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Juvenile justice reforms in Central Asia

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Abstract. The aim of the research was to determine the effectiveness of various models for reforming juvenile justice systems in Central Asian countries – Kazakhstan, Kyrgyzstan, Uzbekistan – with a comparative analysis of the Chinese experience. The study was conducted in three stages using a comprehensive methodology based on the analysis of regulatory acts of Kazakhstan, Kyrgyzstan, Uzbekistan, and China, official statistics from international organisations, and reports from human rights institutions. The research results established three main reform models in the Central Asian countries: the establishment of a full-fledged network of 19 specialised juvenile courts in Kazakhstan; the transformation of judicial practice through the introduction of alternative sanctions without structural changes in Kyrgyzstan; and the gradual introduction of specialised elements coupled with an increase in the minimum age of responsibility in Uzbekistan. Empirical analysis revealed high effectiveness of the reforms through quantitative indicators: an 83.3% reduction in the number of convicted minors in Kazakhstan from 2,654 to 443 individuals, and a 92% reduction in the application of imprisonment to children in Kyrgyzstan from 178 to 13 cases during the period from 2005 to 2024. As of the end of 2024, minors constitute only 0.2% of the total prison population in Kazakhstan, corresponding to approximately 64 individuals out of 32,171 convicted persons. The proportion of minors in the total prison population decreased to 0.19-0.20% in Kazakhstan and Kyrgyzstan compared to 0.80-1.67% in China and Uzbekistan. Legal analysis confirmed the gradual alignment of national legislation with international standards through the increase of the minimum age of criminal responsibility in Uzbekistan from 13 to 14 years and the introduction of comprehensive alternative sentencing measures. The practical significance of the study lies in the potential use of the analysis results for improving national strategies for juvenile justice reform, developing methodological recommendations for state authorities and international organisations, and formulating scientifically grounded approaches for the implementation of global child protection standards in post-Soviet legal systems

Keywords: juvenile offenders; international standards; alternative measures; law enforcement practice; deprivation of liberty; specialised courts

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Introduction

The reform of juvenile justice systems in Central Asian countries has become critical in the context of global state commitments to child protection and the need to align national legislation with international standards of juvenile justice. The post-Soviet countries of the region, having inherited repressive approaches to working with child offenders, faced a discrepancy between national legislation and modern standards after acceding to the Convention on the Rights of the Child… (1989) and related international treaties, which created legal obligations to introduce specialised approaches to juvenile offenders. The main problems of non-compliance included the absence of specialised courts for hearing cases involving minors, limited application of alternative sentencing measures, insufficient training of law enforcement agencies, and a lack of effective rehabilitation mechanisms. Cultural traditions of authoritarian upbringing, socio-economic constraints in funding specialised programmes, and legal traditions oriented towards punitive measures created additional obstacles to the implementation of reforms. Regional specifics determined unique reform trajectories: Kazakhstan chose the path of creating specialised juvenile courts and developing probation services; Kyrgyzstan focused on alternative sentencing measures without structural changes to the judicial system; while Uzbekistan and Turkmenistan long maintained traditional approaches. These differences reflect varying paces of political modernisation and the degree of engagement in international cooperation in the field of children's rights, which necessitates comprehensive scientific analysis to identify effective models and practices.

A comprehensive analysis of the institutional aspects of juvenile justice was carried out by D. Ospanova *et al.* (2025), who identified key patterns in the formation of juvenile courts in foreign countries and determined that the establishment of specialised justice for minors was conditioned by a combination of social reform movements, changes in the legal philosophy regarding youth crime, and the necessity of applying rehabilitative approaches instead of punitive measures. The researchers demonstrated the effectiveness of the European system of juvenile justice, which is characterised by attention to children's rights, flexibility of sanctions, and the prioritisation of educational measures over punishment, while attributing particular importance to the specialisation of judges and a deep understanding of adolescent psychology. Y. Buribayev *et al.* (2023) focused on the issues of judicial specialisation in the context of Kazakhstani practice and substantiated the necessity of creating specialised social and labour courts as a means of enhancing the effectiveness of justice. The authors established that the specialisation of the judicial system constitutes the basis of its development and an important tool for dynamic progressive development, while simultaneously emphasising the need for a cautious approach to implementing specialisation, taking into account potential side effects on the proper administration of justice.

Procedural aspects of juvenile participation in criminal proceedings were analysed in detail by Z. Zhumabayeva (2020), who identified gaps in legislative regulation and deficiencies in the mechanism for realising minors' right to legal representation. The researcher established the incomplete content of the concept of "legal representative of a minor participant in criminal proceedings" and insufficient regulation of the procedural status of legal representatives, particularly regarding the representation of the interests of child witnesses and victims. G. Sheishekeeva *et al.* (2024) investigated the specifics of the diversion of minors from criminal justice in the system of the Kyrgyz Republic and identified three main components of this institution: formal conditions for applying diversion, guarantees of rights during its application, and organisational-procedural issues. The authors established that the national legislation of Kyrgyzstan generally complies with the United Nations Standard Minimum Rules for the Administration of Juvenile Justice, however, questions regarding the types of offences for applying diversion and lowering the age threshold from 16 to 14 years remain debatable. M. Musabayev *et al.* (2023) analysed theoretical provisions and legal norms of the administrative-legal protection of minors in European countries and identified priority areas for the administrative-legal protection of children's rights, including improving juvenile justice bodies, enhancing the quality of social services, and ensuring children's access to justice through the creation of specialised courts and the introduction of alternative measures.

U. Saliev (2023) analysed the legal frameworks and social initiatives for the protection of minors in Uzbekistan and established the multifaceted nature of children's rights, encompassing education, healthcare, protection from exploitation, and access to justice. The author demonstrated that the constitutional-legal status of children is guaranteed by the new Constitution of the Republic of Uzbekistan and relevant laws, while attributing particular importance to the Law of the Republic of Uzbekistan No. LRU-263 (2010) as a key instrument for protecting children's rights. G. Rakhimova *et al.* (2024) conducted a comprehensive analysis of the evolution of child protection laws in Kazakhstan since gaining independence and identified three phases of development: formation, establishment, and early development. The researchers identified improvements in various aspects of child protection, including the refinement of legislative goals and principles, while simultaneously noting that nearly half of the country's children live below the poverty line. Y. Shapoval *et al.* (2025) analysed the Kazakh approach to the rehabilitation and reintegration of children repatriated from Syria and Iraq under the humanitarian operation "Zhusan" and identified key elements of a successful programme through the restoration of children's legal status, minimisation of stigmatisation, and support for social rehabilitation. M. Nazim *et al.* (2024) conducted a comparative analysis of different countries' approaches to reforming juvenile justice systems and demonstrated the

necessity of a comprehensive approach to address problems of inequality in access to justice and the absence of universal standards, emphasising the importance of balancing public safety and rehabilitation. However, a comparative analysis of the effectiveness of different juvenile justice models in the context of the cultural and legal specificities of Central Asian countries remains an under-researched aspect of the scientific literature.

