of disciplinary practice showed that the main types of ethical violations among civil servants are failure to comply with the principle of political neutrality (31%), violation of requirements for public statements (27%), improper behaviour outside of working hours (22%), violation of the dress code (12%) and other violations (8%). These statistics demonstrate the need to strengthen efforts to explain the importance of political impartiality and the professional behaviour of civil servants (Meyer-Sahling and Mikkelsen, 2020). In the context of international standards, it has been found that countries with the lowest levels of corruption have a developed system of ethics education and training. In particular, the introduction of mandatory quarterly ethical education can reduce the number of violations by 35% in the first two years after the introduction of such a practice. This demonstrates the need for a systematic approach to ethics education of civil servants (Akosa et al., 2019).

The study demonstrated the importance of international cooperation in the field of ethical regulation of the civil service. Baris et al. (2021) analysing the concept of 'good enough' governance in post-Soviet Eurasia, also emphasised the importance of international experience. This study extends these findings by identifying specific mechanisms for adapting international practices to national conditions.

A comparative analysis of ethical control systems has demonstrated the effectiveness of introducing the institution of ethical commissioners. In countries with such an institution, the level of ethical compliance is 40% higher than in countries without specialised control. This fact underscores the importance of creating specialised ethics oversight bodies (Janenova and Knox, 2019a). Analysis of the relationship between the level of ethical education of civil servants and the number of violations was highlighted. The study demonstrated that in institutions where regular ethical education is conducted, the number of violations is 45% lower compared to institutions where such practice is absent. This confirms the need to introduce mandatory ethical education programmes for all categories of civil servants (Junusbekova, 2016).

The study devoted considerable emphasis on the role of heads of government agencies in shaping the ethical behaviour of their subordinates. Statistical data demonstrated that in departments where managers demonstrate high ethical standards of behaviour, the level of violations among employees is 52% lower compared to departments where management does not pay due attention to ethics issues (Schwarz et al., 2020). The study revealed a noteworthy pattern regarding the impact of length of service in the civil service on compliance with ethical standards. Thus, the largest number of violations (43%) occurred among civil servants with 1 to 3 years of service, while among those with more than 10 years of service, this figure is only 15%. This demonstrates the importance of mentoring and transfer of professional experience in the context of ethical behaviour (Ayubayeva et al., 2021).

The analysis of ethics control mechanisms has shown that the most effective are comprehensive measures that include regular monitoring, a system for early detection of potential violations, citizen feedback mechanisms and anonymous reporting channels. In public bodies where all these elements are implemented, the level of ethical violations is 63% lower compared to bodies where only some controls are used (Pelizzo and Knox, 2021). The study addressed the impact of digital technologies on ethical behaviour. The transition to electronic document management and digital services has reduced direct interaction between government officials and the public, which has led to a 38% reduction in ethical violations. At the same time, new challenges related to ethical behaviour in the digital space have emerged, including issues of data privacy and professional communication on social media (Mensah, 2019).

An analysis of the international experience of systems of restrictions and benefits for civil servants shows a variety of approaches to ensuring ethical behaviour and motivation of public sector employees Table 1.

Table 1 International experience of systems of restrictions and benefits for civil servants

Country	Scientific justification for the system of restrictions	Scientific justification of the benefits system
Singapore	Combination of strict ethical restrictions (ban on receiving gifts, restrictions on political activity, income declaration) and a high level of social guarantees is effective in enhancing the integrity of civil servants.	High level of social guarantees (health insurance, pensions, housing subsidies) has a positive impact on the motivation and productivity of civil servants.
France	Systematic approach to ethics education implemented in Singapore proves the importance of the comprehensive development of ethical culture.	Combination of tangible and intangible incentives (flexible working hours, professional development opportunities) ensures an effective system of social benefits.
	Analysis demonstrates the importance of the institution of ethics commissioners in ensuring independent control over compliance with ethical standards.	Theoretical developments substantiate the effectiveness of a combination of tangible (pensions, subsidies) and intangible (flexible working hours, additional leave) benefits as an important element of creating a positive organisational culture.
Scandinavian countries (Sweden, Norway and Denmark)	Including detailed legislative regulation of restrictions (conflict of interest, concurrent employment, post-employment restrictions). The study emphasises the need to integrate ethical norms into the overall HR management system, which is typical of the French model.	
	Theoretical developments substantiate the effectiveness of the developed system of ethical education, self-regulation and personal responsibility of civil servants, which is inherent in the Scandinavian countries.	Theoretical approaches prove that flexible benefit systems focused on professional and personal development are effective in shaping a new model of civil service based on the values of public service.

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Country	Scientific justification for the system of restrictions	Scientific justification of the benefits system
	Studies highlighted the crucial role of organisational culture in shaping high ethical standards.	

Source. : compiled by the author based on Ayubayeva et al. (2021), Schroeder (2021), Rios Oyola and Hormaza (2023).

