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Prof. Dr. İlknur AYDOĞDU KARAASLAN



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CHAPTER 1

THE IDEOLOGICAL READING OF THE WOMAN CHARACTERS SEDUCING MEN IN TURKISH CINEMA: THE EXAMPLE OF THE FILM NAMUSLU (HONORABLE)

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INTRODUCTION

Cinema is a potent narrative medium. It is an art form that transcends and includes all other types of art. Besides, cinema is fundamentally a mass media that has the potent ability to influence human cultures. As a result, movies have always been a part of politics, whether overtly or covertly, for as long as people have been living their lives. They contain an ideological discourse, either explicitly or implicitly (Sancar, 2021: 149).

According to the Turkish Language Association Dictionary (TDK), literally, ideology is the completeness of political, legal, scientific, philosophical, religious, moral and aesthetic thoughts that form a political or social doctrine and direct the behavior of a government, a party or a group (TDK, 2025). On the other hand, many scholars have defined ideology in a different way. However, Althusser's definition of ideology is quite comprehensive and explanatory (Sucu, 2012: 30). According to Althusser, ideology is a tool used to run the state's repressive apparatus's sanction mechanism. The states and societies ideological apparatuses are mostly in the private realm, whereas the repressive apparatus operates in the public domain. As "state apparatuses of repression and state ideological apparatuses," he believes that ideological apparatuses are situated within a body of knowledge about hegemony, the creation of consent, and the role that persuasion plays in fostering societal acceptance. (Althusser, 1971). These apparatuses transmit a sense that relates to institutions that act as bearers of the elements that make up the state's value system, even if they seem to be beyond the state's realm of dominance and control.

Comparable to Althusser's concept of the ideological apparatus, the representation of women in Turkish cinema from its inception to the present demonstrates a patriarchal and even sexist approach. In this context, there are many studies that show that the representation of women in Turkish cinema is designed in accordance with the patriarchal state and society ideology (Yerlikaya, 2020; Öz, 2018; Kaya, 2024; Sarıgül and Şahin, 2023; Demir, 2021).

Women who were once respectable, motherly, and wealthy daughters of a family can now be seen in Turkish cinema as promoting their sexuality or pushing men in undesirable directions in films produced after 1980. As a good example of this, the representation of women in the Turkish film *Namuslu* (Honorable) from 1984 will be examined in this study. Because of its unique qualities, the movie *Namuslu* was selected as the article's topic as it is ideally suited for examining Althusser's idea of "Ideological State Apparatuses". The film reveals the protagonist's subordination to ideological apparatuses like the family, the workplace, the media, the law, and the school. In terms of women portrayal, it offers conventional and dubious

characters. The way the figures are positioned serves a very practical purpose in showing how patriarchal beliefs are perpetuated and how the masculine order is accepted in daily life.

In this film, which depicts how a guy who leads a respectable life is degraded by his surroundings, the women in his immediate vicinity including his wife and mother-in-law seduce him, mislead him, and degrade him. The male role in the movie is not as prominent, even though practically all of the woman characters actively and deceptively try to seduce Ali Riza. It is important to pay attention to this since it clearly shows that women are portrayed as "dangerous," "transgressive" creatures.

The film is critically analyzed in this study. The film's representations of women and its ideological framework are examined using Louis Althusser's theory of the state's ideological apparatuses. This framework is used to evaluate the film's contribution to the maintenance of gender norms and patriarchal ideology. The study employed qualitative material analysis. An analysis of the movie's characters' behavior, speech, and spatial and visual representations focused on the ways in which women contribute to "leading honorable men astray".

1.Theoretical Framework: Cinema as an Ideological State Apparatus

In addition to being a means of artistic expression, cinema is an ideological medium that is vital in forming social consciousness. Ideology functions through what Louis Althusser (1971) refers to as Ideological State Apparatuses (ISAs), which include media, culture, education, and religion. These mechanisms work by normalizing, internalizing, and representing prevailing values rather than by using direct force. Cinema is a potent ideological tool that helps perpetuate current social relations because it is a cultural and representational medium.

According to Althusser (1971), ideology positions people inside particular social roles and identities by showing them as subjects. Cinema contributes to this process by presenting ideological meanings as normal and inevitable through character development, narrative structures, and visual depiction. It frequently perpetuates gender hierarchies in patriarchal settings by replicating prevailing standards of masculinity and femininity. Male-centered narratives and established power dynamics are often reinforced through the construction of female characters. Therefore, cinema actively reproduces and legitimizes patriarchal social order in addition to reflecting ideology.

1.1 Feminist Film Theory and the Male Gaze

Feminist film theory offers a more focused examination of how gender ideology is replicated through cinematic representation, while Althusser offers a framework for comprehending how ideology functions through cultural institutions. Laura Mulvey's concept of the "male gaze" is among the most significant contributions in this discipline. According to Mulvey (2021), women are portrayed in classical films as objects of visual pleasure rather than active subjects since the genre is constructed around a masculine viewing stance. In this framework, men are portrayed as the active agents who propel the story along, while women are positioned as passive characters to be examined.

Mulvey's theory illustrates how patriarchal ideology is reinforced and women are objectified through cinematic tactics including camera angles, framing, and narrative focus. By creating subjects in ways that uphold dominant power relations, this visual structure supports Althusser's contention that ideology functions through representation. In this way, the male gaze can be viewed as a particular method used in film to perpetuate patriarchal ideology.

Cinema can be viewed as a gendered representational system and an ideological institution by combining Mulvey's study of the masculine gaze with Althusser's theory of ideological state apparatuses. By portraying women as symbolic characters who uphold masculine identity, morality, and authority, cinema not only places people in ideological subject roles, but also perpetuates gendered power dynamics. This theoretical framework offers a basis for examining how *Namuslu's* female characters are portrayed within a patriarchal ideological framework and how these portrayals support the perpetuation of prevailing gender norms.

1.2 Turkish cinema and the seducing women

Since 1917, Turkish cinema has featured seductive, dangerous, and dishonorable female characters. Two characters from the 1917 film *Pençe* (Claw) by Sedat Simavi can be used as examples. In Ahmet Fehim's *Murebbiye* (Tutoress) (1919), the French beau Anjel seduces an affluent household after Leman, a lady with an insatiable yearning for men, and Feride, a woman who cheats on her husband. During this time, man filmmakers stereotyped women and portrayed them in movies (Akyurt, 2018).

Two contrasting woman kinds appeared in Turkish cinema in the 1950s, when women clichés started to be accurately depicted (Kaymal, 2020). The wicked woman was alluring, corrupt, and depraved; the good woman was loyal to her spouse, hardworking, submissive, and courteous (Kaplan 2003). This is due to the fact that the women in these movies act immorally and without

shame. The idea of the vamp woman, a continuation of the sex workers, entered the film industry later, in the 1960s. (Serttaş and Sarıkaya, 2025). In movies, social pressure is frequently blamed for the degeneracy of vamp ladies and sex workers. A woman left alone would reportedly become a target for danger (Ahmad, 2016). During that period, most of the characters appear to be femme fatales, women who seduce men with their femininity.

Therefore, it can be said that the main woman characters in Turkish cinema up until the 1980s were both nice and wicked women. Both women have typical characteristics. A good woman is innocent, doesn't reveal her desires, and doesn't freely engage in her sexuality and doesn't smoke or drink alcohol. A bad woman, on the other hand, is seductive, knows what she wants, has high self-confidence, and uses her sexuality without hesitation. She likes traditional Turkish music and dance, smokes, drinks, and laughs a lot. These characters are usually performed by blonde ladies such as *Lale Belkıs*, *Suzan Avcı*, and *Neriman Köksal*.ⁱ Typical good performers include actors such as *Hale Soygazi*, *Filiz Akın*, *Fatma Girik*, *Hülya Koçyiğit*, and *Türkan Şoray*.ⁱⁱ They alternate between portraying the selfless mother, the devoted and honest but defamed wife, and the young lady looking sorrowfully at her white bridal gown (Gedik and Kadayıfçı, 2016: 126). They frequently fall prey to the cunning plans of their malevolent rivals, but they are unable to bring themselves to confide in the man they love about their problems. They triumph and get the joyful home they want at the end of the movie. On the other side, the bad woman loses (Kaymal, 2020:285).

In Turkish cinema, a feminist awakening started in the 1980s. Films started to depict the liberation of women. Given the societal shifts resulting from television's impact and the fact that Turkish cinema started to include female performers undressing, the portrayal of both nice and wicked women was merged into a single figure. These movies portray the challenges that women encounter because of their social standing, their estrangement from both themselves and their environment, and their necessity to carry on living as obedient and defenseless system participants (Özkan, 2012: 79).

Despite all of these developments, woman characters in some movies portraying the political issues and sociocultural traits of the time somehow mislead men and transform them from honorable to dishonorable. The patriarchal thought systems that have been established for years cannot be overcome, and the positions that are assigned to women essentially stay unchanged despite the feminist awakening in film. One of the movies that best illustrates this is the 1984 film *Namuslu*, which is the focus of the study.

2.The Film *Namuslu*

The Film *Namuslu* is directed by Ertem Eğilmezⁱⁱⁱ in 1984, which starred Şener Şen. Şener Şen played the lead for the first time in this film. He switched from portraying himself as a swindler, a scammer, and an immoral man to portraying a good character in this movie. The political climate of the time and the populace's fixation with money are both comically explored in the movie.

Ali Rıza (Şener Şen) is a modest, honorable, and trustworthy trustee in a company. His peers dislike and disregard him because of these characteristics. He visits the Central Bank one month to pick up his paycheck. He loses the money to two robbers on his way out and the suspicion is directed at Ali Rıza. Everyone believes he has the money and tries to be a partner despite his denials. Ali Rıza's reputation is enhanced by this. In the end, he chooses to exact revenge on people around him since he can no longer stand to be called a thief and treated with the deference he merits. In the film, Ali Rıza is transformed from a person of dignity to one who is dishonorable by the ladies in his life. Women attempt to mislead him, from his mother-in-law to his wife, from his neighbor to his coworker.

The film is considered one of the important masterpieces in Turkish cinema that deals with the themes of honor, morality and family. It depicts Turkey's gender roles, family values, and societal structure in the 1980s in an outstanding way.

2.1. Female Characters Seducing Ali Rıza

Naciye, Ali Rıza's Ambitious Wife

Ali Rıza's wife, Naciye, is a housewife. She, her husband, her mother, and their son reside in the basement of an apartment building, but she is not content with her life. She aspires to be wealthy and to abandon her life and household chores. She is upset with her spouse all the time. She says stuff like, "Take your foot off, you bloody idiot!" when her spouse gets home from work. She continually disparages her husband. She makes it clear that he is the reason they lead the way they do. How her husband, a fiduciary who plays with thousands of moneys every day, is impoverished is a question she asks frequently. She keeps saying, "I wish you were a thief."

At this moment, Naciye is the one who pressures Ali Rıza the most to claim that he stole money that he didn't. She did not respect him and did not even share a bed with him and treated him horribly before to the crime. But when the money issue arises, she begins to lavish him with praise, fix meals for him, and treats him extremely well. Following Ali Rıza's alleged wealth and embezzlement, Naciye's mother and brother dislike her femininity. They claim that she is

a woman who is unable to win over her husband. In fact, her mother says, "I could never teach you how to please your husband. I would beat her to death if I had a wife like that," her brother replies, turning to Ali Rıza's face.

Naciye's mother resides with her daughter and son-in-law. She frequently claims that her daughter is squandered as a result of this marriage and is not at all pleased with the man her daughter married. She never shows her son-in-law any respect, yet she praises him profusely after learning that he is supposedly stealing. Ali Rıza's mother-in-law is one of the women who led him astray since she continuously laments the lack of money and blames it solely for her and her daughter's pleasure. However, she cautioned her daughter to set up lovely tables for him and exploit her femininity to retain him in her grip once it was reported that Ali Rıza had stolen the money.

The way women are portrayed in movies is approached differently in this setting. There were two categories of female stereotypes in Turkish cinema up until the 1980s: good or wicked women. Women can be described as honorable, homemakers, moms, asexual, loving, forgiving or vamp women, who are merely sexual, hostile to pleasant homes, and deceive men (Kaplan, 2003:149).

At this point, although Naciye does not represent the traditional bad woman character, she represents the unacceptable housewife because she does not fulfill her feminine duties due to financial problems and constantly complains about her life. The movie portrays Ali Rıza's mother-in-law and wife as the catalysts and causes of his moral deterioration. The intricacies of women's roles in power and control within the family are reflected in their first abuse of him and subsequent change in attitude toward material gain. This portrayal demonstrates how women are put to the test in the patriarchal system when they must choose between helping to corrupt men and maintaining their "honorable" status. Because they are both the source and the result of the male protagonist's metamorphosis, the female characters thereby fulfill an ideological role.

Gönül, The Secretary

Gönül (Hülya Kutlubay) is a stunning, alluring, and ostensibly clever woman who works with Ali Rıza. She visits the boss of the company at his office. In this manner, she doesn't work at all, and Ali Rıza does the work that needs to be done by her.

Here, Gönül serves as a metaphor for the wicked woman. The "evil woman" motif is employed in Turkish cinema to describe people who have less-than-ideal traits. The non-ideal woman is

frequently portrayed by a woman who emphasizes her sexuality, lacks the traits of a housewife, refuses to have children, dresses provocatively, and seduces married man. (Baş, 2019: 568).

Because Gönül lacks morals, she attempts to seduce Ali Rıza when she hears that he is wealthy. She visits his room, attempts to arouse his passion, and makes hints. The change in Gönül's behavior towards Ali Rıza after it becomes clear that he has become wealthy through illegal means is noteworthy in demonstrating how the relationship between a female character and economic power is cinematically represented. In particular, Gönül's repeated questioning of Ali Rıza, such as "Do you need anything?", reveals that the character is coded as a self-serving and opportunistic figure not only on a narrative level but also through acting performance and body language. Gönül's exaggerated facial expressions, softened tone of voice, and physical closeness that invades Ali Rıza's personal space serve to construct the character as an object of desire directed towards male power and economic power. The rhythmic editing and repetitive dialogue structure, supported by comedic elements, ironize the female character's behavior while simultaneously reproducing the patriarchal perspective that associates womanhood with material gain. Thus, while satirizing social decay, the film simultaneously portrays the female character as dependent on economic power, morally unreliable, and a figure who changes her position according to male status. The close-up shots and the narrow physical distance between the characters visually emphasize Gönül's dominant and controlling position over Ali Rıza. The camera's presentation of Gönül leaning forward and positioned in the center of the frame makes her body the primary visual focus of the scene, while Ali Rıza's seated position lower down creates an image that reverses the power dynamic. Gönül's clothing and striking appearance are supported by mise-en-scène elements that emphasize the character's sexuality. In contrast, Ali Rıza's static bodily position and limited range of movement reinforce his passivity. The close-up scale intensifies the sexual tension and discomfort in the scene by increasing the visibility of facial expressions and glances. The exaggerated acting performance and physical proximity, used in a manner consistent with comedic aesthetics, code the female character as a seductive figure, while cinematically reproducing the patriarchal gaze that represents female sexuality as a threat to the male character.

The fact that Gönül's character is a secretary, it is important to highlight some aspects of the representation of secretarial women in Turkish cinema. In Turkish cinema, the secretary woman type is often portrayed as frivolous, seductive and bad woman. Visual cues like tight attire, over-the-top makeup, and flirtatious conduct are used to represent her. In the office where she works, she serves as a sexual object for the male hero or employer. She is rarely given any depth

of character; her labor, intelligence, and private life are nearly always hidden. Through such movies, this scenario forces working women particularly those from the lower middle class who have secretarial or office jobs into a sexualized space (Hollows 2000, 89). In line with the Althusserian theory, this type of portrayal characterizes the woman as a body that serves the man's desires, even if she works in the public sphere.

Iffet, The Neighbour's Wife

Ali Rıza's downstairs neighbor, Iffet (Sevim Çalışgır) is an attractive, blond woman. She constantly shows up at the door to welcome her spouse. Later, Iffet's husband uses her to seduce Ali Rıza after he is believed to be rich.

Iffet visits his home and begins making advances on him. She tries to make personal contact with him and offers him beverages. Iffet's behavior disturbs both Naciye and her mother.

One day, when Ali Rıza comes home from work, Iffet makes a plan with her husband to become his business partner and takes Ali Rıza home and tries to seduce him. Iffet is shown in this movie as a broad-secular woman. She has no morals and no sense of shame. Even though she is married, she tries to seduce another man who is married to achieve her goal. In the film, the character of Iffet is one of the most prominent examples of how female sexuality is represented in relation to manipulation and self-serving relationships. As Ali Rıza quickly gains economic power and status, Iffet's behavior towards him changes; she is presented as an intensely sexualized female figure through her body language, facial expressions, and persistent attitude. Particularly in the scene where she invites Ali Rıza into her home while her husband is away, Iffet's constant attempts at physical intimacy, her closing the door to restrict his movement, and her exaggeratedly flirtatious behavior, through mise-en-scene and acting performance, transform the female character into a seductive and morally threatening figure. In contrast, Ali Rıza's withdrawn physical demeanor, uneasy facial expressions, and resistance to entering the house emphasize the passive and vulnerable position of the male character.

In this scene showed in Figure 2, the physical proximity and bodily contact of the female character contrast sharply with the man's shy and passive demeanor. The woman's act of adjusting her tie is presented not merely as a casual gesture, but also as a symbol of power and control. The use of pastel-toned curtains and soft lighting adds an artificial intimacy to the scene, while the man's constrained body language heightens the comedic tension. The close positioning of the characters in the frame reinforces the feeling that the man's personal space

has been violated. Thus, the scene visually supports the ideological structure of Yeşilçam (Turkish cinema) which represents female allure as a tool of manipulation exerted over men.

At this point, Iffet resembles the femme fatale character of Hollywood movies. These female characters are attractive, charming and dangerous. Sometimes they seduce a married man, sometimes they can ruin a man's life or even drive him to death. With all these characteristics, they make men uncomfortable; their insecure, uncanny, and threatening presence terrifies male heroes. But they also frighten the audience, spoiling the pleasure of watching and impressionism (Willemsen, 1994: 34).

Iffet is a modern-day version of the stereotypical character often seen in patriarchal films: the "woman who transgresses moral boundaries and threatens the institution of marriage." This character is shown as a "bad woman" who doubts the sanctity of marriage and has the ability to destroy it, as well as a "dangerous woman" who jeopardizes the honor of the male protagonist, the defender of family values. Despite being married, the woman's attempts toward Ali Rıza serve to further the film's portrayal of "corrupting honorable men" and highlight the ways in which patriarchal standards that govern women's sexuality are perpetuated in the film industry. Therefore, this character in the film plays an ideological role by bolstering the notion that women's sexuality is viewed as a threat and needs to be curbed in order to preserve the male-dominated order.

Conclusion

In conclusion, *Namuslu* should be viewed as a potent ideological discourse that reproduces gender beliefs and patriarchal ideals, going beyond simply being a typical comedy that is ingrained in Turkish popular cinema history. The film's woman characters, including wives, mothers-in-law, neighbors, and coworkers, are portrayed as seductive agents who manipulate and corrupt the "honorable" man in addition to their social roles when analyzed through the lens of Althusser's theory of the state's ideological apparatuses. These portrayals portray masculinity as helpless and victimized, while women are portrayed as the main danger to men's moral character and public honor. One of the main causes of Ali Rıza's character breakdown is the self-serving, hypocritical, and manipulative actions of woman characters. Beyond economic differences, the representation of women as seducers who undermine male honor serves to uphold the patriarchal values of ideological structures like the family, community, and business. By depicting femininity as "dangerous" or "leading to immorality," the movie reproduces the core tenets of patriarchal ideology on a cinematic level and uses popular culture to justify gender inequality. The movie mainly explores the idea of honor from a sexist perspective, giving the

impression that dishonesty is only connected to women. Despite the deception of male characters, especially Ali Rıza, societal responsibility and criticism mostly target women. This illustrates how gender and the extent of women's subjugation influence the idea of honor.

Using *Namushu* as an example, this paper shows how popular Turkish cinema serves as a potent social tool that perpetuates the sexist norms of the prevailing ideology in addition to providing amusement. This study reveals that in the film, female characters are ideologically constructed not only on a narrative level but also through cinematic narrative techniques. Also, female characters are represented as figures who seduce men, are drawn to material power, and are morally unreliable, through body language, costumes, acting performances, physical intimacy, camera framing, and comedic aesthetics. This form of representation, within the framework of Laura Mulvey's "male gaze" approach, demonstrates the transformation of the female body into a visual object of desire, while simultaneously revealing, in the context of Althusser's concept of ideological apparatuses, how cinema functions as an ideological tool that reproduces patriarchal social values.

