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ONLINE PETITIONS AS NEW MEANS OF POLITICAL COMMUNICATION: A CRITICAL ANALYSIS OF THE UK CASE AND ITS RELEVANCE FOR KAZAKHSTAN

The article deals with the role of electronic petitions as a means of political communication, with a particular focus on the experiences of the United Kingdom and the evaluation of its applicability to Kazakhstan. The analysis examines the challenges to the e-petitioning practice, comparing the institutionalized frameworks and assessing its effectiveness in fostering political participation. The study also questions key indicators of success or failure of e-petitions.

The case studies cover the differences in the legal and institutional framework for e-petitions in the UK and Kazakhstan, as well as the impact of external actors. The study also evaluates how institutional setup, political culture, including, political situation, and political polarization, in each country, affects the responsiveness of governments to petitions.

The authors point at the limitations of e-petitions as a tool for democratic engagement and at the significant bureaucratic and institutional constraints in both cases, including the lack of mechanisms to ensure a meaningful response, as well as the frequent disregard of petitions, when they challenge established policies or political agendas of governments.

Key words: e-petitions, political communication, digital democracy, political participation, citizen engagement, digital activism.

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Онлайн петициялар саяси коммуникацияның жаңа құралы ретінде: Ұлыбритания кейсіне сыни талдау және оның Қазақстан үшін өзектілігі

Мақалада электрондық петициялар саяси коммуникация құралы ретінде қарастырылып, Ұлыбритания тәжірибесіне және оның Қазақстанға қолдану мүмкіндігіне ерекше назар аударылады. Талдау электрондық петицияларды қолдану тәжірибесіндегі мәселелерді қарастырып, институционализацияланған құрылымдарды салыстырып және олардың саяси қатысуды ынталандырудағы тиімділігін бағалайды. Зерттеу сонымен қатар электрондық петициялардың табысты немесе сәтсіз болуының негізгі көрсеткіштерін талқылайды.

Зерттеу барысында Ұлыбритания мен Қазақстандағы электрондық петициялардың құқықтық және институционалдық базасындағы айырмашылықтар, сондай-ақ сыртқы субъектілердің әсері зерттеледі. Сонымен бірге, әр елдегі саяси мәдениеттің, институционалдық құрылым мен саяси ахуалдың, соның ішінде саяси поляризацияның, петицияларға үкіметтердің реакциясына қалай ықпал ететіні бағаланады.

Авторлар электрондық петициялардың демократиялық өзара іс-қимыл құралы ретіндегі шектеулерін атап өтеді, әсіресе екі елде де айтарлықтай бюрократиялық және институционалдық кедергілер бар екенін көрсетеді. Мұндай кедергілерге мазмұнды жауап беруді қамтамасыз ететін тетіктердің болмауы және петициялардың орнатылған саясатқа немесе саяси ақпараттық күн тәртібіне қайшы келген жағдайда жиі еленбеуі жатады.

Түйін сөздер: электрондық петициялар, саяси коммуникация, цифрлық демократия, саяси қатысу, азаматтық белсенділік, цифрлық белсенділік.

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Онлайн-петиции как новое средство политической коммуникации: критический анализ кейса Великобритании и его актуальность для Казахстана

В статье рассматривается роль электронных петиций как средства политической коммуникации, с особым акцентом на опыте Великобритании и оценке его применимости к Казахстану. Анализ рассматривает проблемы практики электронных петиций, сравнивая институционализированные структуры и оценивая ее эффективность в содействии политическому участию. Ставятся под сомнения ключевые показатели успеха или неудачи электронных петиций.

Исследования случаев охватывают различия в правовой и институциональной базе для электронных петиций в Великобритании и Казахстане, а также влияние внешних субъектов. Оценивается то, как политическая культура, включая институциональную структуру и политическую ситуацию, а также политическую поляризацию в каждой стране влияет на реакцию правительств на петиции.