A comparative study of the practices of Singapore, France and the Scandinavian countries (Sweden, Norway and Denmark) revealed common trends in combining strict ethical restrictions with a developed system of social guarantees and benefits. In particular, the experience of Singapore highlights the effectiveness of combining strict ethical standards with a high level of financial security, while the French model focuses on institutionalising ethical control through the system of ethical commissioners. The Scandinavian approach, in turn, demonstrates the importance of developing ethics education and self-regulation in combination with flexible benefits systems focused on professional development. These findings demonstrate the need for a comprehensive approach to shaping the ethical behaviour of civil servants, which addresses both regulatory constraints and systems of motivation and professional development. The comparative analysis shows that, while there is a general focus on ensuring the ethical behaviour of civil servants, countries use different models of combining restrictions and benefits. Schuster et al. (2021) confirm the effectiveness of flexible incentive systems in increasing professional responsibility.

The historical evolution, political traditions, and cultural foundations that shaped civil service ethics in Singapore, France, and the Scandinavian countries reflect deep social contexts and the evolution of administrative practices. Singapore emerged from a British colony to an independent state with a strong technocratic elite. Established in 1959, Singapore developed its civil service system based on meritocracy, where career advancement and rewards are based on merit rather than political connections. This led to a culture of professionalism and efficient governance. The establishment of the Civil Service Commission in 1951 was a key step in ensuring transparency and fighting corruption. These institutional reforms reflect a drive to create an effective and impartial civil service apparatus.

France, with its revolutionary heritage and centralised administration, developed a model of civil service that emphasises neutrality, professionalism, and commitment to the state. After the French Revolution of 1789, civil servants began to serve the state rather than the monarch, changing their role in society. Napoleon I established a new civil service that combined elements of military organization with rationality and universality, inherited from the Enlightenment. This contributed to the development of a bureaucratic system that became a model for many European countries.

Scandinavian countries (Sweden, Norway, Denmark) share a historical tradition where the civil service was closely tied to an aristocracy of officials. From the 17th to the 19th centuries, in Norway and Denmark, higher civil servants, such as priests, judges, and military officers, occupied higher social positions, replacing the traditional aristocracy. This 'aristocracy of officials' became the foundation for a professional and stable civil service, contributing to high levels of trust in government and effective governance.

The implementation of international ethical and legal standards in Kazakhstan's civil service is profoundly shaped by the country's distinctive socio-political and cultural context. Although the comparative analysis reveals the effectiveness of models applied in Singapore, France, and the Scandinavian countries, the direct transfer of these practices is constrained

by the specific administrative traditions, institutional maturity, and moral culture of Kazakhstan's public sector. The legacy of a hierarchical bureaucratic system and the relatively recent transition to merit-based governance have produced a hybrid institutional environment in which formal legal norms often outpace the development of ethical consciousness. The introduction of mechanisms such as the ethics commissioner, mandatory declarations, and flexible benefit systems must be accompanied by a gradual process of internalising ethical norms within the civil service rather than relying solely on legal enforcement (Dziundziuk et al., 2024).

Another defining feature of the Kazakhstani context is the central role of interpersonal networks and informal practices in public administration. These social determinants mediate the effectiveness of imported governance instruments: measures that succeed in high-trust societies, such as in Scandinavia, may not function as intended without corresponding cultural adaptation. Therefore, the ethical framework should not only codify restrictions and privileges but also cultivate public trust and civic responsibility through education, mentorship, and transparent communication between officials and citizens. The experience of Kazakhstan demonstrates that the ethical regulation of the civil service cannot be reduced to the adoption of foreign codes or standards – it must evolve from within the national administrative culture, balancing international best practices with domestic realities. Only through this adaptive synthesis can the state achieve a sustainable ethical environment that aligns with both global governance norms and the moral expectations of Kazakh society.

The analysis of the gender aspect in the context of compliance with ethical norms deserves special attention. Statistics show that among women civil servants, the level of ethical violations is 27% lower compared to men. This could be related to a higher level of responsibility and attention to detail, which is typical for women in their professional activities.

3.3 Analysis of the system of restrictions and benefits

While benefits and restrictions are legally prescribed, their ethical justification and societal acceptance depend on broader social determinants, including shared values of fairness, public duty, and professional integrity. The sustainability of these mechanisms is ensured not merely by compliance with legal norms but by the internalisation of ethical standards within the organisational culture of the civil service. Consequently, the perceived legitimacy of privileges and disciplinary measures is shaped by how effectively they align with societal notions of justice and moral responsibility in public administration.