The aim of the study was to determine the patterns and specificities of the transformation of juvenile justice systems in Central Asian countries from inherited Soviet models to models compliant with international child rights standards. The research objectives were:

1. To analyse the institutional and legislative reforms of juvenile justice in Central Asian countries (Kazakhstan, Kyrgyzstan, Uzbekistan) considering the experience of China (PRC) to identify the main models of legal system transformation and to reveal specific regional approaches to the modernisation of juvenile justice;

2. To conduct an empirical analysis of the effectiveness of the implemented reforms through statistical indicators to assess the practical results of the humanisation of juvenile justice systems;

3. To undertake a legal analysis of the compliance of national juvenile justice systems with international child rights standards to establish the degree of implementation of the principles of the UN Convention on the Rights of the Child.

Materials and Methods

The research was conducted based on a comprehensive theoretical-legal approach, utilising the conceptual frameworks of international human rights law and comparative jurisprudence. The theoretical foundation consisted of doctrinal provisions regarding the implementation of international standards for child protection into national legal systems, particularly the principles enshrined in the Convention on the Rights of the Child… (1989) and related international instruments, including the Resolution of the United Nations General Assembly No. A/RES/40/33 (1985), the Resolution of the United Nations General Assembly No. A/RES/45/112 (1990), and the Resolution of the United Nations General Assembly No. 45/113 (1990). The methodological framework was composed of concepts of transitional justice and the theory of legal transformation in post-Soviet states, which enabled an analysis of the specificities of the transition from repressive to rehabilitative models of working with juvenile offenders. The research was conducted in three sequential stages corresponding to the set objectives, each involving the application of specific methods and analysis of relevant groups of sources to ensure a comprehensive examination of the issues surrounding juvenile justice reform in the region.

The first stage of the research was dedicated to analysing the institutional and legislative reforms of juvenile justice in Central Asian countries using historical-legal and comparative-legal methods. The historical-legal method was applied to study the genesis and evolution of juvenile justice systems, allowing for the tracing of the transformation from Soviet models to modern specialised systems through an analysis of key normative legal acts, namely the Concept for the Development of the Juvenile Justice System of the Republic of Kazakhstan (Decree of the President of the Republic of Kazakhstan No. 646, 2008), the Law of the Republic of Kazakhstan No. 401-IV (2011), Penal Code of the Republic of Kazakhstan No. 226-V (2014) and CPC – Criminal Procedure Code of the Republic of Kazakhstan No. 231 (2014) and the Law of the Republic of Kazakhstan No. 38-IV LRK (2016), and the Criminal Code of the Kyrgyz Republic No. 19 (2017). The comparative-legal method provided the opportunity to juxtapose different national approaches to reform through an analysis of the institutional models of Kazakhstan, Kyrgyzstan, and Uzbekistan, as well as a comparison with the Chinese experience based on the Law of the People's Republic of China (2020), the Law of the People's Republic of China No. 40 (2021), and the working report of the Supreme People's Court of the PRC (Xinhua News Agency, 2021) to identify regional specificities and common trends.

The second stage involved an empirical analysis of the effectiveness of the implemented reforms using the statistical method and the method of content analysis of official reports. The statistical method enabled a quantitative analysis of the dynamics in indicators related to the application of punishments to juveniles, based on data from the World Prison Brief: Kazakhstan (n.d.), World Prison Brief: China (n.d.), World Prison Brief: Kyrgyzstan (n.d.), World Prison Brief: Uzbekistan (n.d.), UNICEF (United Nations Children's Fund) reports for Kazakhstan (Juvenile justice, n.d.; Dialogue about the future…, 2024), Kyrgyzstan (Protecting children, n.d.; UNICEF Kyrgyzstan Country Programme 2023-2027, 2023), and Uzbekistan (Access to justice for children, n.d.; Child-friendly justice system…, 2024), as well as materials from the Joint Staff Working Document (2023), official data from the State Penitentiary Service of the Kyrgyz Republic (2024), and reports from the Supreme People's Procuratorate of the People's Republic of China (2021). Reports from the United Nations Office on Drugs and Crime (2024) regarding the development of non-custodial sanctions in the region were also utilised. The systemic-structural method was used to analyse the interconnections between different elements of juvenile justice systems and to identify patterns in their functioning through a comparison of statistical indicators from different countries and reform periods.

The third stage included a legal analysis of the compliance of national systems with international child rights standards using the formal-legal method and the method of legal hermeneutics. The formal-legal method was applied to analyse provisions of national legislation and international legal instruments to establish the degree of conformity of national norms with international standards. Analytical materials from international human rights organisations served as additional sources, namely reports (Minimum ages of

criminal…, n.d.; Our programmes: Central Asia, n.d.; Experts: Juvenile justice..., 2021; Monitoring the criminal justice sector…, 2025, which provided an independent assessment of the state of children's rights observance in the studied countries. Reports from the US Department of State on human rights (United States Department of State, 2023) and government responses to questions from the Committee on the Rights of the Child (2023) were analysed. This comprehensive source base ensured the objectivity of the research by combining official statistical data, normative legal acts, and independent analytical assessments from international organisations, thereby contributing to the achievement of the research aim through a comprehensive examination of juvenile justice reform processes in the region.

A limitation of the study was the absence of complete statistical data on recidivism among juveniles and the long-term results of rehabilitation programmes in all the studied countries, which complicated a full assessment of the effectiveness of different reintegration models. This circumstance necessitated a focus on available indicators of punishment application and institutional changes as the primary indicators of reform effectiveness.

Results

Institutional and legislative reforms of juvenile justice in Central Asian countries

The analysis of the development of juvenile justice in the Central Asian region demonstrates a gradual transition from the inherited Soviet model to specialised juvenile justice systems that comply with international child rights standards. In the 1990s, the situation in the sphere of juvenile justice in the region was far from meeting international requirements: a 1999 UNICEF study noted systemic violations of children's rights in the justice process in Central Asia, from the moment of detention and pre-trial detention to sentencing and serving punishment. Throughout the criminal justice process for children, instances of police brutality aimed at extracting confessions were frequently recorded, juveniles were routinely held in pre-trial detention, judges and investigators lacked specialised training in working with children, alternative measures were practically not applied, and consequently, juveniles were often sent to places of deprivation of liberty even for relatively minor offences, where conditions of detention were poor, sometimes bordering on inhuman (UNICEF Regional Office..., 2012).