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ⁱ They are the actors who portray the evil female characters of Turkish cinema. Although actors such as Türkan Şoray and Hülya Koçyiğit has played a significant role in Turkish film history, the "main girls" have always needed a "villain" to center themselves on in order to exist. The "good" requires a steppingstone that will elevate them by keeping the other person out (Gedik, 2014).

ⁱⁱ They are known as the four-leaf clover of Turkish cinema.

ⁱⁱⁱ He primarily directed comedies in Turkish cinema. As a producer and director who quickly grasped the changes in Turkish cinema, adapted himself to these changes with his intuition, and kept his finger on the pulse of his audience, he left a significant mark. He made significant contributions both to the realization of risky films and to the introduction of certain directors and actors to Turkish cinema (Biography, 2025).

CHAPTER 2

LIBRARY SERVICES IN CORRECTIONAL FACILITIES ACROSS COUNTRIES: A COMPARATIVE ANALYSIS

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INTRODUCTION

Prison libraries are among the most important institutions for helping convicted individuals and detainees successfully reintegrate into society. When providing high-quality services, these libraries facilitate a more manageable experience of the challenging incarceration process by offering general, educational, recreational, and vocational information and activities that cater to the inmates' needs and interests; furthermore, by supporting their educational, vocational, and cultural development, these libraries transform the process into a constructive one and prepare them for life after release (Demir, 2015, p. 602). The prison library offers inmates a “normal zone” where they can escape the monotony of daily life and connect with the outside world. Library resources and services support processes of education, rehabilitation, and socialization, enabling inmates to engage with literature, culture, current events, and knowledge. However, the effective and sustainable provision of these services depends on the existence of appropriate national policies, economic support, and a functional service structure (Ljødal, & Ra, 2011, p. 473). These institutions contribute to the development of literacy skills and general knowledge by expanding inmates' opportunities to read and access information. Moreover, they can support inmates' physical and mental well-being by providing a safe and supportive environment. Library activities also help maintain family ties by enabling inmates to communicate with their families and share common experiences. Additionally, developing information literacy and vocational skills can enhance post-release employment prospects and reduce the risk of recidivism. However, insufficient funding, staff shortages, and limited collections hinder prison libraries from effectively fulfilling these functions (Han, 2023, pp. 110-111). Furthermore, strict security regulations and various institutional conditions common in many prisons often impede the meeting of these needs. Access to vital legal information is just as important as opportunities for education and vocational skill development, both of which can aid post-release reintegration. Reliable resources offering guidance on health and the challenges of daily life are also essential for inmates.

At the international level, emphasis is placed on protecting prisoners' rights regarding reading, access to information, and educational and cultural development. The Council of Europe's European Prison Rules serve as a key reference in this regard (Penal Reform International & Council of Europe, 2022). While the library is recognized as a vital institutional component in this context, guidelines from the US and the UK (Lehmann & Locke, 2005; Nurcombe, 1999) highlight libraries' role in supporting education and rehabilitation programs. Under this approach, the prison library reflects a shift in philosophy from punishment to rehabilitation and serves as a crucial resource for preparing prisoners for reintegration into society. International guidelines suggest that prison libraries should be organized to uphold prisoners' rights to read, learn, and access information. These libraries should provide services that are sensitive to diverse needs, including language, age, disability, and literacy levels. While library services need to align with security requirements, any restrictions imposed for security reasons must be necessary and proportionate.

This study aims to examine the state of prison libraries across various national and institutional contexts, analyzing selected examples from different countries. The data from this study reveal a significant gap between the institutional definition of prison library services and the actual benefits that prisoners receive. Several factors contribute to this discrepancy, including a lack of dedicated library spaces, outdated and insufficiently diverse collections, inadequate budgets, and the absence of specialized staff. Additionally, limited hours of access, censorship practices, and barriers to digital resources all negatively affect the quality of library services. Furthermore, much of the existing research on prison libraries is primarily descriptive, which complicates comparisons of practices across countries and effective assessment of these services' impact.

Method and Scope

This study employs a comparative literature-based approach to examine the provision of prison libraries across the countries included. It draws on scholarly studies, policy documents, legislation, official reports, and selected institutional or journalistic sources. Sources were identified through relevant databases, websites, and official reports using terms related to prison libraries, correctional libraries, library access, and the countries included in the study. Sources were included if they provided relevant evidence for at least one of the study's comparative dimensions: governance and service responsibility, legal or policy recognition, staffing and resources, practical access, service scope, or digital provision. This study is a comparative narrative review rather than a systematic review; therefore, the country accounts reflect the availability and quality of the identified sources and should not be interpreted as equally comprehensive national assessments.

Comparative Framework

The country cases are compared using six dimensions: (1) the legal or policy basis for prison library access; (2) the institution or organizations responsible for governance and delivery; (3) the availability of qualified library staff, funding, collections, and facilities; (4) the practical conditions of access, including opening arrangements and restrictions; (5) the range of services beyond book lending, such as educational, legal, cultural, and family-literacy activities; and (6) the role of digital resources and the safeguards applied to their use. For this study, a public-library partnership model refers to provision in which a public library authority has a formal service-delivery role; an institution-led model refers to provision primarily organized by the correctional authority; and a hybrid or multi-level model refers to shared responsibilities between correctional institutions and external public or educational bodies. These categories describe dominant arrangements in the available evidence and do not imply that provision is uniform across every facility in a country.

PRISON LIBRARY CONCEPT

In the Online Dictionary for Library and Information Science, the prison library is conceptualized as a "Correctional Library" and is defined as a synonym for "prison library." It is defined as follows: "A type of special library maintained inside the walls of a prison or other correctional institution for the use of inmates and staff, usually managed by a prison librarian..." The collection usually includes general-interest titles for recreational reading, educational and vocational materials, and legal resources (e.g., the Federal Bureau of Prisons Library) (Reitz, 2014). According to Folorunso (2019, pp. 2, 5–7, 16–19), a prison library is a service unit within a correctional facility that supports prisoners' access to information, self-directed learning, and education, and offers opportunities for social interaction and recreation. The fundamental dimensions of such a library can be summarized as follows: access to information and reading resources; education and professional development; information services regarding legal matters, health, and daily life; social and psychological support; and support for rehabilitation and reintegration into society. Effective service delivery also requires an adequate and diverse collection, a suitable physical space, qualified staff, and access to information technologies.

Based on these definitions, a prison library can be described as a specialized library service unit within a penal institution that enables prisoners—and, when necessary, staff—to access information resources; it supports needs related to reading, education, professional development, acquiring information on legal matters and daily life, social interaction, and leisure time. At the same time, it fosters the personal development, rehabilitation, and social reintegration of prisoners. The effective fulfillment of these functions requires a diverse and adequate collection, a suitable physical environment, qualified staff, and access to information technologies.

Prisoners continue to need access to information, including details about the law, legal procedures, and new skills, even while incarcerated. Libraries can fulfill these needs, but the availability and quality of library services differ widely from one country to another and from one prison to another. Some prisons have well-equipped libraries, while others provide little to no library services at all. This inconsistency restricts prisoners' access to vital information and learning opportunities (Paulson, 2025, p. 5).

The International Federation of Library Associations and Institutions (IFLA) provides guidelines for library services in correctional facilities (Garner & Krolak, 2023). These guidelines emphasize the importance of establishing safe, accessible, and inclusive library services that honor prisoners' rights to read, learn, and access information. Libraries should focus on supporting education, culture, well-being, rehabilitation, and preparation for release. They must offer up-to-date resources that cater to diverse needs, including considerations for language, age, disability, and literacy. It is essential to protect the privacy of prisoners, and any censorship or access restrictions should only be applied for necessary and proportionate security reasons. Key elements for effective library services include having qualified librarians, adequate budgets and space, opportunities for user participation, regular evaluations, and collaboration with public libraries. While the development of digital access and skills is crucial, digital resources should not replace print collections or in-person services. Minimum service standards should be established as a starting point for facilities where services are currently lacking (Garner & Krolak, 2023).

HISTORICAL PERSPECTIVE OF PRISON LIBRARIES

The origins of prison libraries can be traced back to the 17th century in Europe and America, when clergy members distributed books to prisoners for moral and religious reform purposes (Garner, 2017, p. 332). The first documented instance of a prison library in the United States was a book service initiated in 1790 through a collaboration between the Philadelphia Prison Society and the Walnut Street Jail. Between 1790 and 1870, these services were largely restricted to religious publications and aimed to encourage repentance among inmates. As this approach came to be viewed as ineffective for crime prevention, libraries were reconceptualized from 1870 onwards as rehabilitation-oriented institutions that supported educational and recreational needs (Iverson, 2021). More formal library services, involving the purchase of books for prisoners' use, became widespread in U.S. prisons during the mid-19th century; initially, the collections consisted primarily of religious works (Garner, 2017, p. 332).

The American Correctional Association published its first handbook on prison libraries in 1930, while the Library Services and Construction Act of 1966 provided funding for the development of these services. From the 1970s to the present, professional standards and legal rulings have played a decisive role. In its 1977 “*Bounds v. Smith*” decision, the U.S. Supreme Court recognized prisoners' right to meaningful access to the courts. In contrast, the 1996 “*Lewis v. Casey*”¹ ruling established that concrete evidence of harm was required to demonstrate a violation of this right. Furthermore, the proliferation of prison tablets since 2012

¹**Bounds v. Smith (1977):** The U.S. Supreme Court ruled that states must provide prisoners with reasonable means—such as law libraries or qualified legal assistance—to ensure access to the courts. The objective was to enable prisoners to exercise their right to seek judicial relief effectively.

Lewis v. Casey (1996): The Court clarified the limits of this obligation: prisoners do not have an independent right to possess a comprehensive law library. A prisoner must demonstrate actual injury in a specific case resulting from the state's inadequate assistance, such as being unable to file a significant lawsuit or losing one. While “*Bounds*” established the obligation to provide access—stating that states must offer adequate resources like law libraries or qualified legal assistance to ensure meaningful access to the courts—“*Lewis v. Casey*” held that concrete injury must be proven. A prisoner must show that inadequate resources actually prevented them from pursuing a specific legal claim, thereby causing concrete harm (Gerken, 2003).

has transformed access to digital resources and sparked new debates about the nature and accessibility of library services (Iverson, 2021).

From the early 20th century onwards, as libraries began to assume functions similar to those of public libraries, the growing emphasis on the rehabilitative aspect of incarceration transformed the objectives of their services. The Library Services and Construction Act, enacted in the US in 1966, enabled prison libraries to enhance their collections, employ professional librarians, and expand their services. In Australia, the assessment and renewal of collections in New South Wales prisons—along with the shift allowing inmates to select their own books—marked a significant development in 1951; the opening of Western Australia's first state prison library in Bunbury in 1971 represented a noteworthy milestone (Garner, 2017, pp. 332-333).

The history of prison libraries in Scandinavia dates back to the 18th and 19th centuries: while early collections in Denmark consisted of religious publications, the introduction of the solitary confinement system in Norway in 1851 brought the issue of providing prisoners with reading materials to the fore. A prison library was established in Denmark in the 1860s, and its services became increasingly integrated with those of public libraries during the 20th century. Sweden linked these services to municipal public libraries in 1958, Denmark established a committee in 1968 proposing similar cooperation, and Norway moved toward a state-supported model following a 1976 study. A pilot program launched in Norway in 1980 proved successful; it was made permanent in 1983, and the services were incorporated into the national budget. Deficiencies in the scope of services were identified in 2003; the scope subsequently expanded due to increased funding and new standards introduced after 2005. By 2010, services were being provided to all prisoners unable to visit public libraries. Although the models in the three countries differed, prison libraries were regarded as important for education, culture, equality, and reintegration into society, and international guidelines also supported cooperation between these libraries and public libraries (Ljødal, & Ra, 2011, pp. 475-479, 480-482).

As is evident, the earliest examples of prison libraries worldwide—particularly in Europe and the Americas—emerged in the 17th and 18th centuries through initiatives aimed at providing inmates with religious and moral publications. While the primary objective was initially to foster moral reform, from the 19th century onwards, these libraries began to evolve, taking on roles in education, literacy, and rehabilitation. This transformation unfolded at varying paces across different countries; for instance, early institutional steps regarding prison libraries were taken in Ireland in 1827 and in the Netherlands in 1841. In the 20th century, the development of professional standards and collaborations with public libraries strengthened services in some nations. At the same time, digital resources and technologies have been incorporated into library services since the 2000s. Nevertheless, as a 2023 review reveals, this global development has been uneven: while services are relatively advanced in the US, the UK, and certain European countries, issues such as insufficient budgets, a lack of specialized staff and suitable facilities, limited collections, and censorship remain significant challenges in many regions (Hussain et al., 2023, pp. 184-185).

The study conducted by Ardanuy and Sulé (2023) explores the historical development of prison library research using bibliometric methods. An analysis of 957 publications from 1901 to 2022 reveals that these works generally possess limited scientific value, as they primarily rely on description and speculation. There is a noticeable increase in publications, particularly after the 1970s, a trend believed to be linked to socio-political movements. Collaboration—especially partnerships with public libraries—emerges as the most frequently researched topic. While the United States produces the highest volume of research, an increase in studies is also observed in other countries. Most of these studies are authored by a single individual, written in English, and are relatively brief (one to two pages). They tend to focus on practical

applications rather than offering substantial international visibility. Consequently, the study highlights the need to enhance the field through more scientific and evaluative research.

Finlay and Bates (2018) introduce a theoretical framework to explore how incarcerated individuals use library services and how these services can support desistance from crime. They highlight the positive effects of prison libraries on education, psychological well-being, identity transformation, social connections, and motivation. Their model integrates aspects of crime theories, informal learning, and critical librarianship to help researchers and practitioners evaluate and enhance library services. However, implementing this model faces challenges such as limited materials and technology, security-related restrictions in learning environments, and the time and cost required for staff training. Additional obstacles include insufficient support from prison management, resistance to change, and the need to adjust existing institutional practices. A lack of empirical data in this field may further delay measurable outcomes and improvements. A recent study by Finlay, Hanlon, and Bates (2023) highlights the challenges faced by prison libraries and offers evidence-based recommendations for aligning policy and practice. It examines difficulties related to fundamental rights, access, staff training, collaboration, resource shortages, and service inconsistencies. The study emphasizes the need to address barriers to access, improve the availability of digital technology, and develop user-oriented services. By implementing international guidelines and policies, prison libraries can play a crucial role in upholding prisoners' rights and aiding their social integration. Ultimately, as Kelley (2025, p. 6) notes, traditional library services depend on users' fundamental freedoms—such as borrowing books or accessing the internet—yet these resources are often scarce in a prison environment where even simple tasks can become complicated. According to Croce (2025, p. 33-36), digital transformation presents a significant challenge for prisons, which operate 24/7 and require high security. The technological infrastructure, including IP-based security systems, primarily focuses on security, surveillance, and communication. Video conferencing systems, used for remote visits or legal consultations, maintain strict privacy and security measures, limiting connections to the facility rather than allowing internet access. Installing new IP devices poses challenges related to costs, risks, and complexity. However, these solutions offer benefits such as improved security, high-resolution surveillance, and support for rehabilitation. Modern technologies such as Ethernet over Coaxial (EoC) and Power over Ethernet (PoE) can reduce cabling costs and simplify installation, contributing to the digital transformation of prisons.

Prison libraries have transformed from simple tools for moral instruction into complex services that promote access to information, education, well-being, rehabilitation, and social reintegration. Despite professional guidelines and service models, the availability of these libraries varies widely and is affected by institutional limitations, including funding, staffing, security measures, and access to digital resources.

Broader penal policies and institutional structures play a significant role in shaping these challenges and priorities. Therefore, analyzing prison libraries within different national contexts is essential for meaningful comparison. The following section will explore how various incarceration systems affect the organization, accessibility, and development of prison library services worldwide.

INCARCERATION SYSTEMS AND PRISON LIBRARIES IN A GLOBAL PERSPECTIVE

This section explores the institutional frameworks, service models, and key practical challenges of prison libraries in various countries, each with its own geographical and institutional context. It takes an introductory approach, provides a framework for comparative analysis, and addresses prisoners' needs for access to information, reading, learning, and

participation in cultural life. It discusses important aspects such as the accessibility of library services, the adequacy of staffing and resources, digital access, and collaboration with public libraries. The objective is not to rank countries by their success but to illustrate how different prison policies impact library services. The selection of these countries does not constitute a statistically representative sample of the global landscape; instead, it aims to highlight various service models and the challenges of implementation. Norway, the Netherlands, Japan, Spain, the United States, and Brazil provide diverse insights into rehabilitation policies, legal regulations, library service organization, and the practical challenges faced. Additionally, Canada and Australia are included as complementary cases that broaden the comparative discussion, addressing issues such as standardization, resource and staffing adequacy, access to information, and user needs. Türkiye is also evaluated to assess international approaches within a national context and to establish a comparative basis for discussions about prison librarianship in the country.

According to information provided by Shabbir et al. (2025), it is possible to compare countries' penal systems based on the balance between "punishment and supervision" and "rehabilitation and reintegration into society." In this context, Norway treats imprisonment primarily as a process of rehabilitation and reintegration. Prisoners are offered education, vocational training, mental health support, and relatively normal living conditions. The article links this approach to low recidivism rates while noting the high per-capita cost. The Netherlands opts for alternatives to imprisonment—such as community service, fines, and behavioral support—whenever possible. When incarceration is necessary, the system prioritizes maintaining family and community ties and preparing for life after release. Specialized facilities combining treatment and supervision are also utilized for certain individuals with mental disorders. Japan places order, discipline, and personal responsibility at the core of its system. Although prisoners may receive vocational training in fields like carpentry and computer programming, their daily lives and social interactions are governed by strict rules. While highlighting Japan's low recidivism rates, the article criticizes practices such as restricted visitation and solitary confinement for their humanitarian and psychological impacts. Spain integrates security and rehabilitation within a tiered system. Prisoners' conditions vary according to the nature of their offense and their stage of reintegration; those nearing release are granted greater opportunities for community contact and preparation. Sentence reductions for work, temporary leave, and non-custodial sanctions for low-risk individuals are components of this approach. The United States employs a model that is more punitive and reliant on incarceration. Key issues include mass incarceration, overcrowded facilities, policy disparities between states, and limited access to rehabilitation services. It is noted that difficulties in accessing housing, employment, and healthcare services following release increase the risk of recidivism. While Brazil's widespread prison system is characterized by severe overcrowding and limited rehabilitation resources, the community-based Association for the Protection and Assistance of the Convicted (APAC) model is cited as a positive alternative. According to the article, although this model shows promise for lower costs and reduced recidivism, its nationwide expansion remains limited.

Overall, the central argument put forward by Shabbir et al. (2025) is that systems prioritizing human dignity, rehabilitation, and post-release support can facilitate reintegration into society and reduce recidivism. However, it is also emphasized that each country's approach must be evaluated within the context of its own social, cultural, and political conditions.

One way to classify correctional facility libraries is by three types: "administration and funding," "services and collection development," and "hybrid." In the United States, Canada, Germany, and Poland, funding and management of library services are handled directly by the correctional institutions. In contrast, Sweden, Norway, Denmark, France, Italy, and Spain

provide library services through agreements between correctional institutions and public libraries. In these cases, public libraries are responsible for service management and collection development. Additionally, the United Kingdom uses a hybrid system in which some institutions collaborate with public libraries under the oversight of local authorities, while others—especially privately operated facilities—manage their own budgets and assume full responsibility for library services (Demir, 2015, pp. 522–523; Lehmann, 2011, p. 384).

To illustrate how different approaches to penal administration influence prison library services, this section compares the provision of prison libraries in Norway, the Netherlands, Japan, Spain, the United States, Brazil, Canada, Australia, and Türkiye. It organizes these cases based on their primary systems of governance and service delivery, categorizing them into four models: “public-library partnership” or “imported service” models; “institution-led models”; “hybrid and multi-level models”; and “legally mandated but locally variable or underdeveloped models.” These categories focus on the distribution of responsibility rather than ranking national performance. The comparison also examines how broader penal philosophies, legal frameworks, institutional resources, and restrictions influence the gap between formal commitments and the actual access prisoners have to library services.

PRISON LIBRARIES ACROSS PENAL SYSTEMS: A COMPARATIVE SYNTHESIS OF GOVERNANCE, ACCESS, AND REHABILITATION

Penal Philosophy and Library Governance

National approaches to imprisonment significantly affect the environments in which libraries operate within correctional facilities. As mentioned earlier, in Norway, the focus is on rehabilitation and reintegration, making these principles central to its prison system. The Netherlands has historically emphasized alternatives to incarceration, aiming to maintain community ties for inmates. Japan combines rehabilitation goals with a strong focus on discipline and institutional order. Although Spain's legal framework formally prioritizes rehabilitation, its implementation has been influenced by political changes, overcrowding, and uneven resource distribution. In contrast, the United States relies heavily on incarceration, leading to significant variations between different jurisdictions. Brazil's system aims to balance statutory commitments to education and reintegration with challenges such as severe resource constraints and overcrowding, as well as community-based alternatives like the APAC model (Shabbir et al., 2025).