Авторы указывают на ограничения электронных петиций как инструмента демократического взаимодействия при существенных бюрократических и институциональных ограничениях в обоих случаях, в том числе отсутствие механизмов для обеспечения содержательного ответа, а также частое игнорирование петиций, когда они бросают вызов установленной политике или политическим повесткам дня.

Ключевые слова: электронные петиции, политическая коммуникация, цифровая демократия, политическое участие, гражданская активность, цифровой активизм.

Introduction

Political theorists as well as empirical researchers have been studying the communication between governments and citizens, recognizing its importance for efficiency and legitimacy in democracies and beyond. This communication is most commonly conceptualized as a series of communicative acts between civil society and government institutions aimed at facilitating public debate, producing and conveying public opinion, and enhancing transparency and accountability (Habermas, 1989; Dhanagare, 2001). However, beyond the specific emphasis on political culture (Luhmann, 2000; Volodenkov, 2017), modern society as a whole may be conceptualized as a multichannel communication network of government relations (Stanyer, 2007; Sorina, 2014) or even as a necessity for survival of a polity per se (Rawnsley, 2005; Yarmak, 2014).

As recent technological advancements introduced and dissimilated its new forms, social media now facilitate direct engagement and communication bypassing conventional means through political campaign apps and other data-driven strategies as well as online petitions, digital polls and live Q&A sessions. However, while digitalization has improved transparency, efficiency, and democratization, it also poses a number of challenges. Big data analytics, reinforced with sentiment analysis, enables to craft messages that resonate with specific demographics (Gillespie, 2014). Similar tasks may be fulfilled through engagement of influencers and digital opinion leaders. Political agendas and affiliations of digital platforms' owners and CEOs, along with the use of chatbots and other AI-generated content may significantly compromise any political discourse practices (Zuboff, 2019). As for online petitioning, despite its rapid spread worldwide, its effectiveness and role within a representative democratic regime remain uncertain.

Literature Review

A number of studies offer some valuable insights for the understanding of the role of petitions to political participations of citizens and societies and, in particular, e-petitions in the now digital era. First, Habermas' theory of the public sphere, outlined in his seminal work *The Structural Transformation of the Public Sphere* (1989), is critical for understanding democratic participation and communication. The public sphere, Habermas states, is a space for individuals to gather and to deliberate on societal issues to form public opinion and, ultimately to influence political decision-making. According to Habermas, rational-critical debate, free from the constraints of government or market forces, is essential for a functioning democracy. In a similar vein, Castells' *Communication Power* (2011) highlights democratizing and emancipatory

potential of the new technical means of communication, arguing that they provide a space for counterhegemonic voices. This optimism was shared by numerous scholars (Benkler, 2006; Shirky, 2008; Jenkins, Ford & Green, 2013), while the others are more cautious (Dean, 2009), or overall critical (Morozov, 2011; Bauman, 2013; Fraser, 2024).

The theory of the public sphere is complimented by those on deliberative democracy. participatory democracy, and digital democracy. Authors such as Cohen (1997) and Fishkin (2011) argue in faviour of citizen engagement in discussions and deliberation over policies to achieve consensus. However, some scholars (Gutmann, Thompson, 2004) assume that more than the mere collection of opinions is necessary for a democracy to function; there must also be respect for differing views and argumentation based on evidence and reason. The concept of participatory democracy, as articulated by Pateman (1970), also emphasizes active citizen involvement in political processes. Similarly, the theory of digital democracy, discussed by Held (2006) and Papacharissi (2015), focuses on a direct connection between technology and political participation. Nevertheless, concerns have been raised regarding the lack depth and effectiveness of such participation, with critics like Pateman (1970) and Schudson (1998) questioning the potential of digital political communication to lead to substantive political change.