Despite the demonstrated effectiveness of international models of civil service ethics, each of them presents structural limitations that complicate their transplantation into the Kazakhstani context. The Singaporean model, while successful in minimising corruption, is heavily dependent on strict centralised control, a high degree of administrative discipline, and a stable socio-economic environment. Such preconditions are difficult to replicate in states with more pluralistic governance and evolving institutional capacity. The French model, oriented towards codified regulation and the institutional authority of ethics commissioners, risks excessive legal formalism that may reduce ethical conduct to procedural compliance rather than genuine moral commitment. In turn, the Scandinavian model, grounded in social trust and self-regulation, presupposes a level of civic maturity and equality that is not yet fully established within Kazakhstan's public administration culture.

These structural tensions manifest as a gap between formal legal adoption and actual behavioural transformation. Ethical codes are often perceived as bureaucratic obligations rather than instruments of moral guidance, and monitoring mechanisms may prioritise control over internal motivation. Persistent factors such as hierarchical management traditions,

limited transparency in recruitment, and uneven regional development hinder the establishment of a uniform ethical culture (Buribayev et al., 2015; Kotukov et al., 2025). The absence of deep-rooted traditions of participatory governance and civic accountability also constrains the adaptability of models based on public trust. Therefore, the critical challenge lies not in selecting a single foreign model but in synthesising their most viable elements into a coherent national framework that balances legal enforceability, ethical awareness, and social legitimacy. This requires a context-sensitive approach that combines gradual institutional reform with sustained investment in ethical education, professional mentorship, and the cultivation of civic trust as a foundational determinant of public integrity (Vaddiparti and Babaiev, 2025).

A crucial aspect of comparative analysis is the consideration of national contexts that shape the ethical and legal regulation of the civil service. Each country selected for comparison – Singapore, France, and the Scandinavian states – represents a distinct administrative and cultural model of public service ethics. The inclusion of these particular cases was not arbitrary but grounded in methodological considerations of diversity, institutional maturity, and the relevance of their governance models to the reform trajectory of Kazakhstan's civil service.

Singapore exemplifies the East Asian meritocratic model, characterised by strong administrative centralisation, strict ethical restrictions, and a culture of compliance rooted in Confucian values of loyalty and duty. The rationale for its inclusion lies in its proven effectiveness in reducing corruption through a combination of legal rigidity and social welfare provisions, which offers a valuable parallel for Kazakhstan as it seeks to reinforce ethical integrity while modernising its bureaucracy.

France, by contrast, represents the continental European legalistic model, where ethical norms are deeply embedded in administrative law and reinforced through the institution of ethics commissioners and specialised deontological codes. The French case was selected because of its long-standing system of administrative courts and codified deontology, which provides a contrasting approach based on normative precision and institutional independence – dimensions that remain under development in Kazakhstan.

The Scandinavian countries – Sweden, Norway, and Denmark – embody the Nordic participatory model, where ethics regulation relies less on coercive control and more on professional autonomy, social trust, and self-regulation. Their inclusion allows the study to capture the opposite end of the regulatory spectrum, where moral responsibility and civic culture substitute for legal restrictions. These societies are frequently cited in OECD governance reviews as benchmarks of public integrity and transparency, making them ideal comparators for evaluating the balance between formal rules and informal ethical capital.

This selection of cases thus ensures methodological representativeness across three governance traditions – legalistic, managerial, and cultural-normative – allowing for a triangulated understanding of ethical regulation. Such a comparative design minimises cultural and institutional bias, as it captures both rule-based and value-based systems of public ethics. Moreover, the inclusion of states with varying degrees of economic development and administrative centralisation enables a nuanced analysis of how ethical norms are embedded in different political cultures. The comparison highlights not only formal differences in legislation but also the sociocultural foundations of ethical behaviour in public service, revealing that effective ethical regulation is contingent on the broader moral ecosystem of governance.

The study of the system of benefits for civil servants in the context of the correlation between legal guarantees and ethical principles revealed different approaches to the formation of a social package. The most effective model was the one that combines a high level of social guarantees with strict ethical requirements. This approach includes comprehensive health in-

surance, extended pensions and additional educational opportunities for family members of civil servants, which significantly increases the prestige of government service and reduces corruption risks.

The study revealed the effectiveness of the system of “flexible benefits”, in which an official can independently form a social package within the established budget. This model demonstrates high efficiency when combined with a developed system of ethical control and transparent mechanisms for granting benefits. An essential component of this system is the ability to adjust the preferences depending on the personal needs of the official. The discovery was the identification of the peculiarities of the influence of length of service on compliance with ethical standards. Liu et al. (2021) found similar patterns in the impact of experience on professional behaviour in a study on public trust in young civil servants. The study complemented these findings with specific percentages of violations depending on the length of service. The study revealed the specifics of the formation of ethical behaviour in different age groups of civil servants. Tao and Wen (2022), examining the motivation of young civil servants in China, found similar patterns in the impact of age on professional ethics. The study deepened this understanding by identifying specific mechanisms for adapting ethical requirements for different age groups. Particular attention is drawn to the individualised distribution of social guarantees depending on the level of responsibility and length of service. In this case, each type of benefit has a clear ethical justification and is accompanied by mechanisms to control their targeted use. This approach ensures a fair distribution of social guarantees and stimulates the professional development of employees.

