Bayan Mussayeva
Farabi University, Almaty, Republic of Kazakhstan
E-mail: bayanmussayeva@outlook.com
ORCID ID: 0009-0003-0412-4596

Nazgul Shyngyssova
Farabi University, Almaty, Republic of Kazakhstan
E-mail: nshyngyssova@gmail.com
ORCID ID: 0009-0007-0145-5241

Dana Baigozhina
L.N. Gumilyov Eurasian National University, Astana, Republic of Kazakhstan
E-mail: baigozhinadana96@gmail.com
ORCID ID: 0009-0003-7252-6781

Concept of media culture and media education in the information society. A comparative analysis of media-culture concepts and media-education strategies in Kazakhstan, the United States of America, and France

DOI: http://dx.doi.org/10.12775/FT.2026.006

The text is available under a Creative Commons Attribution-No Derivatives 4.0 International (CC BY-ND 4.0).

Received: 8.06.2026
Accepted: 2.10.2026

Bayan Mussayeva is a Senior Lecturer at the Department of Journalism, Farabi University, Almaty, Republic of Kazakhstan. Her research focuses on media culture, media education and information literacy in the digital environment.

Nazgul Shyngyssova is Full Doctor, Professor at the Department of Journalism, Farabi University, Almaty, Republic of Kazakhstan. She specialises in media literacy, disinformation and the development of media culture in Kazakhstan.

Dana Baigozhina is PhD, Senior Lecturer at the Department of Tv, Radio and Public Relations, L.N. Gumilyov Eurasian National University, Astana, Republic of Kazakhstan. Her

academic interests include media education, media culture and the role of digital media in modern society.

Keywords: information literacy; social networks; internet penetration; critical thinking; disinformation

Abstract. The study aimed to conduct a comparative analysis of media-culture concepts and media-education strategies in Kazakhstan, the United States of America and France. Using a qualitative comparative analysis of documents, including legal acts and reports from leading international organisations, the study identified the dominant national models and assessed the degree of alignment between mediaenvironment characteristics and the educational approaches applied. The findings revealed three markedly distinct models of how the information society functions. The Kazakhstani model is characterised by a notable strengthening of state control over the digital sphere and security-oriented media education. This occurs against the backdrop of high citizen activity on social networks, from which 46% of the population obtain news, and the country's low position in the press-freedom index. The American model demonstrates deep political polarisation, exceptionally low overall trust in news, with a pronounced partisan divide between individuals with left- and right-leaning views and the decline of local media, which has resulted in the emergence of "news deserts". In these conditions, the fragmented system of media education proves insufficiently effective against common cognitive biases. The French model combines an institutionalised system of media and information literacy, integrated into national education, with strong state regulation carried out by the Regulatory Authority for Audiovisual and Digital Communication. However, this model faces challenges related to low public trust in the media and issues arising from media-ownership concentration. In all the countries examined, substantial gaps were identified between the educational strategies declared and the actual challenges within their media cultures. In all the countries examined, substantial gaps were identified between the educational strategies declared and the actual challenges within their media cultures. The findings emphasise that effective media education requires the adoption of holistic, contextually adapted approaches that combine the development of individual citizens' competencies with systemic measures aimed at improving the overall information environment.

Introduction

The functioning of contemporary society is closely linked to digital media, which have become an integral part of everyday life. They shape public opinion, influence cultural identity and political processes, and generate both new opportunities and significant challenges. In an environment characterised by a constant flow of information, the spread of disinformation and manipulation, the ability to interpret, analyse and responsibly use media – media and information literacy (MIL) – has

become a fundamental necessity for every individual. This is especially relevant in an era of rapid development in artificial intelligence, which introduces new dimensions to the creation and dissemination of content. The development of MIL is not only a matter of personal awareness but also a key factor in societal resilience and national security in the face of information threats. The problem lies in the fact that, despite the global importance of MIL, its development and implementation vary considerably across countries. National media-education strategies are shaped by unique media cultures, political systems, educational traditions and levels of state regulation. This results in substantial differences in approaches, ranging from centralised government programmes to decentralised civilsociety initiatives.

Significant scholarly attention has been devoted to various aspects of media literacy and media culture. Hodkinson (2024) examined the social and cultural significance of media in the era of digital platforms. His research offers a comprehensive synthesis of how mediatisation influences power, politics, identity and everyday life, highlighting the pervasive nature of the contemporary media environment. Hobbs (2024) focused on the practical dimensions of media literacy. She proposed specific pedagogical tools and approaches that foster students' abilities to question media critically, analyse content and recognise themselves as active participants in media processes. In the context of Kazakhstan, Tahan and Khussainova (2024) explored trends in the development of media literacy amid the globalisation of the media sphere. They analysed data on the use of the internet and new media in the country and conducted a study on school pupils' levels of media literacy, confirming the strategic importance of MIL for national security and identifying risks associated with its low level. Serduk et al. (2022) examined the effectiveness of fact-checking as a foundation for media literacy among young people (centennials) in Kazakhstan. Their analysis indicated an average level of media literacy, linked to the limited dissemination of media-education practices, and highlighted the importance of involving young people in information-verification processes. Abueva et al. (2025) considered media literacy as a tool for countering disinformation, analysing international approaches alongside the Kazakhstani experience. Their study underscored the strategic role of MIL in the context of information warfare and hybrid conflicts. Dmitriyeva et al. (2025) analysed the role of information manipulation ("disinformation injections") in escalating tensions and its impact on political stability in Kazakhstan. Their findings demonstrated a significant influence of such manipulations on the population, driven by low levels of media literacy, and offered recommendations for its improvement. Karakozhaeva and Satpaeva (2022) examined the digital competencies of the population across Kazakhstan's regions. Their study confirmed the effectiveness of the state programme Digital Kazakhstan in enhancing digital literacy, while also revealing the persistence of regional disparities. Gajlewicz Korab's (2023) study of the French model of media education characterised it as a well-developed and centralised system. However, her critical analysis indicated the need to reconsider its priorities and target audiences in light of the evolving media landscape and the country's socio-political context. Park et al. (2021) conducted a scientometric study

of the concepts of digital, information and media literacy. Their analysis identified the multidisciplinary nature of these fields and the key research themes that have developed since 2000.

Despite the substantial volume of research, a gap remains in the systematic comparative analysis of the relationship between national media cultures and their corresponding media-education strategies, particularly when contrasting contexts as distinct as Kazakhstan, the USA and France. Existing studies often focus either on a single country or on a specific aspect of MIL (such as fact-checking or digital competencies), without conducting an in-depth comparison of how different types of media environments – those characterised by high levels of state control, strong political polarisation or long-established regulatory traditions – shape distinctive challenges for media education and how national education systems attempt to respond to them. There is insufficient research on the effectiveness of different models of media education (centralised vs decentralised, integrated vs optional) in addressing shared global challenges such as disinformation or algorithmic influence within diverse national contexts. Accordingly, this study aimed to conduct a comparative analysis of the concepts and practices of media culture and media education in Kazakhstan, the USA and France in order to identify distinct national models. To achieve this aim, the following objectives were set: to identify and describe the dominant models of contemporary media culture in the three countries; to analyse the main strategies and practices of MIL; to carry out a critical assessment of the potential effectiveness of these strategies and to identify key gaps.