The literature dealing with the challenges of digitalization in political participation and communication highlights the impact of big data analytics, artificial intelligence and digital platforms. Some authors focus on their effect on political parties (Gibson & Ward, 2009; Barberà et al, 2021), or on how it transforms voter targeting and campaign strategies (Ruppert, Isin & Bigo, 2017; Postill, 2020; Vreese & Votta, 2023), or even on digital challenges to democracy itself. Unver (2017) and Wilhelm (2000) warn of new forms of digital authoritarianism and the potential of the digital platforms to reinforce existing inequalities, while Beaufort (2021) emphases how social media algorithms may lead to greater polarization and fragmentation of public discourse.

Finally, there is a growing body of literature specifically focused on online petitioning. Many authors emphasize the role of online petitions in improving civic engagement and examine their effectiveness, highlighting positive impact on democratic participation and policy change (Morva, 2016; Rosenberger, Seisl, Stadlmair & Dalpra, 2022). However, its efficiency is frequently problematized as they may not result in tangible policy change and face resistance from political institutions when they do not align with government agendas. Optimism about using online petitioning as a means to foster long-term political change is increasingly replaced by caution (Vromen, Halpin, & Vaughan, 2022) and concerns about institutional and technical barriers (Böhle & Riehm, 2013, Briassoulis, 2021). Media attention, the way of delivery, and the language are important factors (Setyoko, Wahyuningrat & Kurniasih, 2023). Petitions containing positive emotions, as opposed to those with heavier moral messages, tend to be more successful (Elnoshokaty, Deng & Kwak, 2016). More broadly, narratives and popularity clues may affect individuals' decisions to sign online petitions (Porten-Cheé et al, 2023). Thus, the notion of 'slacktivism' has been introduced (Morozov, 2011; Piat, 2019; Rosenberger et al, 2022). One of the newer area of focus is the challenges posed by digital manipulation (Aichholzer & Rose, 2020; Kaur et al, 2024).

Considering these trends, this article specifically examines the institutionalization and implementation of e-petitioning by analyzing the cases of the UK and Kazakhstan. It evaluates utility of both successful and ineffectual examples from the UK and assesses their relevance to Kazakhstan. The authors interrogate traditional efficiency indicators of online petitioning and discuss the broader implications for contemporary representative democratic regimes regardless their exteriority.

Methodology

A pioneer in digital democracy, the UK was chosen as a benchmark for this paper. Indeed, the country features a long tradition of petitioning as well as the current mechanisms to integrate online petitions into the legislative process that has recently evolved into the institutionalization of e-petitions and citizen participation. In this study, the authors first compared the laws governing e-petitions in both the UK and Kazakhstan. Following this, a qualitative critical analysis was conducted to identify the challenges and trends of the e-petitioning practices in the UK and to evaluate the applicability of the UK experience and its relevance for Kazakhstan.

The main source for the UK-based data was the official Parliament website, which functions as a repository for petition submissions, government responses, and parliamentary and public debates. Mainstream and alternative media were also consulted (i.e. the BBC, The Guardian, New Statesman, and Navara Media), to gain a deeper understanding of the broader public discourse surrounding e-petitions in the UK. Such analysis helped discern the

patterns of public and detect the trends in digital engagement, media and external actors' influence, and the government's responses to high-profile petitions.

In spite of an emerging petition culture, Kazakhstan petitions are a younger phenomenon and have been developing mostly online. In this respect, the official e-petitioning platform, ePetitions.kz offers an excellent starting point to understand the latest trends in the country. The platform was established after petitions were regulated and a legislation was adopted so that data on Kazakhstan is mostly taken from that platform but integrated by opinions and understanding of public discourse gathered from a variety of main newspapers and media. The platform provides the information on petitions, signatures, and government responses.

Both cases studies, in terms of the data collection and analysis, were designed to achieve two specific objectives; firstly, to evaluate the efficiency and responsiveness of the e-petitioning systems and to assess their overall performance; and second, to understand the broader political, cultural, and institutional contexts that influence public participation in the petitioning practices in both countries. As a result of these case studies, the authors were able to evaluate whether the challenges observed in the UK are present in Kazakhstan and to discuss their implications for citizen engagement here.