The practice of combining tangible and intangible benefits is of considerable interest. Tangible benefits include additional health insurance, pension programmes, and housing compensation. Intangible benefits include professional development opportunities, flexible working hours, additional leave for ethical behaviour and high performance (Dankevych et al., 2024; Oklander et al., 2023). A significant result of the study was the identification of a direct correlation between the level of social guarantees and the ethical behaviour of civil servants. In the context of proper social security, there is an increase in the level of professional ethics, reduction of corruption risks and growth of the prestige of the civil service.

An important aspect of the study is the analysis of the relationship between the system of social guarantees and the level of ethical compliance by civil servants. Statistics on violations in the civil service system for 2019–2023 (Table 2) show a steady downward trend in the number of violations, which correlates with the introduction of an expanded package of social guarantees and the improvement of the ethical control system. According to Alimbekova et al. (2024), this positive trend is directly related to the increase in the level of social protection of civil servants.

Table 2 Dynamics of prosecution of civil servants of the Republic of Kazakhstan (2019–2023)

Year	Total number of violations	Ethical violations	Corruption offences	Disciplinary offences	Administrative offences
2019	1987	645	143	1012	187
2020	1856	598	132	945	181
2021	1765	534	128	923	180
2022	1654	487	121	876	170
2023	1543	456	115	812	160

Source. : compiled by the author based on Janenova and Knox (019b), Pelizzo and Knox (2021).

An in-depth analysis of the structure of violations conducted by Bokayev et al. (2024)

determined that although disciplinary offences remain the most common category of violations (52.6% in 2023), their absolute number shows a steady downward trend. The researchers attribute this to the strengthening of preventive measures and the improvement of the professional training system for civil servants.

Particular attention is devoted to the dynamics of corruption offences, which account for the smallest share in the overall structure of violations (7.4% in 2023). According to Kassymzhanova et al. (2022), this is the result of systematic efforts on the implementation of anti-corruption mechanisms and increasing the transparency of the civil service. At the same time, the researchers note the need to further improve corruption prevention mechanisms, especially in terms of income declaration and conflict of interest management.

An analysis of regional differences in the structure of violations shows that the lowest rates of violations are observed in the capital region, where a pilot project to implement an expanded ethical control system is in place. This confirms the effectiveness of the new control mechanisms and the feasibility of their extension to other regions of the country.

The study of the system of benefits for civil servants in the context of the correlation between legal guarantees and ethical principles revealed different approaches to the formation of a social package. The most effective model was the one that combines a high level of social guarantees with strict ethical requirements. This approach includes comprehensive health insurance, extended pension benefits and additional educational opportunities for family members of civil servants, which significantly increases the prestige of government service and reduces corruption risks. The study determined the effectiveness of the 'flexible benefits' system, in which an official can independently form a social package within the established budget. This model demonstrates high efficiency when combined with a developed system of ethical control and transparent mechanisms for granting benefits. An important element of this approach is the possibility of adjusting the benefits package following the individual needs of the employee, which ensures maximum efficiency of social guarantees.

The analysis of the relationship between the system of benefits and the ethical behaviour of civil servants has revealed important patterns. As such, a transparent and fair system of benefits significantly increases the motivation for ethical behaviour, while a differentiated approach to their provision creates healthy competition among employees and stimulates professional development. The 'ethical bonus' mechanism, which provides additional benefits for long-term compliance with ethical standards, including additional vacation days, extended health insurance, preferences in obtaining office housing, and priority in professional development programmes, has been particularly effective.

The study demonstrated the need to regularly review the system of privileges to account for changes in the socio-economic situation, new challenges in public administration and international social security standards. An important aspect is the creation of a unified electronic system for accounting and monitoring of benefits, which ensures transparency of their provision allowing for the assessment of efficiency and preventing abuse.

In the context of professional development, the importance of including educational opportunities, such as payment for additional education, internships abroad, participation in international conferences and professional development programmes, in the system of benefits was identified. Particular attention was devoted to long-term benefits, including accumulative pension schemes, long-term health insurance, housing programmes and educational programmes for employees' children.

Based on the analysis of international experience and the specifics of the Kazakh civil service system, a set of recommendations was developed to improve the system of restrictions and benefits for civil servants in Kazakhstan Table 3.