The Republic of Kazakhstan demonstrated the most consistent approach to building a comprehensive juvenile justice system, initiating this process with the approval of the Concept for the Development of the Juvenile Justice System for 2009-2011 (Decree of the President of the Republic of Kazakhstan No. 646, 2008). This strategic document defined the fundamental directions of transformation: creating specialised juvenile courts throughout the country, forming police units for juvenile affairs with preventive and investigative functions, introducing a probation service to supervise the execution of non-custodial sentences, developing a system for coordination between child protection institutions, building social-psychological support services within the juvenile justice system, as well as specialised training for judges, prosecutors, and other professionals working with children (UNICEF Regional Office..., 2012). The practical implementation of this concept occurred rapidly: after an experimental launch of two pilot courts in Astana and Almaty in 2007, by February 2012, an extensive network of 19 specialised courts was operational in all regional centres and major cities of the country. Kazakhstan became the first state in Central Asia and the entire post-Soviet space to introduce a full-fledged system of juvenile courts for handling criminal, civil, and administrative cases involving children (Syzdykova *et al*., 2021).

Parallel to the judicial reform, a comprehensive transformation of other institutions within the juvenile justice system took place. Positions for juvenile prosecutors were created within the prosecution bodies, and specialised units of juvenile affairs inspectors were formed within the police, their activities focused on the prevention of youth crime and the investigation of offences committed by children. An important step was the transfer of reception-distribution centres for juveniles from the Ministry of Internal Affairs to the education system, transforming them into Centres for Temporary Isolation, Adaptation, and Rehabilitation of Juveniles under the leadership of the Ministry of Education and Science. This measure signified a fundamental change in philosophy from a punitive to a socio-rehabilitative approach: juvenile offenders are held not in conditions resembling detention centres, but in special educational institutions under the supervision of educators, with prosecutors losing the right to arbitrarily place children in such institutions. To ensure the coordination of efforts among various agencies in implementing juvenile justice, the Human Rights Commissioner (Ombudsman) was endowed with a mandate to conduct independent monitoring of the situation regarding children's rights in criminal proceedings. Services for free legal aid for children and centres for socio-legal services for juveniles and their families also began to be established (UNICEF Regional Office..., 2012).

Legislative reforms in Kazakhstan have reflected a fundamental shift in approaches to the criminal liability of minors. In 2014, the Penal Code of the Republic of Kazakhstan No. 226-V (2014) and Criminal Procedure Code of the Republic of Kazakhstan No. 231 (2014) came into force, embodying the principles of the humanisation of punishment for children. The application of detention for minors at the pre-trial stage was significantly restricted: whereas prior to the 2014 reforms, the 1997 Criminal Procedure Code permitted holding a minor without a court sanction for up to 72 hours, after the new CPC-2014 came into effect, the maximum period of such detention for minors was reduced to 24 hours in exceptional situations related to particularly serious crimes, and it can only be extended to 72 hours with a court sanction. Detention became an exceptional preventive measure, with alternatives such as transfer to parental supervision, bail, or house arrest. The legislator expanded the possibilities for

exemption from criminal liability through the application of compulsory measures of an educational nature, probation, and mediation. The adoption of the Law of the Republic of Kazakhstan No. 401-IV (2011) allowed for the application of reconciliation procedures in cases involving juvenile offenders, facilitating the implementation of restorative justice in practice. A key achievement was the adoption of the Law of the Republic of Kazakhstan No. 38-IV LRK (2016), which introduced a comprehensive probation system in the country. According to this law, probation is defined as a system of supervision measures and socio-legal assistance aimed at correcting the behaviour of individuals, including minors, and preventing them from reoffending. The probation service monitors the execution of non-custodial sentences by convicted children and provides them with comprehensive support for resocialisation, ranging from assistance in continuing education to employment or receiving psychological help.

The Kyrgyz Republic chose an alternative model of reforms, focusing its efforts on transforming sentencing policy and ensuring alternative measures without establishing separate specialised judicial institutions. Instead, within some courts of general jurisdiction, judges responsible for juvenile cases were appointed and juvenile judicial panels were created. The main emphasis of the Kyrgyz reforms was a radical change in judicial practice regarding the sentencing of children. A series of legislative changes, notably the adoption of the new Criminal Code of the Kyrgyz Republic No. 19 (2017), which introduced more opportunities to avoid imprisoning children, reflected a fundamentally different approach compared to raising the age of criminal responsibility. Instead of changing age thresholds, Kyrgyzstan opted for a strategy of humanising punishment: it abolished imprisonment for non-serious crimes and for individuals under 16 for crimes of medium gravity, reduced the maximum prison term from 15 to 10 years, and expanded non-punitive sanctions, including community service. At the same time, the system provides for referral to closed-type special educational institutions for a period of 6 to 24 months, although Kyrgyzstan has only one such special school for boys aged 11-14, with the majority of its pupils being placed there due to truancy or running away from home rather than for offences. A key feature of the Kyrgyz model has been the widespread practice of suspended sentences, which are possible for any crime except particularly serious ones, directly focusing on providing alternatives to imprisonment rather than changing the age of responsibility (UNICEF Regional Office..., 2012).

The Republic of Uzbekistan began active juvenile justice reforms somewhat later compared to Kazakhstan and Kyrgyzstan, especially after President Shavkat Mirziyoyev came to power in 2016. The delay in reforms was due to previous state policy, which was characterised by limited readiness for structural changes in the judicial system and less engagement with international child protection initiatives (UNICEF, 2015). President Mirziyoyev initiated a policy of large-scale reforms aimed at liberalising and democratising society, including bringing national legislation into line with international standards. His administration intensified cooperation with international organisations on human rights protection and building a rule-of-law state (Presidential Decree of the Republic of Uzbekistan No. UP-4947, 2017). As evidenced by a UNICEF and Supreme Court of Uzbekistan study, the country still lacks specialised judges, prosecutors, and lawyers working exclusively on cases involving children. All cases concerning minors are heard by general courts, which often leads to insufficient consideration of the age-specific characteristics of the defendants. The state guarantees a free defence lawyer only to children in conflict with the law, whereas child victims or witnesses do not have automatic access to legal assistance (Access to justice for children, n.d.).

The most important step was raising the minimum age of criminal responsibility. Historically, Uzbek criminal law had a specific provision: the general age of responsibility was 16, for most serious crimes it was 14, but for intentional murder under aggravating circumstances, liability began at 13 (Minimum age of criminal…, 2021). Henceforth, no person under the age of 14 can be held criminally liable in Uzbekistan, which aligns with the recommendations of the Committee on the Rights of the Child (2007), and the principles of the UN Convention on the Rights of the Child (United Nations General…, 1989).

With UNICEF support, a Strategy and Action Plan on Ensuring Children's Access to Justice is being developed, which is intended to lay the groundwork for creating a more specialised juvenile justice system. This strategy is expected to provide for the introduction of training for judges and investigators on child psychology, and possibly the creation of separate juvenile panels in courts or special court chambers within the system of courts of general jurisdiction (Access to justice for children, n.d.). While such courts do not yet exist, Uzbekistan is focusing on other elements of the reform: improving offence prevention and developing alternatives to punishment. In cooperation with UNICEF, two closed special institutions for "difficult" adolescents have been reformed, introducing behaviour correction and preparation for reintegration into society programmes instead of a punitive approach. Within the investigative units of the Ministry of Internal Affairs, at least 3 "child-friendly rooms" have been created for interviewing children using a special, child-friendly methodology, which were subsequently expanded to 39 police departments across the country. This allows for the interrogation of child victims or witnesses of crimes in a safe environment, taking into account their psychological state.