Materials and methods

This study is based on a qualitative methodology integrating comparative analysis and document examination to explore the concepts of media culture and media education in the information society. The geographical focus covers three countries: the Republic of Kazakhstan, the United States of America and the French Republic. The selection of these jurisdictions reflects their representativeness for comparing three distinct models. The analysis covers systems marked by strengthened state control (Kazakhstan), a market-based and polarised system (USA), and a model with a strong tradition of state regulation (France). The chronological scope of the study primarily spans the period from 2022 to November 2025, enabling an examination of the most recent trends, legislative developments and reports. Material collection was carried out through desk-based research. The source base consisted of a diverse range of primary and secondary materials. A comparative legal analysis of primary sources was used to identify the *de jure* framework of media policy. These sources included the legislative acts of the countries under study regulating the media sphere, online platforms, information security and education. In particular, the analysis covered the Republic of Kazakhstan's Law On Online Platforms and Online Advertising (2023), Law On Mass Media (2024), France's Law No. 2024-850 on preventing foreign interference (2024), SREN Law (Law No.

2024-449…, 2024), European United Digital Services Act (2024) and state-level legislative initiatives in the USA: H.R.9584 Digital Citizenship and Media Literacy Act (2024), Social Media and Children 2023 Legislation (2023).

To establish the *de facto* situation and collect quantitative indicators, a document-analysis method was applied. This included secondary sources such as a wide range of analytical reports produced by international organisations and research centres specialising in freedom of expression, media consumption, media literacy and digital rights. The key sources of statistical and analytical data were the annual reports of the Reuters Institute for the Study of Journalism (Digital News Report, 2024), Freedom House Kazakhstan (2024), Pew Research Center (Social Media and News, 2025), International Research & Exchanges Board (IREX) (2024), United Nations Educational, Scientific and Cultural Organization (2025), Centre for Media Pluralism and Media Freedom (2025), European Digital Media Observatory (EDMO) (2022) and the United States National Association for Media Literacy Education (ASU Learning Transformation Studios, 2024). Statistical data from websites aggregating social-media indicators (Social Media Users, 2024) and reports from specialised institutions, such as the Aspen Institute (2021) and Northwestern University on local news (2025), were also used. In addition, the case-study method was applied to illustrate key precedents and trends. This involved the analysis of media materials highlighting cases such as the January 2022 events in Kazakhstan (2022), the CNews case in France (Pidd, 2024; French Council of State, 2024), and the E. Jean Carroll case in the USA (2025).

The analytical procedure involved a qualitative content analysis of the collected materials and their comparative examination according to key parameters for each country. Both *de jure* aspects (legislation, official strategies) and the *de facto* situation (media-consumption statistics, levels of trust, freedom-of-expression reports and the implementation of educational programmes) were analysed. Based on this comparison, three national models of media culture and media education were identified. The effectiveness of the educational strategies was then assessed by analysing their alignment with the identified challenges and by determining gaps between stated objectives and actual outcomes. As the study did not involve the primary collection of empirical data (surveys or experiments), statistical processing methods were not applied. Quantitative data were used as illustrative and supporting material drawn from existing reports.

Results

Contemporary media culture: A comparative analysis of Kazakhstan, the USA and France

The examination of the current state of media culture in the Republic of Kazakhstan, the United States of America and the French Republic for the period 2022 to November 2025 made it possible to identify three fundamentally distinct models

of the information society. These models are characterised by unique patterns of media consumption, differentiated levels of trust in public institutions and dominant challenges within the information sphere.

The media culture of the Republic of Kazakhstan during this period is marked by strengthened state regulation of the digital space alongside high levels of citizen activity on social media. The events of Tragic January (Qantar) 2022 (2022) served as a catalyst for substantial legislative changes. In early January 2022, protests erupted in Kazakhstan, beginning on 2 January in Zhanaozen in the west of the country. The immediate trigger was an increase in fuel prices. The protests quickly spread to other cities, and the demands broadened to include economic and political issues. On 5 January, law enforcement agencies used tear gas and stun grenades to disperse protesters (Human Rights Watch, 2022). At the same time, unidentified individuals in civilian clothing began attacking police officers and public buildings, as well as looting shops in Almaty. In response, President KassymJomart Tokayev dismissed the government, restricted access to the Internet and declared a state of emergency. In September 2023, the Law On Online Platforms and Online Advertising was adopted (2023). This legislation requires social networks with an audience of more than 100,000 users to appoint a representative in the country and to remove “false information” at the request of the authorities. In June 2024, the new Law On Mass Media came into force (2024). These regulatory measures are taking place at a time when the population is actively using digital channels. Internet penetration in the country has reached 92.9% (Freedom House Kazakhstan, 2024). Social networks have audiences in the millions. For example, in February 2024, Facebook had more than 13.3 million users, while Instagram counted over 12.1 million (NapoleonCat, 2024). At the same time, systematic pressure on independent journalism has been recorded. Since late 2023, at least nine independent media outlets, including El Media and Orda.kz, have faced a wave of cyberattacks (Deutsche Welle, 2023). Another precedent occurred in 2024, when the authorities refused to grant accreditation to 36 journalists from Radio Azattyk (the local RFE/RL service) (Belarusian Association of Journalists, 2024). These facts indicate the emergence of a media culture in which high levels of digital engagement among citizens are counterbalanced by the expansion of state mechanisms of control over the information environment.

The media culture of the United States of America is a model shaped not by state control but by market dynamics and deep political segmentation. A central problem is the low level of trust in the news. According to the Reuters Institute (Digital News Report, 2024), overall trust in news in the USA in 2024 stood at only 32%. This figure is highly asymmetrical: among respondents identifying as “left-leaning”, trust reached 53%, whereas among those identifying as “right-leaning” it was only 14%. This polarisation is reinforced by the economic incentives faced by media outlets, which must compete for audience attention by publishing more extreme and emotionally charged content (Syracuse University Today, 2025). A key structural factor is the systematic decline of local journalism. According to The

State of Local News, more than 3,500 local newspapers have disappeared in the USA since 2005. As of 2025, 213 counties in the country have been identified as "news deserts", lacking any local news source (Syracuse University Today, 2025). This vacuum is filled by unverified information from social networks, which 53% of American adults use as a news source, according to the Pew Research Center (Pew Research Center, 2025). The consequences of this media culture extend into the realm of public health. In 2023, the US Surgeon General (U.S. Department of Health and Human Services 2023) issued an official warning about the link between social-media use and the deterioration of young people's mental health, highlighting the rising risks of depression and anxiety. Another aspect of the media culture is the role of the courts in regulating public expression. High-profile defamation cases, including E. Jean Carroll's lawsuit against Donald Trump, which concluded in 2024 with the awarding of substantial punitive damages (USD 83.3 million) for defamatory statements, illustrate the legal boundaries of destructive discourse in the media (Carroll, 2025).