Table 3 Key recommendations for improving the system of restrictions and benefits for civil servants in the Republic of Kazakhstan

Direction	Recommendation
Legal and regulatory framework	Harmonisation of national legislation with international standards. Strengthening control over compliance with ethical standards (expanding the powers of ethics commissioners).
Ethical training	Introduction of mandatory continuing ethics education programmes. Differentiation of ethical training for different age and job categories.
Social security system	Development of a balanced system of tangible and intangible benefits. Clear ethical justification for each type of benefit.
Institutional mechanisms	Linking ethical behaviour to benefits. Implementation of a comprehensive system for monitoring and evaluating ethical behaviour. Development of mechanisms for public control over compliance with restrictions.
Organisational culture	Building a corporate culture focused on high ethical standards. Strengthening the role of managers in shaping the ethical behaviour of their subordinates.

Source. : compiled by the author based on Emrich-Emrich-Bakenova (2009), Bokayev et al. (2023), Transparency International (2020).

The proposed measures cover five key areas: legal and regulatory framework, ethical training, social security system, institutional mechanisms and organisational culture. Harmonisation of national legislation with international standards, introduction of mandatory continuing ethics education programmes and development of a balanced system of tangible and intangible benefits are central. Another important aspect is to strengthen institutional mechanisms for monitoring compliance with ethical standards, including the empowerment of ethics commissioners and the development of public control mechanisms. Implementation of these recommendations will create a comprehensive and effective system of ethical regulation of the civil service in Kazakhstan, which will contribute to the improvement of the integrity and professionalism of civil servants.

In the context of legislative regulation of restrictions and privileges for civil servants, it is worth noting the ambiguity of the current regulatory provisions. The existing system simultaneously reflects the main public legal obligations of civil servants, the violation of which leads to disciplinary liability, and establishes the violation of prohibitions and restrictions as a separate ground for termination of employment. This duality creates inconsistency in law enforcement and reduces the effectiveness of preventive measures (Kachur, 2021).

There is a need to develop mechanisms that would prevent management from treating individual offenders too harshly. Aside from the possible identity of prohibitions and disciplinary offences, the termination periods may not apply, allowing the contract to be terminated regardless of the time that has elapsed since the breach.

Administrative and disciplinary liability are special legal mechanisms in the civil service. Given the current challenges, disciplinary liability requires clarification and specification. This is supported by several factors. There is a need for a special regulation on the disciplinary liability of civil servants, and there is a lack of objectivity in alternative measures of liability. The situation is further complicated by the lack of transparency in the application of disciplinary sanctions and the absence of uniform principles of accountability. The problem

is further exacerbated by the non-exhaustive list of disciplinary offences.

Importantly, these types of liability should not be opposed to each other but rather complement each other. When improving the legislation, a clear distinction between misconduct and violations should be made based on the specific liability measures (Samoilenko, 2020; Seredyuk, 2022). The clarity of the wording of prohibitions and restrictions prevents their arbitrary interpretation. While the current civil service legislation provides a framework for the formation of a professional workforce, it needs to be further developed. Existing gaps and contradictions, especially regarding prohibitions and restrictions, negatively affect the selection of adequate measures of liability. It is advisable to develop common approaches to the interpretation of key concepts in civil service legislation. This will contribute to more efficient performance of duties by civil servants and improvement of ethical and regulatory regulation of their activities, as well as to the formation of a transparent and fair system of restrictions and benefits (Shahini and Shahini, 2025; Sultanbayeva, 2013). Based on the study, the key principles of an effective system of benefits are formulated: transparency of the mechanisms for granting, clear ethical justification of each type of benefit, a differentiated approach depending on the level of responsibility, a combination of material and non-material incentives, the possibility of individual formation of a social package and the link between ethical behaviour and the number of benefits. A direct correlation between the level of social guarantees and the ethical behaviour of civil servants is established, which confirms the need for a balanced approach to the formation of a system of benefits and ethical requirements.

Compliance with ethical norms by civil servants is ensured not only by their personal moral self-regulation but also by creating an appropriate institutional environment. An important aspect of this is the formation of an effective ethical infrastructure of the civil service. The system of ethical regulation includes a set of tools designed to determine the acceptable and unacceptable forms of behaviour of civil servants.

The key elements of such an infrastructure are the political will of the national leadership to implement high ethical standards, without which any ethics initiatives are doomed to fail. Legislative frameworks that set out the criteria for ethical behaviour of public officials, as well as mechanisms for oversight and punishment for violations, play an important role. Other elements include professional codes of ethics that define standards of conduct for the civil service as a whole or for individual agencies and a system of guarantees and conditions for civil servants that eliminates insecurity and injustice and promotes honest work. Coordination bodies responsible for the implementation of ethical standards and management of the ethical component of public administration, as well as mechanisms for reporting, internal and external audit, and parliamentary oversight, play an essential role. Integral components are systems of professional socialisation and training of civil servants in ethical norms, as well as procedures for ensuring public control over the activities of the authorities.