The Chinese model of juvenile justice is distinguished by the scale of its institutional infrastructure and the specifics of coordination between different levels of the system. To ensure uniformity in law enforcement practice, the Supreme People's Court in 2021 established a separate office and six regional juvenile divisions, which develop standardised approaches to hearing cases involving violence, bullying, and child trafficking (Xinhua News Agency, 2021).

Legislative reforms included the 2020 Juvenile Protection Code, which introduced family guidance programmes and inter-agency commissions for monitoring children's cases (Law of the People's Republic of China, 2020), and the Law of the People's Republic of China No. 40 (2021), which establishes the priority of non-punitive measures and grants equal educational rights to minors under probation. Compared to the experience of Central Asian countries, the Chinese model is characterised by centralised coordination through a vertical system of specialised divisions and shows similarities with the Kazakh approach regarding the development of probation and mediation, while differing in the significantly larger scale of its institutional network and an emphasis on standardising judicial practice through separate coordination structures.

The experience of Central Asian countries in the field of juvenile justice reform demonstrates the importance of a comprehensive approach to the transformation of legal systems. The success of reforms is largely dependent on the political will of the state, the presence of strategic planning, and effective coordination between different institutions. The Kazakh model confirms that the gradual introduction of alternative sentencing measures combined with institutional changes can lead to a radical reduction in the number of children in the penitentiary system. The Chinese experience demonstrates the possibility of creating a large-scale institutional infrastructure for juvenile justice, although legislative decisions regarding the differentiation of the minimum age of criminal responsibility remain a subject of debate in the context of international standards. At the same time, regional experience attests that the pace and depth of reforms differ significantly depending on socio-economic conditions, legal traditions, and societal readiness for change.

Empirical analysis of reform effectiveness: Statistical indicators and comparative analysis

Statistical analysis of the results of juvenile justice reforms in Central Asian countries demonstrates the significant effectiveness of the implemented measures in reducing the repressiveness of the system and increasing its humanity. The analysis covers the period from 2009 to 2017 due to the limited availability of systematic official statistics for later periods, as national penitentiary systems in the region do not always maintain separate records for minors or publish such data with the necessary regularity. In Kazakhstan, during the specified period, the number of registered crimes committed by children decreased from 6,651 to 3,148 cases per year, representing a reduction of 52.7%. The trend in the number of convicted minors is important: whereas 2,654 children were convicted in 2009, only 443 were convicted in 2017, meaning a reduction of 83.3% or an almost six-fold decrease (Juvenile justice, n.d.). According to the latest available data, as of the end of 2024, the proportion of minors in Kazakhstan's penitentiary system is only 0.2% of the total prison population, confirming the sustainability of the positive trend in reducing the application of custodial sentences for children (World Prison Brief: Kazakhstan, n.d.). This was made possible by the broader application of alternative measures instead of criminal penalties, specifically probation, mediation, and suspended sentences.

Substantial changes have occurred in the application of custodial measures. The number of minors held in pre-trial detention centres decreased from 475 individuals in 2009 to 166 in 2017, representing a reduction of 65.1%. In correctional institutions, the number of children decreased even more radically: from 427 individuals at the end of 2009 to only 49 in 2017, i.e., a reduction of 88.5% or more than 8.7 times (Juvenile justice, n.d.). According to official statistical data from the World Prison Brief: Kazakhstan (n.d.), maintained based on information from the national prison administration via the organisation Penal Reform International (Our programmes: Central Asia, n.d.), as of 26 December 2024, minors under the age of 18 constitute 0.2% of the total prisoner population, which amounts to approximately 64 individuals out of a total of 32,171 convicted persons. Due to the implementation of a policy of humanising criminal legislation, the overall penitentiary contingent has more than halved: from 78,029 individuals in 2000 to 32,171 individuals in 2024, and the incarceration rate decreased from a peak of 566 persons per 100,000 population in 2002 to 163 persons in 2024, contributing to the country's shift from leading positions in the world ranking in the early 2000s to moderate indicators in the international context (World Prison Brief: Kazakhstan, n.d.). Detailed statistical indicators of the detention of minors in the custodial system by country in the region are presented in Table 1.

Table 1. Indicators of minors in custodial systems (2018-2024)

Country	Date of data	Prison population, persons	Incarceration rate (per 100,000)	Proportion of minors, %
Kazakhstan	26 December 2024	32,171	163	0.20
Kyrgyzstan	31 December 2023	7,728	112	0.19
Uzbekistan	1 January 2022 / September 2022*	29,000	85	1.67
China	31 December 2018**	1,690,000	119	0.80

Note: *the absolute number of minors (484 individuals) was reported by the delegation of Uzbekistan during the 91st session of the UN Committee on the Rights of the Child (12 September 2022) – this is the most recent officially stated indicator; the ratio 484 / 29,000 = 1.67 %; **data for China as of 31 December 2018 are the latest official statistical indicators published by the national penitentiary administration. Subsequent data are not officially published

Source: created by the author based on World Prison Brief: Kazakhstan (n.d.), World Prison Brief: China (n.d.), World Prison Brief: Kyrgyzstan (n.d.), World Prison Brief: Uzbekistan (n.d.), Joint Staff Working Document (2023)

Analysis of the data presented in Table 1 demonstrates certain differences in the approaches of Central Asian countries and China to the application of custodial sentences for minors, reflecting different stages of reforming their national juvenile justice systems. Contrasting results are observed between Kazakhstan and Kyrgyzstan as reform-leading countries, China with intermediate indicators, and Uzbekistan as a state in the initial stages of transformation. The statistical indicators confirm the effectiveness of a comprehensive approach to reform, where legislative changes are accompanied by institutional transformations and changes in law enforcement practices. The lowest indicators for the share of minors among prisoners are demonstrated by Kazakhstan (0.20%) and Kyrgyzstan (0.19%), which contrasts significantly with the indicators of Uzbekistan (1.67%) and China (0.80%), showing an eightfold difference between the countries with the lowest and highest indicators. The statistical data from the table reveal the potential for further improvement of juvenile justice systems in the region, particularly in the context of achieving full compliance with the principle of ultima ratio – using deprivation of liberty only as a measure of last resort, as stipulated by Article 37(b) of the UN Convention on the Rights of the Child. The indicators in Uzbekistan (1.67%) and China (0.80%) may reflect not only different starting points for reforms but also such specific factors as limited financial resources for developing alternative programmes, insufficient training of judicial personnel in the field of juvenile justice, and traditional law enforcement practices oriented towards punitive measures, highlighting the necessity of considering the national context when assessing the effectiveness of reform.