French media culture represents a third, regulatory model, in which the state maintains an active role in shaping the information environment. Recognising potential threats, the government initiated a large-scale nine-month public consultation process, the General States on Information (2024). The final report, published in September 2024, identified key challenges, including the "weaponisation" of networks for disinformation and algorithm-driven polarisation (General Assembly on Information). Unlike the USA, the French model involves direct regulatory intervention. A notable precedent was the case against the television channel CNews (Pidd, 2024). In February 2024, the Conseil d'État, following a complaint by Reporters Without Borders (RSF), instructed the media regulator ARCOM to strengthen oversight of the channel's pluralism. The court ruled that ARCOM must take into account the views of all participants in broadcasts, including commentators and hosts, not just politicians (French Council of State, 2024). This decision marked a significant step towards the regulation of "opinion media". At the same time, France is responding to external threats. In July 2024, Law No. 2024-850 on preventing foreign interference was adopted (Law No. 2024-449…, 2024). It introduced a public register for representatives of foreign interests. Critics, however, note that the law also expands the state's surveillance powers (Centre for Media Pluralism and Media Freedom, 2025). The effectiveness of these measures remains a matter of debate. Despite the implementation of the EU Digital Services Act (DSA) (The Digital Services Act, 2024) in February 2024, a surge of disinformation was observed during the 2024 electoral campaigns (Centre for Media Pluralism and Media Freedom, 2025).

Synthesising the findings of this section, the analysis of the first stage of the study identified three distinct starting conditions. The Kazakhstani model is characterised by strengthened state legislative control over the digital environment in response to socio-political events. The American model reflects the consequences of market deregulation, which has led to the disappearance of local media and deep political segmentation of the audience. The French model is based on a tradition

of strong state regulation, attempting to adapt to new digital challenges through enhanced powers for regulatory authorities and the enactment of new legislation. These three media-culture landscapes dictate differing priorities for national mediaeducation strategies.

Media-education strategies and practices: A comparative analysis of state and civic initiatives

The analysis of the media-culture landscape presented in the previous section identified three distinct sets of challenges that require corresponding media-education strategies. This section outlines the *de jure* (legal) and *de facto* (practical) responses to these challenges in Kazakhstan, the USA and France. The results reveal three different philosophies of media education. Kazakhstan applies a centralised, stateoriented model focused on information security. The United States relies on a decentralised, community-driven model developed at the level of individual states. France employs an institutionalised model integrated into the national education system and managed by central authorities. Table 1 presents a comparative overview of the media-environment indicators for the three countries under study from 2022 to November 2025.

Table 1. Comparative media-environment indicators (2022 – November 2025)

Indicator	Kazakhstan	USA	France
Internet penetration	93% (2024)	93% (2023)	89% (2024)
Press Freedom Index (RSF)	142nd (2024, “difficult”)	55th (2024, “problematic”)	21st (2024, “satisfactory”)
Overall trust in news	Low	32% (2024)	30% (2024)
Social media as a news source	46% (2022)	53% of adults (2025)	40% (2022)
Key challenge (RSF/FH)	State control, media pressure	Polarisation, distrust, decline of local media	Concentration of ownership, distrust

Source: compiled by the authors based on Freedom House Kazakhstan (2024), NapoleonCat (2024), Deutsche Welle (2023), Belarusian Association of Journalists (2024); Digital News Report (2024), Syracuse University Today (2025), Pew Research Center (2025), U.S. Department of Health and Human Services (2023); E. Jean Carroll (2025), H. Pidd (2024), French Council of State (2024), Law No. 2024-449 Aimed at Securing and Regulating the Digital Space (2024); Centre for Media Pluralism and Media Freedom (2024); The Digital Services Act (2024), World Bank (2025).

Media-education initiatives in Kazakhstan largely represent a state response to challenges associated with the spread of false information and the need to strengthen national information security. This approach is institutionalised through the activities of the Ministry of Culture and Information. One of the key tools is the state project Stopfake.kz (2025), launched in 2020. Its stated aim is to combat disinformation. According to official data, in its first three years of operation, the project debunked over 3,000 false reports (Government of the Republic of Kazakhstan, 2023). This

activity reflects the state's priority of "top-down" content verification. At the same time, new legislation has strengthened the punitive aspect of information policy. Amendments to the Law on Crime Prevention (2025), approved by the Mazhilis in October 2025 (Commonwealth of Independent States, 2025), introduce administrative liability not only for the creation but also for the dissemination (including reposts) of prohibited content, such as propaganda of extremism, separatism, or suicide (Orda.kz, 2025). This establishes a legal framework in which media literacy is indirectly equated with compliance with the law. Development is also evident at the academic and civic levels. In 2025, UNESCO (2025), in collaboration with MediaNet, conducted the first comprehensive study of the media and information literacy (MIL) ecosystem in Kazakhstan. The report mapped key actors and analysed government initiatives, providing recommendations for further development of MIL (United Nations Educational, Scientific and Cultural Organization, 2025). A study conducted in Kazakhstani schools during the 2023-2024 academic year (Yeleussiz and Qanay, 2025) highlighted the crucial role of teacher training. It also identified the need to close the resource gap between urban and rural schools to ensure equal access to media education. Thus, the Kazakhstani model is dual in nature. On one hand, the state implements control and verification tools such as Stopfake.kz (2025) and new legislation. On the other hand, international and academic circles are beginning to shape a long-term educational strategy focused on developing critical thinking.

Unlike Kazakhstan's centralised approach, the United States lacks a single federal media-education strategy. Responsibility for education traditionally rests with individual states, leading to uneven development of media literacy. This process is largely driven by non-governmental organisations, notably the National Association for Media Literacy Education (NAMLE). The NAMLE Snapshot 2024 report indicated that educators devote an average of 11 hours per week to media literacy, despite constraints of time and resources (ASU Learning Transformation Studios, 2024). The report highlights a marked increase in attention to the field since 2019, reflecting a growing recognition of its importance for political processes and the detection of disinformation. NAMLE recommends integrating media literacy across all educational levels and strengthening support at both state and national levels. At the state-legislative level, activity is notable. Legislative initiatives in 2023 across various states focused on several areas, including the creation of research commissions, age-verification requirements for social media, and the integration of digital- and media-literacy courses into K-12 curricula. For example, New Jersey established a Commission to Study the Impact of Social Media on Adolescents (Social Media and Children, 2023). Other states, such as California, have focused on platform obligations to moderate content that constitutes an "obvious threat" or is "demonstrably false" information**.** These measures respond to the challenges identified in the previous section, particularly political polarisation and threats to the mental health of young people. At the same time, initiatives such as the Aspen

Institute Commission on Information Disorders (2021) provide recommendations at a national level, emphasising the need to combat disinformation. Thus, the American model is fragmentary. It relies on the initiatives of individual states and the civic sector (ASU Learning Transformation Studios, 2024) and primarily addresses specific issues – such as mental health and child safety – rather than implementing a unified educational standard.

