



The Digitalization of Public Services in Uzbekistan: How to Avoid the Rigidity

KEY MESSAGE

- Digital transformation must fully comply with the Law on Administrative Procedures to uphold fairness, transparency, and procedural integrity in public service delivery.
- Public service platforms should include non-digital alternatives and safeguards to ensure that no citizen or organization is disadvantaged by digital errors.
- Algorithms, decision-making logic, and outcomes of digitalized administrative processes must be traceable, reviewable, and publicly accessible to maintain accountability.
- Legal and institutional frameworks should guide digitalization in ways that prevent administrative rigidity, protect citizens' rights, and preserve the human element in governance.

INTRODUCTION

Public services are an important mechanism through which the state engages with citizens and businesses. Public service delivery has markedly improved in Uzbekistan over the past few

years, which can be seen both in quantity and quality of services. For instance, over 200 public service centers, so-called “one-stop-shops”, have emerged across the country, enabling citizens to obtain certificates, permits, and other documents in a few minutes¹. The driving force behind the improved public service delivery and hence governance has been digitalization². For government, digital transformation has become an important political project aimed at enhancing transparency, efficiency, and gaining citizen trust. These measures were presented as a symbol of openness and a key instrument to reduce corruption and streamline bureaucratic procedures through online platforms.

Yet, the pace of digitalization of public service in Uzbekistan has come a way

¹ Gazeta.uz. (2025). ‘В Узбекистане отменяют предъявление паспорта при нотариальных действиях’ [In Uzbekistan, the requirement to present a passport for notarial acts will be abolished]. Available at: <https://www.gazeta.uz/ru/2025/09/06/notarius/> (Accessed: October 8, 2025).

² Press Service of the President of the Republic of Uzbekistan. (2025). ‘Представлены предложения по системе юстиции’ [Proposals concerning the justice system have been presented]. Available at: <https://president.uz/ru/lists/view/8466>.

before a full development of the legal institution of administrative procedures. In many other jurisdictions, the procedural and doctrinal foundations of administrative law had long been consolidated before the introduction of digital technologies. In contrast, in Uzbekistan, technological tools arrived first, while the normative and institutional architecture that should have guided the process is still evolving ³. This imbalance between tools and rules means that digital solutions, while accelerating public service delivery, risk creating new forms of rigidity and procedural opacity. In this policy brief, I describe how this divergence emerged and what consequences it has produced for public service delivery. I argue that pursuing rapid digitalization without fully embedding it within coherent administrative procedures and institutional safeguards can produce severe governance failures, even more than those found in traditional bureaucratic systems.

PUBLIC SERVICES DIGITALIZATION AND ADMINISTRATIVE LAW REFORM

Over the past few years, Uzbekistan has conducted two major and interrelated policy directions that define the current stage of governance reform. The *first* concerns the digitalization of public service delivery, an ambitious effort to

³ Khamedov, I.A. (2020) '*ЗАП: Закон, который не исполняется*' [LAP: The Law That Is Not Enforced]. *Gazeta.uz*. Available at: <https://www.gazeta.uz/ru/2020/06/08/legislation/>; Khamedov, I.A. (2021) '*ЗАП: закон, ожидающий исполнения*' [LAP: The Law Awaiting Enforcement]. *Gazeta.uz*. Available at: <https://www.gazeta.uz/ru/2021/04/20/administrative-procedures/>.

modernize state-citizen interactions, enhance efficiency, and increase transparency through technological solutions. The *second* centers on the development of administrative law, particularly the implementation of administrative procedures and the reform of administrative justice, which provide the legal foundation for ensuring fairness, accountability, and due process within public administration.

Before we proceed with the problem analysis, it is important to establish a clear link between the two reforms mentioned above. Understanding this relationship is essential, as both areas form the backbone of contemporary administrative law, public service and governance reform in Uzbekistan. While digitalization seeks to modernize and streamline state-citizen interactions through technological means, administrative procedure provides the legal and institutional framework that ensures such interactions remain lawful, transparent, and accountable. In scholarly terms, the *public services* constitute an approach that governs the execution of publicly significant and service-oriented actions within the sphere of public administration. *Administrative procedures* likewise represent a legal regime in this domain. Accordingly, when public services are rendered by administrative bodies through the exercise of their authoritative powers, such activities must be conducted in strict compliance with administrative procedural norms ⁴.

⁴ Khamedov, I.A., Kutybaeva, E.D., Tsai, I.M. and Faiziev, F.M. (2023) *Contemporary Administrative Law of the Republic of Uzbekistan*. Tashkent: Dimal, pp. 620-621.

The intersection of these two dimensions through technological innovation and procedural legality defines the trajectory of Uzbekistan's administrative transformation. It also highlights the challenges of aligning rapid digital progress with the slower evolution of legal norms and institutional practices.