Kyrgyzstan demonstrated the most notable results in reducing the application of custodial sentences for minors. The number of cases where custodial sentences were imposed on minors decreased by 92% over the period from 2005 to March 2024 – from 178 sentences to only 13 cases (Dialogue about the future…, 2024). This result was achieved thanks to key legislative changes, particularly the adoption of the Criminal Code of the Kyrgyz Republic No. 19 (2017), which expanded the possibilities for applying alternative sentencing measures, including the abolition of imprisonment for non-serious crimes for persons under 16 years of age and a significant expansion of non-custodial sanctions (Dialogue about the future…, 2024). According to data from the State Penitentiary Service of the Kyrgyz Republic (2024), in the single republican juvenile correctional colony, only 13 convicted individuals are serving their sentences against a capacity limit of 134 persons, demonstrating a radical shift in judicial practice towards suspended sentences, probation, and transfer under parental supervision. The success of juvenile justice reforms became part of a broader transformation of the entire criminal system of Kyrgyzstan, evidencing the systemic nature of changes in approaches to justice. According to United Nations Office on Drugs and Crime (2024), despite a 22% increase in the total number of convictions from 2020 to 2023, the number of non-custodial sentences increased by 55%, and the overall prison population decreased by 20% from 9,658 to 7,728 prisoners. This dynamic confirms the effectiveness of a comprehensive policy of humanising criminal justice, where successful practices in working with juvenile offenders are gradually extended to the entire system, demonstrating the possibility of a successful transition from punitive to rehabilitative approaches even in post-Soviet legal systems with limited resources (United Nations Office on Drugs and Crime, 2024).

A comparative analysis with the Chinese experience reveals distinct trends in regional approaches to juvenile justice. China introduced specialised justice for minors: the first juvenile court in the People's Republic of China was established as early as 1984 in Shanghai, after which juvenile divisions of courts were gradually created in many cities (Minimum ages of criminal…, n.d.). The minimum age of criminal responsibility in China has been relatively high for a long time: the general age is 16, and for certain serious crimes – 14 (China: Revised juvenile…, 2021). The Chinese system has traditionally proclaimed the principle of "education first, punishment second" regarding minors. According to data from the Supreme People's Procuratorate of the People's Republic of China (2021), the number of convicted minors in China decreased from 88,891 in 2008 to 35,743 in 2016. According to the latest official data, in 2024, Chinese procuratorial authorities reviewed cases involving 101,526 minor suspects, which is 4.3% more than the previous year, indicating a shift in the trend towards an increase in the number of cases involving children, demonstrating a global trend towards the humanisation of approaches to juvenile offenders (Davies, 2021).

Simultaneously, the number of registered crimes committed by minors in China demonstrates complex dynamics: according to official data from the Supreme People's Procuratorate of the People's Republic of China (2021), after an increase in indicators in 2019 by 7.51% and 5.12% respectively, in 2020 the number of juvenile cases submitted for arrest consideration decreased by 21.95% to 37,681 individuals, and for criminal case initiation consideration – by 10.35% to 54,954 individuals, which was the lowest indicator in five years. The most common youth crimes are property crimes and minor violent acts - theft, robbery, fights, hooliganism. At the same time, serious violent crimes among minors remain rare, although they show a tendency to increase their share in the overall crime structure. The vast majority of young offenders in China – over 95% – are boys, often from disadvantaged families or children of migrants whose parents left them with relatives while going out to work (Davies, 2021). The social causes of youth crime – lack of parental supervision, school failures, unemployment – are recognised by the Chinese authorities as primary risk factors, which led to the development of targeted state prevention programmes, including enhanced social support for families of labour migrants, the creation of specialised educational institutions for "left-behind children" and the implementation

of comprehensive early intervention measures at the local community level.

In Uzbekistan, according to official data, a moderate number of crimes committed by minors is recorded annually – for example, in 2019, courts reviewed 497 cases of crimes by children, and in 2020 – 399 cases. However, in 2021 the indicator increased sharply: in just 9 months, 707 cases were reviewed (Experts: Juvenile justice…, 2021). This surge may be linked to improved record-keeping, changes in legislation, or an increase in adolescent crime in the post-pandemic period. Participants in the CABAR expert discussion note that the overall level of youth crime in Uzbekistan remains lower compared to other countries in the region: if in Uzbekistan 707 cases were reviewed in 9 months in 2021, then in Kazakhstan in 2020, 1,873 offences were registered per year, which, when adjusted for population, constitutes a higher rate, possibly due to a more conservative society and family control. The main causes of juvenile offences are cited as an unfavourable psychological atmosphere in the family, lack of parental attention, especially the mass labour migration of parents abroad, which results in children being left in the care of relatives, as well as poverty and the influence of the street (Experts: Juvenile justice…, 2021).

Empirical data indicate that the humanisation of juvenile justice has not led to an increase in adolescent crime in the region. On the contrary, Kazakhstan and Kyrgyzstan are observing a stabilisation or decrease in the level of youth offences. In China, official data for the period 2008-2019 demonstrate contradictory trends: the number of initiated cases against minors increased from 58,307 in 2018 to 61,295 in 2019, yet the number of convicted minors radically decreased from 88,891 in 2008 to 35,743 in 2016, indicating a change in approaches to record-keeping and the filtering of cases, with a greater number being resolved without a conviction (Davies, 2021). Judicial authorities often decided not to refer a case of an offence committed by a child to court if it was possible to limit the response to educational measures. Instead, in China during 2014-2019, the number of applications of so-called "informal responses" increased – where a teenager was registered with the police, preventive work was conducted with them, but they were not brought to court. The results of the conducted research confirm the conceptual proposition that alternative measures and early prevention are capable of curbing child crime no worse, and sometimes even better, than strict punishment.

An analysis of the socio-economic consequences of the reforms reveals a positive correlation between investments in rehabilitation programmes and a reduction in recidivism. Together with non-governmental organisations in Uzbekistan, free legal aid is provided to children through the "Madad" and "Istikbolly Avlod" organisations: during 2021-2023, it was received by 2,137 children and 255 adults from vulnerable categories (Access to justice for children, n.d.). In Kyrgyzstan, a coordination mechanism for assisting children returning from places of detention functions, where social services together with non-governmental organisations provide support for such adolescents in the capital Bishkek, and this experience is recommended for expansion throughout the country (Protecting children, n.d.). However, certain problems persist: Kyrgyz legislation is still not fully harmonised internally, there are contradictions in the definitions of the age of children in different acts, for example, Articles 154, 155, 156, 157, 158 of the Criminal Code of the Kyrgyz Republic contain different formulations regarding the age categories of children ("aged from fourteen to eighteen years", "who has not reached the age of fourteen", "who has not reached the age of sixteen"), the issue of statutes of limitations for prosecuting sexual crimes against children is not clearly regulated, which limits victims' access to justice. A problem is the lack of social services at the community level: after returning home, children face an insufficient level of support – neither psychological, nor educational, nor assistance with employment (Monitoring the criminal justice sector…, 2025). A shortage of qualified personnel – social workers, child psychologists, probation specialists – and their insufficient training for working specifically with juvenile offenders is also noted.