The French model of media education is the most institutionalised and integrated into the national education system. The central role in this process is played Center for Media and Information Education (CLEMI), a division of the Ministry of Education established in 1983 (2026), CLEMI is responsible for media and information literacy (EMI – Éducation aux médias et à l'information) within the French educational system. EMI is not taught as a separate subject, but is a transversal competency integrated into various disciplines by teachers. Its primary aim is to develop critical thinking, understand media ecosystems, decode fake news, and deconstruct conspiracy theories. A practical implementation of this strategy is the annual Semaine de la Presse et des Médias dans l'École (Press and Media Week in Schools), organised by CLEMI since 1990 (Media & Learning Association, 2024). This initiative reaches millions of students and thousands of schools, involving over 1,800 media partners in collaboration (About Clemi, 2025). In addition to CLEMI, the media regulator ARCOM is actively involved in media education. ARCOM's activities are not limited to sanctions; the regulator also develops educational resources for teachers, parents, and adults, focusing on digital citizenship, protection against piracy, and understanding copyright (Arcom, 2024). This regulatory and educational approach is further reinforced by new legislation. In May 2024, the Law on Security and Regulation of the Digital Space (SREN) was enacted. This law empowers the state to block websites that distribute financial fraud and obliges platforms to respond to hate speech. Thus, the French strategy is comprehensive. It combines the long-term integration of media literacy into school curricula through CLEMI, active involvement of the media regulator ARCOM in educational initiatives (Arcom, 2024), and legislative regulation of the digital space (SREN Law) (Law No. 2024-449…, 2024). Table 2 presents a comparison of the media education models and institutions across the three countries.

Table 2. Comparison of media education models and institutions

Characteristic	Kazakhstan	USA	France
Primary model	Centralised, state-oriented (security)	Decentralised, state- and NGO-led (problem-solving)	Institutionalised, integrated into education (citizen development)
Key government body	Ministry of Culture and Information	No single federal body; State-level Departments of Education	Ministry of Education (via CLEMI)
Specialist institution	Kazakhstan Institute for Social Development (developer of SynSana)	None at the federal level; NAMLE (NGO) as coordinator	CLEMI (since 1983)
Role of the media regulator	Not defined in educational activities	No single regulator with an educational function	ARCOM (develops educational resources)
Integration into school education	Planned integration into standards from 2025	State-dependent (>20 states have legislation); variable implementation	Cross-curricular integration (EMI) since 2015
Key national initiative	Stopfake.kz project; SynSana app	No unified initiative; Media Literacy Week (NAMLE)	School Press and Media Week (CLEMI, since 1990)
Main identified gap (assessment)	Focus on control vs. need for critical thinking	Fragmentation vs. systemic polarisation	Institutional capacity vs. low trust and market challenges

Source: compiled by the authors based on United Nations Educational, Scientific and Cultural Organization (2025), Government of the Republic of Kazakhstan (2023), Orda.kz (2025), Commonwealth of Independent States (2025), Law of the Republic of Kazakhstan No. 271-IV "On the Prevention of Offenses" (2025), A. Yeleussiz and G. Qanay (2025), ASU Learning Transformation Studios (2024), Social Media and Children 2023 Legislation (2023), Brennan Center for Justice (2021), Center for media and information education (2026), Media & Learning Association (2024), European Commission, Education, Audiovisual and Culture Executive Agency (2024), Law No. 2024-449 Aimed at Securing and Regulating the Digital Space (2024), International Research & Exchanges Board (2024), P. Yelubayeva et al. (2025), Carnegie Corporation of New York (2024), H.R.9584 Digital Citizenship and Media Literacy Act (2024), Centre for Media Pluralism and Media Freedom (2024), European Digital Media Observatory (2022), Digital News Report (2024), United Nations Educational, Scientific and Cultural Organization (2025), Hoerudin et al.(2023), Pavlik (2023), Kharlamova (2021).

The analysis of media education strategies confirms the presence of three distinct models, corresponding to the challenges identified in the previous section. The Kazakh model is centralised and security-oriented, with the state acting as the primary arbiter of information accuracy (Government of the Republic of Kazakhstan, 2023). The American model is decentralised and fragmented, driven by civic initiatives (ASU Learning Transformation Studios, 2024) and state-level legislation (Social Media and Children, 2023), responding to specific social issues. The French

model is the most structured, combining institutional integration into education (About Clemi, 2024) with state regulation (Law No. 2024-449…, 2024), reflecting the country's tradition of active state involvement in shaping the public sphere.

Assessment of effectiveness and identification of gaps in media education strategies

The Kazakh model of media education, largely initiated and controlled by state institutions, reveals a significant gap between its actual implementation and the educational needs of a society operating amidst unregulated social media and substantial external information pressure. State initiatives, such as the centralised fact-checking resource Stopfake.kz, which reported debunking over 3,000 false claims over three years of operation (Government of the Republic of Kazakhstan, 2023), and new legislation increasing liability for sharing content deemed "false" by the state (Orda.kz, 2025), clearly prioritise information security from the government's perspective. The primary focus is on identifying and labelling content considered harmful by authorities rather than developing citizens' autonomous competencies to critically evaluate diverse information flows independently. While this approach may be partially effective against certain types of overt disinformation, it does not address the underlying issues of low trust in official sources and the widespread popularity of alternative, often anonymous, communication channels (International Research & Exchanges Board, 2024). Moreover, the emphasis on administrative penalties for content dissemination, including reposts (Orda.kz, 2025), carries the risk of creating a "chilling effect" on free expression and may encourage self-censorship, undermining the objectives of fostering critical thinking and active civic engagement. UNESCO's research (United Nations Educational, Scientific and Cultural Organization 2025) emphasises that the development of MIL is increasingly viewed through the lens of national security, while simultaneously highlighting the need for its systematic integration into educational programmes and the training of qualified teaching staff. This reflects expert-level recognition of the existing gap. The planned incorporation of MIL elements into the new national educational standard from 1 September 2025, which will include aspects of digital hygiene and artificial intelligence literacy (United Nations Educational, Scientific and Cultural Organization, 2025), represents a step in the right direction. However, successful implementation will require not only formal changes to curricula but also the rectification of resource disparities and teacher preparation across different school types, particularly between urban and rural institutions (Yeleussiz and Qanay, 2025). Research on pedagogical perspectives in Kazakhstan indicates that teachers acknowledge the importance of MIL but frequently face shortages in training and resources necessary for its effective delivery (Yelubayeva et al., 2025). As of October 2025, there remains a significant misalignment between the state strategy – which is predominantly focused on control and reactive measures – and the educational need to develop

proactive, autonomous media literacy skills among citizens for responsible and safe navigation of a complex digital environment. Even educational tools such as the mobile application SynSana, developed by the Kazakhstan Institute for Social Development, while a positive step towards gamification, cannot substitute for the systematic integration of MIL across all levels of education.