Brief History of Online Petitions

Petitions as a collective act of communication with government has a long history. The Magna Carta, which enshrined the right to petition in 1215, was followed by the Petition of Right passed in 1628 and the English Bill of Rights in 1689 (Huzzey et al, 2024). Throughout 17th and 18th centuries, petitions played an essential role in political modernization in Western Europe and North America. During the 20th century, with the rise of mass politics, petitions moved beyond gentlemen's clubs and became a common widespread practice (Huzzey & Miller, 2023). The digital revolution brought about online petitions, revitalizing hopes for "ideal speech situation" (Shabani, 2003 p.49).

The following is not exhaustive list of online privately launched petitions platforms. ThePetitionSite.com, founded in 1998 is often cited as one of the first online petition platforms together with Care2 Petitions and MoveOn.org (Mahmood, 2021). The first internationally recognized Internet petition service, Petition Online, was launched in 1999. It collected 93 million signatures in 2011 before being acquired by perhaps the most globally well-known Change.org (Change.org, 2024).

Additionally, government-backed online petition platforms emerged in parallel with the privately owned ones. In 2005, Germany's Bundestag launched a digital platform where petitions with 50,000 signatures within four weeks would be considered during parliamentary debate (Bundestag ePetition, 2024). Australia's E-Petition System was established at the federal level in 2010 (Australian Parliament Petitions, 2024). 'We the People', launched in 2011 under the Obama administration, is the platform where petitions reaching 100,000 signatures within 30 days receive a response from the White House (We the People – White House, 2024). That same year, the United Kingdom launched its Parliament Petitions site (UK Parliament Petitions, 2024). Similar service began in Canada in 2015 (Canada Petitions, 2024), France (French E-Petition, 2024), and Estonia in 2016 (Estonian e-Petition, 2024). China digitalized its 1950s' Xinfang (Letters and Visits) system in the early 2000s (People's Daily, 2024) and India transformed its Public Grievance Portal of 2006 into E-Petition in 2020 (India E-Petition Platform, 2024). Additionally, online petitioning started in Turkey (Turkish Grand National Assembly, 2024), Russia (Petitions of the President of Russia, 2024), Belarus in 2011 (Belarus Government, 2024), and Vietnam in 2015 (Vietnam Government, 2024).

E-petitioning: the UK and Kazakhstan Cases

The Law of the Republic of Kazakhstan No. 31-VIII 3PK, dated October 2, 2023, regulates the submission, handling, and processing of petitions. In the UK, the petition process is governed by various laws. Key differences between the two include filing process, support threshold, consideration timeline, decision process, and the legal basis for appeal.

In Kazakhstan, petitions require detailed personal information, including the applicant's full name, identity number, and supporting documents (31-VIII 3PK, Article 90-2), while in the UK, petitions may be submitted with a name and email address (The Petitions Act 2011). In Kazakhstan support thresholds for national issues is 50,000 signatures (31-VIII 3PK, Article 90-3), while in the UK 100,000 signatures are required for consideration by Parliament, and 10,000 signatures are sufficient for a government response (The Petitions Act 2011, Section 4). Kazakhstan law stipulates those petitions must be considered within 40 working days by the central government bodies (31-VIII 3PK, Article 90-5). In the UK, however, there is no specific timeline for parliamentary debates, but there

is 60-day requirement for the government response (The Petitions Act 2011, Section 5). In Kazakhstan, under Article 90-6, decisions following the considerations of the petition must be legally justified and can be appealed. In the UK, although petitions may lead to a parliamentary debate or a government response, there is no formal appeal procedure (The Petitions Act 2011, Section 6). Kazakhstan's Law specifically enumerates the subject petitions cannot address, which mostly pertain to the constitutional matters such as rights and freedoms, constitutional and public order, territorial, defense and national security issues, and ongoing legal proceedings (31-VIII 3PK, Article 90 (3). While in the UK, although there are similar restrictions, additionally to those against complains of a personal nature and on the matters outside the direct control of Parliament, petitions may still be submitted. However, they will be automatically rejected by the government and not be accepted for parliamentary debate.