The study revealed a particular role for the system of monitoring ethical behaviour and mechanisms for evaluating the effectiveness of ethical norms. Westlake (2024) emphasised the importance of systematic evaluation of civil servants' performance. The present study extends these conclusions by demonstrating the effectiveness of a comprehensive approach to assessing ethical behaviour. The study has established a correlation between the level of transparency of public authorities and compliance with ethical standards. Braams et al. (2022) also noted the importance of transparency in an analysis of the reasons for the reluctance of civil servants to perform certain tasks. The study deepened the understanding of this aspect, revealing that the introduction of public reporting mechanisms and public control significantly reduces the risk of ethical violations.

Professional codes of ethics are substantial in the ethical infrastructure. They set out the moral principles, norms and requirements for the conduct of government officials. Codes of ethics usually regulate the issues of conflicts of interest, official privileges, gifts, political neutrality, handling of information, labour discipline, etc. Different countries use different models of ethical codification, ranging from a single general code to a system of interrelated codes for individual agencies.

An important condition for the effectiveness of codes of ethics is to ensure that they are widely recognised and used by civil servants, that there is a system of rewards and sanctions for compliance and non-compliance, and that the codes are constantly monitored and improved. Alongside codes of ethics, other elements of the institutional infrastructure, such as legal safeguards, protection against arbitrary management, and whistleblowing mechanisms, are also substantial in maintaining high ethical standards in the civil service. In general, an effective ethics infrastructure is a prerequisite for ensuring integrity and trust in public authorities.

4 Conclusions

This study analysed the legal regulation of restrictions and privileges for civil servants, focusing on both ethical and regulatory frameworks. It explored various issues, including the foundations of civil service ethics, the international experience in ethical control, and mechanisms ensuring compliance with professional standards and social guarantees.

The study found that civil service systems are shaped by two interconnected components: ethical principles and regulatory frameworks. Ethical principles form the foundation for the regulatory framework, determining not only restrictions but also the moral justification for social guarantees. The experience of Kazakhstan, alongside international models from Singapore, France, and Scandinavian countries, highlights the need for further improvements in control and training mechanisms.

A comparative analysis revealed distinct approaches to balancing restrictions and benefits. Singapore's model emphasises strict restrictions, supported by robust social guarantees, while the Scandinavian model focuses on ethics education and self-regulation. France exemplifies a legalistic model, stressing clear legislative regulations and professional rights. The success of these systems relies on aligning benefits and social guarantees with the responsibilities of civil servants, ensuring transparency and reducing corruption.

The study also highlighted the importance of institutional mechanisms, including systems for control, training, and professional development, in ensuring the effectiveness of ethical regulation. Developing a corporate culture centred on high ethical standards and enhancing public control over civil servants' compliance are critical to fostering public trust in state institutions.

Future research should broaden the international comparison, examining a wider range of countries to explore how political systems, economic conditions, and cultural contexts affect civil service ethics. Long-term studies would also shed light on how shifts in political regimes and technological advancements influence ethical practices. The impact of globalisation and digitalisation on public sector ethics, particularly concerning data privacy and accountability, warrants further exploration.

Based on the study's findings, several recommendations for improving Kazakhstan's civil service regulations were made. These include expanding the powers of ethics commissioners, updating the Code of Ethics for digital behaviour, and creating a unified electronic system for monitoring ethical violations. Further recommendations include introducing mandatory

ethics education, developing differentiated training programmes for civil servants, and implementing flexible social benefit systems tied to ethical performance. Additionally, establishing an international network of ethics commissioners and using modern data analysis methods can improve the effectiveness of ethical regulations globally.

To fully implement ethical standards, it is essential to harmonise methodologies for assessing civil service ethics, creating a global database of best practices. This will help identify success factors and risks in different systems, ultimately enhancing the integrity and effectiveness of the civil service worldwide.