The decentralised model of media education in the USA, which develops primarily at the level of individual states and through the efforts of non-governmental organisations, faces fundamental challenges in addressing a key issue of American media culture: deep political polarisation and the resulting problems of trust in information institutions. State-level initiatives, such as legislation integrating media literacy into school curricula (for example, in Florida, Illinois, New Jersey and Delaware) (Social Media and Children, 2023), alongside the active advocacy work of NAMLE (ASU Learning Transformation Studios, 2024), are central to these efforts. The NAMLE Snapshot 2024 report indicates a growing focus on media literacy among educators. However, the impact of these initiatives remains limited due to the absence of a unified national strategy, consistent standards and stable funding. The NAMLE report also highlights the lack of clear policies and implementation mechanisms across many states. The primary identified gap lies in the fact that most existing media literacy programmes traditionally concentrate on developing individual cognitive skills – such as recognising fake news, evaluating sources and analysing arguments. However, research, including studies conducted at Stanford University, demonstrates that political bias and party identity often override the capacity for critical analysis, even among highly educated individuals or those with strong analytical skills. The findings suggest that people tend to assess the credibility of news more through the lens of alignment with their own political views than through an objective evaluation of the facts. Contemporary approaches to media education that focus solely on verification techniques prove insufficient for overcoming motivated reasoning, which underlies political polarisation (Carnegie Corporation of New York, 2024). Educational initiatives alone cannot resolve the structural problems of the information ecosystem, such as the ongoing decline of local journalism. This objectively restricts access to high-quality, unbiased information for approximately 50 million Americans. Federal legislative efforts, such as the Digital Citizenship and Media Literacy Act (2024), aim to establish a grant programme to support media education, but their adoption and funding remain uncertain. Consequently, the American model demonstrates a significant gap between individually oriented educational tools and the systemic, politically and socially determined nature of contemporary information challenges, in which the very structure of media consumption contributes to deepening division (Carnegie Corporation of New York, 2024).

The French model of media education, characterised by a strong institutional base (CLEMI, ARCOM) and the thorough integration of media literacy (EMI) into the national education system (Center for Media and Information Education,

2024), appears the most systematic and coherent of the three countries studied. Nevertheless, despite this infrastructure, the persistently low level of public trust in the media (30% in 2024) (Digital News Report, 2024) indicates significant gaps and limitations in the effectiveness of the existing model. Firstly, institutionalised media education, while developing analytical skills, proves insufficient to counter deep-seated scepticism and distrust towards the media as a social institution. This distrust is reinforced by real issues within the media landscape, including the growing concentration of ownership in the hands of a small number of business figures (for example, the Bolloré group) and concerns regarding political influence over editorial policy, which has raised issues even for the Conseil d'État (Centre for Media Pluralism and Media Freedom, 2024). Educational programmes can teach students to analyse content, but they cannot guarantee trust in its producers when there are legitimate grounds to question their independence. Secondly, the effectiveness of educational efforts may be undermined by the dynamics of the media ecosystem itself and the political context. The rising influence of channels presenting themselves as "opinion media" and their role in promoting certain political narratives, together with surges of disinformation during the 2024 election campaigns (Centre for Media Pluralism and Media Freedom, 2024), despite the actions of ARCOM and legislation (for example the SREN law (Law No. 2024-449…, 2024), which permits the blocking of certain websites), highlights the limits of both educational and regulatory influence. Thirdly, there is evidence of challenges in the practical implementation of EMI within schools. The 2022 Media Pluralism Monitor report pointed to inconsistencies in approaches at the national level and potential resistance from teachers to centralised directives (European Digital Media Observatory, 2022). Although the Press Week initiative achieves high participation rates, the depth of MIL integration into everyday practice may vary (European Digital Media Observatory, 2022). Thus, the French model, while the most developed and institutionally supported, faces a gap between formal education and the actual dynamics of the media market, public trust and the practical challenges of implementation within the educational process.

The assessment of media education strategies in the three countries revealed significant gaps between existing approaches and the real challenges of their media cultures. In Kazakhstan, the state strategy, focused on information security and control, does not sufficiently foster the critical thinking necessary to navigate a media space dominated by social networks. In the USA, decentralised efforts cannot effectively address the national issue of political polarisation, which often outweighs individual media literacy skills. In France, the well-developed institutional system of media education encounters the limits of its influence in the face of systemic distrust in the media, driven by economic and political factors, and the practical challenges of implementation. These findings indicate that effective media education in contemporary information societies requires not only the development of individual skills but also an awareness of each country's specific political, economic and cultural

context. Addressing systemic issues, such as media ownership concentration, political polarisation and public distrust in information institutions – which extend beyond purely educational interventions – is also essential.

Discussion

The results of this study, which identified distinct models of media culture and media education in Kazakhstan, the USA, and France, resonate with and are further contextualised by current scholarly studies. Wuyckens et al. (2022), in their meta-review, highlight the conceptual confusion surrounding the terms media literacy, information literacy and digital literacy. The outcome of their analysis highlights the difficulties in operationalising and evaluating these forms of literacy. This supports the finding in the present study of the need for clear definition and contextualisation of media education strategies according to national specificities, as each country demonstrates unique priorities and challenges. The study also revealed that the absence of a unified approach complicates comparative analysis and the assessment of the effectiveness of media education programmes. Research by Nygren et al. (2021) on the use of a professional fact-checking tool in education demonstrated its effectiveness in improving adolescents' ability to identify visual misinformation, albeit with varying success across countries. The results point to the importance of cultural context: greater progress in Romania and Spain compared with France and Sweden was explained by changes in students' attitudes towards intuition and verification tools. This aligns with the conclusions of the present study regarding the necessity of adapting educational strategies to national contexts, particularly in assessing Kazakhstan's model, which emphasises centralised fact-checking, and explains why even the well-developed French system faces challenges.

An analysis of the media economy by Albarran (2023) emphasises the impact of technology, globalisation and regulation on the functioning of media industries. His study demonstrates how economic factors shape media markets at multiple levels. This confirms the findings of the present study regarding the importance of economic context, particularly in the analysis of the American model, where the decline of local media and market competition contributes to polarisation, and the French model, where ownership concentration remains a key challenge. Norris's (2023) study of the "cancel culture" phenomenon demonstrated that the perception of a "chilling effect" depends on the alignment of an individual's values with the dominant culture, confirming the "fish out of water" hypothesis. Results from her global survey indicate the real suppression of alternative voices across different political contexts. This aligns with the findings of the present study regarding the impact of political polarisation (USA) and state control (Kazakhstan) on public discourse, highlighting that media education must take into account sociopsychological pressures. Cho et al. (2024) proposed a conceptual framework for social media literacy (SoMeLit), emphasising the importance of users' self-perception and choices in a dynamic interaction with content and networks on social media. Their article

represents a shift from mass-media approaches towards analysing the construction of individual online realities. This supports the present study's conclusion that tailored approaches to MIL are needed for social media, which dominate as news sources in Kazakhstan and the USA, and that psychological aspects of platform interaction must be considered. The role of social media in educational communication was analysed by Ohara (2023). Her research confirmed the considerable potential of social media for information dissemination and collaboration, while also identifying risks of misinformation and cyberbullying. This corresponds with the findings of the present study, which highlight the dual role of social media, underscoring the necessity of developing MIL to ensure its safe and effective use. Park et al. (2021) investigated subjective interpretations of media in France and revealed the diversity of "resonance" in media messages. This supports the present study's finding of low trust in the media in France, which may be linked to the varying perceptions of content among different groups.