Variations in library services are significant, as they depend not only on legislation but also on how penal institutions allocate responsibilities, funding, professional expertise, and access opportunities. A useful framework for classifying service governance involves three primary arrangements. First, under the “institution-centered model,” penal authorities assume responsibility for both funding and service delivery; this model is observed in countries such as the United States, Canada, Germany, and Poland. Second, the “public library partnership model” is based on collaboration between penal institutions and public libraries, with public libraries typically taking the lead in collection development and service management; countries such as Norway, Sweden, Denmark, France, Italy, and Spain implement this model. Finally, the “hybrid model”—seen in the United Kingdom—combines elements of public library partnerships in some facilities with direct institutional responsibility in others (Demir, 2015, pp. 522–523; Lehmann, 2011, p. 384).

In comparing these arrangements, legal recognition, policy expectations, and operational access should be treated as distinct matters. A legal regulation or policy statement may establish a general right or expectation of service without specifying the frequency or duration of access, staffing arrangements, or practical conditions. Consequently, the existence of a formal right does not prove that prisoners can use the library regularly or access the resources they need.

Where the cited source does not clarify the legal status or implementation of a provision, it is described as a stated policy or practice rather than as a legally guaranteed right.

The country examples discussed here demonstrate that these categories should be viewed as analytical starting points rather than rigid definitions. In reality, responsibility may be shared, services may vary across institutions, and formal legal requirements may coexist with significant deficiencies regarding staffing, budgets, and access.

PUBLIC-LIBRARY PARTNERSHIP AND IMPORTED-SERVICE MODELS

Norway: Public Services Within the Prison

The Norwegian prison system has evolved from one that favored solitary confinement to an approach that emphasizes communal living and rehabilitation. Initially endorsed by the 1841 Commission, solitary confinement was implemented with the opening of Botsfengslet in 1851. However, it soon became apparent that isolation disconnected inmates from reality and did not help them develop essential skills. A reform committee in 1927 recommended supervised communal living along with work, education, and leisure activities, leading to the 1958 Prison Act, which shifted the focus to human dignity, reintegration, and reducing recidivism. In 1981, life imprisonment was replaced by a maximum term of 21 years for certain offenses. The 2001 Execution of Sentences Act introduced various options, including closed and open prisons, halfway houses, and conditional release. Today, inmates participate in work and educational programs while receiving support to secure employment and housing upon release (STERK, 2025).

According to 2024 data from Statistics Norway (SSB), there were a total of 3,359 individuals in prisons and other forms of penal execution on January 1, 2024; this figure encompasses not only convicted prisoners but also those in pre-trial detention and individuals serving sentences through methods such as electronic monitoring. Throughout the year, 8,827 new admissions to prison and 8,619 releases were recorded, with a total of 1,136,744 prison days served. Of the total count on January 1, 752 individuals were in pre-trial detention, 2,446 were serving prison sentences, 158 were in preventive detention, and 3 were imprisoned for non-payment of fines (Statistics Norway, 2026). According to current data, there are 58 prisons in Norway with a total capacity of just over 3,600 across 33 prison units; approximately 70% of these facilities are high-security. The maximum prison sentence is generally 21 years, while the average sentence is around 8 months. Approximately 3,600 full-time staff are employed in prison services (Kriminalomsorgen, 2026).

In general, the system within Norwegian prisons prioritizes not merely punishment but also rehabilitation, the "normalization" of inmates' living conditions to mirror ordinary life in society as closely as possible, and successful reintegration into society following release. Educational opportunities and normalization programs—particularly those offered in open prisons—are presented as integral components of this approach. Norway's recidivism rate stands at approximately 20 percent—one of the lowest among Western nations—and it is believed that practices supporting education and social reintegration may contribute to this outcome (Denny, 2016, p. 22). Since 1969, Norwegian prison libraries have used the "imported service model." Instead of operating as separate departments within prisons, they extend public library services into correctional facilities. Public institutions provide the necessary services and expertise, while the state offers funding. Additionally, prison administrations oversee the delivery of these services in accordance with security requirements. This model aims to give inmates access to a broader array of resources and programs, thereby aiding their rehabilitation and social reintegration. However, the need for coordination among institutions and adherence to security protocols can present practical challenges (Rocha et al., 2024, p. 765; Jeon, 2025). More generally, the Scandinavian experience illustrates how partnerships with public libraries can

link prison libraries to established professional networks. Such collaboration supports education, cultural participation, equality, and the successful reintegration of prisoners into society (Ljødal & Ra, 2011, pp. 475–482). Norway ensures that prisoners have a legal right to access library services. Prison libraries function as branches of local public libraries. While the state provides funding, service administration is a collaborative effort between prisons and public libraries. This model of "external service provision" promotes literacy and learning by giving prisoners access to a wider selection of books and relevant programs (Jeon, 2025).

In conclusion, the Norwegian prison system is structured to prioritize human dignity, education, and reintegration into society over punishment. The provision of prison library services in collaboration with public libraries is a key element of this approach, facilitating prisoners' access to information and learning opportunities. However, inter-institutional coordination and security requirements can complicate the delivery of these library services.

Norway serves as a prime example of a public-service partnership model in its prison system. It has shifted away from relying on isolation as a core principle and has moved toward communal living, education, work, and rehabilitation. This transformation was solidified by reforms, including the 1958 Prison Act and subsequent legislation that supports various forms of custody, such as open prisons, halfway houses, and conditional release (STERK, 2025). The overarching philosophy of the penal system emphasizes normalization: prison life should, as much as possible, maintain conditions and provide opportunities that prepare individuals for reintegration into the community. Education and reintegration are central to this approach, and Norway's relatively low recidivism rate is often linked to its focus on rehabilitation. However, it is important to note that these outcomes cannot be attributed to any single service (Denny, 2016, p. 22).

The model's principal strength is its connection to public-library expertise and collections. Its practical vulnerabilities lie in coordination between prison administrations and external providers, as well as in the security rules that govern movement, access, and service delivery. Thus, Norway illustrates both the potential of partnership-based provision and its dependence on sustained inter-institutional cooperation.

Spain: A Partnership Framework with Uneven Implementation

The evolution of prisons in Spain is closely linked to the country's political and social transformations. In the Middle Ages, imprisonment primarily served to detain individuals awaiting trial or execution; conditions for prisoners were harsh, and little regard was paid to their well-being. Under the influence of Enlightenment thought, a shift began in the 19th century toward viewing imprisonment not merely as a means of detention, but as a tool for rehabilitation and the maintenance of social order. The Penitentiary Act of 1834 marked a significant turning point in terms of standardizing conditions and developing a more humane approach to the execution of sentences (Lafora, 2025). The first "houses of correction" emerged in the 16th century, and the deprivation of liberty began to be used as a method of punishment. Previously, corporal punishment, forced labor, and fines had been more common. Initially, imprisonment aimed to encourage the prisoner to reflect on their behavior and reform themselves. In the 19th century, the approach shifted from merely eliciting remorse from the prisoner to reintegrating them into society (Perdigó, & Tascón, 2024).

In the 20th century, particularly during the Franco regime, prisons were also used as instruments of political repression. During the final phase of the Franco dictatorship, prisons were institutions where—alongside political dissidents—predominantly poor, young men were held. Just before Franco died in 1975, there were approximately 15,000 people in the prison system. The system was characterized by harsh sentences and preventive detention practices that allowed for the confinement of individuals who had not even committed a crime, based on

the grounds of "social dangerousness" (Rubio, 2023, pp. 130–132). During the democratization process following Franco's death, the aim was to reorganize the system in accordance with democratic principles. The General Penitentiary Law of 1979—a key legal pillar of this transformation—laid the foundation for a modern approach to the execution of sentences that prioritizes the rights and dignity of prisoners, as well as their rehabilitation and reintegration into society (Lafora, 2025).

From 1976 onwards, the failure to grant requests for amnesty and poor prison conditions sparked protests among prisoners convicted of common crimes. COPEL was the primary organization behind this movement. The protests brought demands for prison reform to public attention and played a pivotal role in the government's initiation of a reform process (Rubio, 2023, pp. 134–139). The General Penitentiary Law, adopted in 1979, marked a significant departure from Franco-era practices by establishing a legal framework for prisoners' rights and social reintegration. However, the implementation of these reforms was limited by budgetary constraints, resistance from prison staff, and a rapid increase in the prison population. Overcrowding became acute then in prisons—in Rubio's words, prisons transformed from rehabilitation centers into "warehouses" where prisoners were merely stockpiled (Rubio, 2023, pp. 141–145). Rey Sánchez and Pascual Rodríguez (2021) explain that the initial model created after the 1979 General Penitentiary Law included relatively small prisons located near city centers. These facilities were designed to support various activities for prisoners, such as workshops, schools, libraries, sports areas, and gymnasiums. However, starting in the 1990s, rising prison populations and the demand for additional capacity led to a shift toward a larger "standard" prison model. This new model typically accommodates around 950 to 1,000 inmates and is located in rural areas, far from urban centers (Rey Sánchez & Pascual Rodríguez, 2021, p. 577).

Today, Article 25.2 of the Spanish Constitution stipulates that prison sentences aim at rehabilitation and social reintegration. Accordingly, prison authorities are expected to implement programs that prevent reoffending and support the inmate's return to society. In the modern era, digitalization is also part of this objective. Perdigó, & Tascón (2024) argues that video calls strengthen family ties, digital application systems reduce bureaucracy, and access to distance learning, job placement services, and other digital resources via computers can support inmates' social reintegration. It also emphasizes that these practices must comply with security and data privacy regulations (Perdigó, & Tascón, 2024).

Briefly, the historical foundation of prison libraries in Spain traces back to the 18th century, when Beccaria regarded education as crucial for crime prevention, and to the 19th century, when Concepción Arenal advocated for educational and cultural activities within prisons. Felipe Picatoste proposed establishing public libraries in prisons in 1870; the first prison schools opened in 1873, followed by the libraries that supported them in 1874. However, the library model introduced by María Moliner in the early 20th century did not endure, and the libraries suffered from long-term neglect. The legal basis for the current system was established by the General Penitentiary Law of 1979, which mandated that every prison have a library to address educational, informational, and leisure needs (Pulido, 2011, pp. 460–461).

The organizational model for prison libraries in Spain resembles that of other Mediterranean countries, such as France and Italy; the system relies on cooperation between the prison administration, the Ministry of Culture, and the autonomous regions. Agreements established since the 1980s have supported collection development, staff training, and reading activities. However, libraries were administratively separated from educational units in 1999; in practice, they have maintained close ties with schools. In 2005, the national reading campaign was extended to prisons, and some autonomous regions took steps to link these libraries to public library networks. However, the services remained largely focused on education and the

promotion of reading; professional librarians, regular budgets, information services, and access to technology were inadequate in many locations. Catalonia stands out from other regions by employing professional librarians in all its prisons (Pulido, 2011, pp. 461–464, 467–469).

Spain also belongs broadly to the public-library partnership group, although its system involves cooperation among prison administrations, the Ministry of Culture, and autonomous regional authorities. The legal foundation is comparatively strong: the General Penitentiary Law of 1979 requires prisons to provide libraries addressing educational, informational, and leisure needs. This framework followed a longer history of educational initiatives, including the establishment of prison schools in the nineteenth century and libraries intended to support them (Pulido, 2011, pp. 460–461). The institutional model has nevertheless changed alongside the prison system. Early post-1979 facilities were relatively small and located nearer to urban centers, with space for workshops, schools, libraries, and recreation. From the 1990s, pressure to increase capacity encouraged the development of much larger prisons, often located far from cities (Rey Sánchez & Pascual Rodríguez, 2021, p. 577). This shift has implications for access: a library may be formally present yet remain constrained by the facility's scale, location, staffing, and organization.

Agreements dating back to the 1980s have supported collection development, staff training, and reading activities in prison libraries. Some regions have also attempted to connect prison libraries with public library networks. However, services are still inconsistent; many locations lack professional librarians, stable budgets, adequate information services, and access to technology. Catalonia is noted as an exception, employing professional librarians in its prisons (Pulido, 2011, pp. 461–464, 467–469). Thus, Spain illustrates that having a statutory obligation and a partnership framework alone does not ensure consistent professional service. The decentralized nature of implementation can lead to significant differences between regions.

Türkiye: Developing Partnerships Within a Centralized System

The process of modernizing prisons in Turkey gained visibility during the Ottoman era with the opening of the Bâb-ı Zabtiyye Detention House in Istanbul in 1846; by the 1850s, prison reform, the renewal of penal legislation, and the study of European practices had become part of state policy. The opening of the Central Prison (Hapishane-i Umumi) in Sultanahmet in 1871 and the enactment of the first comprehensive regulation regarding prison administration in 1880 marked significant steps toward institutionalization. Central administration was strengthened through the establishment of the Prison Administration in 1911 and its transformation into the General Directorate of Prisons in 1913; subsequently, during the Republican era, the administrative structure was further defined by the 1930 Law on the Administration of Prisons and Detention Houses and the establishment of the General Directorate of Prisons and Detention Houses in 1938. Approaches to the execution of sentences also evolved; while labor and progressive execution practices came to the fore in the 1930s, the Law on the Execution of Sentences (Law No. 647) of 1965 marked the beginning of a new era. The fundamental framework of contemporary execution law was established in 2004 with the entry into force of the Turkish Penal Code, the Criminal Procedure Code, and the Law on the Execution of Penalties and Security Measures (T.C. Adalet Bakanlığı Ceza ve Tevkifevleri Genel Müdürlüğü, 2019).

According to Eren (2016, pp. 11–14), the history of prisons in Turkey can be divided into three distinct periods, each characterized by changes in architectural structures, legal frameworks, and penal practices. The first period spans from the early Ottoman era to the 1870s. During this time, there were no facilities specifically designed as prisons, and prison sentences were not legally defined. As a result, individuals were typically held in various locations while awaiting trial. The second period began in the 19th century, following the Tanzimat reforms.

This era marked the introduction of imprisonment into the legal system and the construction of buildings specifically intended for use as prisons. The opening of the “Central Prison” (Hapishane-i Umumi) in 1871 and the enactment of prison administration regulations in 1880 represented significant advancements toward institutionalization. Efforts toward rehabilitation, along with an administrative and legal structure that largely carried over from the Ottoman era into the Republic, meant that this period lasted until the 1950s. The third period emerged from the 1950s onward, marked by the introduction of standardized prison designs and a shift from dormitory-style housing to cell-based accommodation. A notable development was the 1983 regulation, which established the legal basis for classifying political prisoners and housing them in single or triple cells. This period marked a pivotal change toward a more security-oriented approach in the penal system. The shift from dormitories to cells became especially pronounced in the 2000s with the widespread adoption of “F-type” prisons, reflecting a transformation in both architectural and legal frameworks alongside a movement toward a security-centric model of penal execution.

The primary users of prison libraries in Turkey are convicts and detainees. Therefore, it is the warden's responsibility to enhance their knowledge, as stipulated in the Regulation on the Administration of Penal Execution Institutions and Execution of Punishment and Security Measures. Based on this framework, the Regulation on Libraries and Book Collections in Penal Execution Institutions and Detention Houses was established and came into effect upon its publication in the Official Gazette on November 9, 1983 (Koç, 2018, s. 800).

Studies directly addressing prison libraries in Turkey are quite limited. Among the older studies, Önal's (1984) article notes that—despite the existence of a legal framework enabling public libraries to serve penal institutions and the willingness of convicts to participate—such services are neither adequate nor widespread; rather, the practice relies on interpersonal relationships rather than institutionalized procedures. Addressing staffing and budget issues, the author recommends hiring librarians with public library experience for these institutions, allocating specific budgets to the libraries, and providing additional funding to public libraries for this purpose. Demir's (2013) article examines penal institution libraries as fundamental tools that normalize prison life by supporting the education, personal development, and connections to the outside world of convicts and detainees. Drawing on practices in the US, Canada, the UK, and Scandinavian countries, as well as survey findings from 137 institutions in Turkey, the study highlights issues such as insufficient budgets, a lack of qualified staff and resources, physical access constraints, and limited cooperation with public libraries. The author argues that improving library services, establishing sustainable partnerships with public libraries, and implementing regulations aligned with international standards would strengthen the processes of normalization and social reintegration.

According to a study conducted by Demir (2015, pp. 524–525) roughly a decade ago, prison libraries in Turkey provide limited services due to a lack of budget, resources, and specialized personnel. Although regulations mandate support from public libraries, such cooperation is generally neither regular nor sustainable. As teachers and correctional officers mostly manage the libraries, professional expertise is also insufficient. The author proposes improving services through short-term, feasible solutions while simultaneously establishing a more permanent institutional structure for the long term. To address these issues, Demir (2015, p. 528) suggests a model of “cooperation with public libraries” between the Ministry of Justice and the Ministry of Culture and Tourism. This approach is both practical, cost-effective, and viable in the long run. Türkiye's legislative framework accommodates this model. Scandinavian countries, as well as France, Italy, and Spain, serve as positive examples by adopting this method.

A protocol signed between the Ministry of Justice General Directorate of Prisons and Detention Houses and the Ministry of Culture and Tourism National Library Directorate aims to support libraries within penal institutions and probation directorates, as well as the Specialized Library located at the Ministry of Justice Training Center. Under this agreement, the National Library Directorate commits to donating duplicate books from its collection—to the extent its resources allow—and providing training in librarianship upon request; meanwhile, the General Directorate of Prisons and Detention Houses undertakes the distribution of the donated books to the institutions and agrees to cover certain expenses related to training activities. The protocol aims to support detainees', convicts', and individuals subject to probation's access to information resources and personal development, while limiting the parties' obligations to their own personnel, regulations, and financial resources. The protocol, which entered into force in 2018, was established for a one-year term, with an annual renewal provision unless terminated (T.C. Adalet Bakanlığı Ceza ve Tevkifevleri Genel Müdürlüğü, 2018).

Another protocol signed by the Ministry of Justice's General Directorate of Prisons and Detention Houses and the Ministry of Culture and Tourism's General Directorate of Libraries and Publications aims to establish public libraries within penal institution complexes for use by convicts, detainees, staff, and their families. While the Ministry of Justice provides the premises, covers renovation and operating costs, and handles security and logistics, the Ministry of Culture and Tourism provides library materials, equipment, automation systems, personnel, and technical support. The protocol entered into force on March 29, 2021, and is in effect indefinitely (T.C. Adalet Bakanlığı Ceza ve Tevkifevleri Genel Müdürlüğü, 2021).

According to information provided by the T.C. Ministry of Culture and Tourism, various initiatives are underway to enhance access to books and educational resources in prisons. These efforts aim to expand library services not only for detainees and inmates but also for staff, families, and visitors. The following points summarize the development of these services, the libraries that have been established, and the ongoing projects (T.C. Kültür ve Turizm Bakanlığı, 2026a):

- The Ministry of Culture and Tourism and Ministry of Justice initiated efforts to improve library and educational services in prisons through a protocol signed on October 24, 2019. Public libraries provide books and audiobooks to penal institutions; these services are available not only to detainees and convicts but also to staff, families, and visitors.
- In response to growing demand, the initiative expanded beyond mere book provision to include establishing dedicated libraries on prison campuses and facilitating faster access to publications.
- To this end, the two ministries signed a supplementary protocol on March 29, 2021. The work involves identifying suitable buildings and spaces for libraries, particularly within high-population campuses.
- The first of these, the Sincan Justice Public Library (Adalet Halk Kütüphanesi), opened at the Sincan Penal Institutions Campus in Ankara on November 15, 2021.
- The Elazığ Justice Public Library is also currently operational.

The Republic of Türkiye Ministry of Culture and Tourism (T.C. Kültür ve Turizm Bakanlığı, 2026b) also announced the opening of "justice public libraries" on the campuses of penal execution institutions in Buca, Aliğa, Bünyan, Adana, Kocaeli, and Marmara. Additionally, efforts are underway to bring six more justice public libraries into service. According to another report (Justice Trends, 2025), prison libraries in Turkey are being addressed as part of the goal to modernize penal institutions and support the reintegration of convicts into society. In campus-style prisons established in major cities, libraries are among

the facilities that provide educational and living services—alongside schools, hospitals, places of worship, and social activity areas. Eight "Justice Public Libraries" have reportedly been established within this framework. These libraries complement educational and cultural development initiatives expanded through collaborations with the Ministry of National Education and the Ministry of Culture and Tourism. The report emphasizes that these services aim to contribute to convicts' personal development, the continuation of their education, and their successful reintegration into society upon release. Vocational training centers and high schools also support this approach, aiming to enhance convicts' prospects of finding employment or starting their own businesses by enabling them to obtain diplomas and vocational qualification certificates.