Legal analysis of the compliance of national systems with international child rights standards

A legal assessment of the compliance of the national juvenile justice systems of Central Asian countries with international child rights standards reveals both significant progress in the implementation of the core principles of the Convention on the Rights of the Child… (1989), and certain gaps requiring further improvement. All the studied states have ratified the UN Convention on the Rights of the Child, Article 40 of which obligates them to ensure humane treatment of child offenders and to create a separate child-friendly justice system. Additionally, international standards, such as the Resolution of the United Nations General Assembly No. A/RES/40/33 (1985) (minimum standards for the administration of juvenile justice), the Resolution of the United Nations General Assembly No. 45/113 (1990) (regarding the prevention of juvenile delinquency) and the Resolution of the United Nations General Assembly No. A/RES/45/112 (1990) (regarding the protection of children deprived of their liberty), establish comprehensive recommendations for states regarding the minimum age of criminal responsibility, rehabilitation instead of punishment, and the prohibition of inhuman treatment of children.

Simultaneously, contemporary discussions in certain countries of the region demonstrate the complexity of balancing international standards and national realities. In Kazakhstan, in October 2024, a group of deputies of the Mazhilis proposed lowering the minimum age of criminal responsibility for certain particularly serious crimes, for instance for rape, from 14 to 12 years. This initiative was prompted by an increase in high-profile cases of brutal crimes committed by teenagers, and deputy Magerram Magerramov argued the necessity of such changes

by the insufficient effectiveness of prevention and the excessive leniency of the current system towards teenagers who have committed serious crimes. In his opinion, the current system is too lenient towards teenagers who have committed serious crimes, allowing them to avoid real responsibility due to their age (Kazakhstan proposes lowering age…, 2024). The initiative sparked discussion in society and among legal professionals: proponents believe that certain 12-13-year-old offenders are capable of understanding the nature of their actions and should be punished for the most serious crimes, while opponents emphasise the non-compliance of such a proposal with the principles of the Convention on the Rights of the Child… (1989). However, as of 2025, no decision has been made, and the minimum age of criminal responsibility remains unchanged (Minimum age of criminal…, 2021). A systematised comparative analysis of key aspects of juvenile justice reform in the region is presented in Table 2.

Table 2. Comparative analysis of juvenile justice systems in Central Asian countries: Institutional models, legal mechanisms, and current reforms

Key Aspect	Kazakhstan	Uzbekistan	Kyrgyzstan	China
Specialised Institutions	A network of 17 regional Child Rights Commissioners, who monitor all institutions, including detention facilities	The Department for Minors' Affairs of the General Prosecutor's Office; from 2024 – pilot juvenile courts in three regions	A Juvenile Probation Service under the Ministry of Justice; regional commissions for the diversion of children from criminal prosecution	Commissions for the Protection of Minors under local governments; specialised divisions in people's courts
Alternatives to Deprivation of Liberty	Probation, mediation, and "pre-trial agreements" for children (a joint EU-UNICEF project)	The "Child-Friendly Justice" programme promotes mediation and social services; a large-scale probation network is absent	Diversion ("otvedenie") and conditional release are the primary tools; practical implementation remains limited	The 2021 Law obliges social protection authorities to apply preventive and educational measures instead of imprisonment for 12-15-year-olds
Monitoring and Legal Protection	The Ombudsman and NGOs have the right to "unannounced visits" to juvenile colonies The annual review of the Department's practice is submitted to parliament; public oversight remains sporadic so far	Public councils at colonies and UN/ UNICEF monitoring groups; powers are inconsistent	Public councils at colonies and UN/UNICEF monitoring groups; powers are inconsistent	Regional committees for education and police operate joint mobile units; data is verified by the State Council
Age-Related Policy	Threshold of 16 years; for 14-year-olds – a list of serious offences; a 2024 draft law proposes lowering the threshold to 12 years for specific crimes	The basic minimum age was raised to 14 years (2021); a lowered threshold is absent	Threshold of 16 years; for 14-year-olds – a list of serious offences; a 2024 draft law proposes lowering the threshold to 12 years for specific crimes	General age of 16 years; a lowered threshold of 12 years for "particularly cruel" offences (2021 reform)
Recent Reforms (2023-2025)	The "Safe Childhood" National Programme – focus on the social reintegration of children and the implementation of electronic case management	Presidential Decree PP-5060 of 2021 launched the reform; in 2025, the creation of a nationwide network of juvenile courts is planned	The 2021 Criminal Code added a special chapter on probation; in 2024, the Ministry of Justice approved a methodology for risk assessment in diversion cases	In April 2025, the State Council adopted an action plan for a full transition to "restorative rooms" in all district courts by 2027

Source: created by the author based on Juvenile justice (n.d.), Access to justice for children (n.d.), Protecting children (n.d.), Our programmes: Central Asia (n.d.), China: Revised juvenile… (2021), UNICEF Kyrgyzstan Country Programme 2023-2027 (2023), Dialogue about the future… (2024), Child-friendly justice system… (2024), G. Sheishekeeva *et al.* (2024)

The comparative analysis in Table 2 reveals a diversity of institutional models and legal mechanisms employed by the countries of the region to achieve the common goal of humanising justice for minors. The presented data demonstrates that the success of reforms does not depend on choosing a single, unified model, but is determined by the comprehensiveness of the approach and the consistency of implementing changes at all levels of the justice system. An important fact is that all the studied countries, regardless of the pace and specifics of their reforms, are moving towards raising the minimum age of criminal responsibility and expanding alternative sentencing measures. The table also illustrates an evolution from creating separate specialised institutions towards forming integrated systems of inter-agency cooperation, which indicates a deepening understanding of the complex nature of juvenile delinquency issues. It is worth noting the varying paces and priorities of reform, reflecting both objective resource constraints and different political approaches to juvenile justice matters. At the same time, the table reveals the need for further strengthening inter-agency coordination and developing specialised support services for minors, which remains a common challenge for all countries in the region, regardless of the achieved level of development of their juvenile justice systems. Furthermore, the comparative analysis underscores the importance of considering cultural

specificities and traditions when implementing international standards, as this allows for the organic integration of new approaches into national legal systems.

The legal analysis of procedural guarantees reveals significant progress in ensuring the rights of children in criminal proceedings. In Kyrgyzstan, the right of minors to free legal aid is ensured through the establishment of a state-guaranteed legal services system with dedicated lawyers trained in child justice matters (Committee on the Rights of the Child, 2023). It is also ensured that arrested children are held separately from adults, although issues of overcrowded detention facilities sometimes arise (United States Department of State, 2023). At the normative level, Kyrgyzstan has largely aligned its legislation with international standards for child protection – as evidenced by expert assessments noting the country's progress in fulfilling the requirements of the UN Convention on the Rights of the Child (Monitoring the criminal justice sector…, 2025).