The trend towards digitalisation in education and the potential of digital learning media are illustrated by the study of Sudarmo et al. (2021) and Aruna et al. (2022). The former study shows the gradual replacement of print media with electronic formats in Indonesia, albeit constrained by infrastructural limitations. The latter demonstrates the high effectiveness of an innovative digital media resource incorporating AR and gamification. These findings align with the present study's conclusion regarding the importance of developing digital educational tools for MIL, while also emphasising the need to consider accessibility and the quality of pedagogical design. The emergence of "educational influencers" as new actors in the educational landscape was conceptualised by Carpenter et al. (2023). Their research highlights the influence of social media on teachers' professional identity and practice, supporting the present study's conclusion about the growing role of influencers, which creates new challenges for distinguishing reliable information. The impact of global media flows on youth identity formation was analysed by Liechty (2022) in the context of Nepal. His research illustrates how media transform local cultural frameworks, corroborating the present study's finding on the importance of accounting for globalisation processes within national media cultures. The constructive potential of the digital public sphere and education within it was explored by Cui et al. (2024) in the context of China. Their study analyses patterns of participation and discourse in online environments, aligning with the present study's conclusion on the role of digital platforms as spaces for public debate and the need for educational approaches to navigate them. The transformation of fan culture under the influence of social media was examined by Jia et al. (2021). Their analysis highlights how fans become active participants influencing society, supporting the present study's finding on the growing agency of audiences, which media education must address. The dual impact of social media on public health – both positive and negative – was considered by Kanchan and Gaidhane (2023). Their review emphasises the risks of misinformation in this sphere, consistent with

the present study's conclusion regarding the ambivalent role of social networks and the necessity of MIL to mitigate these risks. The normative foundations of the "media welfare" concept were explored by Jakobsson et al. (2023) in the context of Scandinavian countries. Their research examines the state's role in ensuring a high-quality media environment, corroborating the present study's conclusion on the differences in national models and the importance of government policy in shaping media systems. The risks of promotional culture and quasi-corporate communication in higher education were investigated by Väliverronen et al. (2022). Their analysis of university branding demonstrates how inauthentic communication strategies can undermine trust, aligning with the present study's findings regarding institutional trust issues in the contemporary media environment.

In summary, the findings of this study are corroborated and further developed by the studies of other scholars analysing various aspects of media culture and media education. These studies confirm the complexity of the contemporary media landscape and the multifaceted challenges it presents for media education. The necessity of contextualising approaches, taking into account economic and sociopsychological factors, and addressing systemic aspects of the media environment are key conclusions that align with the results of this research. There is a need to move beyond a narrow understanding of MIL as a set of technical skills towards a holistic approach that integrates cognitive, ethical and social dimensions of interaction with information. At the same time, educational efforts should be complemented by systemic measures aimed at improving the overall health of the information ecosystem, taking into account both economic realities and the regulatory foundations of media functioning.

Conclusions

The present study successfully achieved its objectives by conducting a comprehensive comparative analysis of concepts of media culture and media education in the information society, focusing on the Republic of Kazakhstan, the USA and the French Republic during the period 2022 to November 2025. The research addressed the identification of dominant models of media culture, the analysis of state and societal strategies for media education and the critical evaluation of their alignment with existing challenges, highlighting the main gaps. Three distinct models were identified. The Kazakhstani model is characterised by increased state regulation of the digital space as a response to socio-political challenges, while media education initiatives are predominantly oriented towards information security and content control. This approach inadequately addresses the need to develop autonomous critical thinking among the population in a context dominated by social media. The American model reflects profound political polarisation and a fragmented media landscape, accompanied by low public trust in news and the decline of local journalism. Decentralised and individually oriented media education initiatives prove insufficient to address systemic issues of cognitive bias and politically motivated

information processing. The French model demonstrates the most institutionalised approach, combining media education integrated into the national curriculum with an active state role in regulating the media space. However, this system faces challenges arising from low public trust in the media, partly due to ownership concentration, as well as practical difficulties in implementing educational standards.

Qualitative analysis revealed a significant gap in all three countries between formal media education strategies and the complex realities of contemporary media cultures. The findings indicate that the effectiveness of media education critically depends on its adaptation to specific national contexts – including the level of freedom of speech, the structure of the media market, the degree of political polarisation, and societal trust. The study concludes that developing individual skills in information verification alone is insufficient without accounting for the psychological mechanisms of perception and the influence of systemic factors in the information ecosystem. Recommendations arising from this study emphasise the need to adopt more holistic and contextualised media education strategies. These should integrate the development of critical thinking, an understanding of the influence of media structures (ownership, algorithms), ethical standards and emotional resilience. Systemic investment in teacher training and the expansion of lifelong media education programmes for all age groups is essential. It is also important to complement educational efforts with measures aimed at improving the overall health of the information environment. It should be noted that the analysis relies mainly on secondary sources such as official reports and existing survey data, rather than original interviews with educators or media consumers, which limits insight into how these strategies are experienced in practice. Additionally, the relatively short period under review means that some conclusions – particularly regarding very recent legislative measures – may need reassessment as their effects unfold over time. Future research would benefit from mixed-methods approaches combining quantitative indicators with qualitative data from practitioners, as well as from extending the comparative scope beyond these three countries to test the broader applicability of the identified models. The main limitation of this study is its geographic focus on three countries, which restricts the generalisability of the findings. Key directions for future research include conducting longitudinal studies to assess the long-term impact of media education reforms.

References

Abueva, N. A., Buzelo, A. S., Abuev, U. A., & Karakushev, D. B. (2025). Media literacy as a tool to counter disinformation: International approaches and the Kazakhstani experience. *Herald of Journalism*, 77(3), 45–60. https://doi.org/10.26577/HJ20257735

Albarran, A.B. 2023. The media economy. New York: Routledge. https://doi.org/10.4324/9781003392293

Arcom. (2025). Media literacy and digital citizenship: Educational resources. https://www.arcom.fr/en/find-out-more/educational-resources/media-literacy-and-digital-citizenship

Aruna, A., Iriaji, I., & Rini, D. R. (2022). Digital learning media for cultural arts class-vii prototype curriculum integrated 6c and tpck. *International Conference on Art, Design, Education and Cultural Studies, 4*(1). https://conference.um.ac.id/index.php/icadecs/article/view/7921

ASU Learning Transformation Studios. (2024). NAMLE "Snapshot 2024" report reveals educators prioritizing media literacy education despite challenges. https://lts.asu.edu/news/namle-snapshot-2024-report-reveals-educators-prioritizing-media-literacy-education-despite