However, based on relatively recent information, detainees eligible to request publications once a month from the Sincan Justice Public Library were presented with a form requiring their personal information to use the library services. This form asked for their full name, Turkish ID number, and signature. The stated purposes for processing this data included managing and improving library services and tracking requests and complaints. According to reports, uncertainties about who would have access to their data led some detainees to abandon their requests for books (Gazete Duvar, 2023). This situation, rather than direct censorship based on the content of publications, can be viewed as an indirect measure that restricts access to books by making the sharing of personal information a prerequisite for using library services.

Furthermore, according to Şık (2026), prisoners convicted of terrorism offenses may use prison libraries or publications supplied through affiliated public libraries, with books requested from the library's catalog delivered by the librarian. In closed institutions, prisoners may receive a book or clothing as a gift once every two months and on New Year's Day or their birthday. The Education Board screens gifted books, while magazines, newspapers, brochures, copyrighted-infringing works, and photocopies are not accepted as gifts. Prisoners may also access periodicals and other publications: newspapers carrying official advertisements may be admitted at the prisoner's expense, and Turkish-language magazines are reviewed for security and rehabilitation concerns; permission for publications in other languages is determined by the Justice Ministry's General Directorate (Şık, 2026, pp. 449-450). This information indicates that convicts' access to books and periodicals is subject to administrative review and prior authorization mechanisms. In particular, the evaluation of gifted books by the Education Board, the screening of magazines on grounds of security and rehabilitation, and the fact that the acceptance of foreign-language publications is left to the discretion of the central administration require critical examination with respect to access to information and freedom of expression. While maintaining security and institutional order are legitimate aims, reliance on vague criteria for restrictions, granting broad discretionary power over publication content, and the absence of individualized, reasoned decisions subject to effective appeal mechanisms may increase the risk of arbitrary application. Therefore, publication restrictions must be evaluated within the framework of the principles of necessity and proportionality; decisions should be based on clear, objective criteria, and convicts must be provided with an effective means of appeal.

On the other hand, as of July 2026, Türkiye's prisons had an official capacity of 304,278, while 427,525 people were held above that capacity, indicating a prison population of approximately 427,525 and an occupancy rate of 140.5% (CİSST, 2025). This level of overcrowding raises serious concerns about the ability of prison facilities to provide adequate living space, privacy, healthcare, and rehabilitation opportunities. The figures, therefore, point not merely to a shortfall in physical capacity but to a broader challenge for the protection of prisoners' rights and humane detention conditions. They also underscore the need for transparent, regularly updated data and for measures that address overcrowding while safeguarding due process and the rights of people in detention. Prison overcrowding may

constrain the space, resources, and staffing available for prison libraries, limiting access to collections and reading facilities. It may also weaken libraries' capacity to support literacy, education, and rehabilitation, thereby disproportionately affecting prisoners' access to meaningful learning opportunities.

In conclusion, Türkiye's prison-library system has a well-established regulatory framework, beginning with the 1983 Regulation on Libraries and Book Collections in Penal Execution Institutions and Detention Houses (Koç, 2018, p. 800). However, research has consistently highlighted several challenges, including limited budgets, insufficient collections, a shortage of qualified staff, physical access barriers, and irregular cooperation with public libraries (Önal, 1984; Demir, 2013; Demir, 2015, pp. 524–525). In many institutions, libraries are managed by teachers or correctional staff rather than by trained librarians, and support from public libraries has not always been consistent or sustainable (Demir, 2015, pp. 524–525). Recent agreements between the Ministry of Justice and the Ministry of Culture and Tourism indicate a shift toward a more structured partnership model. A protocol established in 2018 outlined the distribution of duplicate books and, upon request, offered training for librarians. A subsequent protocol, effective March 2021, set forth a framework for public libraries on prison campuses. Under this agreement, the Ministry of Justice is responsible for providing facilities, security, and operational support, while the Ministry of Culture and Tourism supplies collections, equipment, automation, personnel, and technical assistance (T.C. Adalet Bakanlığı Ceza ve Tevkifevleri Genel Müdürlüğü, 2018, 2021). As a result, public libraries have opened at several prison campuses, including those in Sincan and Elazığ, with additional developments reported in other locations (T.C. Kültür ve Turizm Bakanlığı, 2026a, 2026b).

These initiatives move Türkiye closer to a partnership-based arrangement, but implementation and access remain important concerns. Reports that some prisoners were asked to provide identifying information to request books raise questions about privacy and whether administrative procedures may discourage use (Gazete Duvar, 2023). Publication rules also permit administrative screening of some materials, including restrictions involving gifted books, periodicals, and foreign-language publications (Şık, 2026, pp. 449–450). Security may justify limited restrictions, but their legitimacy depends on clear criteria, individualized reasoning, proportionality, and effective review. The reported overcrowding in Türkiye's prisons further strains space, staffing, and rehabilitation services, potentially limiting libraries' capacity to provide meaningful access (CİSST, 2025).

Türkiye is therefore best characterized as a system in transition: it retains a centralized regulatory structure while developing public-library partnerships and campus-based services. Whether these arrangements become durable, professionally staffed, and accessible will determine whether the partnership framework substantially addresses the longstanding gaps identified in research.

INSTITUTION-LED MODELS AND THEIR VARIATIONS

United States: Extensive Provision, Decentralized Governance

The U.S. federal prison system was formally established by the Three Prisons Act of 1891, which paved the way for the opening of the first federal penitentiaries at Leavenworth, Atlanta, and McNeil Island. In 1930, the management and oversight of federal institutions were centralized by creating the Federal Bureau of Prisons (BOP) within the Department of Justice. Throughout the 20th century, the system expanded to include new facilities, inmate classification practices, and vocational training programs. While subsequent legislation altered sentencing policies and prison capacity, the First Step Act of 2018 prioritized rehabilitation and reentry efforts (National Institute of Corrections, 2026).

In the United States, prison libraries are managed at both state and federal levels. As of 2010, there were around 950 libraries in state prisons, with professional staff in about two-thirds. While some offer extensive collections and resources, services differ by state and institution, facing challenges like budget, staffing, access, and censorship. The Federal Bureau of Prisons oversees library facilities in federal prisons. American prisons have had library programs for over 200 years, and the American Library Association provides resources for those managing these libraries (Hussain et.al., 2023, pp. 184–185, 189, 190-193).

According to a report by the Prison Policy Initiative dated March 11, 2026, approximately 2 million people are held in various confinement facilities across the U.S. on any given day; the system comprises 1,566 state prisons, 98 federal prisons, and 3,116 local jails, alongside facilities for juveniles, immigrants, and tribal populations, with an annual cost of at least \$445 billion. There are more than 7.6 million jail admissions annually, with the majority of those held awaiting trial. While drug offenses account for the incarceration of over 362,000 people, four-fifths of prisoners are held for other categories of offenses, and less than 9 percent are housed in private prisons. Non-custodial supervision is also widespread, according to the report: approximately 3.1 million people are on probation, and 680,000 are on parole. The system also exhibits significant disparities: Black Americans make up 14 percent of the U.S. population, yet constitute 42 percent of the prison and jail population. By comprehensively addressing the causes and effects of mass incarceration, the report highlights the importance of investing in community-based support and rehabilitation (Sawyer, Nam-Sonenstein, & Wagner, 2026).

Prison libraries are important resources for rehabilitation, education, and access to information. In the United States, prison-library services are managed across federal and state systems, and policies and service quality vary by jurisdiction and facility. As of 2010, an estimated 950 libraries operated in state prisons, with professional staff in about two-thirds of them; budget constraints, staffing shortages, restricted access, and censorship remain challenges (Hussain et al., 2023, pp. 184–185, 189–193). In a study of all 50 states, Fontenot (2025) found accessible official policies governing prison libraries in 35 states, while no such policy was identified in 15; the absence of a policy does not necessarily mean that library services are unavailable (pp. 42–43). The study assessed services, including access for people in solitary confinement, interlibrary loans, and professional librarians, but found no statistically significant relationship between the presence or number of these services and state recidivism rates. For example, average recidivism was 39.24% in states with library policies and 40.91% in states without them, a difference that was not statistically significant (pp. 43, 46–49). These findings should be interpreted cautiously because states define recidivism differently, the data were older, and the analysis covered a single time period (pp. 35–37, 49). More broadly, the scale of incarceration and reliance on detention and supervision in the United States place pressure on correctional services, including libraries (Sawyer, Nam-Sonenstein, & Wagner, 2026).

De Beeck (2026) argues that over 900 prison libraries in the U.S. face significant challenges, primarily due to a lack of resources, staffing shortages, and a limited selection of materials that reflect the realities of incarcerated individuals. Internet access is restricted, and the approved electronic devices do not provide meaningful access to books and services. To address these issues, the proposed "Prison Libraries Act" aims to enhance educational and reintegration opportunities by allocating \$10 million in federal funding each year through 2031. In the meantime, library administrators and educators are working to develop skills such as digital literacy and entrepreneurship among prisoners, despite facing obstacles related to technology and funding. Some libraries continue to provide educational and reading opportunities through digital content and access initiatives, even with scarce resources. These developments indicate that, if enacted, the legislation could improve the quality of prison library services and play a crucial role in the successful reintegration of incarcerated individuals into

society. This law (U.S. Congress, 2026), mandates that states and territories submit applications outlining suitable projects and needs for prison libraries. The funding may be used to provide a range of services, such as education, digital literacy, career readiness, civic engagement, health initiatives, and artistic activities. However, expenditures for necessities—including food, clothing, staff salaries, transportation, and general administrative costs—are prohibited. Furthermore, emphasis is placed on priorities such as generating tangible, measurable impact, ensuring geographic diversity, and adhering to local standards. The law encourages maintaining free access to prison libraries and fostering collaboration with educational institutions. This regulation aims to provide comprehensive, structured library services to support the reintegration of incarcerated individuals into society and to reduce recidivism.

In conclusion, while prison libraries in the US have a long history, the scope of services varies by state and institution, and issues regarding resources, staffing, collections, access, and censorship persist. Although some states have official policies governing library services, no statistically significant relationship has been demonstrated between the existence of these policies—or the volume of services provided—and recidivism rates. However, this finding does not diminish the importance of libraries for education and access to information. Resource and technology constraints, as noted by De Beeck (2026), also hinder service improvement. The proposed Prison Libraries Act and the 2026 regulation aim to support services such as education, digital literacy, career preparation, and community reintegration through federal funding for libraries. However, the practical impact of these developments depends on the allocation of funds and the evaluation of program outcomes; thus, the notion that the legislation will reduce recidivism is an anticipated goal rather than a proven result at this stage.

The proposed Prison Libraries Act reflects an effort to address resource and service gaps through federal support for education, digital literacy, career readiness, civic engagement, health, and arts programming. Its intended impact depends on implementation, funding, and evaluation; it should not be treated as evidence that library provision has already reduced recidivism (U.S. Congress, 2026; De Beeck, 2026). The U.S. case thus combines a long history of library provision and policy development with pronounced institutional variation. Its central challenge is not simply whether libraries exist, but whether services are adequately funded, professionally supported, accessible, and responsive to prisoners' needs.

Canada: Institutional Responsibility and Inconsistent Standards

The Canadian correctional system's history began with the opening of the first penitentiary in Kingston in 1835 and the transfer of prison authority to federal jurisdiction in 1868. In the 19th century, practices included hard labor, isolation, and physical punishment. The first women's institution opened in 1934, and after riots in the 1930s, the Archambault Commission (1938) pushed for crime prevention and rehabilitation efforts. Following a major riot in Kingston in 1954, the Fauteux Commission proposed reforms that led to the establishment of the National Parole Board in 1959 and to amendments to the Penitentiary Act in 1961. The 1971 Kingston riot and the abolition of the death penalty in 1976 were significant milestones in advancing prisoner rights and humane treatment. In the 1990s, programs targeting women and indigenous prisoners emerged, alongside initiatives for halfway houses and community reintegration. A focus on public safety intensified after the September 11 attacks in 2001. Overall, the system has shifted from punishment and isolation to an emphasis on rehabilitation and community reintegration (Government of Canada, 2025).

According to current information, the Correctional Service of Canada (CSC) manages 43 correctional institutions across the country: 6 maximum-security, 9 medium-security, 5 minimum-security, and 12 multi-level security institutions, with another 11 classified as clustered institutions. The CSC operates 82 parole offices and sub-offices, 14 community

correctional centers, and 5 regional treatment centers serving inmates with severe mental health issues. The institutions are designed like small communities, incorporating areas for health, spirituality, work, programming, and recreation. The CSC manages 10 healing lodges—4 of which are located within its institutions—that support traditional healing and reintegration processes in collaboration with indigenous communities. Additionally, civil society organizations operate approximately 200 community residential facilities that provide housing, 24-hour supervision, counseling, and programs to individuals released under supervision (Correctional Service Canada, 2025).

The Canadian Federation of Library Associations (CFLA-FCAB) Position Statement on Intellectual Freedom and Libraries asserts that prison libraries in Canada play a vital role in safeguarding prisoners' rights to access information and read. These libraries support literacy, education, and reintegration into society. The statement emphasizes that libraries should provide a wide range of current and diverse books, legal resources, and accessible formats. They should also offer programs and build collections that reflect the cultural, ethnic, and linguistic needs of prisoners, including those related to disabilities. Additionally, it highlights the importance of offering access to resources about indigenous histories, cultures, and languages, as well as works by indigenous authors and information on the impacts of colonialism and related healing processes. This is particularly crucial for indigenous peoples, who are disproportionately represented in the prison population. The text underscores the obligation of federal institutions to provide services equivalent to those of community libraries. It also notes the valuable contribution libraries make in preparing prisoners for release and reducing the risk of reoffending. These principles are equally applicable to provincial institutions (CFLA-FCAB, 2026).

According to Noonan (2023), the fundamental problem facing prison libraries in Canada is the inadequacy of services and resources, combined with a lack of consistent standards across the country. Reports from 1981 and 1984 outlined the need for a national policy, adequate budgets, suitable collections, and improved services; however, the implementation of these recommendations remained limited, with a 2003 study reporting an average annual library budget of 4,051 Canadian dollars (pp. 10–11). Although the “National Guidelines for Institutional Libraries”, published for federal institutions in 2012, established certain standards, readers' advisory services for inmates remain virtually non-existent (pp. 11–13). Factors such as restricted access to the library, a lack of access to the internet and up-to-date legal information, censorship, reliance on donations (often resulting in outdated collections), and insufficient funding hinder the provision of these services (pp. 13–16). The author recommends stronger, clearer national policies, increased collection budgets, specialized training for librarians, and guaranteed access to libraries for inmates as measures for improvement (p. 16).

A recent study by Gordon and Willson (2026, pp. 202-207) highlights that the lack of internet access in Canadian federal prisons makes books and libraries the primary sources of information for inmates. However, the quality of library services varies significantly from one institution to another. Some prisons offer well-organized and comprehensive collections supported by librarians, while others have limited, worn, or disorganized book stocks and restrictive access hours or borrowing policies. In addition to libraries, inmates in the study access resources through various channels, including education staff, chaplains, visits to public libraries, personal book collections, and book-sharing among inmates. Significant barriers to access include the lack of internet access, difficulty in accessing catalogs, staff shortages, lockdown measures, and the cost of acquiring books. Nevertheless, staff support and informal sharing networks developed by prisoners can help facilitate Access. The authors emphasize that improving these services requires consideration of each institution's specific conditions and the allocation of sufficient resources.

Canada is also classified as institution-led, with correctional authorities responsible for services within federal institutions. The broader correctional system has shifted over time from punitive practices to rehabilitation and community reintegration, although security and public safety priorities remain central (Government of Canada, 2025). The Correctional Service of Canada operates institutions at different security levels and provides community-based supervision and support through parole offices, correctional centers, and other facilities (Correctional Service Canada, 2025). Canadian library principles emphasize intellectual freedom, access to current and diverse materials, legal resources, accessible formats, and collections reflecting prisoners' cultural, linguistic, and disability-related needs. Particular attention is directed to indigenous histories, languages, authors, and the effects of colonialism, given the disproportionate representation of indigenous people in the prison population (CFLA-FCAB, 2026). This normative commitment is not matched uniformly by practice. Research describes inconsistent standards, inadequate budgets, restricted library access, limited access to the internet and legal information, censorship, and reliance on donations, which may result in outdated collections (Noonan, 2023, pp. 10–16).

Because internet access is generally unavailable in federal prisons, books and library services become especially important sources of information. However, the quality of provision varies substantially between institutions: some have organized collections and librarian support, while others have small, worn, or poorly arranged holdings and restrictive borrowing or opening hours. Lockdowns, staffing shortages, limited catalog access, and the cost of books further restrict access, although staff assistance and informal sharing among prisoners can help compensate for these constraints (Gordon & Willson, 2026, pp. 202–207). As a conclusion, Canada illustrates a key limitation of institution-led governance: national principles may be clearly articulated, while local resources and conditions remain inconsistent.

LEGALLY MANDATED BUT LOCALLY VARIABLE OR UNDERDEVELOPED SYSTEMS

Japan: A Right to Reading Without a Universal Library Infrastructure

The establishment of a modern prison system in Japan began during the Meiji era, a period characterized by Westernization and legal reforms. Delegations were sent to the United States in 1860 and to Europe in 1862 to study Western prison models. Between 1868 and 1872, Japan created new penal codes and regulations that aimed to shift the focus from corporal punishment to the restriction of liberty. This modernization extended to Japan's colonial territories following its takeover of the Dalian region from Russia in 1905. Lushun Prison, which was originally established by Russia in 1902, began operating under Japanese administration in 1906, became an independent administrative unit in 1908, and opened a branch in Dalian in 1920. The prison served both the needs of the colonial administration and the control of Japanese citizens until Japan's surrender in 1945. Lushun Prison combined modern practices based on surveillance and discipline with corporal punishment, forced labor, and maltreatment (Liu et al., 2026, pp. 4-5, 9-10). As a result, Liu et al. (2026, pp. 6, 11–15) describe the history of Japanese prisons not merely as the adoption of Western-style reforms but as a contradictory process in which these reforms became intertwined with the instruments of repression used by imperial and colonial administrations.

Prisons in Japan face criticism regarding human rights violations. According to Sawanobori (2025), although prison administration in Japan aims to protect human rights and facilitate rehabilitation—objectives enshrined in the 2006 law designed to reintegrate prisoners into society—correctional officers and administrators continue to exercise broad discretionary powers in practice (pp. 1077–1079, 1089). Incidents of prisoner deaths and mistreatment at Nagoya Prison between 2001 and 2002 highlighted the problems stemming from overcrowding

and unchecked authority, thereby initiating a reform process (pp. 1074–1078). While the law introduced mechanisms for visitation, complaints, and oversight, visitation and hygiene facilities remained limited, and solitary confinement was imposed in more than 85 percent of disciplinary cases (pp. 1080–1082, 1084). The author argues that prolonged and frequent solitary confinement violates the Mandela Rules and human dignity, and therefore contends that Japan must align its prison practices with international standards (pp. 1087–1089). As part of an interesting action plan to address this issue, Japan has banned prison jargon and mandated that guards use polite and respectful language when addressing inmates. According to the ruling, prison staff will be required to address inmates using the honorific "san" (meaning Mr. or Ms.). Furthermore, the use of prison-specific jargon—which could reveal a former inmate's criminal history—will be prohibited. A report on Nagoya Prison had exposed widespread abuse committed by guards (Manawatu Standard, 2024).

On the other hand, in a study examining Japan's parole system—specifically, prisoner reintegration, communication during decision-making processes, and the prisoner's voice—García Ramírez (2026) argues that the model that combines parole with community-based supervision and support is associated with lower recidivism rates. However, these low recidivism rates stem not only from supervision but also from the provision of resources such as employment, housing, and community support. Although the law mandates that parole decisions be communicated to prisoners and justified to them, the guidance-oriented feedback provided—particularly regarding negative decisions such as parole denials—is limited; the process often amounts to mere administrative notification rather than a genuine two-way dialogue with the prisoner. Consequently, García Ramírez (2026) recommends that prisoners receive clearer, more constructive feedback on their progress and be more actively acknowledged in decision-making processes, and suggests that the system's success be evaluated not only by recidivism rates but also by justice and human dignity.

Although Japan's incarceration rate is low compared to many Western countries, prison libraries are significant for prisoners' access to information, personal development, and reintegration into society after release—a function also emphasized by IFLA (International Federation of Library Associations and Institutions). Legislative changes enacted in Japan in 2005 and 2006 recognized prisoners' rights to read and to obtain publications, and mandated that prisons provide reading materials. However, as of 2011, few of the country's 188 prisons possessed functional libraries; most lacked professional librarians or dedicated library spaces. Books and other materials were often kept in various locations and sometimes managed by the prisoners themselves. However, materials such as comic books, dictionaries, legal publications, contemporary fiction, and vocational training resources can support prisoners' intellectual, emotional, and social development. Therefore, if the government were to mandate the establishment of prison libraries and employ professional librarians to manage them, it could improve both prisoners' living conditions and their prospects for successful reintegration into society upon release (Alix, 2021).