The analysis of compliance with the ultima ratio principle (last resort), enshrined in Article 37(b) of the Convention on the Rights of the Child… (1989), according to which deprivation of liberty should be applied only as a measure of last resort, demonstrates significant progress in all studied countries. All countries in the region declare their commitment to this principle regarding minors, as enshrined in international law (Art. 37(b) of the Convention on the Rights of the Child). It is indicative that both in more authoritarian China and in more democratic Kyrgyzstan, the rate of child incarceration has significantly decreased over recent decades – this is a global trend, reinforced by UN ideals. Statistical data confirm that alternative measures have become the primary response to juvenile offences (Monitoring the criminal justice sector…, 2025). At the same time, problematic areas requiring attention remain: psychological and legal support for child victims of crime is insufficiently ensured; prosecuting perpetrators is often complicated by statutes of limitations or stigma; all countries experience a shortage of funding for rehabilitation programmes and trained social workers; societal stereotypes regarding "soft" treatment of young offenders can pressure politicians to change the course of reforms.

The Uzbek government, in cooperation with UNICEF, is implementing diversion programmes – an alternative approach to formal court proceedings, provided for by Article 40(3)(b) of the Convention on the Rights of the Child… (1989) and recommended by the Resolution of the United Nations General Assembly No. A/RES/40/33 (1985), i.e., channelling adolescents who have committed a first-time offence without significant harm away from the formal court system into programmes of social and educational influence. The necessity of expanding the practice of alternatives not involving deprivation of liberty at the community level is emphasised. The UNICEF representative office in Uzbekistan has openly called on the government to adopt alternatives to imprisonment for children and to resort to deprivation of liberty only as a last resort (Access to justice for children, n.d.). The government has set a goal to reduce the proportion of individuals receiving prison sentences (for adults – from 30% to 20% of convicts) (New reforms in the judicial…, n.d.), and it is evident that for children this indicator should approach zero, except in cases of serious violent crimes.

The overall legal assessment confirms that the Central Asian countries have made significant progress in aligning national legislation with international child rights standards. Current initiatives in Uzbekistan are generally consistent with the requirements of the UN Convention on the Rights of the Child (particularly regarding setting the age of responsibility no lower than 14 years and ensuring, as far as possible, non-punitive resolution of children's cases). All states in the region declare commitment to the ultima ratio principle regarding minors and demonstrate practical results of its implementation through a radical reduction in the use of deprivation of liberty. The reforms reflect a global trend, underpinned by UN international standards, towards a shift from a punitive to a rehabilitative paradigm in the sphere of juvenile justice. The analysis of juvenile justice reforms in Central Asia shows both common trends and differences: common to all countries is the gradual departure from a purely repressive model of dealing with juvenile offenders, inherited from the past, and a movement towards a more humane, preventive, and rehabilitative paradigm, dictated by international child rights standards. This, in the long term, will contribute both to the well-being of the younger generation and to the safety of society as a whole.

Discussion

The results of the conducted research demonstrate significant positive changes in the juvenile justice systems of Central Asian countries, reflecting a global trend of moving away from punitive to rehabilitative approaches in dealing with juvenile offenders. The identified reduction in the number of convicted juveniles by 83.3% in Kazakhstan and the decrease in the application of custodial sentences by 92% in Kyrgyzstan are of fundamental importance for understanding the effectiveness of systemic reforms in transitional societies. These results are consistent with the research of G. Kahlmeter & O. Bäckman (2025) in Sweden, who identified similar trends of increased use of alternative measures following the 2007 reform, when the share of dismissals from prosecution rose to 40% of the total sanctions. At the same time, the Swedish researchers identified an important aspect of social inequality in access to alternative measures, as children with highly educated parents had significantly greater chances of being exempted from punishment, which poses a challenge for ensuring the fairness of reforms in Central Asia.

The established indicators of juvenile detention rates in Central Asian countries, particularly the reduction in the proportion of children to 0.19-0.20% in the leading reform countries, are corroborated by international research on the negative impact of incarceration on child development. The systematic review by E. Ackerman *et al.* (2024) established that juvenile detention creates a cascading effect with

impairments in mental and physical health, adaptive functioning, and educational attainment, which strengthens the arguments in favour of the strategy to reduce the use of custodial sentences. Similarly, H. Smithson & D. Jump (2024) established through an analysis of the impact of COVID-19 on incarcerated children in the United Kingdom that isolation in cells and the lack of educational services exacerbated existing deficiencies in the sphere of child safety, confirming the correctness of the regional countries' strategy of disinvestment in juvenile custody. The identified effectiveness of alternative measures in reducing the number of juvenile offenders is critical for validating approaches to reforming juvenile justice. These results are consistent with the meta-analysis by H.E. Creemers *et al.* (2022), which found no differences in recidivism rates between custodial sentences and alternative measures among serious young offenders, with an average recidivism rate of 44.47% over 8.68 years. The absence of an association between the length of incarceration and recidivism confirms the correctness of the strategic direction of reforms in Central Asia. Contrasting results are presented in the research by E.C. McCuish *et al.* (2025), who identified paradoxical effects among 1719 serious offenders in British Columbia, finding a decrease in the number of convictions with an increase in days spent in custody, although the authors caution against interpreting the results as supporting the expanded use of incarceration.

The development of the probation system in Kazakhstan, as established by the research, demonstrates the practical implementation of the ultima ratio principle and is significant for other jurisdictions. These results are corroborated by the research of C. Engel *et al.* (2022), who demonstrated the positive impact of intensive support on reducing recidivism over three years in a Cologne probation programme with a clear rehabilitative focus. The programme showed a sustained effect of reducing recidivism, particularly among less serious offenders. Similarly, the research by I. van Delft *et al.* (2025) on the Dutch Halt diversion programme among 1300 juveniles provides methodologically robust evidence of the effectiveness of structured alternative measures through a randomised controlled trial, confirming the advisability of Kyrgyz diversion initiatives. The identified changes in philosophy from a punitive to a socio-rehabilitative approach, particularly the transfer of reception-distribution centres from the Ministry of Internal Affairs to the education system in Kazakhstan, find support in the results of research on trauma-informed approaches. The systematic review by C.G. Malvaso *et al.* (2024) of nine systematic reviews with 8615 participants established the strongest evidence for the effectiveness of trauma-focused interventions regarding symptoms of post-traumatic stress disorder and improved mental health. The establishment of Centres for Temporary Isolation, Adaptation and Rehabilitation of Juveniles reflects an understanding of the need for a trauma-informed approach. S. Ji & R. Enright (2025) further confirm the effectiveness of alternative therapeutic approaches through a study of forgiveness programmes among 27 female offenders in South Korea, finding improvements in attachment and reductions in anger and anxiety, which is significant for the development of culturally adapted programmes in Central Asia.

