

# KAZAKHSTAN

## Country Focus Report

2025



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# A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

## SIX ENABLING PRINCIPLES

- 1. Respect and Protection of Fundamental Freedoms**
- 2. Supportive Legal and Regulatory Framework**
- 3. Accessible and Sustainable Resources**
- 4. Open and Responsive State**
- 5. Supportive Public Culture and Discourses on Civil Society**
- 6. Access to a Secure Digital Environment**

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

## Brief Overview of the Country Context

Reporting period covered: August 2024 to August 2025

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*“Maturity is when you realise that in your twenties you had more ideas than chances, and in your thirties you had more chances than illusions.”*

— Albert Camus, French philosopher and writer

The civil society of modern Kazakhstan is 35 years old. Its formation began with the independence of Kazakhstan from the USSR in 1991 and went through three key stages. The first stage was its formation (1990s), when the first NGOs appeared, and the country's [Constitution](#) was adopted, guaranteeing the protection of civil liberties. The second stage was its institutionalisation (2000s), which was characterised by a strengthening of the role of NGOs in the socio-economic and political life of the country and the Central Asian region, assistance from international donor programmes to develop the capacity of civil society and the adoption of a number of regulatory documents such as the Law [“On Non-Commercial Organisations”](#), [Concept of Civil Society Development, 2006](#), and the introduction of [state social contracting for NGOs](#). The third stage was the increase of partnerships (2010s - 2020s), when a new [Concept of Civil Society Development](#) until 2025 was adopted, thereby giving a new impetus to the development of social dialogue and partnership in society.

Today, more than [23,000 civil society organisations](#) have been registered in the country in the form of associations, public organisations, associations of legal entities, and foundations. Civil society organisations provide a wide range of services to society. Over the past decades, public awareness of the work of civil society organisations has increased, and there has been an increase in the frequency of government consultations with them on national policies and international commitments related to women, persons with disabilities, and the SDG [Voluntary National Review \(VNR\)](#).

The geopolitical situation remains tense: the region is located between Russia and China, states with authoritarian political systems whose governance and legal practices exert a significant influence on socio-political processes in neighbouring countries. Against a backdrop of pressure on democratic institutions and a shrinking space for civic participation, efforts to strengthen institutions of accountability, transparency, public trust, and the

development of an enabling environment are particularly important. However, the role of civil society organisations in the country is limited by a very cautious approach to civil society development, which is reflected, for example, in excessive administrative and financial reporting requirements imposed only on civil society organisations, or in the wary attitude of some deputies towards CSOs receiving foreign funding.

On their part, civil society organisations are limited by insufficient capacities, lack of coordinated strategic interaction within the sector itself and with the government, insufficient working platforms for collective expression of their opinions, and a critical shortage of diverse and sustainable resources. The media in Kazakhstan perceive civil society ambiguously, dividing it into loyal CSOs working with the state, and independent activists who are often subjected to pressure. The media report high social activity but point to restrictions on freedom of speech and risks to civic initiatives.

At the global level, Kazakhstan's democratic indicators have been stable for 2024-2025 and are in the 'not free' category according to [the Freedom House index](#). There are various media in the country, but in general journalists face difficulties in obtaining timely information and censorship, which has led to a drop in Kazakhstan's place in the World Press Freedom Index compiled by [Reporters Without Borders](#) from 134th place in 2023 to 142nd place in 2024 and 141st place in 2025 out of 180 countries. This fact can be assessed as a 'difficult' situation, demonstrating a general downward trend in the level of freedom of speech.

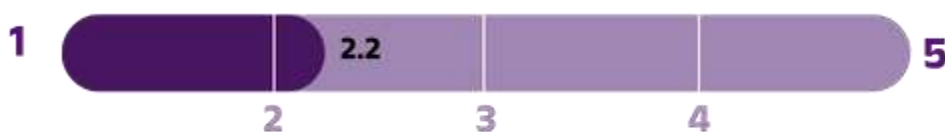
Thus, there are basic conditions for creating an enabling environment in Kazakhstan. However, limited access to resources, entrenched social prejudices and procedural exclusions reduce the effectiveness of civil society organisations' initiatives and weaken their ability to promote inclusive governance. These restrictions affect not only the population served by civil society organisations but also reduce the sector's ability to fully contribute to the country's democratic development.

# B) Assessment of the Enabling Environment

## PRINCIPLE SCORE

### 1. Respect and Protection of Fundamental Freedoms

Score:<sup>1</sup>



#### 1.1 | Freedom of Association

A score of 2.2 reflects a situation where respect for fundamental freedoms in Kazakhstan has not yet reached a level consistent with an enabling environment. [Article 26](#) of the Constitution of the Republic of Kazakhstan and the Law [“On Public Associations”](#) define the right to form or join civil society organisations and enshrines the right of citizens to freedom of association. [More than 23,000 NGOs](#) were registered in the country as of December 2025. However, CSOs' [opinions about the real freedom of association](#) often point to bureaucratic barriers, the difficulty of registration, and restrictions on activities. Mandatory registration is required for civic engagement. Over the past two years, the number of newly registered organisations hasn't increased significantly, with only a handful registered. There are examples of organisations submitting documents for legal registration as many as 10 times, ultimately failing to register. The registration is mandatory, making association without registration impossible in Kazakhstan.

If we consider civil society broadly as an environment, a space for civic engagement, including the creation and operation of independent trade unions, independent media, religious organisations, NGOs, etc., there are real barriers and examples that restrict freedom of association. For example, despite the signing of the [Decent Work Roadmap](#) between

<sup>1</sup>This is a rebased score derived from the [CIVICUS Monitor rating](#) published in December 2025.

Kazakhstan and the ILO for 2024–2025, international human rights organisations note that little has changed in practice for independent trade unions. Human rights activists have documented the practice of ["endless refusals"](#) under formal pretexts. Justice agencies find minor inaccuracies in charters (for example, in the wording of objectives or structure) and impose new requirements each time documents are resubmitted.

Unregistered public and religious associations are prohibited in the country, and any religious activity is subject to a significant number of discriminatory restrictions. The Constitution of the Republic of Kazakhstan and civil legislation prohibit financial support for trade unions from abroad, which has been condemned by the ILO Committee on Freedom of Association as a violation of Kazakhstan's obligations under ILO conventions.

