

International Experience in Implementing Public Control

Bekhruz Sobirovich Turdiev*

¹Professor, Department of Social and Political Sciences, Faculty of Social and Political Sciences, Bukhara State University, 11 M. Iqbal Street, Bukhara City, 200100, Republic of Uzbekistan. Corresponding Author Email: bekiuz0302@yahoo.com*

DOI: <https://doi.org/10.38177/ajbsr.2025.7409>



Copyright © 2025 Bekhruz Sobirovich Turdiev. This is an open-access article distributed under the terms of the Creative Commons Attribution License, which permits unrestricted use, distribution, and reproduction in any medium, provided the original author and source are credited.

Article Received: 06 October 2025

Article Accepted: 17 December 2025

Article Published: 21 December 2025

ABSTRACT

This article analyzes the experience of foreign countries in implementing public control from both theoretical and legal perspectives. It examines the institutional mechanisms of public control in developed countries, including ensuring transparency in government activities, conducting social surveys, submitting draft laws for public discussion, and utilizing public expertise as effective tools. The study employs comparative legal analysis and case studies from various developed countries to evaluate institutional frameworks, practical methods, and citizen participation mechanisms. Furthermore, the study scientifically highlights the necessity of improving legal mechanisms, enhancing the transparency and accountability of government bodies, expanding the participation of civil society institutions, and integrating digital technologies to organize public control effectively.

Keywords: Public Control; Civil Society; Public Administration; Transparency; Accountability; State Authority; Digital Technologies; Social Justice; Democracy; Governance; Citizen Participation; Public Oversight.

1. Introduction

Today, many countries around the world are developing legal frameworks for implementing public control over government authorities, while existing regulatory bases are being improved. These reforms are being actively examined by scholars and practitioners, who develop practical recommendations and proposals. In addition, advanced methods for organizing effective public control of government activities are being promoted.

The English term “public relations”, translated into Uzbek as “Jamoatchilik bilan aloqalar” or “Ommaviy aloqalar”, was first used by the third President of the United States, Thomas Jefferson, in his seventh address to Congress in 1807. He emphasized the need to strengthen the relationship between government and citizens on both scientific and organizational grounds. Although initially linked to communication between the state and society, this concept later evolved into broader practices of public participation and oversight, which form the foundation of modern public control. The historical development of this idea, rooted in dialogue and civic engagement, underscores the enduring importance of citizen involvement in evaluating and influencing government actions [1].

1.1. Study Objectives

The main objectives of this study are as follows:

- 1) To analyze the theoretical and legal foundations of public control in foreign countries.
- 2) To examine institutional mechanisms that ensure transparency, accountability, and citizen participation in governance.
- 3) To compare different models of public control in developed democracies, with particular attention to petitions, public hearings, expertise, and freedom of information laws.
- 4) To assess the role of civil society institutions and investigative journalism in strengthening public oversight.

- 5) To evaluate the use of digital platforms and technologies in enhancing public participation and control mechanisms.
- 6) To provide practical insights and recommendations for adapting international experiences to national conditions.

2. Methodology

This study is based on the analysis of legal, institutional, and practical methods of implementing public control in foreign countries. The research employs comparative-legal analysis, along with the evaluation of social survey results, official statistical data, and institutional reports. Most of these materials were drawn from secondary sources, including published academic studies, government documents, and reports of international organizations, while selected case examples from developed countries were analyzed to illustrate practical applications of public control mechanisms. In addition, the study examines citizen participation through expert opinions, public discussions on draft normative-legal documents, and petitions, using secondary data and documented experiences from various governance contexts.

3. Discussion and results

In developed countries, social surveys conducted among the public are used as an important evaluation criterion when analyzing the activities of executive authorities. This method is considered one of the effective forms of public control. According to researchers M.G. Reshetnikova and I.V. Bikov, in this area of study, public opinion is regarded as the most impartial and objective approach among evaluation methods [2].