Public Services Digitalization

Improving the public service delivery has been the important cornerstone of governance reform in Uzbekistan. As of today, the priority directions for the development of this sphere are defined in the *Uzbekistan – 2030 Strategy*, approved by the Presidential Decree of the Republic of Uzbekistan No. UP-158 of 11 September 2023. This document sets out the task of expanding the scale of digitalization of public services and reducing bureaucracy in relations between citizens and the state. The goals set within the Strategy include full digitalization of all public services, delivery of most services in the Unified Portal of Interactive Public Services, transfer of some public services to private sector and reducing the number of permits. Additionally, the government plans to expand 900 types of services provided online by 2027, installing 1,100 interactive kiosks in neighborhoods, and abolishing requirements to present 30 categories of documents that will instead be exchanged between state databases ⁵. This can demonstrate that Uzbekistan is rapidly catching up to global e-governance standards. The improvement of the public services system is also

envisaged within the framework of annual State Programmes. For example, according to the *State Programme for 2025* ⁶, starting from 1 October 2025, a complete transition to electronic document management in the provision of public services must have been ensured ⁷.

Administrative Procedures and Justice

In Uzbekistan, administrative law is in the process of transition from the model developed after the independence with Soviet features to a new model in line with developed countries. In that sense, administrative law has become a core concept for the ongoing process of building a legal state in the country. Starting point of this process was the adoption of the Law on Administrative Procedures (hereinafter – LAP) in 2018. This reform established two key pillars for the citizen-

⁵ Gazeta.uz. (2025). 'В Узбекистане отменяют предъявление паспорта при нотариальных действиях' [In Uzbekistan, the requirement to present a passport for notarial acts will be abolished]. Available at: <https://www.gazeta.uz/ru/2025/09/06/notarius/>

⁶ Decree of the President of the Republic of Uzbekistan No. UP-16 of 30 January 2025 "On the State Programme for the Implementation of the Strategy 'Uzbekistan-2030' in the Year of Environmental Protection and 'Green Economy'." Lex.uz, available at: <https://lex.uz/ru/docs/7369745>.

⁷ See also other regulations in the field of public services digitalization: Decree of the President of the Republic of Uzbekistan No. UP-84 of 8 May 2025 "On the Further Improvement of the State System of Social Support for Poor Families"; Decree of the President of the Republic of Uzbekistan No. UP-71 of 22 April 2025 "On Measures for the Effective Organization of the Implementation of Priority Tasks Determined for the Further Improvement of the Anti-Corruption System"; Resolution of the President of the Republic of Uzbekistan No. PP-155 of 6 May 2025 "On Comprehensive Measures for the Digital Transformation of the Internal Affairs System"; Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 296 of 1 June 2025 "On the Implementation of a System for Assessing Traffic Violations Based on Penalty Points".

state interaction: *administrative procedures*, regulated by the LAP *and administrative justice*, ensured through the creation of specialized administrative courts. The former provides procedural guarantees for citizens and legal entities in their interactions with the government, while the latter provides judicial oversight.

Although the law established these principles, their implementation faces challenges in real life. On the one hand, it has been difficult to fully integrate the procedural aspect of the law into the legal practice of state agencies ⁸. On the other, administrative justice mechanisms are weakly enforced. Succinctly stated, the administrative courts in Uzbekistan have, thus far, struggled to fulfill their mission of ensuring effective judicial oversight over the legality of administrative decisions and actions. In practice, these courts have applied the LAP only sporadically, and in certain cases, have even deliberately refrained from invoking its provisions, despite explicit references to them by applicants. Such a situation reveals a serious systemic deficiency and failure of judicial bodies to consistently apply the LAP ⁹.

In this context, the first step toward the convergence of the two policy directions, administrative justice and public services, was taken in June 2024,

⁸ Khamedov, I.A. (2020) 'ЗАП: Закон, который не исполняется' [LAP: The Law That Is Not Enforced]. *Gazeta.uz*. Available at: <https://www.gazeta.uz/ru/2020/06/08/legislation/>; Khamedov, I.A. (2021) 'ЗАП: закон, ожидающий исполнения' [LAP: The Law Awaiting Enforcement]. *Gazeta.uz*. Available at: <https://www.gazeta.uz/ru/2021/04/20/administrative-procedures/>.

when the government launched a legal experiment aimed at introducing pre-trial administrative justice mechanisms within selected public services. For instance, between 1 July 2024 and 1 July 2026, Uzbekistan is conducting a legal experiment in Tashkent introducing a new pre-judicial review mechanism for administrative acts related to the provision of public services that are inconsistent with legislation. Under this experiment, two new institutional structures are being created: a High Appeals Council under the Ministry of Justice, and an Appeals Council under the Tashkent City Department of Justice. The councils' decisions are to be published on the "E-qaror" electronic platform, communicated to the parties to the administrative proceedings, and are binding for administrative bodies. While these decisions may be appealed to the courts by interested persons, they are final and non-appealable to administrative authorities ¹⁰. Although the legal experiment started in July 2024, its implementation did not commence until May 2025 (at least ten months later) following the adoption of the corresponding presidential resolution

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⁹ Ibid at 612-614.