The legislation regulating fundamental rights for civic engagement is repressive; it uses concepts that do not comply with the principle of legal certainty and predictability. In particular, organisations working in human rights, watchdog organisations, and socially relevant topics continue to face increasing scrutiny and [stigmatisation related to foreign funding](#). In early 2025, some deputies, including Deputy Smirnova, initiated a discussion on the possible introduction of the status of 'foreign agents' for NGOs and the media. Although this initiative has since subsided, the discussion itself has increased the 'chilling effect' and legal uncertainty for organisations. Similarly, at the end of 2025 Kazakhstan adopted the Law on LGBT propaganda with severe effects on organisations working on LGBTQI+ issues. [According to UN experts](#), "the draft law banning so-called LGBT propaganda being considered by the Parliament of Kazakhstan will perpetuate stigma, restrict freedom of expression, and run counter to international human rights obligations."

## **1.2 | Freedom of Peaceful Assembly**

The law ["On the Procedure for Organising and Holding Peaceful Assemblies"](#) was enacted in Kazakhstan in 2020. Although it replaced the requirement for a permit with a simple notification process for planned assemblies, human rights activists criticise it for strict restrictions and risks of prosecution for 'unauthorised' actions. Experts [point out](#) that the notification principle has actually turned into a requirement of obtaining permission because local executive bodies (akimats) may not agree on a place or time, under the pretext of holding other events.

The law restricts venues for meetings, often taking them to the outskirts of cities, which, according to human rights activists, deprives them of publicity and meaning. The narrow timeframe for submitting an application has been criticised, making it difficult to organise spontaneous or urgent protests. In particular, during the period of public discussions on the energy agenda, including the construction of a [nuclear power plant](#), there were [cases of refusals and detentions of activists](#). Spontaneous events are almost impossible, which limits the operational expression of civic positions. As a result of local authorities' refusal of permits, no peaceful rally has been held since 2023. According to the law, the organiser must submit notice of a rally, picket, or other peaceful assembly to the executive body no later than five business days before the event. The Akimat (city administration) must notify the authorities within three days whether the assembly has been approved or rejected. In practice, [civil society always receives a refusal](#). Despite the legislative changes in 2020, human rights activists state that peaceful assemblies remain strictly controlled, and their implementation carries risks of persecution.

## **1.3 | Freedom of Expression**

Freedom of expression in Kazakhstan is guaranteed by the [Constitution \(Articles 12 and 20\)](#). Human rights, freedom of speech and creativity are recognised, censorship is prohibited, but in practice human rights activists note systematic restrictions. Critics of the authorities, activists, and journalists face pressure, prosecution, intimidation and detention. In 2020, Article 130 on "Defamation" was deleted from the Criminal Code, but [human rights reports](#)

say that [recommendations for reforming other repressive articles that are used to suppress dissent and criticism have not been implemented](#). These refer specifically to Article 274 on disseminating knowingly false information that risks disturbing public order, Article 400 on assemblies held without notification or permission, and Article 405 on participating in activities of a public or religious association that has been banned due to extremism or terrorism. Violation of these articles carries heavy punishment, including correctional labour and up to seven years' imprisonment.

There are unjustified restrictions on the expression of opinions, especially on the internet and social networks. In 2025, [media discrimination in Kazakhstan](#) intensified through targeted website blocking, denial of accreditation, and criminal investigations against independent journalists, particularly those covering corruption or social unrest. Journalists, bloggers, and human rights activists expressing dissenting opinions face [surveillance and persecution](#). [The use of facial recognition technology](#) to track and flag dissenting voices reveals how digital surveillance is becoming a tool of repression. [The denial of accreditation to a number of journalists](#), as well as [the conviction of blogger Temirlan Yensebek](#) on charges related to his public materials, have increased the concern of the professional community.

Key examples of media discrimination and pressure in 2025 include: (1) Physical Harassment and Detention: In December 2025, police raided the newsroom of the independent media agency Orda.kz, detaining staff and pursuing criminal charges against them. (2) Censorship of Sensitive Topics: Independent journalists Lukpan Akhmedyarov and Raul Uporov were pressured to drop a documentary covering the deaths of conscripted soldiers, with one reporting threats from a high-ranking official. (3) Criminal Charges against Reporters: Journalist [Jamilya Maricheva](#) was fined for "spreading false information" after supporting colleagues denied accreditation, and human rights defender Bakhytzhan Toregozhina was [convicted](#) for a social media post.

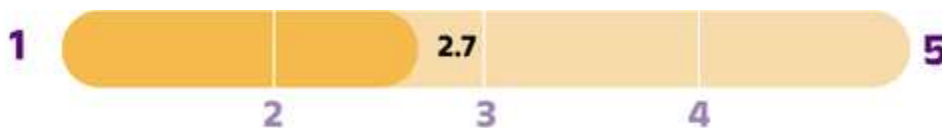
The fragility of media institutions, characterised by high staff turnover and financial instability, further weakens the ecosystem for independent journalism. Additionally, the practices of administrative prosecution and interrogation contributed to self-censorship and a decrease in the quality of public discussion.

Overall, a score of 2.2 points to persistent trends: pressure on the media, limited opportunities for assembly, and tighter control over civil society organisations. These dynamics create unfavourable conditions for freedom of expression, collective action, and association. Taken together, the situation corresponds to the "Repressed" category in the CIVICUS Monitor rating and indicates a continued narrowing of civic space.

# PRINCIPLE SCORE

## 2. Supportive Legal and Regulatory Framework

Score:



### 2.1 | Registration

In general, the legal framework for registration of civil society organisations (CSOs), although bureaucratic, is partially favourable. Along with that, it is extremely difficult to register organisations of religious minorities, in particular, groups professing different trends in Islam from the dominant trend in Kazakhstan, and organisations defending the rights of LGBTIQ+ people. Registration is difficult for independent trade unions and public funds engaged in advocacy activities for the protection of environmental rights.

The legal framework in Kazakhstan provides for a formal way to register and re-register civil society organisations (CSOs) through [Article 31 of the Law on Non-Profit Organisations](#) and [Law on Registration of Legal Entities](#). However, despite the clarity of the law, its implementation creates practical and procedural barriers that affect smaller local civil society organisations. In particular, if a rural organisation is located at a far distance (about 300-400 kilometres) from the regional centre, the location of departments of justice and returning documents several times requires constant effort and long trips for local rural organisations to agree upon revisions each time to obtain registration. Although the registration fee (from 15 to 48 Euros, depending on the legal form) is relatively affordable, the administrative burden and slow decision-making process discourage new organisations. By the end of 2023, the mandatory [number of founders for the establishment of a public association has decreased from 10 to 3 people](#) in Kazakhstan. Although the registration process was liberalised and simplified, there were not many new organisations registered in 2024-2025.