The established increase in the minimum age of criminal responsibility in Uzbekistan from 13 to 14 years corresponds to international recommendations and contrasts with trends in some countries. A.H.L. Wong (2024) analyses the Chinese 2021 reform, which created three different levels of responsibility for different offences, lowering the age for two specific crimes to twelve years. The author argues that creating different levels based on types of crimes is fundamentally wrong, which confirms the correctness of the Central Asian countries' approach to raising the minimum age in accordance with international standards. J. O'Connor (2023) expands this understanding through an analysis of sentencing children in cases of sexual offences in Ireland, proposing a holistic model combining children's rights, victims' needs, and societal interests. The identified issues regarding ensuring the fairness of applying alternative measures in the multi-ethnic societies of Central Asia are critical for the further development of the systems. These results are reflected in the research of J. Afkinich (2024), who established in a systematic review of eleven studies that while several strategies reduced overall juvenile pre-trial detention, few strategies were associated with reducing the disproportionate contact of minorities with the juvenile justice system. This highlights the need for targeted efforts to overcome discrimination and develop special mechanisms for monitoring fairness.

The development of specialised juvenile justice institutions in Kazakhstan, particularly the creation of a network of 19 specialised courts, demonstrates a comprehensive approach to reform. These results find support in the comparative analysis by N. Khmełevska & M. Muravyeva (2024) of the Finnish and Ukrainian systems, where the authors established that Finland stands out for developing a multidisciplinary system with a welfare-oriented approach, including preventive measures, early intervention, and restorative justice. The Finnish experience can inform the further development of systems in Central Asia, taking national contexts into account. The established influence of historical factors on the formation of juvenile justice systems in Central Asia is fundamental for understanding the mechanisms of successful reform. These results are confirmed by the analysis of M. Hajiyeva (2024) on the evolution of criminal-legal protection of minors in Central and Eastern Europe, where the author established that the Soviet era shaped a common ideological approach to juvenile justice with an emphasis on parental rights and educational methods. The shared historical heritage creates opportunities for coordinated development in the region while adhering to modern international standards. The identified necessity for developing technological approaches to risk assessment in Central Asian systems is confirmed by international research on the effectiveness of predictive tools. E. Akpanekpo *et al.* (2025) investigated the accuracy of predicting violent recidivism in different supervision settings,

establishing good discrimination in both custodial (AUC 0.771) and community supervision (AUC 0.728) settings, though they found differences in predictive accuracy between different settings. M. Cavus *et al.* (2025) expand this understanding by presenting a Recidivism Clustering Network using artificial intelligence, which achieved 75% accuracy in predicting re-offending, demonstrating the potential of technological solutions to support decision-making.

The identified importance of quality staff training and the development of practical skills in Central Asian systems finds theoretical justification in modern concepts of juvenile justice reform. A. Day & C. Malvaso (2024) emphasise the importance of the concept of "practice-based evidence" as a central element of reform, highlighting the need to focus on listening to young people, ensuring their safety, and avoiding re-traumatisation. This aligns with the philosophy of reforms in Kazakhstan and Kyrgyzstan, although it requires further development of specialised skills among practitioners. The established results regarding the development of rehabilitation programmes in Central Asia are significant for understanding the effective mechanisms of resocialising juvenile offenders. M. da Silva *et al.* (2023) confirm the importance of developing socio-political control among institutionalised young offenders in Brazil through the validation of leadership competency and political control assessment tools. These results can inform the development of leadership skills and civic participation programmes as elements of rehabilitation in the countries of the region.

The obtained research results are of fundamental importance for understanding the transformation processes of juvenile justice systems in post-Soviet countries and demonstrate the possibility of successfully adapting international child rights standards to national contexts. The identified patterns confirm the effectiveness of a comprehensive approach to reform, including legislative changes, institutional transformations, and changes in law enforcement practice. International experience testifies to the correctness of the chosen direction of reforms in Central Asia and confirms their conformity with global trends in the humanisation of juvenile justice. At the same time, the identified challenges regarding ensuring fairness, developing specialised programmes, and training qualified personnel are common to most jurisdictions and define the directions for further research and practical improvements. These results create the foundation for formulating specific conclusions regarding the achievements and prospects for the development of juvenile justice systems in the Central Asian region.

Conclusions

This study was dedicated to a comprehensive analysis of the processes of reforming juvenile justice systems in Central Asian countries, with the aim of identifying key trends in the transformation from inherited Soviet models to specialised systems of justice for minors that comply with international child rights standards. A three-stage research approach enabled a comprehensive analysis of institutional and legislative reforms, an empirical assessment of their effectiveness, and a legal analysis of compliance with international standards, thereby ensuring the achievement of the set objective. The study conducted a comparative analysis of institutional models and legislative changes in Kazakhstan, Kyrgyzstan, and Uzbekistan, revealing three principal approaches to reform. Empirical analysis of statistical indicators established a high effectiveness of the implemented measures: an 83.3% reduction in the number of convicted minors in Kazakhstan and a 92% decrease in the application of custodial sentences to children in Kyrgyzstan over the period from 2005 to 2024. Analysis of indicators concerning the detention of minors within custodial systems revealed significant disparities between reform-leading countries, where the proportion of minors decreased to 0.19-0.20%, and states in the initial stages of transformation, with indicators of 0.90-1.67%. Legal analysis confirmed the gradual alignment of national legislation with the principles of the UN Convention on the Rights of the Child, evidenced by the raising of the minimum age of criminal responsibility in Uzbekistan from 13 to 14 years and the introduction of comprehensive alternative sentencing measures. A comparative study with the Chinese experience revealed both similar trends of humanisation and specific regional approaches to balancing public safety demands with the protection of children's rights.

The obtained results conceptualise the process of juvenile justice reform as a complex, multi-level transformation that combines institutional changes with the cultural and legal adaptation of international standards to national contexts. The identified direct correlation between the systematic nature of reforms and their practical outcomes demonstrates the critical importance of a comprehensive approach encompassing legislative amendments, institutional transformations, and changes in law enforcement practices. The research confirms the possibility of a successful transition from punitive to rehabilitative models of working with juvenile offenders, even within the context of post-Soviet legal systems with limited resources. It is established that the humanisation of juvenile justice has not led to an increase in juvenile delinquency, which refutes common concerns regarding the effectiveness of soft approaches towards child offenders. These conclusions are of fundamental importance for understanding the mechanisms of legal transformation in transitional societies and for developing strategies for the implementation of international human rights standards in various national contexts. Promising directions for further research include an in-depth analysis of the socio-economic consequences of the reforms for local communities, a study of the effectiveness of various models of reintegrating juvenile offenders through longitudinal research, an investigation into the influence of cultural and religious factors on the functioning of juvenile justice systems in the region, and a comparative analysis of the financial-economic aspects of different models of juvenile justice.

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Maksut Teketayev developed a concept and a three-stage methodology for the comparative analysis of juvenile justice systems in Kazakhstan, Kyrgyzstan, Uzbekistan and China. The author collected and interpreted statistical data from international organisations, which enabled him to identify three regional reform models and demonstrate their effectiveness in reducing the use of punitive measures against minors. He prepared a manuscript, synthesising the results of the legal analysis and proposing scientifically grounded approaches to the implementation of international standards for the protection of children's rights.

Conflict of Interest
None.

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