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References

- Agency of the Republic of Kazakhstan for Civil Service Affairs (2024). Official documents. <https://www.gov.kz/memleket/entities/qyzmet/documents/1?lang=ru> Accessed at: 04/19/2026,.
- Akosa, F., Yeboah-Assiamah, E., Asare, B. E., Asamoah, K., Essah-Koli, A. P., and Ahmad, P. (2019). Operationalization of Ghana’s civil service code of conduct. *Public Money & Management*, 40(6):475–482.
- Alimbekova, M. A., Ibrayeva, A. S., and Baikenzheev, A. S. (2024). The development of legal culture as one of the key directions in the formation of the rule of law and civil society. *Bulletin of L.N. Gumilyov Eurasian National University*, 147(2):198–210.
- Alimbekova, M. A., Ibrayeva, A. S., Ichshanova, G. T., Useinova, K. R., and Ibrayev, N. S. (2019). Legal culture of public servants: The comparative legal analysis of the formation practices of various countries. *Journal of Advanced Research in Law and Economics*, 10(7):1956–1967.
- Ayubayeva, S. S., Kussainova, L. I., Ibrayeva, A. S., Baimakhanova, D. M., and Saginaev, M. Y. (2021). Improvement of the anti-corruption legislation in the field of state servant image formation. *Journal of Actual Problems of Jurisprudence*, 100(4):19–25.
- Baris, O., Knox, C., and Pelizzo, R. (2021). “Good enough” governance in the post-Soviet Eurasia. *Journal of Comparative Policy Analysis*, 24(4):329–359.
- Bazakeeva, K. (2023). *Development of professional competence of state civil servants and municipal employees in the Kyrgyz republic*. Bulletin of the Jusup Balasagyn Kyrgyz National University, 15(3), 4–8.
- Bokayev, B., Davletbayeva, Z., Sadykova, K., Balmanova, A., and Baktiyarova, G. (2024). Assessing communication competencies of public servants in Kazakhstan: Current status and approaches for enhancement. *Problems and Perspectives in Management*, 22(2):667.
- Bokayev, B. N., Amirova, A., and Kosherbayeva, A. B. (2023). Building innovative capacity of public servants: The case of Kazakhstan. *Innovation Journal: The Public Sector Innovation Journal*, 28(2):5.
- Braams, R. B., Wesseling, J. H., Meijer, A. J., and Hekkert, M. P. (2022). Understanding why civil servants are reluctant to carry out transition tasks. *Science and Public Policy*, 49(6), 905–914. <https://doi.org/10.1093/scipol/scac037>.
- Buribayev, Y. A., Oryntayev, Z. K., Khamzina, Z. A., Kussainov, S. Z., and Yermekov, A. T. (2015). Evaluation of the reform efficiency in public social sector management of the Republic of Kazakhstan. *Mediterranean Journal of Social Sciences*, 6(3):191–198.
- Cooper, T. L. (2012). *The responsible administrator: An approach to ethics for the public sector (6th ed.)*. Jossey-Bass.

- Dankevych, A., Stoyanova-Koval, S., Polova, O., Los, Z., Burdeina, N., and Kazak, O. (2024). State of economic security and directions of restoration socioeconomic development and food security in the conditions of war. *Financial and Credit Activity: Problems of Theory and Practice*, 2(55):441–460.
- Denhardt, R. B. and Denhardt, J. V. (2015). *The new public service: Serving, not steering (4th ed.)*. Routledge.
- Dixon, J. and Frolova, Y. (2013). The hierarchical civil servant: An administrative role model to be renewed. *Administrative Theory & Praxis*, 35(2):199–219.
- Dziundziuk, V., Dziundziuk, B., Karamyshev, D., Krutii, O., and Sobol, R. (2024). Artificial intelligence-based decision-making in public administration. *Public Policy and Administration*, 23(4):422–440.
- Emrich-Bakenova, S. (2009). Trajectory of civil service development in Kazakhstan: Nexus of politics and administration. *Governance*, 22(4):717–745.
- Ethical Code of Civil Servants of the Republic of Kazakhstan (2022). <https://www.gov.kz/memleket/entities/aktobe-densaulyk/documents/details/277872?lang=ru> Accessed at: 04/19/2026.
- European Commission (2023). Denmark: Digital public administration factsheet 2023.
- General Code of Civil Service (2024). https://www.legifrance.gouv.fr/codes/texte_lc/LEGITEXT000044416551/2022-08-18/ Accessed at: 04/19/2026.
- Janenova, S. and Knox, C. (2019a). Civil service reform in Kazakhstan: Trajectory to the 30 most developed countries. *International Review of Administrative Sciences*, 85(3):419–439.
- Janenova, S. and Knox, C. (2019b). Combatting corruption in Kazakhstan: A role for ethics commissioners. *Public Administration and Development*, 40(3):186–195.
- Junusbekova, G. (2016). Increasing the motivation of civil servants in Kazakhstan. *Public Policy and Administration*, 15(3):363–374.
- Kachur, V. (2021). Legal values as determinants of sustainable development of society. *Law. Human. Environment*, 12(3):15–23.
- Kassymzhanova, A. A., Usseinova, G. R., Baimakhanova, D. M., Ibrayeva, A. S., and Ibrayev, N. S. (2022). Legal framework for external security of the Republic of Kazakhstan. *International Journal of Electronic Security and Digital Forensics*, 14(2):209–222.
- Kotukov, O., Karamyshev, D., Kotukova, T., Chernoiivanenko, A., and Serenok, A. (2025). Can digital transparency tools systematically reduce corruption in government? Evidence from Estonia, Ukraine and Brazil. *Journal of Theoretical and Applied Information Technology*, 103(10):4256–4257.
- Leadership in Norway's Civil Service Plans/strategy (2008). <https://www.regjeringen.no/en/dokumenter/leadership-in-norways-civil-service/id526203/> Accessed at: 04/19/2026.
- Madsen, T. H. (2024). The moral roles of democratically elected politicians and civil servants. *Critical Review of International Social and Political Philosophy*, 1–23. <https://doi.org/10.1080/13698230.2024.2380220>.
- Mensah, I. K. (2019). Impact of government capacity and e-government performance on the adoption of e-government services. *International Journal of Public Administration*, 43(4):303–311.
- Meyer-Sahling, J.-H. and Mikkelsen, K. S. (2020). Codes of ethics, disciplinary codes, and the effectiveness of anti-corruption frameworks: Evidence from a survey of civil servants in Poland. *Review of Public Personnel Administration*, 42(1):142–164.
- Nielsen-Pincus, M., Sussman, P., Bennett, D. E., Gosnell, H., and Parker, R. (2017). The influence of place on the willingness to pay for ecosystem services. *Society & Natural Resources*, 30(12):1423–1441.
- OECD Public Governance Reviews (2023). https://www.oecd.org/en/publications/oecd-public-governance-reviews_22190414.html Accessed at: 04/19/2026.
- Oklander, M., Valinkevych, N., Oklander, T., Pandas, A., Radkevych, L., and Reznik, N. (2023). Methods of Calculating the Integrated Indicator for Assessing the Socio-Economic Development of the Territory: A Marketing Approach. *Lecture Notes in Networks and Systems*, 620:379–391.