Registration of non-profit organizations in Kazakhstan is considered difficult due to strict documentation requirements, the need to accurately determine the legal form (foundation, association, institution), and thorough verification by the department of justice, especially for public associations. The process includes the development of a charter, obtaining a business identification number (BIN), authorisation through eGov, as well as possible delays in re-registration or changing business objectives. Appeal mechanisms are in place, but they are slow, inconsistent, or rarely lead to successful results because many newly created public organisations submit documents for registration several times, while the authorities

responsible for registration always find new or completely different reasons to refuse or delay registration.

Organisations of religious minorities, LGBTIQ organisations, and independent trade unions face significant, specialised pressures and are not included in the civil society definitions and concept as non-commercial non-governmental organisations. These groups encounter legal restrictions, systemic harassment, and bureaucratic hurdles, with independent unions experiencing severe retaliation for activism and LGBTIQ groups facing severe societal marginalisation. All these groups frequently encounter administrative burdens and, at times, direct interference from state authorities aimed at limiting their respective political, labour, social, or religious activism. For example, the registration applications of feminist [CSO 'Feminita'](#) were repeatedly rejected, eventually leading to its co-founders receiving fines for heading an unregistered organisation.

In May 2025, Kazakhstan's Prime Minister introduced a proposal to develop [new legislation concerning Non-Governmental Organisations \(NGOs\)](#), referred to as the Draft Law. The government's stated aim for this initiative is to enhance the legal framework governing non-commercial organisations in the country. A working group of more than 40 members was formed to draft the legislation. This group includes experts put forward by the Civic Alliance of Kazakhstan (CAK)—the most prominent government-affiliated non-commercial organisation in Kazakhstan—as well as several independent civil society specialists. Although the Draft Law is still in the early stages, some independent experts within the working group have expressed concern that it may not effectively improve NGO regulations.

## ***2.2 Operational Environment***

On the whole, CSOs can determine their own goals and sources of funding. Nevertheless, there are restrictive provisions on CSO reporting, on reporting on financing from foreign sources, and on accreditation of missionary activities, which the authorities also understand as spreading religious views in regions other than those where a religious association is registered.

In Kazakhstan, there is a legal and institutional framework that regulates the structure, autonomy and participation of civil society in public life. In particular, the activities of civil society organisations (non-profit or non-governmental organisations) are regulated by [Article 32 of Law "On Non-Profit Organisations"](#). NGOs can carry out activities that are not prohibited by law and comply with their charter.

Civil society organisations are required to comply with regulatory requirements, which create periodic obstacles, but in general they can work relatively freely and easily, providing timely reporting, which CSOs submit on an equal basis with other legal entities, for example, business structures, but there are special requirements for CSOs:

- Forms of quarterly and annual tax reporting and accounting maintained in accordance with legislation for establishing legal entities in the Republic of Kazakhstan.
- [According to paragraph 5 of Article 41 of Law "On Non-Profit Organisations"](#), NGOs in Kazakhstan are required to submit information about their activities, founders, property and sources of funding to the NGO Database annually by 31 March.

Civil society organisations in Kazakhstan have access to domestic and international financing, although there are certain restrictions. Kazakhstan has specific reporting requirements when receiving income from foreign sources, which also apply to non-profit organizations. [Article 56 of the Tax Code of the Republic of Kazakhstan](#), as updated by [Order No.685 dated November 10, 2025](#), stipulates that legal entities or their structural divisions that receive and spend money or other property from foreign states, international and foreign organisations, foreigners and stateless persons are required to inform the tax authorities of Kazakhstan. NGOs must

notify tax authorities of foreign funds' receipt within 10 business days and report expenditure by the 15th of the second month following each half-year. Non-compliance with these requirements is subject to administrative liability under the [Code of administrative offences](#) (Article 460-1).

The above reporting requirements often create a disproportionate burden for small and developing organisations. These groups may not have the technical or financial capacity to meet such requirements, especially when it comes to digital platforms, tight deadlines, or accounting standards beyond their reach. Thus, although these rules are aimed at ensuring transparency, they inadvertently become barriers to entry and sustainable development for new civil society organisations.

Since 2023, the State Revenue Committee has been publishing a register of persons receiving money and (or) other property from foreign states, international and foreign organisations, foreigners and stateless persons. On the one hand, such information helps increase the level of citizens' trust in both the state and non-governmental organisations. On the other hand, referring to this list, deputies of the parliament in 2025 initiated the idea of developing a [Law on "Foreign Agents"](#) following the example of Russia. Such initiatives create distrust among the population towards the activities of civil society and discourage international organisations from investing in the country's social sector.

### **2.3 | Protection from Interference**

In Kazakhstan, civil society organisations enjoy moderate protection from unlawful interference in their activities, although important problems still remain. The state regulates the work of CSOs, and there are many laws that can be used to close or suspend CSOs' activities. [Articles 26-30 of the Law on Non-Profit Organisations of the Republic of Kazakhstan](#) regulate that a non-profit organisation may be liquidated voluntarily (by a decision of the owner or representative) and forcibly (by a court decision in accordance with the procedure provided for by the Civil Code). It implies that civil society organisations are legally protected from arbitrary dissolution, and this must take place in accordance with due process and based on specific grounds, such as "serious violation of the charter," although such criteria can be interpreted in different ways. Civil society organisations also have access to judicial mechanisms to challenge arbitrary decisions, which provides an important guarantee, although lawsuits can be lengthy and expensive for small civil society organisations.

However, a significant gap in the Kazakh legislation is the lack of legal provisions safeguarding CSOs from third-party interference. Existing legal instruments, such as libel suits or protective measures, are mostly available to individuals rather than legal entities. There are particular concerns for organisations working on sensitive issues such as gender rights or environmental protection, which often face increased risks. For example, in recent years, the non-profit organisation Feminita that protects women's rights [has become the target of a coordinated campaign](#) that included threats and physical attacks, which clearly demonstrates the real dangers faced by civil society actors. Civil society actors emphasise that their legal status does not protect them from such threats, including cyber attacks, smear campaigns, or impunity for aggressors. The remedies available are often insufficient to ensure their security and the ability to act freely. Such actions are also confirmed by the fact that the legal framework provides minimal protection, since by the end of 2024 Kazakhstan had adopted the Law on LGBT propaganda. [According to UN experts](#), "the draft law banning so-called LGBT propaganda being considered by the Parliament of Kazakhstan will perpetuate stigma, restrict freedom of expression, and run counter to international human rights obligations."