According to M.G. Reshetnikova and I.V. Bikov, conducting social surveys is considered an important and effective tool, especially for determining the effectiveness of activities carried out at the regional level. Researcher S.V. Fateyeva, in her article titled “Conceptual foundations for evaluating the effectiveness of executive authorities’ activities”, emphasizes that the evaluation process should rely on the following sources: first, official reports on the results of regional activities; second, statistical data provided by the State Statistics Committee; third, departmental statistical information; and fourth, the results of social surveys [3].

According to the renowned scholar Z. Taylor, the assessment of effectiveness can be carried out in several forms. In particular, one widely used method in the field of public administration is evaluating the quality of services provided by employees and the level of satisfaction among their users. At the national level, the effectiveness of governance is determined by analyzing the quality of public services and comparing the results of surveys conducted based on public opinion [4].

In many developed democratic countries, public control is carried out in the following forms:

- 1) submitting petitions to state authorities and local self-government bodies (by individual citizens or groups);
- 2) ensuring transparency of information regarding government activities (providing citizens with open access to information from state bodies);
- 3) participation of citizens in managing community affairs through local self-government, citizens’ meetings, and assemblies;

- 4) public hearings conducted in a transparent manner;
- 5) public discussions of draft laws and other important matters of state life;
- 6) public expertise of draft legislative documents;
- 7) investigative journalism and other similar mechanisms [5].

One of the most widely used forms of public control in Western countries is citizens submitting petitions to state and local self-government bodies. For example, according to Article 17 of the German Constitution [6], every citizen has the right, individually or together with others, to submit a written request or complaint to the relevant authorities or representative bodies. The Bundestag establishes a special Petitions Committee to review these submissions. The authority of this committee to consider complaints is defined by federal law.

Article 28 of the Belgian Constitution guarantees every citizen the right to submit a petition to state authorities, either independently or together with others. At the same time, petitions on behalf of a group can only be submitted by authorized organizations. However, an individual is prohibited from submitting a petition directly to a parliamentary chamber in their own name. Each chamber has the right to forward petitions addressed to it to the relevant ministers, who are required to provide explanations and clarifications regarding the content of the petitions if necessary [7].

Providing citizens with access to information about the activities of state bodies is considered one of the most important tools of public control in most Western countries.

In the United States, the laws “Freedom of Information Act” [8] and “Electronic Freedom of Information Act” [9] grant any individual or organization, regardless of their citizenship or country of birth, the right to access documents held by federal government agencies. However, this right is subject to certain exceptions. Specifically, information related to national security, internal regulations of agencies, trade secrets, official correspondence, personal privacy, the activities of law enforcement agencies, financial institutions, and oil fields is not disclosed.

Similar legislative acts exist in the United Kingdom (the “Freedom of information” [10] Act) and in Finland (the “Act on the openness of government activities” [11]).

The level of public transparency in the process of assessing the regulatory impact of draft legal acts is organized differently across various countries, making the comparative study of foreign experience highly significant. For instance, in Canada, Denmark, Finland, Italy, New Zealand, Norway, Poland, the United Kingdom, and the United States, the results of regulatory impact assessments are publicly disclosed during the stage of public consultation. In France, Japan, and Portugal, these results are provided only for draft documents deemed significant or specially selected. In Australia and the Netherlands, the assessment results are disclosed during the process of submitting the draft to parliament. In Sweden, the results are initially communicated only to the interested parties, but their full publication for the general public is not ensured. In some countries, specifically Austria, the Czech Republic, Germany, Hungary, Ireland, South Korea, Mexico, Spain, and Switzerland, the assessment results are not published at all [12].

In the experience of foreign countries, to ensure the participation of all interested parties in the process of adopting normative-legal acts, preliminary discussions are first organized within small groups with the aim of collecting initial expert opinions on the draft.

In Finland, from the very initial stage of drafting a normative-legal act, the draft is published on the specially created “Otakantaa.fi” portal. Through this platform, interested parties can participate in public discussions, take direct part in shaping the draft, or initiate new discussions on other socially significant issues. The portal serves as an important tool for collecting proposals and opinions from various social groups regarding draft normative-legal acts and socially significant issues. These suggestions and comments are then used in the development and adoption of normative-legal acts, in planning normative legislative activities, and in identifying the needs for reforms in society and state governance.