A study conducted by Nakane and Noguchi (2011) examined seven correctional facilities in Japan between 2007 and 2009. It found that while reading materials were provided to prisoners, there were no functional, centralized prison libraries staffed by professional librarians. Instead, books were scattered haphazardly across shelves, living quarters, and work areas, with collection sizes ranging from approximately 5,000 to 26,000 items. Although prisoners could purchase books and magazines or receive them as gifts from family and friends, the institutional collections did not adequately meet their reading needs (pp. 447, 450–451). While legal regulations acknowledged the prisoners' right to access books, they did not specifically require the establishment of libraries. Access to reading materials could be restricted for reasons related to security, rehabilitation, or censorship. In fact, 55 percent of

prisoners reported that the reading materials provided by the institutions were insufficient. Additionally, budget constraints and outdated resources further compromised the quality of these services (pp. 448–449, 452–453). This situation indicates that, although access to books in Japan had not completely vanished during this period, the service lacked proper organization and equity. Nakane and Noguchi (2011) recommended the establishment of professionally managed libraries in every prison, improvements to the collections, and greater cooperation with public libraries (pp. 452–454, 457).

According to Jiaku's (2013) comparative study, prison libraries in Japan are institutionally underdeveloped: prisoners mostly purchase their own reading materials, while books provided by the prison are kept on shelves scattered across various locations, such as cells and work areas. As of March 31, 2009, the total number of books in prisons stood at 1,453,000; the author compares this figure with large prison collections in the US and deems Japan's resources relatively inadequate. Furthermore, the author notes that budgets are low, professional librarians are not employed, and services are managed by prison staff and inmates. Although Japanese law mandates the provision of reading materials, it does not explicitly require the establishment of a library in every prison (pp. 82–84). In contrast, library services in Norway are linked to the public library network and were expanded to cover all prisons by 2010; meanwhile, in the US, despite more advanced legal and professional standards and dedicated budgets, staff and resource shortages persist (pp. 81–84). In summary, according to the article, Japan's primary issues are fragmented and limited services, insufficient budgets, and a lack of professional librarians.

In conclusion, despite the Western-style modernization and rehabilitation goals of the Meiji era, Japan's penal system has historically intertwined discipline and control with coercive measures; today, it continues to exhibit a distinct tension between legal regulations aimed at protecting prisoners' rights and the restrictions imposed in practice. The broad discretionary powers held by prison administrators, combined with limited visitation and hygiene facilities and the widespread use of solitary confinement, undermine objectives related to human dignity and social reintegration. A similar discrepancy is evident in prison libraries: although prisoners have a recognized right to access books, there is no explicit mandate to establish a library in every prison, nor is there adequate funding, professional library staff, or infrastructure for consistent service. The disorganized storage of books and the failure of collections to meet actual needs render access both unequal and limited. Therefore, libraries should be viewed not merely as a service providing reading material, but as a rehabilitative element that supports prisoners' access to information, personal development, and post-release integration into society. Establishing professionally managed libraries in every prison, enhancing collections, and fostering cooperation with public libraries could strengthen the practical realization of Japan's human rights and social reintegration goals.

Japan's prison system combines formal rehabilitation objectives with a strong emphasis on discipline and administrative control. The history of modernization includes both the adoption of Western-style institutions and the use of coercive practices in colonial settings (Liu et al., 2026, pp. 4–5, 9–10). Contemporary reforms have recognized rehabilitation and human rights, but research continues to raise concerns about broad administrative discretion, solitary confinement, and the practical protection of prisoners' dignity (Sawanobori, 2025, pp. 1074–1089).

The library system reveals a similar gap between formal rights and institutional provision. As mentioned earlier, legislative changes in 2005 and 2006 recognized prisoners' access to reading materials, but did not require every prison to establish a professionally managed library. Research in seven facilities found that books were often dispersed among cells, work areas, and shelves rather than organized in centralized libraries; collections ranged

from approximately 5,000 to 26,000 items, and many prisoners considered the available materials insufficient (Nakane & Noguchi, 2011, pp. 447–454). Budget constraints, outdated collections, material restrictions, and the lack of professional librarians further limited service quality (Nakane & Noguchi, 2011, pp. 448–453). Current information also indicates that, generally speaking, Japanese prisons lack librarians or dedicated library spaces. Although some reading materials are provided, they are scattered throughout the prison, and there is no oversight regarding them. Furthermore, no partnerships have been established with public libraries; instead, Japanese inmates prefer to purchase reading materials or obtain them from friends and family. Japanese law mandates inmate access to reading materials, and numerous regulations govern which materials inmates may possess and the associated inspection procedures. However, the only mention of a "prison library" is a provision requiring a guard to make reading materials available. Policies and procedures governing these materials are also in place. Educational staff, rather than librarians, manage these collections (Patil, 2026).

Japan is therefore not readily classified as a mature institution-led or partnership model. It is more accurately described as a legally recognized but institutionally underdeveloped system: access to books is acknowledged, yet the law does not ensure a dedicated library, specialist staff, adequate collections, or equitable access in every facility. Comparisons with Norway underscore the difference between making reading materials available and embedding prison libraries within a professional public-service network (Jiaku, 2013, pp. 81–84). Establishing professionally managed libraries, improving collections, and strengthening public library cooperation would help align practice with stated rehabilitation and rights objectives.

Brazil: Legal Mandate, Educational Programming, and Structural Constraints

The historical basis for prison libraries in Brazil dates back to Imperial Decree No. 8,386 of 1882. Article 287 of the decree authorized the establishment of a library containing entertaining and enriching books suited to prisoners' educational levels and needs. This provision was given a clearer legal framework by the Law of Criminal Enforcement (Law No. 7,210) of 1984; library services were linked not only to prisoners' access to books and information but also to processes involving education, culture, and reintegration into society. Prison librarianship has not been seen merely as the provision of books, but as a professional practice that addresses prisoners' information needs and supports them in constructing meaning and taking ownership of knowledge through reading, education, and cultural activities (Martins de Sousa, & Guedes Farias, 2023, pp. 2–3, 6–7).

According to Da Costa (2003), Brazil's prison system is organized into three distinct security and penal regimes: the closed regime, where convicts serve their sentences in high-security prisons; the semi-open regime, which includes work farms or similar institutions; and the open regime, where inmates reside in halfway houses. At the time of the article's publication, the state of Rio de Janeiro had a prison system that comprised 12 prisons, three penal institutes, four jails, one detention center, three general hospitals, and three psychiatric hospitals. Overcrowding was a significant issue in the system, contributing to riots, escape attempts, and inadequacies in food, supervision, work, and leisure activities. The author highlights that the majority of prisoners come from socially marginalized backgrounds, often with limited access to education and guidance, and notes that the recidivism rate exceeds 40 percent. The Penal Execution Law (LEP, 7.210/1984) stipulates that the execution of sentences should aim for social reintegration and requires the state to provide educational services. Notably, Article 36 of the law identifies the establishment and maintenance of libraries as a priority for these educational services (pp. 3–5). Although 18 institutions in Rio de Janeiro possessed book collections, the author notes that these were too limited to be classified as "libraries." In 2002, surveys were conducted to assess inmates' reading and information needs; 78 percent of participants supported establishing libraries at their institutions. Due to limited space and

budget, portable shelving units were chosen, but changes in administration disrupted the initiative. Consequently, despite the importance of prison library services for rehabilitation, it is evident that the efforts during that period were still in their infancy and faced resource constraints (pp. 5–6, 10–11).

The Sentence Reduction through Reading Program, based on the Criminal Enforcement Act and approved in 1984, was launched in Brazil in 2012 and aims to support inmates' education and social reintegration through reading. Under the program, participants select a book from the prison library, read it within 21 to 30 days, and subsequently prepare an evaluation report. These reports are reviewed by a commission that may include experts in education and corrections. Alternative methods—such as audiobooks, peer support, and oral assessments—are offered to inmates with low literacy levels or specific accessibility needs. Each evaluation report approved by the commission results in a four-day reduction of the inmate's sentence. Participants may submit evaluations for up to 12 books per year, thereby earning a total sentence reduction of up to 48 days. The program aims to improve literacy, foster critical thinking and empathy, enhance inmates' capacity for self-reflection, and contribute to rehabilitation processes. In addition to increasing inmates' access to knowledge and culture, the initiative seeks to support their reintegration into society and reduce recidivism rates (UNESCO Institute for Lifelong Learning, 2026).

Although no regularly updated official statistical resource providing qualitative and quantitative data on the current nationwide status of prison libraries in Brazil has been found, SENAPPEN's "Relatório de Informações Penais" (Penal Information Report) for the first half of 2024 presents data on educational and reading activities within penal institutions. These indicators primarily offer a general overview of the prevalence of reading services (Secretaria Nacional de Políticas Penais, 2024). Brazil's "Lei de Execução Penal" (Penal Execution Law) mandates the presence of libraries in penal institutions; furthermore, CNJ Resolution No. 391/2021 contains regulations regarding the conduct of reading activities within these facilities (Conselho Nacional de Justiça, 2021; Presidência da República, 1984). In practice, services may vary by institution and state; while book lending and reading activities are provided, there is limited comparable nationwide data on their scope and continuity.

A study conducted by Martins de Sousa and Guedes Farias (2023, pp. 10–16) examines the experiences of librarians currently or formerly employed in Brazilian prisons. Seven of the nine participating librarians reported conducting activities focused on information mediation within the prison setting; this included storytelling, reading clubs, literary discussions, creative writing, film and book discussions, book lending, and the preparation of informational materials. The findings indicate that most librarians believe these activities can contribute to social reintegration by supporting prisoners' access to information, critical thinking skills, and connections to the outside world. However, the punitive and restrictive nature of the prison environment, disparities in literacy levels, and institutional barriers complicate these library initiatives. In this context, access to information and culture must be viewed not merely as a tool for rehabilitation, but as a fundamental human right for prisoners.

Brazil has a strong statutory basis for prison libraries. Imperial Decree No. 8,386 of 1882 authorized libraries for prisoners, while the 1984 Penal Execution Law linked library provision to education, culture, and social reintegration. The law identifies libraries as part of the educational services that the state should provide (Martins de Sousa & Guedes Farias, 2023, pp. 2–3, 6–7; Da Costa, 2003, pp. 3–5). This makes Brazil a "legally mandated but unevenly implemented" case rather than a straightforward example of either institution-led or public-library partnership provision.

The distance between law and practice is illustrated by research in Rio de Janeiro, where institutions had book collections that were often too limited to qualify as functioning libraries. Space and budget constraints disrupted efforts to establish services, despite substantial prisoner interest in library provision (Da Costa, 2003, pp. 5–6, 10–11). More recent studies describe librarians facilitating reading clubs, storytelling, literary discussions, creative writing, and other forms of information mediation. These activities can support critical thinking, cultural participation, and connection with the outside world, but they remain vulnerable to institutional restrictions, unequal literacy levels, and resource shortages (Martins de Sousa & Guedes Farias, 2023, pp. 10–16).

Brazil's Sentence Reduction through Reading Program connects reading to sentence reduction, allowing participants to receive a four-day reduction for each approved book report, up to a specified annual limit. Alternative forms of participation are available for people with lower literacy levels or accessibility needs (UNESCO Institute for Lifelong Learning, 2026). This approach gives reading a direct institutional incentive and can expand educational engagement. At the same time, the program should not be treated as a substitute for a comprehensive library service: the availability of suitable collections, professional support, accessible formats, and sustained activities remains essential.

Brazil's case demonstrates how a strong legal mandate and innovative reading programs can coexist with substantial inequalities in institutional capacity.

Australia: Mandated Service, Limited Professional Infrastructure

Prison libraries in Australia have their historical roots in religious publications, with the initial goal of promoting moral development. It is important that these libraries provide inmates with access to educational materials and opportunities to utilize their leisure time constructively, in line with human rights principles (Hussain et al., 2023, p. 189).

The literature on the role, performance, and value of Australian prison libraries is limited and mostly lacks formal research, as noted by Garner (2017, p. 333). Although there is little peer-reviewed research on this topic, descriptions of Australian prison libraries can occasionally be found outside of academic sources. Garner's (2017, pp. 333–335) research indicates that Australian prison libraries can play a significant role in supporting rehabilitation by addressing inmates' needs for education, access to information, and opportunities for reading and leisure activities. However, the operation of these services differs across various states and territories. Most libraries do not have professional librarians; instead, inmates often manage daily operations.

According to research by Garner (2019, pp. 344–353), the provision of some form of library service is mandatory in every adult prison in Australia; however, these libraries often lack adequate budgets and professional staff, and their collections—frequently reliant on donations—are not systematically developed to meet users' needs. The libraries are generally small; while some inmates can visit the library to select books, in other prisons, books are delivered to cells or wards, and in some locations, access to the library may not be possible at all. Links to educational programs are also limited. Nevertheless, research based on interviews with 29 inmates reveals that libraries foster autonomy by offering the opportunity to make choices; alleviate stress, anxiety, and distress by serving as calm, safe spaces; and reduce boredom while helping inmates maintain positive behavior. Garner's (2020) another research—based on interviews with 27 regular library users across seven prisons of varying security levels in three Australian states and territories—reveals that prison libraries serve as spaces for both physical and mental escape for inmates. Participants described the library as a safe and liberating environment where they could retreat from the crowded, noisy, and tense atmosphere of the cellblocks to spend time in quiet moments when they could, at times, feel as though they

were "not prisoners." Reading books borrowed from the library also transports them away from the reality of prison life into other worlds, allowing them to connect with an activity familiar from their lives outside. While the research indicates that these experiences can be valuable for well-being and mental health, it also notes dissatisfaction regarding the inadequacy of educational resources. However, it must be emphasized that, because the study involved only 27 regular readers and frequent library users, the findings may not represent the experiences of all Australian prisoners (Garner, 2020).

A more recent study by Garner (2024, pp. 1003-1004) examines the state of prison libraries in Australia through the lens of prisoners' information needs. Conducted in 2022 across six adult prisons in New South Wales, the study analyzed survey responses from 106 prisoners, investigating their needs and information sources regarding law, education, spirituality, health, prison life, and post-release reintegration into society. While 58% of participants stated that the prison library did not meet their needs at all, only 8% reported that it met their needs "very well"; 12 individuals reported not using the library because they were denied access. Libraries were often limited to recreational book collections in cell blocks—collections that were not regularly updated and did not allow selection of specific titles upon request. Information needs went unmet across all six areas; notably, 32% of educational needs, 28% of health needs, and 25% of legal needs remained unaddressed. Prisoners turned to other inmates for legal information, to health services and staff for health information, and primarily to other inmates for information regarding prison life. The study concludes that library access and collections need to be improved to better align with prisoners' actual needs.

In conclusion, while prison libraries in Australia represent significant spaces capable of supporting prisoners' well-being, autonomy, and rehabilitation, the quality and accessibility of these services vary across facilities; this potential is constrained by insufficient budgets, a lack of professional librarians, collections that fail to address specific needs, and limited access. Research indicates that libraries can alleviate stress and boredom by providing a calm, safe environment and enrich prisoners' lives through opportunities for reading and making choices; however, it also reveals that educational and fundamental information needs often go unmet. Notably, a 2022 study in New South Wales (Garner, 2024, pp. 1003-1004) found that the majority of participants deemed library services inadequate, highlighting the gap between current practices and prisoners' information needs regarding legal matters, education, health, and post-release life. Nevertheless, given the scarcity of existing research and the limited nature of some samples, findings should be generalized to all Australian prisons with caution. The overarching assessment is that library services must evolve beyond the mere provision of books into accessible, professionally managed services tailored to the actual needs of prisoners.

Australia is thus best classified as a “mandated but locally variable service system “. Its libraries can make a meaningful contribution to well-being, but the absence of consistent professional staffing, needs-based collection development, and reliable access limits their educational and informational role. The evidence base is also relatively small, so findings from selected facilities should not be generalized without caution (Garner, 2017, p. 333; Garner, 2024, pp. 1003–1004).

The Netherlands: A Legally Mandated but Locally Variable Model

The development of prison libraries in the Netherlands began in 1841 with a legislative proposal by the Minister of the Interior calling for the establishment of libraries for inmates; regulations were subsequently updated in 1952 and 1971, granting prisoners the right to use the library once a week. As of 1996, there were reportedly 70 libraries and 113 librarians serving 52 correctional facilities, 8 forensic psychiatric hospitals, and 16 juvenile detention centers in the country. Library collections included publications in foreign languages to meet the linguistic

needs of inmates; in institutions with a high proportion of foreign prisoners, materials were provided in 15–20 different languages, and in some locations, up to 36 languages (Hussain et al., 2023, p. 187). The historical origins of prison labor in the Netherlands lie in 16th-century correctional institutions that aimed to transform offenders into "industrious citizens" through work. The first such institution in Amsterdam was established in 1596; men were employed rasping logs at the Rasphuis while women spun yarn at the Spinhuis. Although initially intended for the prisoners' welfare, these institutions soon evolved into municipal workshops that exploited inmate labor and imposed forced labor and harsh punishments. Today, while prison work in the Netherlands appears to have shifted to a voluntary basis as of 2021, it is structured not as a right to work but as a privilege contingent upon good behavior; Noorda (2024) notes that low wages and limited job options hinder prisoners' reintegration into society and the labor market (Noorda, 2024, pp. 465–468, 472–475).

However, much like Norway, the Netherlands' criminal justice system views punishment as a last resort for addressing societal issues and prioritizes treatment and rehabilitation in its approach to offenders. Prison sentences are generally kept short, while alternatives such as fines and suspended sentences are employed more frequently. Prisons implement programs to support inmates' reintegration into society, and the facilities themselves are typically small and have relatively low security levels. Although this model is notable for its low incarceration rate, it also presents certain shortcomings, such as high costs, limited citizen participation, and challenges faced by long-term inmates (U.S. Department of Justice, 1980).

Historically, the incarceration rates declined steadily and significantly from 1837 to 1975, but reversed course in the 1970s and rose rapidly. This increase is linked to the expansion of prison capacity following the earlier reduction caused by prison closures in the 1970s, the relaxation of the "one prisoner per cell" policy, and a rise in both arrests and the frequency and duration of prison sentences. Consequently, the Netherlands—once known in the post-war era for its humane and moderate prison system—had by the 2000s become one of the European countries with high incarceration rates (Tonry, & Bijleveld, 2007, pp. 10–11, 13–15, 16).

According to Reijnders (1996, p. 129), the institutionalization of prison libraries in the Netherlands stems from a regulation enacted in 1841 that mandated the provision of libraries for prisoners in every penal institution. Prisoners' rights of access to the library were strengthened by subsequent legislative changes; regulations in 1952 and 1971 granted them the opportunity to use the library at least once a week. Thus, libraries evolved from mere repositories of books into institutions that met prisoners' needs for reading and access to information. Reijnders (1996, p. 131) also notes that prison libraries were developed to address the needs of multilingual prisoners. Collections were established to provide books and reading materials in foreign languages, and a support center and inter-library network were created to facilitate these efforts. This network was formally established in 1991, when 17 of the 67 prison libraries were designated as support centers for one or more foreign languages. An evaluation conducted in 1992 revealed such high levels of satisfaction among the libraries regarding the network's services that a decision was made to continue the initiative with only minor modifications.

In the Netherlands, the provision of library services to inmates is mandatory under the Prison and Penal Institutions Act; however, the specific structuring of these libraries is determined by each institution. Although there were past plans to replace traditional libraries with tablets due to budget cuts, these plans did not progress beyond the pilot phase (Berkvens, 2026). According to a news report from April 19, 2016—nearly a decade ago—the Ministry of Justice had planned to remove physical libraries and televisions, replacing them with tablets designed for in-cell use. This initiative aimed to achieve cost savings and foster a sense of individual responsibility among inmates. The tablets were intended to allow prisoners to watch

television, participate in educational programs, purchase essential items, and organize visits without leaving their cells. While unrestricted internet access would not be permitted (use was to be limited to approved sites), the Ministry of Justice presented the initiative as a means of encouraging personal responsibility among inmates. Conversely, a union representative argued that the primary objective was cost reduction, warning that the closure of libraries and other services could weaken communication between staff and inmates, thereby negatively impacting security (NL Times, 2016). Prison libraries in the Netherlands are designed like small public libraries, featuring magazines, newspapers, and games alongside books. Here, crime novels and books on sports, nutrition, and personal development attract interest. Libraries offer inmates not only the opportunity to read but also the chance to relax, acquire knowledge, and spend their time meaningfully; furthermore, reading and writing groups create safe spaces that foster creativity, self-reflection, and connection with others (Berkvens, 2026).