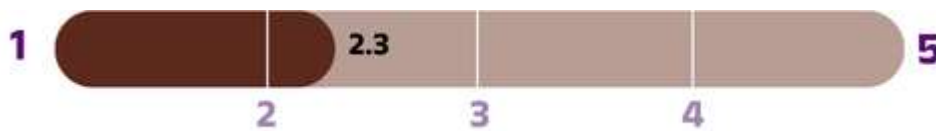
Therefore, the regulatory and operational environment formally possesses a legal framework for CSO activity, yet in practice faces selective enforcement, targeted barriers for "inconvenient" groups (e.g., LGBTIQ+ organisations), discriminatory reporting requirements for CSOs receiving foreign funding, as well as the possibility of arbitrary liquidation through

vague legal terms such as "extremism" and "social discord." These conditions are restrictive because the state not only creates bureaucratic hurdles, but also actively uses leverage against critical or undesirable organisations.

# PRINCIPLE SCORE

## 3. Accessible and Sustainable Resources

Score:



### 3.1 | Accessibility

In Kazakhstan, there is access to various sources of financing for CSOs. In order of priority for most CSOs in Kazakhstan: (1) government funding; (2) foreign funding; (3) income from local sources; (4) income from entrepreneurial activity.

While fairly free in principle, access to public resources is conditioned by a 'presumption of loyalty' when receiving financing from (a) state social contracting, (b) grants, (c) awards, (d) strategic partnerships. All forms of state support for CSOs in Kazakhstan are regulated by the Law of the Republic of Kazakhstan "[On State Social Contracting, Social Contracting for the Implementation of Strategic Partnership, Grants and Awards for Non-Governmental Organisations](#)." Since 2023, NGOs have been eligible to compete for strategic partnerships and receive financial support for up to three years. State resources, primarily state grants and social orders, are increasingly available but often considered inaccessible. Digitalisation has improved general accessibility, but CSO access to funding remains competitive and at the grassroots level. Additionally, the processes of monitoring and evaluation of projects within state grants are considered weak.

More than 100 international and foreign organisations have the [right to provide grants](#) to NGOs in the Republic of Kazakhstan. Other organisations can provide assistance to Kazakhstani NGOs, among other ways, in the form of donations. The list of grant giving organisations is determined by government agencies and published by the State Revenue Committee. NGOs that receive grants from organisations on this list receive benefits with respect to certain types of taxes.

In 2025, major donors like USAID significantly cut humanitarian budgets, leaving independent and human rights organisations without their primary revenue streams. CSOs that do not receive grants from government sources are thus experiencing difficulties. Additionally, accessing the remaining international grants requires capacities to administer international grants, which many small and remote organisations struggle with.

NGOs can receive the following income free of charge for carrying out their statutory activities: entrance and membership fees, charitable assistance, gratuitously received property, deductions and donations free of charge. These types of income are recognised as exempt from corporate income tax for NGOs. However, local donors, primarily from the business environment, are not very inclined to support independent CSOs, especially those focused on human rights.

NGOs in Kazakhstan can engage in entrepreneurial activity if it meets their statutory goals. Income from NGOs' business activities cannot be distributed among the members (participants) of an NGO but needs to be directed to their statutory goals. NGOs are required to keep separate records of income/expenses and pay taxes. While allowed by law, CSOs do not have access to financial resources from entrepreneurial activity in practice.

In conclusion, the lack of income diversification (donor grants, business, and government) deprives the sector of autonomy and the ability to serve as an independent driver of social change and reform.

### **3.2 | Effectiveness**

While the funding environment has been generally enabling for funds from foreign donors, their number and financial support have been steadily declining in recent years, especially in connection with the new US administration, limiting the overall flexibility in the use of available funds.

The donors' response to the changing operational environment and emerging needs is uneven. While some donors are adapting their funding frameworks to changes in the missions of civil society organisations or external conditions, others keep rigid programme priorities and have limited scope for flexibility. For resources disbursed by the state, bureaucratic delays and reporting requirements often hinder effectiveness, while expectations of loyalty limit autonomy. With inflexible public funds, donor funding remains a critically important resource for civil society organisations, which similarly is increasingly conditioned by alignment between civil society and donor priorities and varying responsiveness to contextual realities.

In addition, civil society activists and CSOs are engaged by international financial institutions (IFIs, for example, [the Asian Development Bank](#)) to independently assess the social and environmental impact of projects, conduct gender plans' analysis, etc. In these engagements, CSOs are not only recipients of funds, but hired as consultants or partners, thereby creating an opportunity to diversify resources.

### **3.3 | Sustainability**

Long-term planning of the financial activities of civil society actors is almost impossible as interruptions in financing are a common scenario. There is lack of funds for the institutional development of CSOs. Trends are shifting from long-term strategic planning for the sustainability of organisations to the implementation of medium-term or short-term projects.

In the sector as a whole, opportunities for self-reliance efforts – such as local fundraising, donations or income-generating activities – remain underdeveloped. Promisingly, CSOs are striving to develop social enterprises but their impact will depend on the availability of technical support, quality of services and market access. While there is a rapid growth of registered social enterprises (from 835 in 2024 to 1,431 in 2025), access to development tools remains uneven. The state provides preferential rental rates and tax breaks (exemption from corporate tax provided all profits are reinvested in social causes). Despite

these opportunities, access to a broader market is limited by intense competition in large cities, while rural and small CSOs face a lack of marketing skills and logistical challenges.

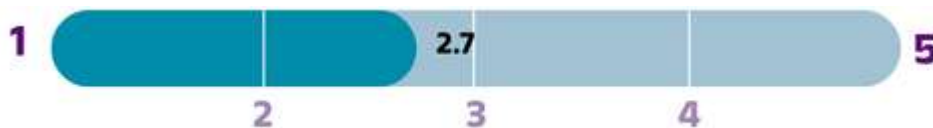
Thus, many civil society organisations have reduced their annual financial turnover and have been forced to reduce operating costs and make salary adjustments in an effort to maintain their operations despite the difficulties. The financial downturn for Kazakhstani CSOs is a result of the drastic reduction in international funding and the intensifying domestic structural barriers. Along with funding, training and technical support programmes are disappearing, forcing CSOs to reduce their staff. Simultaneously, the domestic environment has become more restrictive due to the "foreign agent" registry and increased tax scrutiny, which stigmatises foreign-funded groups. While state funding is available, it remains tied to a "presumption of loyalty" and rarely covers the operating costs or salaries of independent CSOs. Consequently, organisations are forced to downsize and adjust salaries to survive within a system that prioritises service delivery over civic advocacy. This shift fundamentally threatens the sustainability and autonomy of the independent civil society sector in Kazakhstan.