The following is an analysis of the UK case study which covers the most popular petitions since 2018 and their respective consequences. The UK petitioning landscape is dominated by the official platform and the above mentioned private Change.org.

In total, during the period since 2018, six petitions submitted to the UK Parliament platform received more than 500,000 signatures. In 2018, a petition with 598,254 signatures called for banning all ISIS members from returning to UK. In response, the government revoked the citizenship and passports of several individuals (UK Parliament, 2018), raising legal and human rights concerns, particularly with regard to the UK's obligations under the IC-CPR (OHCHR, 2020).

The Brexit proved to be one of the most pressing issues. The petition calling for revoking Article 50 and remaining in the EU, launched in early 2019, is the most popular petition on the Parliament website so far. The debate in Parliament was held in April 2019. At the time the number of signatures stood at 5.75 million. Eventually it amassed over 6 million signatures. The reaction of the government is noteworthy. It responded negatively immediately following the announcement before the debate: "We will honor the result of the 2016 referendum and work with Parliament to deliver a deal that ensures we leave the European Union" (BBC, 2019). Three years earlier, the 2nd EU Referendum petition received over 4,150,262 million, yet the UK government maintained its stance on leaving the EU reaffirming binding nature of the 2016 referendum and no policy change occurred then. Additionally, 'Leave the EU without a deal' petition, also launched

in 2019, reached 608,152 signatures. The response was that "the deal that we have reached with the EU is the right one… Leaving without a deal would risk uncertainty for the economy, for business and for citizens" (UK Parliament, 2019).

Another motivation for launching and signing a petition is general frustration with the performance of the current parliament. In 2019, the petition against the government's decision to prorogue parliament received over 1.7 million signatures. Later, the UK Supreme Court ruled that the prorogation was unlawful (BBC, 2019). In response to the petition calling for an early General Election, which in 2022 received more than 900,000 signatures, the existing parliamentary schedule was maintained. (UK Parliament, 2022). The petition was unsuccessful. Similar petition was launched in November 2024. It has received more them three million signatures so far and is scheduled for debate in Parliament on 6 January 2025. There are, however, several compelling reasons to believe that early general elections will not be called, as indicated in the following discussion.

There have been several petitions regarding materials conditions of various population groups. During the COVID-19 pandemic, 'End Child Food Poverty' petition gathered over 1.1 million signatures and was debated in Parliament in May 2021. Tas a result, the government extended the provision of free school meals during school holidays and introduced the Holiday Activities and Food programme. This was seen as a partial success. In recent years, several petitions have also advocated for increases in the minimum wage and other benefits. for example, a petition calling for of minimum wage for licensed security closed in October, 2022 with 11,475 signatures. The government responded that it had no plans to introduce a specific minimum wage for this category of workers. Another petition calling for an increase on Career's Allowance to match the pay for a full-time job closed in December, 2023 with 13,914 signatures. The government explained that allowance exists to provide financial recognition for those unable to work full-time, but did not increase the amount. A petition requesting that the State Pension to be raised to the level of minimum wage closed in January, 2024 with 17,683 signatures. The government informed that there were no plans to increase the basic State Pension (UK Parliament Petitions, 2024). Evidently, the government responses reflect a reluctance to provide any significant increases beyond the established policies.