The information presented so far indicates that the Dutch prison system has historically prioritized the rehabilitation and social reintegration of inmates. However, this practice has become increasingly complex over time. Since the 1970s, the rising frequency and duration of detention and sentencing, alongside short sentences and alternative sanctions, have put a strain on the system. The support for prison libraries, established by a legal and institutional foundation since 1841, suggests that reading and access to information are considered essential needs for inmates. The multilingual collections and inter-library networks further demonstrate the inclusive nature of this approach. However, the reliance on institutional discretion for service delivery, combined with the prospect of replacing libraries with tablets due to budget cuts, highlights a tension between rehabilitation goals and concerns about cost and efficiency. Libraries are not just repositories for books; they provide inmates with opportunities for meaningful engagement, learning, relaxation, and social connection. While digital tools may facilitate access to information, completely replacing physical libraries and direct staff interaction could jeopardize the humane and rehabilitative aspects of the system.

The Netherlands is best classified as a "legally mandated but locally variable model". Prison library provision is required under the Prison and Penal Institutions Act, but individual institutions determine how services are organized. The available evidence does not indicate a consistent nationwide public-library partnership or uniform service structure (Berkvens, 2026).

As is understood, Dutch prison libraries have a long history: legislation calling for prison libraries dates to 1841, and later regulations established prisoners' access to library services at least weekly (Reijnders, 1996, p. 129). Provision for multilingual readers is a notable feature. Collections included materials in numerous languages and were supported by an inter-library network in which designated libraries served as language resource centers (Hussain et al., 2023, p. 187; Reijnders, 1996, p. 131).

Libraries also serve purposes beyond lending books. Their collections, reading, and writing groups can support learning, recreation, self-expression, and social connection (Berkvens, 2026). However, proposals to replace physical libraries with restricted-use tablets raised concerns that cost-saving measures could reduce access to shared spaces and direct interaction (NL Times, 2016). Although the proposal did not proceed beyond the pilot stage, it illustrates the tension between digital efficiency and the broader educational and social role of prison libraries.

Overall, the Netherlands combines a strong legal and historical basis for prison libraries with institution-level variation in delivery. Its case shows that a statutory requirement can protect access in principle, but consistent services also depend on adequate resources, clear standards, and sustained support.

United Kingdom: Hybrid Governance and Uneven Access to Prison Library Services

In 18th-century England, more than 200 crimes were punishable by death. Serious offenders who were not executed were often sent to the colonies under the Act of 1718. Despite this, prisons became overcrowded with debtors, individuals awaiting trial, and those serving sentences, with debtors representing the largest group of prisoners. To address the issue of overcrowding in local jails, 32 acts related to debt relief or bankruptcy were passed between 1700 and 1800. Prison facilities varied widely, ranging from small village lock-ups to massive castle dungeons. Among the largest was Newgate in London, which housed approximately 300 prisoners. When the loss of the American colonies complicated the policy of transportation, prisoners were confined to old ships anchored in harbors—known as "prison hulks"—where they were put to work doing heavy labor. This practice, initially intended as a temporary solution, eventually became a permanent arrangement (UK Parliament, 2026). In the late 18th century, prisons in England and Wales were designed as institutions to rehabilitate offenders, influenced by Christian concepts of repentance and utilitarian thought. However, during the 19th century, the goal of rehabilitation was increasingly sidelined; isolation, silence, hard labor, and harsh living conditions came to the fore. Britain's colonial penal practices also influenced this disciplinary approach. From the late 19th century onwards, the harm prisons inflicted on prisoners' health and self-esteem became more apparent and drew criticism from reformers. While education and less punitive practices gained prominence in the early 20th century—accompanied by periods of reduced incarceration—the harm caused by prisons in England and Wales, along with the penal system's link to social inequalities, persisted (The Open University, 2026). According to Coyle's (1986) study, the Scottish prison system was gradually brought under central control starting in 1835; the Act of 1839 established the General Board of Prisons to create uniform management and discipline across the country and designated the General Prison at Perth as the system's central institution. During this period, William Brebner, the administrator of Glasgow Bridewell, played a pivotal role in the system's development through practices such as prisoner segregation, productive labor, basic education, and post-release support. In the second phase, spanning 1877–1929, the Prison Commission for Scotland managed the system; the Elgin Report of 1900 addressed the distinctive evolution of Scottish prison administration and, in particular, the issue of overcrowding driven by convictions for minor offenses and drunkenness-related charges. From 1929 onwards, the prison service was removed from its position within the criminal justice system and integrated into the mainstream of civil administration; this structural shift became a primary source of difficulties regarding the service's core functions, such as secure custody (pp. 8–10; 16–21; 39–43). During the Troubles in Northern Ireland (1968–1998), prisons became central sites of political conflict and contested state authority. Following the escalation of violence after the late-1960s Civil Rights movement, mass internment was introduced in 1971, replaced by Special Category Status in 1972, and followed by a policy of criminalization in 1976, which denied prisoners a distinct political status. Tensions surrounding this policy culminated in the 1981 hunger strikes, in which ten prisoners died. Other defining events included the largest prison escape in British history in 1983 and prisoners' subsequent support for the peace process, which contributed significantly to its success. Prisons thus functioned both as symbols of the conflict and as potential flashpoints, while Northern Ireland had one of Europe's highest prison populations per capita during this period. The Prison's Memory Archive preserves these histories through 300 hours of audiovisual recordings at Armagh Gaol, Maze, and Long Kesh, featuring 160 contributors, using principles of co-ownership, inclusivity, and life-storytelling (McLaughlin, 2026).

Currently, in the UK prisons, the limited autonomy of prisoners, combined with aging, disability, and health issues, increases the need for social care. However, the definition and

delivery of care services vary across institutions; needs falling below the statutory support threshold—such as assistance with financial matters, safety, privacy, and daily activities—often go unmet. It appears that efforts to prevent these needs and support prisoner independence are not implemented consistently or adequately, and that responsibilities and inter-service coordination remain unclear. These shortcomings can negatively affect well-being; further research and a collaborative approach to identifying needs and determining who meets them are required. (Buck et al., 2025, pp. 2, 10–12, 16).

According to Bowe's assessment of prison libraries in the UK, which focuses primarily on the period from 2009 to 2010, the provision of prison libraries in England and Wales was a statutory requirement. This system was designed to ensure that prisoners had access to libraries and the ability to borrow books. The service was mainly administered through agreements between prisons and local authority library services, supported by librarians employed by local authorities and funded by centrally allocated resources. A specification established in 2010 set standards for staffing and service delivery, while a 90% budget increase between 2005 and 2008 reflected the emphasis placed on libraries within learning and rehabilitation policies (pp. 428–434). During this period, the implementation of services varied across different prisons. Significant limitations included restrictions on prisoners' library use, allowing only 30 minutes per week, and occasional disruptions to access due to staff shortages. Although collections were expected to cater to diverse linguistic, cultural, and learning needs while also supporting low literacy levels, access to computers and the internet remained limited. Despite these challenges, reading groups and family literacy projects became increasingly common, and libraries played a vital role in education, personal development, and maintaining family ties (pp. 434–438, 442–443).

According to a recent study by Finlay, Hanlon, and Bates (2023, p. 3), current prison regulations in the United Kingdom grant inmates the right to access libraries and their resources throughout their sentences; however, the scope of this access is not detailed in the regulations. In England and Wales, the Ministry of Justice's framework stipulates that prison libraries should support learning, improve literacy, reduce barriers to reintegration into society, and offer opportunities for cultural engagement. Service-level agreements between the prison and the local public library authority largely determine the scope of services. Nevertheless, the authors (2023, pp. 4–5) note that this statutory right of access is not always guaranteed in practice. Staff shortages can prevent inmates from being escorted to the library and hinder the library's regular opening; indeed, library services are often among the first activities affected by staffing constraints. Although some prison libraries in the UK are managed by local public library authorities, staff shortages in public libraries and the distance of prisons from city centers complicate this collaboration. The study (Finlay, Hanlon, and Bates 2023, pp. 8–10) indicates that discussions regarding practices in the UK reveal that library services extend well beyond the mere lending of books. Reading and writing groups, workshops, opportunities for individual study, and family literacy activities are among these services. During the pandemic, delivering books to the wards and using remote book request systems ensured services were provided to inmates unable to access the library in person.

Another recent study by Wilson (2024, pp. 419–423) sheds light on significant disparities in the provision of library services within UK prisons, emphasizing how these services vary with factors such as the prison's management structure, available funding, and the specific regime implemented at each facility. Despite regulations stipulating that inmates are entitled to at least 30 minutes of access to library services each week, implementation of this requirement is inconsistent across the prison system. Many facilities face challenges, including staff shortages and operational constraints, that further limit inmates' access to library resources. Moreover, libraries in prisons are not merely places for educational pursuits or reading; they

also host a variety of cultural activities to promote inmates' emotional and psychological well-being. These initiatives can range from organizing book clubs and writing workshops to hosting guest speakers and cultural events. However, the success of these programs often hinges on effective collaboration between different institutions, the dedication of volunteers who contribute their time and expertise, and the significant emotional labor performed by library staff, who navigate the complex dynamics of working in correctional environments. Through these multifaceted efforts, prison libraries strive to provide inmates not only with access to information but also with opportunities for personal growth and rehabilitation.

As can be understood, the United Kingdom is best classified within the “hybrid and multi-level models” category, although the available evidence discussed here focuses primarily on England and Wales. In these jurisdictions, prison library provision is generally shaped by statutory expectations and service-level agreements between individual prisons and local public library authorities, with public-library staff and resources contributing to service delivery. However, responsibility and implementation vary across institutions, and some facilities rely more directly on prison management for budgets and provision. This shared arrangement combines public-library partnership with institutional responsibility, while differences in staffing, funding, prison regimes, and local agreements produce uneven access in practice. Thus, the UK case illustrates how a formally recognized right to library access can coexist with substantial variation in the scope and reliability of services. The evidence should not, however, be assumed to represent Scotland and Northern Ireland, about which sufficient resources are not available, and whose arrangements require separate consideration.

EVIDENCE LIMITATIONS

The evidence available for the countries in this review is uneven in scope, date, and source type. Some cases are informed by research focused specifically on prison libraries, whereas others rely partly on broader studies of correctional systems, policy documents, or contextual sources. These sources are not treated as equivalent: claims about library services are based primarily on library-specific evidence. In contrast, wider historical and penal-system sources are used only to contextualize the institutional setting. Where direct or recent evidence is limited, the discussion is presented as provisional and is not intended to represent every prison or jurisdiction within the country. In particular, evidence concerning England and Wales is not assumed to describe Scotland or Northern Ireland.

CROSS-NATIONAL COMPARISON

The cases reveal several recurring contrasts. First, governance determines the source of expertise and the consistency of service, but no model automatically guarantees quality. Public library partnerships in Norway and Spain can connect prisons to professional networks and broader collections. However, coordination challenges in Norway and regional variation in Spain show that cooperation requires stable funding, clear responsibilities, and effective access arrangements (Rocha et al., 2024, p. 765; Pulido, 2011, pp. 461–469). Institution-led systems in the United States and Canada allow correctional authorities to organize services within their own structures, yet decentralized administration and uneven resources produce substantial differences between facilities (Fontenot, 2025, pp. 42–49; Noonan, 2023, pp. 10–16). The United Kingdom also illustrates a hybrid, multi-level arrangement: in England and Wales, prison library provision commonly involves agreements between prisons and local public library authorities, while responsibility and implementation vary across institutions. Differences in staffing, funding, prison regimes, and local agreements can therefore produce uneven access, despite the formal recognition of prisoners' right to library services. Since the evidence considered here focuses primarily on England and Wales, it should not be assumed to

represent Scotland and Northern Ireland (Coyle, 1986, pp. 8–10; 16–21; 39–43; Finlay, Hanlon, & Bates, 2023, pp. 3-10; McLaughlin, 2026; The Open University, 2026). Türkiye’s emerging agreements demonstrate the potential of a hybrid approach, but their long-term effectiveness depends on institutional continuity, professional staffing, and privacy-conscious procedures (Gazete Duvar, 2023; Justice Trends, 2025; T.C. Adalet Bakanlığı Ceza ve Tevkifevleri Genel Müdürlüğü, 2018, 2021; T.C. Kültür ve Turizm Bakanlığı, 2026a, 2026b; Şık, 2026).

Second, legal recognition is not equivalent to practical access. Spain and Brazil have strong statutory foundations, while Japan recognizes access to reading materials. However, in all three cases, service delivery can remain uneven or incomplete. Spain’s legal requirement coexists with regional disparities; Brazil’s statutory commitment is constrained by overcrowding and limited resources; and Japan’s recognition of reading rights does not ensure a library in every prison (Pulido, 2011, pp. 461–469; Da Costa, 2003, pp. 5–11; Nakane & Noguchi, 2011, pp. 448–454). Formal policy must therefore be assessed alongside staffing, hours of access, collection quality, and the practical ability to request and use materials.

Third, the scope of library service matters as much as the existence of a collection. Libraries that function primarily as bookstores or cell-delivery services may offer recreational reading while failing to meet needs related to law, health, education, employment, and release preparation. Australian research documents unmet needs in these areas, while Canadian research highlights the importance of legal and current information in environments where internet access is unavailable (Garner, 2024, pp. 1003–1004; Gordon & Willson, 2026, pp. 202–207). The IFLA framework accordingly treats collections, professional guidance, accessible formats, privacy, and user participation as interdependent components of service quality (Garner & Krolak, 2023).

Fourth, security and technology create both opportunities and constraints. Digital tools may support distance learning, communication, and access to selected information resources, but prison networks are designed primarily around security and surveillance, and internet access is often tightly controlled (Croce, 2025, pp. 33–36). The Dutch tablet proposal illustrates the risk that digital provision may be introduced primarily as a cost-saving substitute for physical libraries and staff interaction (NL Times, 2016). Digital services should therefore be evaluated in terms of their actual informational value, accessibility, privacy protections, and relationship to print and in-person provision.

Finally, rehabilitation should not be reduced to recidivism outcomes alone. Libraries can support learning, identity, well-being, social connection, and motivation—processes that may contribute to reintegration but are difficult to measure through a single indicator (Finlay & Bates, 2018). The U.S. study found no statistically significant relationship between selected library-policy indicators and state recidivism rates, but this does not establish that library services lack value; it underscores the methodological difficulty of isolating their effects and the need for broader, longitudinal evaluation (Fontenot, 2025, pp. 35–37, 46–49). Comparative research should assess access, use, user experience, educational outcomes, and post-release support alongside recidivism.

CONCLUSION

Prison libraries hold a unique role within correctional facilities. They offer access to reading materials and information while also promoting education, personal development, well-being, and preparation for release. By providing educational, vocational, recreational, legal, and general-interest resources, these libraries can make imprisonment more constructive and help individuals maintain connections with knowledge and life beyond prison walls (Demir, 2015; Folorunso, 2019). The importance of prison libraries goes beyond simply offering books. Their services can enhance literacy, develop information skills, support psychological well-being,

strengthen family relationships, foster vocational growth, and aid in social reintegration. However, limited funding, insufficient staffing, inadequate collections, and restricted access can hinder libraries from effectively fulfilling these roles (Han, 2023, pp. 110–111).

International guidance frames access to reading, information, education, and culture as important dimensions of prisoners' rights. The European Prison Rules and IFLA guidelines call for accessible and inclusive services that respond to differences in language, age, disability, and literacy, while protecting user privacy and limiting restrictions to those that are necessary and proportionate (Penal Reform International & Council of Europe, 2022; Garner & Krolak, 2023). These principles also emphasize qualified staff, adequate budgets and facilities, user participation, evaluation, and collaboration with public libraries. Digital services are increasingly relevant, but should complement—not automatically replace—print collections and direct library services (Garner & Krolak, 2023).

The comparison shows that prison libraries operate under different institutional arrangements but face a shared challenge: the gap between formal recognition and reliable, equitable access. Norway's imported-service model illustrates the potential of integrating prison libraries with public services. Spain demonstrates how statutory requirements and intergovernmental cooperation can coexist with uneven regional provision. The United States and Canada show that institution-led systems can support extensive services while remaining vulnerable to decentralized standards, resource shortages, and restricted access. Japan illustrates the limitations of recognizing a right to reading without requiring professionally managed libraries. Brazil combines a strong legal mandate and innovative reading programs with significant implementation constraints. Australia's required but locally variable services reveal the difference between providing books and meeting prisoners' broader information needs. Türkiye, meanwhile, is developing public-library partnerships, but longstanding concerns about staffing, access, privacy, and capacity remain relevant.

Across these models, effective provision requires more than a room or a collection. It depends on qualified staff, adequate and current resources, accessible opening arrangements, privacy, user participation, appropriate technology, and collaboration with public libraries and educational institutions. Restrictions imposed for security reasons should be clear, necessary, proportionate, and subject to review. Digital services should extend access rather than displace physical collections and professional support.

Moreover, the review distinguishes between the presence of a library or collection and the delivery of a meaningful library service. Service quality is considered in relation to staffing, the relevance and accessibility of collections, opening arrangements, privacy, user participation, and the availability of educational, informational, and cultural support. References to rehabilitation, well-being, or reintegration describe potential contributions identified in the literature; they should not be interpreted as evidence that library services alone cause particular outcomes. Establishing such effects requires evaluation designs that account for the wider conditions of imprisonment and the multiple factors influencing post-release outcomes.

Future comparative studies could use a shared set of facility-level indicators to document not only whether a library exists, but also who provides the service, whether qualified staff are available, how often prisoners can access the library, which groups face barriers, and what resources and activities are offered. Combining policy analysis with service records, interviews, and prisoner feedback would help identify differences between formal provision and everyday experience. Such comparisons should report jurisdictional and institutional variation explicitly and avoid treating national arrangements as uniform.

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CHAPTER 3

THE MARITIME JURISDICTION DISPUTE IN THE EASTERN MEDITERRANEAN AND THE AEGEAN: TÜRKİYE-GREECE CONFLICTS AND RECENT DIPLOMATIC REALIGNMENTS

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There are many disputes over the sharing of maritime zones around the world (Balık, 2018, p. 86). Especially in recent years, evidence of the existence of energy resources in marine deposits and increasing technological access to them have attracted the attention of countries to maritime zones (Sur, 2016, p. 319). A consensus has not been reached among many coastal countries due to gaps in international law and disputes that have persisted throughout history (Doğru, 2019, p. 252). One of the regions where no specific agreement can be reached is the Eastern Mediterranean region (Dalar, 2019, p. 152).

There are deep-rooted disputes between Türkiye and Greece regarding the Aegean Sea, Cyprus, the European Union and many other issues (Savrun, 2018, p. 141). Between 2019 and 2021, disputes over maritime zones escalated; as Türkiye concluded an agreement with Libya, an anti-Türkiye alignment was formed, leading Egypt to cooperate with Greece and deep-seat regional polarization (Acer, 2020, p. 11). However, from late 2023 to mid-2026, bilateral relations shifted toward a "Positive Agenda" and normalization steps. The signing of the Athens Declaration on December 7, 2023, and the subsequent High-Level Cooperation Council (HLCC) meetings during 2024–2026 have once again demonstrated the vital importance of interstate diplomacy alongside international law (Republic of Türkiye Ministry of Foreign Affairs, 2026).

As its strategic importance has been realized day by day, the Eastern Mediterranean has been gaining increasing value in recent years due to oil and natural gas reserves as well as critical maritime transit corridors (Savrun, 2018, p. 145). The great powers and the countries of the region are trying to establish a presence in the Eastern Mediterranean; the exploration and drilling activities of the coastal states in the region continue to gain momentum (Yılmaz, 2020, p. 30). Determining the rights of coastal states in the region through international law is important both for regional peace and for determining how to utilize these resources fairly (Doğru, 2019, p. 253). In this study, in particular, the problems of territorial waters, continental shelf, and Exclusive Economic Zones (EEZ) between Türkiye and Greece in the Mediterranean and the Aegean along with the recent diplomatic developments up to 2026 will be discussed (Balık, 2018, p. 87).

There are significant problems in the basic rules of international law regarding the use of maritime areas by states and in the implementation of these rules (Pazarcı, 2016, p. 263). These problems can be listed as the inability of legal rules to be sufficiently clear, varying legal interpretations and political disputes (Sur, 2016, p. 320). By the agreements it has

concluded, Türkiye has determined the boundaries of its maritime jurisdiction in the Black Sea without dispute (Balık, 2018, p. 88). However, there are major disagreements between Türkiye and Greece (Acer, 2020, p. 3). The main disagreements pertain to territorial waters, continental shelf, and EEZ issues (Balık, 2018, p. 87).