Thus, access to resources in Kazakhstan exists formally but is severely constrained by bureaucracy, a "presumption of loyalty" for recipients of state funding, and the growing stigmatisation of foreign grants. Resource effectiveness is undermined by rigid, often contradictory requirements and weak monitoring, while sustainability is eroded by the dominance of short-term project-based funding, gaps between funding cycles, and critical dependence on one or two sources — particularly the state budget. Taken together, this creates an unfavourable environment: civil society loses its autonomy, is forced into self-censorship, reduces its staff, and shifts from human rights advocacy to the delivery of government contracts — leading to sectoral stagnation and the inability to serve as an independent driver of reform.

# PRINCIPLE SCORE

## 4. Open and Responsive State

Score:



### 4.1 | Transparency

[The Constitution of the Republic of Kazakhstan in its Article 20](#) guarantees the right of everyone to freely receive and disseminate information in any way not prohibited by law. In 2015, Kazakhstan enacted [Law of the Republic of Kazakhstan “On Access to Information”](#) that was developed and adopted in order to promote and implement reforms in Kazakhstan: institutional reform aimed at increasing transparency and accountability of the state, as well as anti-corruption reform. According to the Law, everyone has the right to freely receive and disseminate information, except for legally limited information. Access can be restricted to only three categories: state secrets; personal, family, medical, commercial and other legally protected secrets; official information marked ‘for official use’.

Socially significant information, namely about emergency situations, the state of the environment, health, crime, as well as about budget funds and regulatory legal acts, is not subject to restriction.

While constitutional provisions and transparency initiatives do exist, the broader legal and institutional framework remains inadequate. In general, access to information is provided, including through the use of effective digital information and communication technologies. However, in a number of cases, the authorities use legislation on state secrets, restrictions on access to information, or investigative secrecy in an arbitrary manner.

This environment of partial transparency imposes systemic constraints on the ability of civil society to access, interpret and use public information. The resulting information vacuum weakens the foundations of participation in governance, reduces the effectiveness of civil society programmes, and contributes to the creation of a restrictive enabling environment that limits civic engagement and accountability.

The authorities declare an open country and a ‘hearing state’ but in fact they hide a lot of information – budgetary, environmental and socially significant. Information on sensitive topics is especially often held back – peaceful rallies, the right to freedom of speech, ethnic issues, LGBTIQ+, etc. This makes it very difficult to communicate and participate in

government affairs.

Most draft decisions and many types of public information are published at the national and local levels. Refusals and delays in responding are usually related to sensitive issues. Currently, there is a problem with appealing refusals to provide information because they are attributed to a simplified procedure, according to which responses are not guaranteed. Simplified procedures aim to boost efficiency and manage high request volumes. However, they often lead to "non-guaranteed" responses, allowing sensitive inquiries to be stalled or denied without formal appeal options.

## **4.2 | Participation**

There are formal mechanisms for dialogue with participation, but they are ritualistic in nature; the real influence of civil society on decisions is minimal. Despite the developed legislative and institutional frameworks for CSOs' participation in the decision-making process, including through legislation on [access to information \(2015\)](#), [public councils \(2015\)](#), [public oversight \(2023\)](#) and [petitions \(2023 – can be used through an online platform\)](#), the authoritarian nature of the political regime, the absence of political opposition in legislative and representative authorities, and the absence of independent media significantly weaken these opportunities. Those critical of the government practically do not participate in such dialogue, and the dialogue itself produces low results and is ineffective. Existing platforms, such as councils for interaction with public organisations, which have been established in each region under regional akims, are not fully active and effective in addressing social issues. These public councils operate in accordance with [Law of the Republic of Kazakhstan No.383-V ZRK dated November 2, 2015 \(as amended and supplemented as of January 22, 2025\)](#) with the goal of expressing the opinion of civil society on socially significant issues. There are 258 councils in total, 35 at the national level (under ministries) and 223 local ones. The activities of the councils themselves are not transparent and accountable, and information about their composition, activities, contacts and decisions is rarely published on the official websites of regional akimats. Due to bureaucracy and the peculiarities of their formation, they often merely churn out ready-made decisions, failing to serve as a real instrument of citizen influence.

In Kazakhstan, an [E-government online platform](#) has been established. Civil society organisations, as legal entities, have an electronic digital signature and have access to different services including registration/re-registration of the organisation, providing tax reporting, e-notary, state services, etc. This online platform is an opportunity for civil society to provide feedback on the laws and regulations when they are posted by authorised bodies for public discussion.

In the field of environmental protection, legislation on public participation has been developed, including in public hearings on environmental impact assessment. However, it is common practice for companies to apply these requirements on a discriminatory basis. Companies often restrict effective participation by selecting venues that create de facto barriers to participation: remote locations prevent impacted locals from attending, leaving only less-informed or hand-picked groups; online-only formats exclude those without digital access or literacy; private or restricted venues discourage participants from bringing data or presenting counter-arguments; long travel times force people to focus on logistics rather than analyzing complex impact data. By controlling the location, companies curate a less-informed audience that lacks the resources to challenge their proposals.

To summarise, a comprehensive legislative framework has been established for civic participation, including public councils, oversight laws, and online petition systems. However, these mechanisms remain largely formal, as the authoritarian political climate and lack of independent media nullify their real impact on decision-making. The absence of political opposition further ensures that dialogue with the state yields minimal results and lacks genuine inclusivity. In specialised sectors like environmental protection, public

hearings are often conducted discriminatorily, with companies using tactical barriers to exclude or marginalise effective public input. Consequently, while the institutional conditions for engagement exist, the actual influence of civil society on governance remains negligible. This enabling environment creates limited participation opportunities that do not address societal problems.

### **4.3 | Accountability**

Government accountability in the Republic of Kazakhstan is regulated by the Constitution of the Republic of Kazakhstan, the laws [“On Local Government and Self-Government”](#), [“On Public Councils”](#), [“On State Statistics”](#) and [“On Access to Information”](#). They oblige government agencies to report publicly and ensure the participation of citizens in decision-making, and transparency of the executive branch.

Accountability is based both on transparency in the activities of government agencies, which is a prerequisite, and on the active participation of government agencies in justifying the steps, policies and strategic plans being taken.

A frequent criticism from civil society concerns the difficulty in drawing a clear line between public participation and decision-making. Consultations are often seen as gathering feedback without follow-up or real implementation. This recurring trend – where reports and feedback from consultations are usually not returned to the consulted communities – exacerbates public frustration and undermines trust. This was particularly evident in the recent consultations on time transfer to winter and summer periods.

The feedback from government agencies with CS actors is not clear and consistent but is carried out formally through certain agreed channels. The opportunities for contesting are very limited despite the establishment of a system of specialised administrative courts. Civil society can use this after the consultation mechanisms have been conducted.