Public discussion is considered an integral and essential stage in the process of assessing the regulatory impact of draft normative-legal acts. Therefore, it is necessary to clearly determine which draft acts should be included in this assessment process. In this regard, a well-developed mechanism for consultations involving broad public participation is required. Specifically:

- 1) the purpose of the consultations must be clearly defined in advance;
- 2) the procedure for conducting consultations, including the methods, forms, and timelines to be used, must be established;
- 3) the stakeholders involved in the process and their opinions, including any unified positions or opposing viewpoints, should be recorded. Additionally, it is advisable to indicate which specific comments were utilized in refining the draft document [12].

Conducting public expertise on normative-legal documents is considered one of the important forms of cooperation between the state and civil society. This is clearly manifested in France through the activities of the Council for Economic, Social, and Environmental Affairs. According to the 1958 French Constitution, this Council is recognized as the third constitutional body in the country, following the National Assembly and the Senate. According to Article 69 of the French Constitution [13], the Council, at the request of the government, expresses its opinion on draft laws and legislative initiatives and has the right to appoint its representative to present these opinions in the parliamentary chambers. Investigative journalism, in turn, is one of the most widespread methods of public control, aimed at drawing the attention of society and state bodies to violations of human rights and freedoms, as well as to problems arising in various sectors. Article 19 of the Universal Declaration of Human Rights states that every person has the right to freedom of thought and expression, which includes the freedom to seek, receive, and impart information and ideas through any media and regardless of frontiers.

According to the Law of the Russian Federation “On the Fundamentals of Public Control in the Russian Federation”, the entities carrying out public control include:

1. The Public Chamber operating at the level of the Russian Federation;
2. Public chambers established in the constituent entities of the Federation;

3. Public chambers at the local (municipal) level;
4. Public councils established under federal executive authorities, as well as under the legislative (representative) and executive bodies of the constituent entities of the Federation (pursuant to Article 9 of the Law).

In the Republic of Kazakhstan, there is a law “On Public Councils”, according to which public councils are defined as bodies established under ministries and central executive authorities that perform advisory and control functions. In these councils, representatives of civil society must constitute at least two-thirds of the total membership.

4. Conclusion

The study of international experience in implementing public control demonstrates that the effectiveness of this institution is closely tied to the development of democratic governance, the rule of law, and active civil society participation. Comparative analysis of legal frameworks and institutional practices in the United States, Germany, Belgium, Finland, the United Kingdom, France, and other countries shows that public oversight functions are deeply embedded in their political systems through mechanisms such as petitions, freedom of information laws, social surveys, public hearings, and investigative journalism. These forms of control not only enhance government accountability but also strengthen public trust in state institutions.

The research highlights that in Western democracies, public control is viewed as an indispensable component of governance. Transparency of government activities, citizen access to information, and the inclusion of diverse stakeholders in decision-making are treated as fundamental rights. In contrast, countries such as Russia and Kazakhstan have sought to institutionalize public control through public chambers and councils, but these mechanisms often remain state-dominated and limited in terms of independence. This difference underscores the importance of political will and genuine citizen empowerment in the success of public oversight systems.

The findings also suggest that public control cannot be effective without continuous legal reforms and the modernization of institutional frameworks. The use of digital platforms, as seen in Finland’s Otakantaa.fi portal, represents a significant innovation in expanding citizen participation. Similarly, investigative journalism serves as a powerful tool for holding governments accountable by exposing corruption, abuse of power, and violations of human rights. These experiences demonstrate that the integration of modern technologies and independent civic initiatives can significantly enhance the scope and effectiveness of public oversight.

From a theoretical standpoint, public control represents not only a set of legal and institutional mechanisms but also a reflection of the principles of democracy, social justice, and equality. It ensures that citizens are not passive recipients of state policies but active participants in shaping and monitoring them. In this regard, the comparative study of foreign experience provides valuable insights into how Uzbekistan and other emerging democracies can develop more inclusive, transparent, and accountable systems of governance.