HISTORICAL DEVELOPMENT OF THE LAW OF THE SEA

The control of the seas, and especially the issue of jurisdiction, has been the subject of power politics since the beginning of the 17th century (Evans & Newnham, 2007, p. 149). During this time, coastal nations have alternated between attempts to claim vast areas from the high seas and regulating the principle of "freedom of the high seas," which prevents national division and allows free entry to all (Dalar, 2019, p. 150). In fact, the principle of freedom of the open sea became generally accepted. In his work "Mare Liberum" (1608), the Dutch thinker Hugo Grotius is generally recognized for establishing the first systematic doctrine of "offshore freedom" (Evans & Newnham, 2007, p. 150). Grotius argued that since private property cannot be defined on the seas, maritime areas cannot be divided (Dalar, 2019, p. 150). The Grotius doctrine was considered a favorable doctrine from the very beginning by powerful states seeking unrestricted freedom of navigation, while it was considered a more repressive doctrine by smaller, weaker states concerned about protecting their territorial rights (Evans & Newnham, 2007, p. 150). This division between the interests of stronger and weaker states has continued as a fundamental structural feature in maritime law (Evans & Newnham, 2007, p. 150).

The freedom of the high seas, once pronounced, became one of the basic principles of the international community (Dalar, 2019, p. 152). However, this freedom was not unlimited (Pazarcı, 2016, p. 263). A coastal state's request for a coastline around its coast (territorial waters) to be treated as part of its territorial jurisdiction was met with tolerance (Pazarcı, 2016, p. 263). While initial boundaries were based on the "cannon-shot rule," modern practice has adopted 12-nautical-mile territorial waters (Evans & Newnham, 2007, p. 150). Nevertheless, this has not established a universally simple solution in every maritime basin (Evans & Newnham, 2007, p. 150).

Today, the discovery of raw materials on the seabed combined with rapid technological developments has revived concerns among less developed states about losing out in an open competitive environment, prompting a re-examination of the philosophy underlying the law of the sea (Sur, 2016, p. 319).

MARITIME DELIMITATION AND LEGAL REGIME

Limitation of maritime jurisdiction is the process of establishing the boundary lines of two or more coastal states by mutual agreement (Doğru, 2019, p. 252). Delimitations are based mainly on the rules of law reflected in international conventions, customary international law and the decisions of the International Court of Justice (ICJ) and arbitration tribunals (Bayıllıoğlu, 2018, p. 95). Although the 1958 Geneva Conventions and the 1982 United Nations Convention on the Law of the Sea (UNCLOS) set out general principles, they cannot be reduced directly to every specific dispute; therefore, court decisions and state practices remain highly decisive (Doğru, 2019, p. 253).

TURKISH-GREEK DISPUTES: TERRITORIAL WATERS, CONTINENTAL SHELF AND EEZ

3.1) The Problem of Territorial Waters

Territorial waters, as a part of the coastal state's territory, are under the full sovereignty of that state (Pazarcı, 2016, p. 263). According to UNCLOS, each country has the right to determine its territorial waters up to a breadth not exceeding 12 nautical miles (Sur, 2016, p. 325).

There has been a persistent problem between Greece and Türkiye regarding territorial waters (Savrun, 2018, p. 151). Greece unilaterally increased its territorial waters from 3 to 6 nautical miles in 1936 and Türkiye responded in 1964 by setting its territorial waters in the Aegean to 6 nautical miles as well (Savrun, 2018, p. 151). Greece maintains that it holds the legal right under UNCLOS to extend its territorial waters to 12 nautical miles (Gökdemir Işık, 2009, p. 45). However, in the Aegean Sea, if territorial waters are 6 miles, the dominance rates are 35% for Greece, 9% for Türkiye, and 56% for the open sea (Savrun, 2018, p. 152). If extended to 12 miles, Greece's share rises to 64%, while open sea areas shrink to 26%, severely restricting Türkiye's direct access to international waters (Savrun, 2018, p. 152; Republic of Türkiye Ministry of Foreign Affairs, 2021). Consequently, the Turkish Grand National Assembly declared in 1995 that a unilateral expansion of territorial waters by Greece beyond 6 miles in the Aegean would be considered a "casus belli" (cause for war) (Yılmaz, 2020, p. 33). Currently, the territorial waters border for both countries in the Aegean remains at 6 nautical miles (Republic of Türkiye Ministry of Foreign Affairs, 2021).

3.2) Continental Shelf and EEZ Disputes

An Exclusive Economic Zone (EEZ) is a maritime area extending up to 200 nautical miles from baselines, in which the coastal state has sovereign rights over biological and mineral resources in the water column, seabed, and subsoil (Arıboğan et al., 2010, p. 498; Sur, 2016, p. 357). The continental shelf refers to the natural prolongation of a state's land territory under the sea (Gökdemir Işık, 2009, p. 1). Türkiye and Greece hold conflicting views regarding the maritime entitlements of islands (Yılmaz, 2020, p. 35).

Greece's Position: Based on UNCLOS Article 121, Greece argues that islands possess full continental shelf and EEZ rights identical to mainland territories (Acer, 2020, p. 8; Savrun, 2018, p. 155). Applying this to the island of Kastellorizo (Meis)—located 2 km from the Turkish mainland and over 500 km from mainland Greece—creates a continuous maritime boundary between Greece and Cyprus, confining Türkiye to a narrow coastal strip (Acer, 2020, p. 8).

Türkiye's Position: Türkiye (which is not a party to UNCLOS) argues that delimitation must be based on equitable principles (equity) and the principle of natural prolongation (Acer, 2020, p. 11). Türkiye maintains that small islands situated opposite a vast mainland should not cut off the mainland's natural extension (Acer, 2020, p. 11). ICJ jurisprudence, such as the *Costa Rica v. Nicaragua* (2018) and *Libya v. Malta* (1985) decisions, demonstrates that islands do not automatically receive full effect in maritime delimitation (Bayıllıoğlu, 2018, p. 119). Furthermore, Greece's EEZ agreement with Italy in the Ionian Sea, which granted reduced effect to islands, serves as an international precedent supporting Türkiye's position (Acer, 2020, p. 11).

EVALUATION AND NEW DEVELOPMENTS (2020–2026)

Following the 2019 Türkiye-Libya MoU on maritime boundary delimitation and the reciprocal Greece-Egypt EEZ agreement signed in August 2020 (and subsequently published by the UN), geopolitical tensions peaked in the Eastern Mediterranean (Acer, 2020, p. 12; QHA, 2020). Egypt's alignment with Greece at the time created a diplomatic disadvantage for Türkiye (Perspektif Online, 2020). However, the period from late 2023 through mid-2026 marked a structural transition toward diplomatic rapprochement and conflict management:

1. The Athens Declaration and Bilateral Rapprochement (December 2023–2026):

On December 7, 2023, during the 5th High-Level Cooperation Council (HLCC) meeting in Athens, Turkish President Recep Tayyip Erdoğan and Greek Prime Minister Kyriakos Mitsotakis signed the historic "Athens Declaration on Friendly Relations and Good-Neighbourliness" (Anka News, 2026; Republic of Türkiye Ministry of Foreign Affairs, 2026). Both nations pledged to maintain open channels of communication, foster economic cooperation, and refrain from statements or actions that could endanger regional stability (Anka News, 2026).

Positive Agenda & Visa Facilitation: The express visa facilitation allowing Turkish tourists easy access to 10 Greek islands was maintained throughout 2024–2026, boosting commercial and societal ties (Republic of Türkiye Ministry of Foreign Affairs, 2026).

Institutionalized Dialogue: Structured bilateral dialogue was further solidified through the 9th Round of the Positive Agenda Joint Action Plan held in Athens in early 2026 and the 6th HLCC meeting in Ankara in February 2026 (Anadolu Agency, 2026; Republic of Türkiye Ministry of Foreign Affairs, 2026).

2. Türkiye-Egypt Normalization (2024–2026):

Türkiye's full restoration of diplomatic relations with Egypt, marked by reciprocal presidential visits and the establishment of a High-Level Strategic Cooperation Council, reshaped Eastern Mediterranean dynamics (SETA, 2026). This normalization dissolved the rigid anti-Türkiye diplomatic front and opened new avenues for potential dialogue regarding regional gas transport and energy trade (IndyTurk, 2025).

3. Shifting Energy Geopolitics:

By 2026, the commercial viability of the proposed EastMed pipeline had diminished due to prohibitive costs and technical hurdles, giving way to regional LNG trade and electricity interconnectors (Gazete Oksijen, 2026). Türkiye's position as an indispensable energy hub and its restored ties across the region reaffirmed that energy projects cannot easily exclude major coastal states (IndyTurk, 2025).

Conclusion

Although fundamental legal disagreements regarding island maritime entitlements and territorial sea expansion remain unresolved between Türkiye and Greece, the 2023–2026 period proves that sustained political dialogue can prevent military escalation (Anka News, 2026; IndyTurk, 2025). Türkiye's diplomatic normalization with Egypt, alongside its structured engagement with Greece under the Athens Declaration, has successfully established a more balanced and cooperative climate in the Eastern Mediterranean (Republic of Türkiye Ministry of Foreign Affairs, 2026).

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CHAPTER 4

SKILLS TRANSFORMATION AND EMPLOYABILITY IN THE AGE OF ARTIFICIAL INTELLIGENCE: AN ASSESSMENT FROM A SOCIAL POLICY PERSPECTIVE

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Introduction

Technological developments have transformed the nature of working life, production processes, and the skills expected of the workforce throughout history. Today, the increasing use of artificial intelligence (AI), and particularly generative AI technologies, in cognitive activities such as data analysis, content generation, decision support, and customer services is extending technological transformation to a broader range of occupations and workers. Accordingly, it is insufficient to assess the effects of AI on the world of work solely in terms of the disappearance of certain occupations or the emergence of new ones; it is also necessary to examine how job content, task structures, and the skills required to perform those tasks are changing.

The global study conducted under the auspices of the International Labour Organization (ILO) by Gmyrek et al. (2025) shows that approximately one in four workers worldwide is employed in an occupation exposed to generative AI to some degree. However, the study's central conclusion is that the transformation of tasks and jobs is more likely than large-scale substitution. Similarly, employers participating in the World Economic Forum's Future of Jobs Report 2025 expect approximately 39% of workers' existing core skills to change or become outdated by 2030 (World Economic Forum [WEF], 2025). These findings suggest that the key issue in the age of AI is not simply how many jobs will disappear, but how the tasks in which human labour is used, and the skills required to perform them, will be reconfigured.

The Organisation for Economic Co-operation and Development (OECD, 2026) notes that the diffusion of AI does not require all workers to possess advanced AI expertise; rather, digital competencies, the capacity to use and interpret data, critical thinking, and social skills that complement technology are becoming increasingly important. This shift in skills demand is making problems such as skill obsolescence, skills gaps, and skills mismatch more visible, while placing reskilling, upskilling, and lifelong learning among the central issues of contemporary working life.

Skills transformation is directly related to employability. In the age of AI, employability encompasses not only the capacity to enter employment but also the ability to remain employed, adapt to changing skills demands, acquire new knowledge and skills, and, when necessary, move between different jobs or occupations. However, workers are not equally positioned in terms of educational attainment, age, income, gender, occupation, digital access, or opportunities to participate in adult learning. OECD (2025b, 2025d) shows that inequalities in skills development and adult learning opportunities can reproduce existing socioeconomic

inequalities. For this reason, AI-driven skills transformation is not merely a technological or economic process; it also requires examination from a social policy perspective.

The social policy approach adopted in this study is based on the premise that exposure to AI and technological vulnerability are not the same. AI may affect a large number of tasks within a given occupation; however, workers' educational attainment, occupational experience, access to learning opportunities, and alternatives in the labour market can substantially alter the consequences of this transformation. The analysis therefore considers the question, 'Which jobs are exposed to AI?' together with the question, 'Who has access to the resources required to adapt to changing skills demands?'

This study aims to examine the skills transformation generated by AI in the world of work in relation to employability, assess its unequal effects on different groups of workers, and discuss the process from a social policy perspective. Accordingly, the central research question is: 'How does AI-driven skills transformation affect workers' employability, and what new risks and areas of policy intervention does this transformation create from a social policy perspective?'

This study is based on a conceptual and narrative review of the literature examining the effects of AI-driven skills transformation on employability from a social policy perspective. Within this framework, peer-reviewed academic studies, together with recent reports and policy documents published by international organisations such as the ILO, OECD, and WEF, were thematically evaluated.

1. Artificial Intelligence and the Transformation of the World of Work

1.1. The Role of Artificial Intelligence in the World of Work

The relationship between technology and employment has long been a central area of debate in labour economics. Acemoglu and Restrepo (2019) analyse the effect of technological change on labour demand through a 'task approach', arguing that automation can displace labour by taking over some tasks previously performed by workers, while the creation of new tasks can reinstate labour's role in the production process. This approach makes it possible to analyse technological transformation not only through the disappearance of occupations, but also through the reallocation of the tasks that constitute those occupations.

AI makes this relationship more complex. OECD (2023) emphasises that the impact of AI is not limited to changes in the number of workers; it can also transform tasks, work organisation, job quality, and the skills required. Raisch and Krakowski (2021), in turn, explain

the use of AI in organisations through the paradox between automation and augmentation. While AI may substitute for human labour in some tasks, it can support decision-making, analytical, and productive capacity in others. The more realistic question is therefore not 'human or technology?' but which tasks will be transferred to technology and which will be reshaped through human-AI collaboration.

The distinction between automation and augmentation is also important for the quality of work. A technology that relieves workers of certain routine tasks may allow them to devote more time to complex and creative activities; however, it may also lead to tighter monitoring of work processes, higher performance standards, or reduced worker autonomy. The employment effects of technological innovation therefore depend not only on the technical capabilities of the technology, but also on organisational design, managerial choices, and the ways in which workers are involved in the process.

1.2. From Automation and Generative AI to the Transformation of Tasks

One of the main features distinguishing the impact of generative AI on the world of work from traditional automation is its capacity to be used, to some extent, in cognitive and knowledge-intensive tasks. In an experiment involving university-educated professionals, Noy and Zhang (2023) found that using ChatGPT reduced the time required to complete mid-level professional writing tasks by an average of 40% and increased output quality by 18%. Brynjolfsson, Li, and Raymond (2025), analysing data from 5,172 customer service workers, found that the use of a generative-AI-based digital assistant increased the number of issues resolved per hour by an average of 15%, with larger gains among less-experienced workers. These findings provide strong, although context-specific, evidence that generative AI can augment worker capacity in certain tasks.

These findings cannot be generalised to all occupations. The effects of AI vary according to the nature and standardisability of the task, workers' skills, and the way technology is implemented within organisations. In their global analysis based on approximately 30,000 tasks, Gmyrek et al. (2025) show that exposure does not mean the automation of an entire occupation; within the same occupation, some tasks may be automated, others may be supported by AI, while others may continue to depend on human social, cognitive, or contextual capabilities. Shifting the level of analysis from occupations to tasks therefore provides a more accurate account of the nature of AI-driven transformation.

Two limitations are important when interpreting experimental and firm-level productivity findings. First, short-term performance gains measured in specific writing or

customer-service tasks do not reveal the long-term employment outcomes of all occupations. Second, although larger gains from AI support among workers with lower initial performance point to the potential to narrow performance gaps, whether these gains translate into sustained learning depends on job design. Productivity improvements should therefore not be equated directly with job security or skills development; the effects of technology on task allocation and learning processes need to be considered together.

1.3. Occupational Transformation and New Ways of Working

Changes in task structures also transform occupational content and the organisation of work. As AI systems are used in areas such as work allocation, performance evaluation, process monitoring, and decision support, technology also becomes part of organisational control. Kellogg, Valentine, and Christin (2020) show that algorithmic technologies create new mechanisms for directing, evaluating, and controlling workers. The effects of AI should therefore not be assessed solely in terms of productivity gains; consequences for worker autonomy, work intensity, surveillance, and job quality must also be taken into account (Kellogg et al., 2020; OECD, 2023).

Overall, a defining feature of AI-driven transformation is the reorganisation of the task composition of many occupations. The automation of some tasks, stronger human-AI complementarity in others, and the movement of workers towards roles that evaluate or verify technological outputs are also changing the skills mix required by jobs. This transformation raises questions about which skills are losing value, which are becoming more important, and how workers can adapt to change.

The recomposition of tasks may also make occupational boundaries more permeable. As workers move from directly producing outputs to verifying AI-generated results, adapting them to context, or converting them into final decisions, questioning, evaluative, and communication skills become increasingly important alongside domain knowledge. If some traditional entry-level tasks decline, this shift may also require a redesign of the routes through which workers gain experience, because occupational expertise is often developed through a learning process that progresses from simpler to more complex tasks.

2. Skills Transformation in the Age of Artificial Intelligence

The diffusion of AI in the world of work is reshaping the combination of knowledge, skills, and competencies expected of workers. While WEF (2025) identifies AI and big data, networks and cybersecurity, and technological literacy among the skills expected to grow most

rapidly in importance, it also anticipates that analytical thinking, creative thinking, resilience, flexibility, curiosity, and lifelong learning will remain important. Skills transformation should therefore be understood not merely as the rise of technical skills, but as a recomposition of technological, cognitive, and social skills.

Skills transformation involves both 'acquiring new skills' and 'changes in the relative importance of existing skills'. The core knowledge of an occupation may remain relevant while the way in which that knowledge is used alongside AI tools changes. Skills policy should therefore focus not only on teaching entirely new technical competencies, but also on integrating existing occupational expertise with digital tools and strengthening transferable skills.

2.1. Changing Skills Requirements and AI Literacy

Skill refers to the capacity to use knowledge and practical ability in a way that enables a person to perform a specific task effectively. Skills demands are not static; they change with production methods, work organisation, and technological innovation. OECD (2026) notes that, in the age of AI, foundational skills, information and communication technology skills, and complementary skills such as problem solving, creative thinking, communication, collaboration, and autonomy are becoming important in combination. The notion of a 'skilled worker' is therefore related not only to existing occupational knowledge, but also to the capacity to learn new technologies and adapt to different task conditions.

AI literacy is an important dimension of this transformation. Ng, Leung, Chu, and Qiao (2021) conceptualise AI literacy as a multidimensional construct involving knowing and understanding AI, using and applying it, evaluating its outcomes, and being aware of its ethical dimensions. It is important not only that workers are able to use an AI tool, but also that they can assess the accuracy, reliability, and potential biases of the content it produces. AI literacy should therefore be regarded as a broader workplace competence rather than as a form of technical expertise alone.

The growing importance of AI literacy does not mean that workers need to understand every technical detail of the technology. For the wider workforce, the key requirement is to understand the types of tasks for which AI can be used reliably, when its outputs need to be verified, and when issues concerning data, privacy, bias, or accountability may arise. This perspective requires AI literacy to be understood not as a single occupation-independent skill set, but as a contextual competence used in conjunction with domain knowledge.

The organisational and educational dimensions of AI literacy must also be considered. The framework developed by the OECD and the European Commission (2026) treats AI literacy as a competence in which knowledge, skills, and attitudes need to be developed together, with emphasis on understanding how AI systems work, evaluating outputs for accuracy and bias, and using technology responsibly. Applied to working life, this approach implies that training should not be reduced to tool use or prompt writing. Workers' ability to distinguish reliable from unreliable outputs within their own occupational fields, identify erroneous recommendations, and preserve human judgement where necessary is fundamental to the quality of AI use.

2.2. Skill Obsolescence, Skills Mismatch, and Lifelong Learning

Technological change can increase the risk of skill obsolescence by reducing the economic or occupational value of certain knowledge and skills. Schultheiss and Backes-Gellner (2023) show that technical and occupation-specific skills can lose value more rapidly in the face of technological change than social and interpersonal skills, while lifelong learning can reduce employment risks particularly in occupations that are intensive in technical skills. Skills mismatch, by contrast, arises when the match between workers' existing skills and the skills required by jobs weakens. OECD Skills Outlook 2025 emphasises that skills must not only be developed but also matched with appropriate jobs and economic opportunities (OECD, 2025b).

Skill obsolescence and skills mismatch are closely related but distinct concepts. Obsolescence refers to a skill losing value in the face of changing technology or job requirements, whereas mismatch refers to an insufficient fit between a worker's skills and the skills demanded by the job. This distinction matters for policy design. Skill obsolescence can often be addressed through updating and continuous learning, while mismatch requires not only training but also mechanisms for job matching, career guidance, and skills recognition.

In response to changing demands, upskilling refers to updating skills in order to remain in one's current job, whereas reskilling refers to acquiring new skills in order to move to a different task or occupation (OECD, 2026). WEF (2025) reports that by 2030, 59 out of every 100 workers may require training, upskilling, or reskilling, while 77% of employers plan to reskill or upskill their employees in response to AI. These figures are employer expectations rather than realised outcomes; nevertheless, they provide an important indication of the scale of anticipated skills development needs.