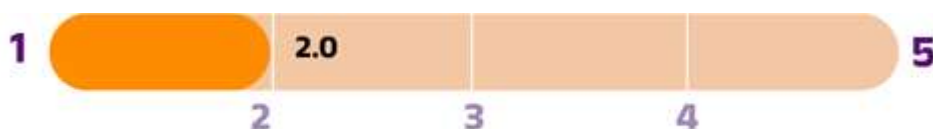
In general, access to services, feedback from the government, and participation in decision-making through various means, including electronic means, are very important. Therefore, the function of civil society organisations is extremely important – to assist and train the population to use existing mechanisms, and to hold the government accountable for how feedback is integrated into policies and decisions.

In summary, despite the existence of constitutional guarantees and legislative frameworks for access to information, public participation, and accountability that place Kazakhstan in a moderately strong position on paper, practice reveals a different reality. Transparency is undermined by arbitrary restrictions and withheld sensitive information, participation remains largely ritualistic with minimal civil society influence on decisions, and accountability is fragile due to formalistic consultations and weak follow-through. The result was the assignment of a 2.7 score, reflecting an environment where legal provisions do not translate into consistent practices of openness and responsiveness.

## PRINCIPLE SCORE

# 5. Supportive Public Culture and Discourses on Civil Society

Score:



### 5.1 | Public Discourse and Constructive Dialogue on Civil Society

The public discourse on civil society remains ambiguous, shaped by a combination of recognition on the one hand, and scepticism and caution in regulation on the other. Government and political leaders tend to view civil society actors primarily in terms of their contributions to social well-being and the provision of services, especially in areas such as providing livelihoods and support to vulnerable groups or providing services to specific target groups. These roles are generally recognised and appreciated, including by the Parliament. Parliament values CSOs for legislation related to supporting vulnerable groups and delivering special social services, but they remain sceptical and cautious regarding their role in regulation or policymaking. This creates a narrow "social-only" recognition that fails to empower civil society in the political sphere. However, the broader democratic functions of civil society – such as promoting civil rights, upholding political interests, and holding Government accountable – are receiving limited recognition. Such a selective approach greatly narrows the perceived legitimacy of civil society organisations and reinforces the idea of them as secondary participants in governance rather than as important participants in democratic processes. Despite the declared policy of open dialogue of the 'hearing state', the issue of whether it is possible to apply the Russian equivalent of the law "On Foreign Agents" is acute.

The media in Kazakhstan perceive civil society ambiguously, dividing it into loyal CSOs working with the state, and independent activists who are often subjected to pressure. The media report high social activity but point to restrictions on freedom of speech and risks to civic initiatives. The media broadcast the opinion that part of civil society is organised non-profit organisations, while the other part is independent activists seeking to limit government interference. The activities of NGOs receiving state social contracting are actively covered, while independent civic initiatives often receive less media coverage or are criticised in pro-government media. The media community points out that it is difficult for CS to function due to restrictive legislation, meaning the media recognises the role of civil society as an important element of control, but notes that its influence is limited. Journalists emphasise the need for legal protection of activists and civic initiatives, as well as the importance of dialogue between the government and society. These narratives, often repeated in political

discourse, foster public scepticism and reinforce stricter regulation. As a result, a media environment is formed that does not always support civil society and sometimes increases distrust rather than promotes its recognition.

Organisations operating at the local level and in rural areas often have stronger links with local authorities. These organisations tend to enjoy the trust of the communities they serve. Such local trust creates the basis for constructive interaction but does not fully protect organisations from broader discursive issues.

## **5.2 | Perception of Civil Society and Civic Engagement**

The lack of a competitive political environment, the difficulty for opposition political parties to register, the lack of independent media, as well as negative coverage of the work carried out by active CSOs, human rights organisations and opposition political movements leads to citizens' distrust in the possibility of influencing political processes and perception of CSOs either as disloyal and funded from abroad, or based on socially dependent ideas.

Citizens have little faith that they can influence political decisions, which leads to low civic engagement. Public opinion in Kazakhstan plays an increasing role, but the level of active citizen participation in politics remains relatively low. According to the results of a sociological survey in 2025 conducted by the [Kazakhstan Institute of Public Development \(KIOR\)](#), only 38.4% of respondents rate themselves as people with a proactive life stance. Among those who consider themselves active, participation most often manifests itself in the following forms: participation in elections and referendums (54.3%); volunteerism (32.6%); gentrification of house and public territories (27.2%). The least common forms of activity were publications in the media (2%) and social networks (5.9%) on socially significant issues, as well as participation in protest actions and online petitions (8.3%).

In the absence of state-promoted civic education programmes or schools, some [non-governmental organisations](#) offer lectures on human rights and the state and democracy. Civic education at the level of public systemic education in schools or at the higher education level is minimal, with limited emphasis on individual rights and responsibilities.

## **5.3 | Civic Equality and Inclusion**

The legislation of Kazakhstan guarantees equal rights and freedoms for all citizens, prohibiting discrimination based on gender, race, nationality, language, religion and other grounds. This is enshrined [in Article 14 of the Constitution of the Republic of Kazakhstan](#). It is based on the principles of gender equality, equal opportunities in work, education and participation in public administration. The [Law “On State Guarantees of Equal Rights and Equal Opportunities for Spouses”](#) is aimed at eliminating gender stereotypes and ensuring equal participation of men and women in society. [Article 25 of the Labour Code](#) prohibits discrimination when entering into a contract, including issues related to pregnancy or having children. [Article 5 of the Law on Elections](#) forms the basis for citizens to participate in elections on an equal basis (the ‘one voter – one vote’ principle). [Article 26 of Kazakhstan’s Constitution](#) guarantees equal protection of both state and private property.

Civil society organisations play a central role in advocating for the inclusion of marginalised and vulnerable groups, including women, LGBTQ+ people, people with disabilities, and disadvantaged youth. One of the positive changes in the last three years is the [Social Code of the Republic of Kazakhstan \(2023\)](#) and the Law [“On the Protection of Women’s Rights and Child Safety” \(2024\)](#). They provide for toughening penalties for violence, introducing new benefits, and providing child protection and social support, including alimony.

There are legal frameworks and national strategies aimed at promoting inclusiveness, such as a [mandatory 30% quota](#) on party lists for elections to the Majilis (the lower house of

parliament) and maslikhats (local electoral bodies), aimed at women, youth (under 35) and people with disabilities. This requirement ensures their representation in the electoral lists of the parties. This norm is enshrined in law to promote inclusiveness and gender equality in the country's political life. The quota applies to the list of candidates, not to guaranteed mandates, which means that women can be appointed to positions that are not up for election.