Belarusian Association of Journalists. (2024). More than 30 "Radio Svoboda" employees were not accredited in Kazakhstan; the publication went to court. https://baj.media/ru/bolee-30-sotrudnikov-radio-svoboda-ne-byli-akkreditovany-v-kazahstane-izdanie-obratilos-v/

Brennan Center for Justice. (2021). Recommendations to the Aspen Institute Commission on Information Disorder. https://www.brennancenter.org/our-work/research-reports/recommendations-aspen-institute-commission-information-disorder

Carnegie Corporation of New York. (2024). *Digital Citizenship* Why Polarization Is a Problem. https://www.carnegie.org/our-work/article/why-polarization-is-a-problem/

Carpenter, J. P., Shelton, C. C., & Schroeder, S. E. (2023). The education influencer: A new player in the educator professional landscape. *Journal of Research on Technology in Education*, *55*(5), 749–764. https://doi.org/10.1080/15391523.2022.2030267

CBS News. (2025). E. Jean Carroll. https://www.cbsnews.com/tag/e-jean-carroll/

Center for Media and Information Education. (2026). https://www.clemi.fr/about-clemi

Centre for Media Pluralism and Media Freedom. (2024). Country profile: France. *European University Institute.* https://cmpf.eui.eu/country/france/

Cho, H., Cannon, J., Lopez, R., & Li, W. (2024). Social media literacy: A conceptual framework. *New media & society*, *26*(2), 941–960. https://doi.org/10.1177/14614448211068530

Commonwealth of Independent States. (2025). Cooperation between Turkmenistan and Kazakhstan against 21st-century threats. https://e-cis.info/news/566/130940/

Cui, J., Wan, Q., Chen, W., & Gan, Z. (2024). Application and analysis of the constructive potential of China's digital public sphere education. *The Educational Review, USA*, *8*(3). http://dx.doi.org/10.26855/er.2024.03.002

Deutsche Welle. (2023). Who benefits from intimidating journalists and media in Kazakhstan? https://www.dw.com/ru/komu-vygodno-zapugivat-zurnalistov-i-smi-kazahstana/a-64564313

Digital News Report 2024. (2024). https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024

Dmitriyeva, A. S., Ospanova, A. N., & Zholdasbekova, A. N. (2025). The role of information propaganda in the escalation of tensions and their impact on the political stability of Kazakhstan. *Bulletin of the LN Gumilyov Eurasian National University. Political Science. Regional Studies. Oriental Studies. Turkology Series.*, *150*(1), 171–184. https://doi.org/10.32523/2616-6887-2025-150-1-171-184

European Commission, Education, Audiovisual and Culture Executive Agency. (2024). *Media literacy and safe use of new media: France*. Youth Wiki. https://national-policies.eacea.ec.europa.eu/youthwiki/chapters/france/68-media-literacy-and-safe-use-of-new-media

European Digital Media Observatory (EDMO). (2022). France: Mapping the media literacy sector. https://edmo.eu/resources/repositories/mapping-the-media-literacy-sector/france/

Freedom House. (2024). Kazakhstan: Freedom on the Net 2024 country report. https://freedomhouse.org/country/kazakhstan/freedom-net/2024

French Council of State. (2024). Pluralism and independence: Arcom must re-examine compliance with its obligations by CNews. https://www.conseil-etat.fr/en/news/pluralism-and-independence-arcom-must-re-examine-compliance-with-its-obligations-by-cnews

Gajlewicz-Korab, K. (2023). The French model of media and information education. A critical analysis of opportunities and threats. *Media Business Culture*, *2*(15), 17–28. https://ejournals.eu/en/journal/media-biznes-kultura/article/the-french-model-of-media-and-information-education-a-critical-analysis-of-opportunities-and-threats

General Assembly on Information. (2024). Official website of the General Assembly on Information. https://etats-generaux-information.fr/ (etats-generaux-information.fr

Government of the Republic of Kazakhstan. (2025). Over 3,000 fake news items were debunked by Stopfake.kz over 3 years of operation. https://www.gov.kz/memleket/entities/mam/press/news/details/647943?lang=ru

H.R.9584 Digital Citizenship and Media Literacy Act. (2024). https://www.congress.gov/bill/118th-congress/house-bill/9584/text

Hobbs, R. (2024). Media literacy in action: Questioning the media. London: Bloomsbury Publishing. https://www.bloomsbury.com/us/media-literacy-in-action-9781538180136/

Hodkinson, P. (2024). Media, culture and society: An introduction. Los Angeles: SAGE Publications. https://collegepublishing.sagepub.com/products/media-culture-and-society-3-273820?utm_source=chatgpt.com

Hoerudin, C.W., Syafruddin, S., Mayasari, A., Arifudin, O., & Lestari, S. (2023). E-learning as a learning media innovation islamic education. *Qalamuna – Journal of Education, Social Studies, and Religion*, *15*(1), 723–734. https://doi.org/10.37680/qalamuna.v15i1.4466

Human Rights Watch. World Report 2022: Kazakhstan. (2022). https://www.hrw.org/world-report/2022/country-chapters/kazakhstan#039b39

International Research & Exchanges Board. (2024). VIBE 2024 Kazakhstan: Vibrant Information Barometer: Kazakhstan chapter https://www.irex.org/sites/default/files/VIBE_2024_Kazakhstan.pdf

Jakobsson, P., Lindell, J., & Stiernstedt, F. 2023. Normative foundations of media welfare: Perspectives from the Nordic countries. *Media, Culture & Society*, *45*(2), 305–322. https://doi.org/10.1177/01634437221111914

Jia, B., Li, J., & Ma, J. (2021). Transformation of fan culture under the influence of social media. In: M.Z. Bin, N.A. Ghaffar (Eds), *2021 4th International Conference on Humanities Education and Social Sciences (ICHESS 2021)* (pp. 2173–2178). Amsterdam: Atlantis Press. https://doi.org/10.2991/assehr.k.211220.375

Kanchan, S., & Gaidhane, A. (2023). Social media role and its impact on public health: A narrative review. *Cureus*, *15*(1). https://doi.org/10.7759/cureus.33737

Karakozhaeva, A., & Satpaeva, Z. (2022). Analysis of digital competencies of the population in the regions of Kazakhstan. *Bulletin of the National Academy of Sciences of the Republic of Kazakhstan*, *4*, 305–318. https://journals.nauka-nanrk.kz/bulletin-science/article/view/2806

Kharlamova, T. V. (2025). Composer in the media space: Global AI challenges. *Arts Academy*, *3*(15). https://doi.org/10.56032/2523-4684.2025.3.15.34

Law No. 2024–449 Aimed at Securing and Regulating the Digital Space. (2024). https://www.legifrance.gouv.fr/loda/id/JORFTEXT000049563368/2024-12-24/?utm_source=

Law No. 2024–449 on Securing and Regulating the Digital Space. (2024). https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000049563368

Law No. 2024–850 on Preventing Foreign Interference in France. (2024). https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000050052193