¹⁰ Paragraph 15 of the Presidential Decree of the Republic of Uzbekistan No. UP-80 of 24 May 2024 "*On the Further Enhancement of Accountability and Formation of a Compact Management System of Justice Bodies and Institutions within the Framework of Administrative Reforms*". Available at: <https://lex.uz/ru/docs/6937316>.

¹¹ Resolution of the President of the Republic of Uzbekistan No. PP-188 of 19 May 2025 "*On Introducing as a Legal Experiment a New Procedure of Pre-Court Review of Disputes over Administrative Acts Related to the Provision of Public Services*", Art. 1 and Annexes. Available at: <https://lex.uz/ru/docs/7532802>.

Moreover, the requirement to publish the decisions of the Council has not been fulfilled to date, as none of these decisions have been made publicly available.

REGULATORY AND LAW-ENFORCEMENT ISSUES

The central issue lies in the misalignment between two concurrent reform processes: the digitalization of public service delivery and the implementation of administrative procedures. This divergence becomes apparent in two principal domains: first, within the regulatory frameworks that govern individual public services; and second, in the legal practices that shape their enforcement and delivery in administrative reality.

Enforcing the law in the field of public services operates primarily in the form of administrative regulations. In Uzbekistan, the government adopts a separate administrative regulation for each specific public service, defining the procedures, criteria, and conditions under which it is to be delivered. For instance, the *Administrative Regulation on the Provision of the State Service for the Conservation of Agricultural Land*¹² establishes that the authorized body may reject a project or issue a negative conclusion on land conservation if the “Explanatory Note” section of the project contains *unreliable* or *questionable*

information. The key problem with such administrative regulations lies in their inconsistency with the LAP. In particular, Article 45 of the LAP stipulates that if an application contains correctable errors, the administrative body must provide the applicant with an opportunity and sufficient time to rectify them. Likewise, if an application lacks mandatory documents required by law or referenced by the applicant, without which the issuance of an administrative act is impossible, the administrative body is obliged to allow the applicant to submit the missing documents within a specified period (not less than 5 days).

However, the aforementioned administrative regulation restricts the applicant’s ability to correct deficiencies, thereby contradicting the procedural guarantees enshrined in the LAP. This problem is symptomatic of a broader pattern observed across all administrative regulations currently in force in Uzbekistan. In the context of ongoing digitalization of public services, administrative regulations must never be designed or applied in ways that limit the procedural rights of interested parties to submit, supplement, or correct their applications for public services. This is a tiny bit of the broader issue of public services regulations’ inconsistency with the LAP.

From the perspective of public service delivery aimed at enhancing transparency, Uzbekistan’s digital reforms have been also presented to reduce the transactional costs associated with

¹² Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 590 of 17 September 2025 “*On the Approval of the Administrative Regulation for the Provision of the State Service on the Conservation of Agricultural Land*”.

interactions between citizens and the state. Anyway, one should note that while digitalization can indeed minimize direct personal contact and streamline administrative processes, it does not automatically guarantee the protection of procedural rights that underpin fair administrative proceedings. On the contrary, digital systems may inadvertently diminish the flexibility that citizens and businesses require to navigate complex regulatory environments, thereby creating new forms of “digital obstacles” that can, in turn, generate opportunities for corruption or social exclusion.

Brief interviews conducted for the purposes of this study indicate that such rigidity tends to arise precisely at the interface between law and code. Instead of translating legal norms into a more accessible and user-friendly medium, certain digital platforms inadvertently constrain them. Platforms over-enforce where the statute does not command, under-enforce where it does, and fracture legal certainty when registers disagree.

For instance, personal identity and authentication are the most visible choke points. Issuing electronic signatures remotely is functionally foreclosed for many non-residents because identity proofing is tied to a mobile application linked to the national PINFL (Personal Identification Number) and appears non-operational abroad. Foreign signatories are pushed into physical presence for photo and biometrics, even when the underlying material law does not require

such burden. In competition filings, pre-merger consent must be signed via my.gov.uz with a digital signature (DS), yet a DS is unavailable without a Tax Identification Number, which itself presupposes physical presence in Uzbekistan for biometrics collection.