In 2024, total 771 petitions were posted on the official website. Of these, 366 were rejected, leav-

ing 405 petitions currently open. The government responded to 17 petitions posted on the official online petition platform. Of these, 14 petitions were responded negatively. The notable examples are the petitions calling a general election, criminalizing breaking manifesto commitments, changing the UK electoral system to proportional representation, rejoin the EU as a full member, retaining the tax breaks for private schools and inheritance tax relief for working farms, banning fossil fuel advertising and sponsorship, and abolishing the TV license. However, the government agreed to run public information campaign on the climate crisis and set a minimum age for children to have social media accounts (UK Parliament Petitions, 2024).

The other opportunity to exercise the right to petition is provided outside official platforms. For example, Change.org founded in 2007 by Ben Rattray as a global online petition platform (Geron, 2012). The private nature of such platforms does not oblige governments to consider and response, not alone implement them regardless the number of signatures. In other words, Change.org is a pivotal tool in digital activism while shaping public discourse, but not influencing directly policy decisions as shown in the examples below.

The petition titled 'Make Sign Language part of the National Curriculum', initially posted on Change.org and doubled on the official UK Parliament platform, received 300,000 signatures and resulted in adoption of the BSL Act In 2022, while Stop the Privatization of the NHS' petition on Change.org and on the official UK Parliament platform with over 1.2 million signatures only contributed in ongoing political debates. The other vivid example is the petition against Tony Blair's knighthood opened on Change.org, 2022 due to his role in the Iraq War, which surpassed one million signatures within a few days (BBC News, 2022). In the result, the knighthood, granted by the Sovereign, was not revoked.

Let us present a case study of Kazakhstan, where citizens began posting online petitions as early as 2020. The official ePetition.kz platform was launched in April 2024, following the adoption of the respective legislature in October 2023 as a part of a broader effort to enhance citizen engagement through e-government system (Vlast.kz; 2024). Under the Law 31-VIII 3PK (2023), the nationwide thresholds for the government response is 50,000 signatures. In addition to the international Change.org and Avaaz.org, there is also unofficial nationwide private ALASH online platform, which was launched in December 2024. In 2024 there were 98

open petitions on the official website (ePetition.kz, 2024).

These are the examples of the petitions that exceeded 50, 000 signatories and received the response by the government in 2024 in Kazakhstan. The petition 'We are against open and hidden propaganda of LGBT in the Republic of Kazakhstan!' was initiated in May 2024 by the 'Kazakhstan Union of Parents'. The response by the Ministry of Culture and Information emphasized the need to balance cultural traditions with international human rights obligations of Kazakhstan and advocated for a cautious approach to potential changes in the respective legislature (ePetittion.kz, 2024). In April 2024 a petition was launched calling for reinstatement of the three time zones in Kazakhstan. In May 2024, two more petitions gained over 50,000 signatures: one is about the abolition of the utility tax and the other is calling for banning public servants from participating in gambling. Both were responded negatively by the respective government bodies (Tengrinews.kz, 2024).

Discussion

Political Science vs. Political Reality. The UK case study vividly illustrates the discrepancy between the theoretical ideals of digital democracy and the practical realities of political engagement through online petitions. Literature commonly suggests that petitions are effective for maintenance of dialogue between citizenry and government institutions, with the potential to reshape political culture, reinvigorate political communication, and enhance engagement. It is also commonly believed that effectiveness of an online petitions is measured by its ability to result in political change. Yet, in reality, governments tend to response positively and initiate political change only when the subject matter of a petition aligns with their own policies regardless the number of signatures. Despite petitions amassing millions of signatures, governments often reject them, and there are no formal channels for the public to seek recourse.

In terms of efficiency, the number of signatures is often viewed as an indicator of public engagement and, consequently, seriousness of the issue at hand. However, the UK case study shows that even petitions with millions of signatures have been repeatedly met with negative responses. Another issue concerns the digital nature of the "public space" where the petitions are launched and discussed. Thus, online petitions are often criticized for their "slacktivist", performative character. An additional

complication is the role of media coverage, which often help to gather more signatures. However, as previously indicated, large number of signatures does not guarantee the success of a petition. The discrepancy between the media coverage and likelihood of policy change further complicates the question of the efficiency of digital political activism. Finally, the Influence of external actors such as private individuals of disproportionate material and social capital, or even malevolent foreign entities can distort any petitioning process.