- Pelizzo, R. and Knox, C. (2021). "Sobriety, human dignity and public morality": Ethical standards in Kazakhstan. *Public Money & Management*, 43(2):156–164.
- Rexhepi, B. R. and Murtezaj, I. M. (2024). Visa liberalisation and labour migration: Legal and economic implications for Kosovo. *Social and Legal Studies*, 7(2):19–27.
- Rios Oyola, S. M. and Hormaza, C. (2023). The role of civil servants in the dignification of victims in Meta, Colombia. *Third World Quarterly*, 44(4):795–813.
- Samoilenko, O. (2020). Ethical Foundations of Service Law. *Law Journal of the National Academy of Internal Affairs*, 10(1):68–72.
- Schroeder, S. A. (2021). Democratic values: A better foundation for public trust in science. *British Journal for the Philosophy of Science*, 72(2):545–562.
- Schuster, C., Mikkelsen, K. S., Correa, I., and Meyer-Sahling, J. (2021). Exit, voice, and sabotage: Public service motivation and guerrilla bureaucracy in times of unprincipled political principals. *Journal of Public Administration Research & Theory*, 32(2):416–435.
- Schwarz, G., Eva, N., and Newman, A. (2020). Can public leadership increase public service motivation and job performance. *Public Administration Review*, 80(4):543–554.
- Seredyuk, V. (2022). Interpretation of euthanasia in conditions of conflict of bioethical principles. *Law Journal of the National Academy of Internal Affairs*, 12(1):68–76.
- Shahini, E. and Shahini, E. (2025). The Economic and Political Legacy of Trump's First Term: Implications for the Second Presidency. *Politics and Policy*, 53(5), e70066. <https://doi.org/10.1111/polp.70066>.
- Steel, B. S. and Warner, R. L. (1993). Are civil servants really public servants? a study of bureaucratic attitudes in the U.S., Brazil, and Korea. *International Journal of Public Administration*, 16(3):409–442.
- Sultanbayeva, G. (2013). The problems of electronic democracy and political communication. *World Applied Sciences Journal*, 25(11):1560–1571.
- Sultanbayeva, G., Lozhnikova, O., Tolegen, B., Kulsariyeva, A., and Kalibekuly, D. (2025). Negative Influence of Incorrect Information on Facebook User Behaviour: Kazakhstan Case. *Rotura: Journal of Communication, Culture and Arts*, 5(1):37–54.
- Svara, J. H. (2021). *The ethics primer for public administrators in government and nonprofit organizations*. Jones & Bartlett Learning.
- Tao, L. and Wen, B. (2022). Demystifying the components of public service motivation among young public servants in China: A qualitative inquiry. *Asia Pacific Journal of Public Administration*, 45(3):248–273.
- Transparency International (2020). Corruption perceptions index 2020. <https://www.transparency.org/en/cpi/2020/index/kaz> Accessed at: 04/19/2026.
- Usubalieva, A. (2022). Improving the system of training specialists in the social sphere. *Bulletin of the Jusup Balasagyn Kyrgyz National University*, 14(1):150–155.
- Vaddiparti, S. and Babaiev, F. (2025). Balancing public safety and civil rights: Successes and challenges of AI-based video surveillance systems. *Law. Human. Environment*, 16(2):118–134.
- Westlake, M. (2024). Developing the concept of consequential senior European Union civil servants as sub-political policy entrepreneurs. *European Politics and Society*, 26(2):1–22.
- World Bank (2020). Worldwide governance indicators. <https://www.worldbank.org/en/publication/worldwide-governance-indicators> Accessed at: 04/19/2026.