Data schema and business-rule design exhibit a second axis of rigidity. For example, cadastral processes illustrate the problem where online workflows still expect legacy sixteen-digit identifiers, while new procedures¹³ issue fourteen-digit numbers¹⁴. Illustrative example can be found in the field of corporate governance. Registry interfaces and signature infrastructures often recognize only a single “director,” blocking accurate recording of boards and preventing issuance of electronic signatures to multiple authorized persons (several directors). In labor administration, the legislation permits aggregate employment up to 1.5 full-time equivalents, yet the my.mehnat.uz platform interface rejects combinations such as multiple 0.25 posts. The most corrosive form of rigidity arises when state systems announce incompatible facts about rights. As reported in interview, a homeowner’s plot is taxed and displayed in MyGov platform as owned, yet a notary’s electronic check labels the entire parcel “self-seizure”; rectification is deferred for two

¹³ Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 555 of 09 September 2024 *“On the Approval of the Regulation on the Procedure for Cadastral Division of the Territory of the Republic of Uzbekistan and the Formation of Cadastral Numbers of Real Property Objects”*. Available at: <https://www.lex.uz/docs/7101388>

¹⁴ The issue was observed in September 2025.

years under a legalization program that lumps undisputed and disputed land together ¹⁵. During that interregnum, alienation is effectively blocked.

A similar dynamic can be observed in the licensing process for private universities, where one authority attributes the issuance of a license to a “system error,” while another publicly denies that it was an error ¹⁶. This situation raises critical legal questions: what should be the legal consequences in such cases, and who bears responsibility for an “error” that has resulted in financial losses for the affected business or homeowner? Undoubtedly, there is a growing disjunction between legality as a normative framework and legality as operationalized through code.

CONCLUSION AND POLICY RECOMMENDATIONS

In conclusion, it is clear that Uzbekistan has undertaken ambitious and systematic efforts to bring governance into the digital era. The expansion of digital public services from approximately 500 to over 900, together with the elimination of redundant paperwork, marks a substantial step toward a more efficient, transparent, and citizen-oriented system

of public administration. The main challenge, however, is not to halt or reverse digitalization, but to ensure that its development remains consistent with the principles of administrative law and safeguards procedural fairness and due process.

Building on this analysis, the following policy measures are proposed to address the risks of administrative rigidity and to strengthen the overall effectiveness of public service digitalization in Uzbekistan:

Regulatory:

- The government should harmonize administrative regulations on public services with the LAP.
- Administrative regulations in the sphere of public services should be designed to mitigate automation bias by incorporating procedural flexibility and ensuring the availability of alternative, non-automated channels for service access. It is imperative that no individual or legal entity be deprived of the opportunity to obtain a public service as a result of digital errors.

Institutional:

- The government should collaborate with legal scholars and systems experts to implement and preserve the essential guarantees of due process within the evolving context of public services digitalization ¹⁷.

¹⁵ Law of the Republic of Uzbekistan No. ZRU-937 of 5 August 2024 “On Recognition of Rights to Illegally Occupied Land Plots and Structures”. Available at: <https://lex.uz/docs/7049444>.

¹⁶ Gazeta.uz. (2025). ‘Минвуз заявил, что пять вузов получили новые разрешения по ошибке. Минюст опроверг ошибку’ [The Ministry of Higher Education stated that five universities had received new licenses by mistake. The Ministry of Justice denied that any mistake had occurred]. Available at: <https://www.gazeta.uz/ru/2025/08/29/edu/>.

¹⁷ Citron, D.K. (2007). Technological due process. *Wash. UL Rev.*, 85, 1249, p. 1301.

- When a decision is made through automated procedures, the platform's design must ensure the secure storage and traceability of the algorithms and decision-making logic used in the process. This requirement should also be incorporated into the draft *Law on Public Services* currently under development, to strengthen transparency, accountability, and the right to effective review.
- The outcomes and decisions of the Pre-Trial Administrative Justice legal experiment should be made publicly available in strict compliance with the provisions of the Presidential Decree to ensure transparency and accountability ¹⁸. Such a publication will also contribute to the development and accumulation of institutional experience.
- Legal review of draft normative legal acts should guarantee that the process of automation does not inadvertently create new regulatory provisions or modify the scope of existing legislative norms, whether through unjustified restriction or expansion.
- All digitalization initiatives should be designed to prevent automation from generating systemic rigidity that undermines fairness, or access within administrative procedures.

¹⁸ Paragraph 15 of the Presidential Decree of the Republic of Uzbekistan No. UP-80 of 24 May 2024 *"On the Further Enhancement of Accountability and Formation of a Compact Management System of Justice Bodies and Institutions within the Framework of Administrative Reforms"*. Available at: <https://lex.uz/ru/docs/6937316>.

DISCLAIMER

The study's findings, interpretations, views, conclusions, and recommendations, as contained in this publication, reflect the authors' view and do not necessarily reflect the official opinion of WIUT or CPRO.

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