5. Future Suggestions

Based on the analysis of international practices, the following measures are suggested for strengthening public control in national contexts:

1. Develop a comprehensive legal framework that consolidates different forms of public control into a unified system of laws and regulations.
2. Expand the role of civil society organizations by ensuring their independence, increasing their participation in decision-making, and providing institutional support.
3. Introduce modern digital platforms to enable broader public engagement in legislative processes, consultations, and monitoring of government activities.
4. Strengthen transparency and accountability mechanisms by improving access to information and ensuring open reporting of government decisions and actions.
5. Support and protect investigative journalism as an essential instrument of accountability and as a complementary tool for monitoring government performance and protecting citizens' rights.

Declarations**Source of Funding**

This study received no specific grant from any funding agency in the public, commercial, or not-for-profit sectors.

Competing Interests Statement

The author declares that he/she has no competing interests related to this work.

Consent for publication

The author declares that he/she consented to the publication of this study.

Authors' contributions

Author's independent contribution.

Availability of data and materials

Supplementary information is available from the author upon reasonable request.

Institutional Review Board Statement

Not applicable for this study.

Informed Consent

Not applicable for this study.

References

- [1] Urinbayeva, S. (2023). Legal foundations for developing public relations in public administration. *Law and Duty*, 5: 49.
- [2] Reshetnikov, M.G., & Bykov, I.V. (2007). Sectoral and functional approaches to public administration. Perm.
- [3] Fateeva, S.V. (2014). Conceptual foundations for assessing the effectiveness of executive authorities. *Management of Economic Systems: Electronic Scientific Journal*, 9.

[4] Taylor, Z. (2016). Good governance at the local level: Meaning and measurement. Toronto, Pages 23–28.

[5] Jalilov, A., Muhammadiyev, U., & Jo'rayev, Q. (2015). Foundations of civil society. Tashkent: Baktria Press.

[6] Basic Law for the Federal Republic of Germany (n.d.). Retrieved from https://www.gesetze-im-internet.de/englisch_gg/index.html.

[7] The Belgian Constitution (n.d.). Retrieved from https://www.dekamer.be/kvvcr/pdf_sections/publications/constitution/grondwetuk.pdf.

[8] Freedom of Information Act (United States) (n.d.). Retrieved from <https://home.treasury.gov/footer/freedom-of-information-act>.

[9] Electronic Freedom of Information Act (E-FOIA) (n.d.). Retrieved from <https://www.dol.gov/agencies/ebsa/about-ebsa/our-activities/public-disclosure/foia/electronic>.

[10] Freedom of Information Act (United Kingdom) (2000). Retrieved from <https://www.legislation.gov.uk/ukpga/2000/36/contents>.

[11] Laki viranomaisten toiminnan julkisuudesta [Act on the openness of government activities] (1999/2023). Retrieved from <https://finlex.fi/eli?uri=http://data.finlex.fi/eli/sd/1999/621/ajantasa/2023-02-16/fin>.

[12] Ivanova, M.V. (2018). Models and methods for assessing regulatory impact in public administration of Russia and foreign countries. St. Petersburg: St. Petersburg State University of Economics.

[13] Constitution of France (2009). Retrieved from https://www.conseil-constitutionnel.fr/sites/default/files/as/root/bank_mm/anglais/constiution_anglais_oct2009.pdf.

[14] Sobirovich, T.B. (2023). Basic criteria for building the third renaissance in Uzbekistan. Asian Journal of Applied Science and Technology, 7: 149–157.

[15] Sobirovich, T.B. (2020). The criterion of human indicators in development and renewals in Uzbekistan. EPRA International Journal of Multidisciplinary Research, 6: 509–511.

[16] Sobirovich, T.B. (2021). National principles of democracy in Uzbekistan. Mediterranean Journal of Basic and Applied Sciences, 5: 131–135.