However, many of civil society and government efforts at inclusive participation are still limited by inequality. In the social aspect, persistent stigmatisation and discrimination, especially against LGBTQ+ people, and the recently passed [Law on LGBT Propaganda](#) continue to undermine civil equality. These attitudes not only marginalise individuals but also discredit the work of civil society organisations that represent or support them. In such circumstances, civil society organisations face reputational risks and may encounter resistance from both the public and government agencies, which may limit their access to funding, partnerships and policy influence. Opposition political parties are absent, and movements, as well as sexual, national, and religious minorities, are virtually excluded from socio-political processes. The involvement of the Kazakh-speaking population and opportunities for civic participation for rural local communities are also limited.

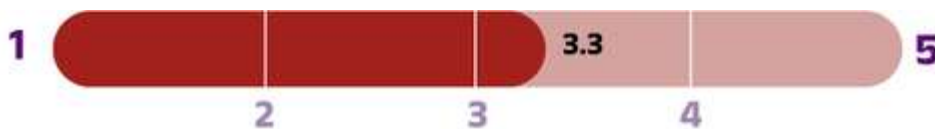
Such barriers lead to a restrictive civic space in which civil society organisations must operate. Limited access to resources, entrenched social prejudices, and procedural exclusions reduce the effectiveness of civil society initiatives and weaken its ability to promote inclusive governance.

In summary, despite some progress and the active resistance of civil society, public discourse, social perception, and conditions for inclusion remain dominated by disinformation and structural inequalities. This justifies the score reflecting an enabling environment that remains unfavourable for the full exercise of civil society action.

# PRINCIPLE SCORE

## 6. Access to a Secure Digital Environment

Score:



### 6.1 | Digital Rights and Freedoms

The authorities, relying on law enforcement agencies, primarily national security agencies, exercise selective control over political content, occasionally [blocking internet access](#), carrying out implicit censorship or pushing for self-censorship, and persecuting individual civic activists and journalists for spreading false information or inciting various types of enmity.

CSOs have unlimited access to the Internet. However, the actual exercise of digital rights in Kazakhstan remains limited and unpredictable. Access to individual internet resources and social media is periodically blocked without sufficient transparency or public explanations. For example, in November 2025, the independent news website Respublika.kz was blocked nationwide based on old, re-activated court decisions, following their critical reporting.

[The mechanisms of content restriction are insufficiently regulated](#), and the practice itself looks non-transparent: decisions are made without notification and subsequent analysis of the impact on constitutional rights. Key laws regulating digital rights include: (a) [Law on Mass Media](#) (2024) - expands the definition of "mass media" to include almost all internet resources, allowing the state to monitor content for compliance with "national, cultural, and family values". It grants powers to deny or withdraw accreditation for foreign journalists; (b) [Law on Communications \(2004\)](#) with frequent amendments: Article 41-1 allows the National Security Committee and other authorities to unilaterally suspend communication networks and internet access without a court order in "urgent" cases; (c) Criminal and Administrative Codes - Articles such as "Provocation of Hatred" ([Article 174 of the Criminal Code](#)) and those regarding "False Information" are frequently used to prosecute bloggers and activists for online speech. The practice of selective pressure on journalists, bloggers and activists covering sensitive topics (corruption, human rights, and the activities of law enforcement agencies) remains. In some cases, criminal or administrative cases are recorded, which creates an atmosphere of caution and self-censorship.

Technical failures or slowdowns of [internet access during protest situations or resonant events have been repeated for years](#). Although this is not officially recognised as a

restriction, in practice it is perceived by society exactly in this way, which undermines confidence in the observance of digital freedoms.

## 6.2 | Digital Security and Privacy

In 2024–2025, Kazakhstan adopted a number of measures to strengthen digital security, including the implementation of national standards, which establish strict cybersecurity requirements for public and private information systems. Key initiatives include the transition to biometric authentication, a [Concept for Artificial Intelligence Development for 2024-2029 adopted by the Government](#), and the active use of AI to prevent data leaks. New rules have been adopted regulating the use of biometric data (facial ID, fingerprints) in digital services, limiting the possibility of unauthorised access to personal data. Systems to block cyberattacks are being implemented in [the banking](#) and [government](#) sectors. In other words, various measures are aimed at creating a secure digital ecosystem in line with international standards.

In recent years, [leaks of personal data](#) from government information systems and commercial services have been recorded repeatedly. Information containing full personal identifiers of citizens circulates freely on the internet and on shadow platforms. Investigations into such leaks are conducted irregularly, and cases of officials being held accountable remain isolated, which undermines confidence in the data protection system.

CSOs, journalists and activists working on sensitive topics have noted increased risks of unauthorised access to their communications and collection of their and their beneficiaries' data. [The Law on Personal Data \(Article 24\)](#) grants data subjects the right to file a complaint with the Information Security Committee of the International Center for Information Security and Anti-Corruption or the court if they believe their data is being collected or used illegally. The Office of the Human Rights Commissioner (Ombudsman) further investigates complaints against the actions of officials who restrict civil rights. However, given weak confidentiality guarantees and practical limitations of these appeal mechanisms, data collection requests and incidences can create a sense of insecurity and restrain citizen participation. In practice, low public awareness and low digital literacy mean that many citizens believe that they must "consent" to data collection to access essential digital services. This results in complaint mechanisms being unused as users are unaware of their right to complain. Additionally, the effectiveness of [judicial practice](#) is limited given that most successful cases involve simple violations (like lack of written consent) rather than complex technical breaches or mass leaks. Lastly, redress mechanisms are limited by the fact that citizens often struggle to prove that their data was leaked from a specific source, as [many breaches](#) originate from unauthorised "shadow" platforms.

The level of digital literacy and access to professional cybersecurity tools in CSOs remain limited. Small organisations are particularly vulnerable to phishing, account hacking, and other types of attacks because they lack the resources to systematically implement security standards.

Disinformation remains a serious threat to Kazakhstan, undermining public trust and hindering informed decision-making. With the increasing level of digitalisation, society is increasingly faced with cases of mis- and disinformation and media dumps aimed at manipulating public opinion and inciting discord. According to the research by [Youth Information Service of Kazakhstan](#), Kazakhstani society is at high risk of misinformation and propaganda, and this primarily concerns the population of older age groups and the population of territories bordering Russia.

Recognising the threat posed by disinformation, the government and civil society organisations (CSOs) are working to develop preventative mechanisms and address these issues. The government is working to strengthen this by establishing [the Centre for](#)

[Combating Disinformation](#) under the Central Communications Service under the President of the Republic of Kazakhstan in 2025. This centre will act as an analytical hub, identifying mass-dissemination techniques and publishing regular reviews of manipulations, and by creating [the web-portal](#). For these mechanisms to be effective, they need to integrate clear criteria for identifying malicious content. Meanwhile, CSOs are working through [the Fact Check initiative](#) and [trainings for youth and journalists](#) in Kazakhstan's regions. Available tools used by CSOs and universities include basic media literacy courses for journalists and educators, development of methodological materials for detecting misinformation and working with AI tools. While these varied measures are aimed at creating "information immunity" among the population and minimising the damage from systemic information attacks, their scale is still insufficient to effectively protect against threats of mis- and disinformation.