The following example from the UK case study illustrates all these issues. More importantly, it invites a deeper examination of more a fundamental question, the role and place of petitions within a representative liberal democracy, as opposed to a plebiscitary, direct one.

As it was mentioned earlier, in November 2024, a petition, calling for a general election, launched on the UK Parliament's official website is currently exceeding 3 million signatures. Two months later, the UK government responded to the petition stating that it was "elected at the July 2024 general election and had no intentions to discontinue implementing its existing policies and commitments" (UK Parliament Petitions, 2024). "That isn't how our system works", said Prime Minister Keir Starmer (Sky News, 2024). During the extensive media coverage, the rapid accumulation of signatures was attributed to the involvement of Elon Musk, CEO of Tesla and SpaceX and his support of Nigel Farage's Reform UK party (the Sun, 2024). Several columnist and political commentators in both establishment media outlets, namely BBC and the Guardian, as well as in alternative leftwing sources such as Navara Media, expressed concerns about such involvement and dismissed the popularity of the petition (Cave, 2024; Hyde, 2024, Marr, 2024; Navara Media, 2024).

Andrew Marr's *the New Stateman* podcast segment is particularly illustrative. Key arguments include the petition's legitimacy and impact. First, it was necessary to question its validity by comparing it to previous petitions, such as one calling for revoke Article 50, which despite 6 million signatures did not lead to the desired outcome. In the current UK political system, it was argued, petitions are not mechanisms for direct democracy, but rather symbolic gestures. This particular petition was dismissed as a attempt to stir political disruption and boost Farage's popularity, rather than enact genuine change. Further, during the podcast, it was noted that such petitions reflect an online "student politics" trend.

The next concern was Elon Musk's involvement in the petition's rise in popularity through the use of his platform X, which, reportedly, made it possible for significant number of signatories to come from outside the UK. The petition's representativeness is, therefore, compromised, the podcasters said. The most noteworthy, they argued that to link directly public sentiment with political decisions is dangerous for the UK as it is a parliamentary democracy, and warned against turning it into a plebiscitary system.

Thus, the UK case study informs on the ongoing debate about the role of digital democracy, the limitations of petitions in achieving political change, their potential for compromising representative character of the current democratic order, and the influence of external figures and their political or technical capabilities in shaping political discourse.

UK E-petitioning Experience and its Relevance for Kazakhstan. The following analysis examines the relevance of the trends and challenges identified in the UK case study for Kazakhstan. First, there are challenges to e-petitioning that are mitigated in Kazakhstan due to the officially established procedures or the current policies of the national leadership. For example, the recent e-petitioning experience in the UK raised concerns about foreign signatures. Such concerns are irrelevant in Kazakhstan because to submit a petition, prospect signatories are required to register using their government-issued ID or a digital signature. The UK case also highlighted that certain petitions, particularly those concerning constitutional matters, are bound not to be responded positively. However, these petitions are still permitted on the official parliament website and must be responded by the government and debated by the parliament if they gather enough signatories, even though it is understood in advance that they be automatically rejected. In contrast, Kazakhstan has an official "Approval' procedure by the platform's administration.

Moreover, the UK case revealed that, despite a long history and tradition, the role of petitions in maintenance of a representative nature of democracy is increasingly being questioned, particularly in the context of rising political polarization and concerns among certain groups about the growth of populism and dangers to liberalism. In Kazakhstan, however, the notion of plebiscite democracy does not curry such a negative connotation. Furthermore, there is a Presidential initiative to enhance the "hearing state", i.e. government's openness to citizen input. As such, there are significant grounds to believe that institutionalized barriers for petitions in Kazakhstan are less likely to come from the establishment media,

academia, and intelligencia, but rather from established bureaucracy.