Law of the Republic of Kazakhstan No. 18–VIII “On Online Platforms and Online Advertising”. (2023). https://online.zakon.kz/Document/?doc_id=35159963

Law of the Republic of Kazakhstan No. 271–IV “On the Prevention of Offenses”. (2025). https://online.zakon.kz/Document/?doc_id=30657323&pos=3;-106#pos=3;-106

Law of the Republic of Kazakhstan No. 93–VIII on Mass Media. (2024). https://adilet.zan.kz/rus/docs/Z2400000093

Liechty, M. (2022). Media, markets and modernization: youth identities and the experience of modernity in Kathmandu, Nepal. In: V. Amit, H. Wulff (Eds.), *Youth cultures* (pp. 166–201). London: Routledge. https://doi.org/10.4324/9781003333487

Media & Learning Association. (2024). Mapping of the media literacy initiatives, landscape and industry in the context of Better Internet for Kids. https://media-and-learning.eu/files/2024/03/MLA_mapping-exercise_sd19022024.pdf

Media and Learning Association. (2025). CLEMI (Center for Media and Information Education). https://media-and-learning.eu/member/clemi-centre-pour-leducation-auc-medias-et-a-linformation/

NapoleonCat. (2024). Social media users in Kazakhstan. https://stats.napoleoncat.com/social-media-users-in-kazakhstan/2024/02/

National Information Assembly. (2024). Protecting and developing the right to information: An urgent democratic imperative. https://etats-generaux-information.fr/Media/medias-creation-rapide/english-report-2024

Norris, P. (2023). Cancel culture: Myth or reality?. *Political studies*, *71*(1), 145–174. https://doi.org/10.1177/00323217211037023

Nygren, T., Guath, M., Axelsson, C. A. W., & Frau-Meigs, D. (2021). Combatting visual fake news with a professional fact-checking tool in education in France, Romania, Spain and Sweden. *Information*, *12*(5), 201. https://doi.org/10.3390/info12050201

Ohara, M. R. (2023). The role of social media in educational communication management. *Journal of Contemporary Administration and Management*, *1*(2), 70–76. https://doi.org/10.61100/adman.v1i2.25

Orda.kz. (2025). Kazakhstan: Bill proposing fines for reposting prohibited content on social media passes first reading. https://en.orda.kz/kazakhstan-bill-proposing-fines-for-reposting-prohibited-content-on-social-media-passes-first-reading-8941/

Park, B. Y., Abecassis, A., & Revel, M. (2021). Varieties of resonance: The subjective interpretations and utilizations of media output in France. *Poetics*, *88*, 101597. https://doi.org/10.1016/j.poetic.2021.101597

Park, H., Kim, H. S., & Park, H. W. (2021). A scientometric study of digital literacy, ICT literacy, information literacy, and media literacy. *Journal of Data and Information Science*, *6*(2), 116–138. https://doi.org/10.2478/jdis-2021-0001

Pavlik, J. V. (2023). Collaborating with ChatGPT: Considering the implications of generative artificial intelligence for journalism and media education. *Journalism & mass communication educator*, *78*(1), 84–93. https://doi.org/10.1177/10776958221149577

Pew Research Center. (2025). Social media and news fact sheet. https://www.pewresearch.org/journalism/fact-sheet/social-media-and-news-fact-sheet/

Pidd, H. (2024). French regulator to look into CNews channel after 'opinion media' allegation. The Guardian. https://www.theguardian.com/world/2024/feb/13/french-regulator-to-look-into-cnews-channel-after-opinion-media-allegation

Serdyuk, A., Bresler, M., & Manoilo, A. (2022). Fact-checking as the basis of media literacy of centennials in Central Asian countries (the case of Kazakhstan). *Etnosayasat*, *1–2*. https://journal.etnosayasat.kz/index.php/etp/article/view/28

Social Media and Children 2023 Legislation. (2023). https://www.ncsl.org/technology-and-communication/social-media-and-children-2023-legislation?__cf_chl_tk=zrjndzfxixs91jej5ocqwlqroqc677ixabqrmofnqdm-1761530669-1.0.1.1-7tc1dveedlv.vgbpprpjsquizbk.pgfblbfupxgfoge

Stanford News. (2024). News consumers are more influenced by political alignment than by truth, new study shows. https://news.stanford.edu/stories/2024/10/new-study-shows-that-partisanship-trumps-truth

StopFake. (2025). Zakharova accused Kyiv of launching UAVs over Kazakhstan; 90% of drones found there belong to Russia. https://www.stopfake.org/ru/zaharova-obvinila-kiev-v-zapuske-bpla-nad-kazahstanom-90-najdennyh-tam-bespilotnikov-prinadlezhat-rossii/

Sudarmo, S., Arifin, A., Pattiasina, P.J., Wirawan, V., & Aslan, A. (2021). The future of instruction media in Indonesian education: Systematic review. *Al-Ishlah: Journal of Education*, *13*(2), 1302–1311. https://doi.org/10.35445/alishlah.v13i2.542

Syracuse University Today. (2025). "The Great Divide": Understanding US political polarization. https://news.syr.edu/2025/10/23/the-great-divide-understanding-us-political-polarization/

Tahan, S. S., & Khussainova, A. K. (2024). Trends in the development of media literacy in Kazakhstan in the context of globalization of the media space *Bulletin of L.N. Gumilyov Eurasian National University. Journalism Series*, *149*(4), 34–50. https://doi.org/10.32523/2616-7174-2024-4-149-34-50

The Digital Services Act. (2024). https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act_en

U.S. Department of Health and Human Services. (2023). Social media and youth mental health. https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf

United Nations Educational, Scientific and Cultural Organization. (2025). Mapping of Media and Information Literacy Conducted in Kazakhstan. https://www.unesco.org/en/articles/mapping-media-and-information-literacy-conducted-kazakhstan

Väliverronen, E., Sihvonen, T., Laaksonen, S. M., & Koskela, M. (2022). Branding the "wow-academy": The risks of promotional culture and quasi-corporate communication in higher education. *Studies in Communication Sciences*, *22*(3), 493–513. https://doi.org/10.24434/j.scoms.2022.03.3285

World Bank. (2025). Individuals using the Internet (% of population). https://data.worldbank.org/indicator/IT.NET.USER.ZS

Wuyckens, G., Landry, N., & Fastrez, P. (2022). Untangling media literacy, information literacy, and digital literacy: A systematic meta-review of core concepts in media education. *Journal of Media Literacy Education*, *14*(1), 168–182. https://doi.org/10.23860/JMLE-2022-14-1-12

Yeleussiz, A., & Qanay, G. (2025). Media literacy in Kazakhstan: Educators' perspectives and policy implementation. *Journal of Curriculum Studies Research*, *7*(1), 1–25. https://doi.org/10.46303/jcsr.2025.1

Yelubayeva, P., Owen, T., Kudyarova, S., Khamidova, A., & Gabdullina, Z. (2025). Educators' perspectives on media literacy in language education for inclusive knowledge societies in Kazakhstan and the United States. https://doi.org/10.30564/fls.v7i9.10801