### **6.3. | Digital Accessibility**

In general, the Internet in Kazakhstan is accessible to most people: on average, [more than 90% of the population uses the Internet](#); mobile Internet is relatively inexpensive, and people actively use digital public services. However, accessibility is uneven. In large cities the Internet is fast and stable, but in rural areas the quality of communication is lower: the speed is slow, the connection is unstable, and online services are performing more poorly. A separate issue is digital accessibility for people with disabilities. Many websites and applications, including government ones, are still not adapted, as characterised by difficult navigation, lack of text-to-speech or inaccessible forms. Therefore, even with the Internet, not everyone can use digital resources.

While the level of the population's digital literacy is quite high, the use of new technologies, including AI, among civil society actors continues to be limited.

In summary, despite widespread access to the internet and the development of digital public services, the digital environment in Kazakhstan is characterised by selective content control, opaque blockages, pressure on activists and journalists, weak personal data protection, and growing privacy risks. At the same time, inequalities in access quality persist between urban and rural areas, along with limitations for people with disabilities. This justifies the score of 3.3, reflecting both the existence of significant opportunities for digital civic activism and serious constraints that hinder the full realisation of digital rights and security.

# C) Recommendations

A holistic approach is needed to strengthen the overall enabling environment for civil society in Kazakhstan. This includes coordinated actions at the level of the state, civil society, and the community of international organisations.

## Interaction with the state

To address the problem of the limited influence of civil society on decision-making and the lack of formal accountability mechanisms, the following recommendations are made to the government:

- Promote transparency and feedback by publishing reports from government agencies that explain how information from civil society organisations has been used, and how it affects the country's socio-economic development. This will increase trust and accountability in the participation processes.
- To balance the goals of accountability and the involvement of various civil actors, it is extremely important to implement training programmes and simplify procedures for NGO registrations, as well as to have access to submit proposals to obtain state funding.
- Support the joint implementation of reform programmes such as the recommendations of the Universal Periodic Review (UPR), under which civil society organisations can play a definite role in monitoring and reporting. This supports shared responsibility and partnership between the state and civil society organisations.
- Strengthen the legal protection of civil liberties by making a clear and public statement about the unacceptability of the adoption in Kazakhstan of an analogy of the Russian law on 'foreign agents' and similar initiatives that serve the policy of control over civil society. To ensure genuine civic influence, the legal status of Public Councils should be strengthened by granting them the power of mandatory consultation or a veto on key legislative decisions. Furthermore, strict independent monitoring of public hearings must be implemented to eliminate discriminatory barriers, ensuring that local communities and independent experts have a direct and meaningful impact on environmental and social policies.
- Reduce the excessive administrative burden on CSOs by cancelling discriminatory regulations such as the creation of a "Register of Persons Funded from Foreign Sources" and additional reporting beyond the standard requirements applicable to all other legal entities in Kazakhstan.
- End the attacks on independent journalism and fully investigate cyberattacks and intimidation, ending impunity for attacks on journalists.
- Repeal discriminatory bills such as the [LGBT propaganda Law, 2025](#) and ensure full [respect of international human rights obligations](#), specifically Arts. 17, 19, and 21 of the ICCPR on the rights to privacy, freedom of expression, and freedom of peaceful assembly respectively.

- Ensure that all development programmes comply with international standards and establish mechanisms for mandatory participation of CSOs at all stages of programme implementation. For example, to ensure the mandatory participation of CSOs in the implementation of the European Union's Global Gateway initiative in Kazakhstan, as well as in economic development programmes across various sectors of Kazakhstan, with financing from IFIs, a separate gender quota and others.

### Civic space expansion

To develop an enabling environment for freedom of expression and to counteract the shrinking civic space in Kazakhstan, civil society organisations are recommended to:

- Represent the interests of civil society organisations on issues of respect for rights and freedoms in Kazakhstan at the highest international level, using all formats of global advocacy (HLPF, the UN Human Rights Council, the EU – Kazakhstan Dialogue, etc.).

Carry out systemic monitoring and assessment of alarming trends in Kazakhstan, expressed in:

- Systematic violations of freedom of association (de facto bans on registration of opposition parties and independent associations) and freedom of peaceful assembly
- Restriction of freedom of expression, including legislative initiatives to ban 'LGBT propaganda' in all areas of the information space (October 2025)
- Discriminatory access to resources, excluding human rights CSOs and think tanks from government funding.
- Create targeted mechanisms for direct operational support (legal, expert, financial and urgent) for human rights defenders, journalists, civil society activists, and organisations facing persecution.
- Promote inclusive public dialogue by supporting platforms for dialogue between civil society organisations, government and citizens that are respectful, evidence-based, and represent diverse voices, including marginalised groups.
- For organisations experienced in working with international grants: help grassroots organisations from hard-to-reach regions with access to donor resources.

### Strategic support by international organisations

To ensure the effectiveness and promptness of donor support in accordance with the needs of civil society in Kazakhstan, it is recommended to:

- Ensure a transition from short-term, project-based financing to flexible long-term core strategic support for civil society organisations given the sharp reduction in international aid. This will allow civil society organisations to invest in institutional development, retain staff, and strategically plan their activities, and will ensure the viability of organisations.
- Involve civil society organisations in the joint development of programmes to ensure that they meet the local needs and missions of organizations and provide capacity-building support where necessary. This approach can include joint advocacy on a global level.
- Include risk assessment and protective measures in the funding framework, especially for civil society organisations working on sensitive or human rights issues, and address civil society organisations' concerns about security, as well as being flexible in adapting programmes to a changing environment.
- Provide informational seminars or support in the application process and strengthen mutual accountability and adaptive financing methods.

- Support initiatives that promote the sustainability of civil society organisations, such as the development of social entrepreneurship, collaboration with IFIs, global and local fundraising strategies, and digital transformation, as well as funding platforms for peer learning, cooperation and knowledge sharing among civil society organisations.

## D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the [CIVICUS Monitor](#). However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. **The panel for this report was convened in September 2025.** The discussions are supported by secondary sources, such as [V-Dem](#), the [Bertelsmann Stiftung Governance Index](#), the [RTI Rating from the Centre for Law and Democracy](#), and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

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