However, the UK case study did highlight several issues worth considering in the context of Kazakhstan. As demonstrated in the UK case, popularity of a petition may be influenced by external actors with substantial social media reach. In Kazakhstan, the rapid accumulation of signatures may be attributed to similar factors or to so-called "administrative resource". Notable examples of these are the petitions that exceeded 50, 000 signatories in 2024 in Kazakhstan. First, is the success in rapid accumulation of signatories under the petition calling for abolishment of the utility tax, which was closely associated with Sanzhar Bokayev, a well-known activist and digital opinion leader with a significant presence on social media in Kazakhstan. The second example is the petition against LGBT propaganda, which was responded by the Ministry of Culture and Information as required by law. Five United Nations human rights experts stated that "this petition should not have been entertained by the government in the first place and should be rejected now" (UN Human Rights Office, 2024). The rapid mobilization of signatures raised concerns about their authenticity. Some reported on coercion of civil servants and quasi-government employees into signing (REAct, 2024; Timesca. 2024). While the Ministry response did not fully endorse the demands, it stressed a broader need to balance cultural traditions with international human rights standards and indicated its reluctance to make drastic changes to the national policy and law.

The e-petitioning experience in the UK also highlights the issue of political polarization between considerably large chords and the dilemma it poses for governments, as exemplified by the Brexit petitions. This issue is of clear relevance for Kazakhstan. For instance, rapid mobilization of signatures under the petition again LDBT propaganda may not be entirely be attributable to "administrative resources" used to pressure civil servants to sign, as it was suggested by several human rights groups. Instead, it may be a reflection of a quite strong negative stance on the issues, especially among conservative groups. The situation warrants further study. What is clear, however, is that the government's chosen strategy in this case was to strike a balance and attempt to reconcile the opposing views within a unified policy.

Finally, both the UK and Kazakhstan cases confirm that governments tend to maintain their decided policies and reject petitions that to not align with them even if those petitions are widely supported by substantial number of people and able to gather rapidly huge number of signatories. For example, in 2024, the petitions calling for reinstatement of the three time zones in Kazakhstan, the abolition of the utility tax and the banning of public servants from participating in gambling did not receive positive response despite being signed by more than 50, 000 people.

Conclusion

In conclusion, this article presents the results of a comparative critical analysis of the cases of e-petitioning practices in the UK and Kazakhstan, discussing some similarities and differences. Kazakhstan demonstrates a more structured and regulated approach to e-petitions, which has helped mitigate some of the challenges observed in the UK case, such as concerns about foreign signatories and the submission of petitions that cannot be implemented due to their potential challenge to the constitutional order. The study found that the popularity of a petition, as reflected in the number of signatories, is dependent on such factors as media coverage, language, the involvement of digital opinion leaders, and external actors of substantial digital reach and particular agendas. More importantly, the popularity does not necessarily translate into changes in government policies. Both case studies demonstrate that governments tend to respond positively only on those petitions that align with their pre-established policies. While such practice may be mitigated by discourse emphasizing the importance of maintaining a representative nature of democratic order in the UK, the authors caution that if such trends consolidate in Kazakhstan, they could undermine the success of the "hearing state". This could lead to dissatisfaction with the conventional digital political communication methods and, more broadly, with traditional forms of political participation. Ultimately, dissatisfaction may contribute to political disengagement, depravation and an increased likelihood that citizens will resort to unconventional means of convey their grievances in the future. In this context, the qualitative study currently conducted by the authors in Almaty, Aktau, Aktobe, Kyzylorda, Taraz, Karaganda, Pavlodar, and Semey as part of project AP23488744 'Political Engagement and Participation in Kazakhstan: Dynamics and Broadening Opportunities' is a further opportunity to explore, in depth, current trends and further development of digital activism in general and e-petitioning in particular.

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