Growing skills development needs do not mean that access to learning opportunities will automatically become more equal. Across OECD countries, participation in non-formal learning activities is approximately 61% among adults with tertiary education, compared with about 19% among those with below upper-secondary education (OECD, 2025b). This gap indicates that, in the age of AI, lifelong learning is a determinant not only of individual career development but also of employability and equality of opportunity.

For lifelong learning to be effective, training cannot be limited to teaching the technological tool currently in use. In an environment in which tools change rapidly, workers also need the capacity to learn how to learn, assess new information, and transfer a skill across contexts. Linking short-term technical training with foundational skills, occupational domain knowledge, and complementary social-cognitive skills can therefore contribute to more durable skills investment.

Technological transformation is also increasing the importance of transferable skills. Tushar and Sooraksa's (2023) broad review of the employability-skills literature shows that problem solving, communication, teamwork, adaptability, and willingness to learn have remained consistently in demand across periods and sectors. This finding suggests that framing technical and human-centred skills as substitutes in the age of AI may be misleading. A more realistic approach is to develop digital competencies that enable the use of technological tools together with transferable skills such as decision-making under uncertainty, communication, and problem solving.

3. The Relationship between Skills Transformation and Employability

3.1. The Changing Meaning of Employability

Employability is a multidimensional concept. Fugate, Kinicki, and Ashforth (2004) conceptualise employability as a form of psychosocial adaptability that enables individuals to cope with changes in working life, identifying career identity, personal adaptability, and social and human capital as its core components. Van der Heijde and Van der Heijden (2006), by contrast, consider occupational expertise together with competencies such as anticipation and optimisation, personal flexibility, corporate sense, and balance. Both approaches indicate that long-term employability depends not only on occupational knowledge but also on the capacity to anticipate and adapt to change.

This perspective becomes even more important in the age of AI. Occupational knowledge may lose value over time or need to be complemented by new technological

competencies. Employability can therefore be understood as a dynamic construct encompassing the capacity to enter the labour market, remain in employment, and move to different jobs or occupations under changing conditions. OECD (2026) emphasises the importance of recognising and developing the skills individuals actually possess, alongside qualifications and educational attainment, and matching those skills with labour-market opportunities.

This conceptual framework also indicates that employability is not solely an individual attribute. Two individuals with the same skills profile may have different levels of employability because of differences in their regional labour markets, the pace of transformation within their sectors, employers' training investments, and social protection mechanisms. Employability in the age of AI should therefore be assessed by considering individual characteristics together with the structure of labour-market demand and opportunities.

3.2. Digital Transformation, Skills Gaps, and Career Adaptability

Although digitalisation and AI are changing the determinants of employability, this does not mean that all workers need to become AI specialists. OECD assessments indicate that high exposure to AI does not require advanced programming skills in most occupations; rather, the capacity to combine technology with occupational knowledge, critically evaluate outputs, and use complementary cognitive and social skills is becoming increasingly important (OECD, 2026). Skills gaps are therefore not merely a problem of firms being unable to find suitably skilled workers, but also a social policy issue affecting individuals' ability to remain in their current jobs and to re-enter employment following job loss.

It is also important that not all occupations exposed to AI require specialised AI skills. Green (2024) shows that workers in many occupations with high AI exposure use management, business, cognitive, emotional, and general digital skills more often than advanced technical skills such as machine learning or natural language processing. This finding supports the view that training intended to protect employability should not focus only on educating a limited number of AI specialists. The broader policy need is to develop complementary skill sets that allow different occupational groups to combine their domain knowledge with AI tools safely and productively.

There are two dimensions to the skills gap emerging in relation to AI. The first is that new or complementary skills required by employers may not be sufficiently available in the existing workforce. The second is that workers' existing skills may not be adequately used or

recognised in their jobs. This second dimension broadens skills policy beyond simply increasing the supply of training to include skills recognition, job matching, and job design.

Career adaptability is another important element of sustainable employability. Savickas and Porfeli (2012) explain career adaptability through four psychosocial resources: concern, control, curiosity, and confidence. Rudolph, Lavigne, and Zacher's (2017) meta-analysis of 90 studies found that career adaptability is significantly associated with career planning and exploration behaviours, self-efficacy, employability, and career outcomes. In the age of AI, these findings indicate that not only workers' existing skills but also their capacity to recognise learning needs and manage career transitions are becoming increasingly important.

For the purposes of this chapter, sustainable employability is treated as an analytical framework that requires existing occupational skills, the capacity to acquire new skills, career adaptability, and continuous learning to be considered together. Yet the development of this capacity does not depend solely on individual motivation; access to education, time, financial resources, employer support, and the quality of learning opportunities are also important determinants. Employability should therefore be understood at the intersection of individual responsibility and institutional and public support.

The growing importance of career adaptability should not be taken to mean that all career risks can be resolved through individual flexibility. Preparing for the future and exploring new options are important, but for these behaviours to be effective workers also need accessible education, reliable labour-market information, and economic security during transitions. Otherwise, the expectation to 'adapt' may place a disproportionate share of the costs of structural transformation on individuals.

4. Vulnerable Groups in AI-Driven Skills Transformation

The effects of AI-driven transformation are not distributed equally among workers. High exposure to AI is not synonymous with automation risk; highly educated professionals may be more exposed to many AI applications while remaining relatively advantaged in their ability to use new technologies and move into emerging opportunities. By contrast, one of the principal risks for workers with low educational attainment, women, young people, and older workers is more limited access to the new learning and employment opportunities created by the transformation (Lane, 2024). In this chapter, vulnerability is treated not as an immutable group characteristic but as the intersection of existing labour-market disadvantage, technological exposure, opportunities for skills development, and re-employment capacity.

This approach recognises that vulnerability varies by context rather than classifying particular groups as automatically 'at risk'. Older age, for example, does not in itself imply digital inadequacy, just as high educational attainment does not provide absolute protection against job loss. The task composition of the occupation, the employer's technology strategy, the worker's learning opportunities, and regional employment options need to be considered together. From a social policy perspective, the key issue is whether the costs of transformation are disproportionately concentrated among groups that have fewer resources at the outset.

The intersectional nature of vulnerability must also be taken into account. An older woman with low educational attainment, for example, may face higher adaptation costs not because of age or gender alone, but because of the combined effects of caring responsibilities, digital access, participation in employer-supported training, and re-employment options. Similarly, a highly educated young person may experience a different form of vulnerability if entry-level job opportunities contract despite easy access to technology. Policy targeting should therefore consider how multiple disadvantages accumulate within the same individual or group rather than relying on a single demographic characteristic.

4.1. Young People and NEET Youth

Although young people are often viewed as advantaged in adapting to digital technologies, limited work experience and being at the beginning of their careers can create new risks. Merola, Ernst, Samaan, del Rio-Chanona, and Teutloff (2026) note that the existing empirical literature does not yet provide strong evidence that generative AI has caused large-scale employment losses, but some findings point to a possible erosion of early-career opportunities for young people. Goller, Gschwendt, and Wolter (2025) found an average 8% decline in young people's search intensity for apprenticeship vacancies in Switzerland following the release of ChatGPT, with a more pronounced decline in occupations intensive in cognitive and language tasks. This finding does not demonstrate direct job loss, but rather a change in young people's occupational choices and expectations.

For young people not in employment, education, or training (NEET), the risk is more closely associated with a cumulative skills gap. Extended periods outside education and working life can limit both occupational experience and exposure to new technologies used in the workplace. The International Labour Organization (ILO, 2026b) recommends combining technical skills with social and cognitive competencies in young people's labour-market transitions and strengthening lifelong learning. A systematic review by the ILO and World Bank (2026), covering 228 studies from 62 countries, likewise shows that well-designed active labour

market programmes can improve employment and earnings outcomes for young people. For NEET youth, skills training should therefore be integrated with career guidance, work-based experience, and employment services.

A further issue for young people concerns how work-based learning can be sustained if AI changes the number or content of entry-level tasks. In the past, simpler writing, research, or data-processing tasks often enabled new employees to learn occupational standards; automation of these tasks may shorten traditional pathways for gaining experience. Employers and educational institutions should therefore design new models of work-based learning that enable young people not only to use AI tools but also to develop the domain knowledge and professional judgement required to evaluate the outputs those tools produce.

4.2. Women Workers

The impact of AI on women workers is closely related to occupational segregation. The ILO's 2026 study covering 84 countries shows that 29% of female-dominated occupations are exposed to generative AI, compared with 16% of male-dominated occupations (ILO, 2026a). An important reason for this difference is women's greater representation in occupations, such as clerical and administrative support, that contain higher proportions of routine cognitive tasks. However, high exposure should not be interpreted directly as higher job loss; the ILO emphasises that in most occupations the more likely outcome is the transformation of tasks, skills, and working conditions.

For women, the central social policy question is the extent to which opportunities to prepare for the transformation and benefit from new technological opportunities are equally available. Lane (2024) notes that women may be disadvantaged in access to AI development roles and to AI tools that increase productivity at work. Policies should therefore support access to digital and AI skills, reduce the effects of caring responsibilities on participation in training programmes, and monitor equal access to employer-supported learning opportunities (OECD, 2025b).

From a gender-equality perspective, what matters is not only which occupations are exposed to AI, but also how productivity and wage gains generated by new technology investments are distributed. Women's lower representation in technology-intensive roles, or lower participation in lengthy training programmes because of caring responsibilities, may cause the same technological transformation to produce different outcomes for women and men. The gender effects of AI adaptation policies should therefore be monitored together with indicators of training participation, career progression, and job quality.

4.3. Workers with Low Educational Attainment and Low-Skilled Workers

Low educational attainment and low-skilled work are not the same concept: the former refers to an individual's formal educational background, whereas the latter refers to the level of skills required by the job. Nevertheless, both groups may face common risks in the context of technological transformation. OECD (2023) shows that a high concentration of routine tasks can increase automation risk and that low-skilled workers tend to participate less in adult learning and reskilling programmes. At the same time, the fact that high AI exposure is frequently observed in highly educated professional occupations demonstrates the importance of distinguishing exposure from automation risk.

One of the more significant challenges is access to learning opportunities. The 61%-19% participation gap reported by OECD (2025b) shows that initial educational advantages persist into adult learning. Programmes for workers with low educational attainment and low-skilled workers should therefore be designed to be short, modular, applicable in the workplace, and capable of reducing cost and time barriers; recognition of prior learning and skills-based career transitions should also be supported.

For these groups, training focused exclusively on advanced digital skills may be ineffective. Unless gaps in foundational literacy, numeracy, and general digital competencies are addressed, it may be difficult for AI-literacy training to translate into labour-market outcomes. Skills policies should therefore be differentiated according to starting levels and should provide accessible learning pathways appropriate to workers' existing skills (OECD, 2026).

4.4. Older Workers and Digital Access

Older workers' long-standing occupational knowledge and organisational experience are important assets; however, access to up-to-date learning opportunities becomes critical as digital skills demands change rapidly. Lane (2024) notes that older workers may face a risk of more limited access than younger workers to new AI-related employment opportunities and productivity-enhancing tools. This does not mean treating age itself as a cause of technological inadequacy; rather, the interaction between age, education, occupation, digital experience, and employer support needs to be taken into account.

A common issue linking vulnerable groups is unequal access to digital skills and learning opportunities. The digital divide now encompasses not only access to the internet or devices, but also the capacity to use technology effectively, evaluate AI outputs, gain workplace experience, and benefit from the economic value created by technology. The success of skills

policy should therefore be assessed not only by the number of training programmes offered, but also by whom those programmes reach and which groups remain excluded.

Employer behaviour is also an important determinant for older workers. OECD (2025a) notes that a shorter remaining working life may reduce the expected returns to training investment, thereby limiting both older workers' participation in training and employers' willingness to finance training for this group. By contrast, mixed teams and reciprocal mentoring practices that combine experienced workers' domain knowledge with new technologies can support both technological learning and the preservation of organisational knowledge.

Inequality in digital access also differs across work settings. Large firms or technology-intensive sectors may provide employees with regular exposure to new tools and structured training, whereas such opportunities may be more limited in small firms, low-paid jobs, or insecure forms of employment. Digital skills policy should therefore not rely solely on individual training vouchers; sectoral programmes that support the training capacity of small firms, shared training centres, and accessible learning infrastructure delivered through public employment services may also be necessary. Such measures can reduce the risk that technological transformation creates new skills inequalities through firm size or employment status (OECD, 2025b).

5. The Social Policy Dimension of Skills Transformation

AI-driven skills transformation may be viewed as a process of individual adaptation; however, differences in access to education, income, time, digital infrastructure, and employer support make adaptive capacity unequal. OECD (2025b) shows that socioeconomic background, age, and regional conditions are associated with skills acquisition and access to economic opportunities. The central social policy questions are therefore who is able to acquire new skills, who bears the costs of transformation, and who benefits from the opportunities generated by technological change.

What makes skills transformation a social policy issue is that adaptive capacity does not automatically become equal through market processes. Employers may offer training to workers from whom they expect the highest returns, while workers may be unable to participate in necessary training because of time and cost constraints. The role of public intervention should therefore extend beyond increasing the supply of training to encompass access to the right to learn, skills recognition, career transitions, and income security during periods of transition.

5.1. Lifelong Learning and Active Labour Market Policies

Although lifelong learning is one of the principal instruments for managing skill obsolescence and mismatch, adult learning is unevenly distributed by education, income, and skills level (OECD, 2025c). Barriers such as cost, lack of time, and family responsibilities need to be reduced, and modular, flexible programmes integrated with work-based learning should be developed (OECD, 2025d). This approach requires responsibility for skills development to be shared among government, employers, and educational institutions rather than left solely to workers' own resources.

Active labour market policies also need to take on a preventive role in the age of AI. Card, Kluve, and Weber's (2018) meta-analysis shows that programme effects can become stronger in the medium and long term, particularly in interventions aimed at building human capital. Bonoli, Emmenegger, and Felder-Stindt (2026), in turn, show that reskilling policies should not be limited to conventional active labour market policies activated only after unemployment, but should be integrated with broader adult education systems. Skills forecasting, early-warning mechanisms, career guidance, and modular training should therefore be activated before job loss occurs.

Programme success should not be measured solely by the number of participants. It is also necessary to monitor whether skills are actually used after training, the effects on wages and job quality, the likelihood of becoming unemployed again, and completion rates among disadvantaged groups. Lifelong-learning policy can thus move beyond the provision of short courses towards an outcomes-oriented structure that supports sustainable labour-market transitions.

5.2. Social Inclusion, Social Protection, and a Just Transition

A just-transition approach requires technological change to be assessed not only in terms of productivity outcomes but also in terms of the social distribution of gains and costs. Ding and Hirvilammi (2024) treat employment opportunities, skills development, and income security as complementary policy pillars of a just transition. Applied to AI, this approach implies that workers need not only opportunities to acquire new skills but also access to quality jobs in which those skills can be used and protection against income loss during transition periods.

Bianchi, De Propris, and Labory (2024) argue that the just-transition debate should extend beyond the green transition to encompass digital and skills transformations. This perspective shows that AI-driven change should not be reduced to productivity gains or the

number of people retrained. Justice concerns not only the distribution of the benefits of transformation, but also workers' access to new opportunities and their voice in decision-making. For a skills programme to be considered 'just', it should therefore do more than provide training: it should facilitate the effective participation of disadvantaged groups and help convert acquired skills into quality employment.

ILO (2026c) emphasises that social protection systems can facilitate job and occupational transitions in addition to protecting against income loss. Skills, employment, and social protection policies should therefore not be implemented independently of one another in the age of AI. Providing access to quality training, support for transitions into new jobs, and income security in combination can help limit the concentration of the costs of technological transformation among vulnerable groups.

A just transition also requires workers' participation in decision-making. Decisions about the tasks in which AI will be used, the skills that will be developed, and the distribution of productivity gains are not merely technical; they have direct implications for job security, wages, performance evaluation, and working conditions. Social dialogue should therefore be regarded as an institutional mechanism that can enhance the legitimacy of technological transformation and workers' confidence in skills investment (Gmyrek et al., 2025; ILO, 2026a).

6. Social Policy Recommendations for Protecting Employability

Protecting employability should not be left to the responsibility of a single actor. Public authorities should strengthen national and sectoral skills-forecasting systems, monitor tasks that are rapidly affected by AI, and extend reskilling and upskilling support beyond the period following job loss to the period before risks materialise. Support should be targeted towards groups with more limited access to learning opportunities, and training programmes should be regularly aligned with labour-market demand (OECD, 2025b, 2025d; ILO & World Bank, 2026).

Educational institutions should update curricula to develop transferable competencies such as AI literacy, data use, critical thinking, problem solving, and human-AI collaboration rather than reducing education to the use of particular tools. Employers, in turn, should combine technology investment with plans that map workforce skills and support workplace learning. Where possible, automation should be considered together with job redesign and workforce skills development rather than as a direct redundancy strategy, thereby increasing the inclusiveness of transformation.

The design of AI applications in the workplace should also be treated as part of skills policy. Algorithmic systems are not only tools for technical efficiency; they are organisational mechanisms that affect task allocation, performance evaluation, and worker autonomy (Kellogg et al., 2020). Before new systems are introduced, organisations should identify which tasks will change, which workers will need additional training, and where human oversight of technological outputs must be retained. Coordinating training plans with technology investment enables workers to prepare for the design of change rather than being expected to adapt only after implementation. Particularly in high-risk decision-making processes, clear human oversight, error-reporting mechanisms, and allocation of responsibility can strengthen the organisational foundations of AI literacy.

Career guidance and skills-recognition services should be accessible, particularly to workers at high risk of transition. Although individual responsibility for continuous learning and career adaptability remains important, it cannot be separated from institutional support. Trade unions and employers' organisations should also incorporate issues such as the right to training, the effects of technological change on work organisation, and the distribution of productivity gains into social dialogue and collective bargaining processes (Gmyrek et al., 2025; ILO, 2026a).

Policy design should combine universal access with targeted support. Basic digital infrastructure, career information, and the right to lifelong learning should be accessible to broad sections of the population; however, more resource-intensive instruments such as funding, paid training leave, care support, or intensive counselling can be prioritised for groups facing higher transformation risks and greater resource constraints. This approach can both reduce the risk of stigmatisation and ensure that limited resources are used where they can generate higher social returns.

Policies also need to be evaluated regularly. Because AI and skills demands change rapidly, a training programme considered appropriate today may become outdated within a short period. Public institutions and training providers should therefore monitor not only participation numbers, but also completion rates, the use of new skills at work, outcomes for wages and job quality, and whether different social groups benefit equally from programmes. Feeding evaluation results back into programme design can prevent skills policies from falling behind technological change and improve the effectiveness of public resources.

The financing of skills investment should likewise be organised according to a principle of shared responsibility. Requiring low-income workers to bear the full cost of training or to

participate only outside working hours can widen inequalities in access. Instruments such as paid training leave, employer-contributed learning accounts, publicly supported short programmes, and sectoral training funds can be adapted to different institutional settings. Financial support alone, however, is insufficient; programme quality assurance, links with labour-market demand, and recognition of acquired skills also need to be considered. In this way, public and employer resources can support genuine career transitions rather than merely producing short-lived certificates.

7. Conclusion and Assessment

The effects of AI on the world of work are more complex than a one-dimensional automation debate in which entire occupations are expected to disappear. Current evidence suggests that, in many occupations, the principal effects are likely to arise through the redistribution of tasks, changes in the division of labour between humans and technology, and the resulting transformation of skills demands (Gmyrek et al., 2025; OECD, 2026). Alongside technical and digital skills, this transformation is increasing the importance of complementary skills such as analytical thinking, creativity, communication, adaptability, and continuous learning.

Employability should therefore be understood not only as the capacity to obtain employment today, but also as the capacity to remain in one's current job, acquire new skills, and move to different jobs or occupations. Yet the resources needed to develop this capacity are not equally distributed among workers. Young people, NEET youth, women, workers with low educational attainment or in low-skilled jobs, and older workers may face different mechanisms of vulnerability. Rather than treating these groups as the inevitable 'losers' of technological transformation, it is more appropriate to assess vulnerability through the intersection of exposure, skills structure, learning opportunities, and re-employment capacity.

In conclusion, skills transformation in the age of AI is not merely a personal responsibility that requires individuals to update themselves. Sustainable employability requires accessible lifelong-learning systems, preventive active labour market policies, high-quality workplace learning opportunities, social protection mechanisms, and workers' participation in decisions concerning transformation. The central role of social policy is not to obstruct technological change, but to ensure that the opportunities created by transformation reach broader sections of society and that its costs are not concentrated among vulnerable groups.

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CHAPTER 5

SOCIAL MEDIA USE IN AIRPORT MARKETING COMMUNICATION: AN EXAMINATION OF İGA ISTANBUL AIRPORT'S X POSTS

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1. Introduction

In the contemporary global context, characterised by the escalating dynamics of international trade and tourism, airports have emerged as pivotal entry points for nations and metropolitan areas. These transportation hubs have assumed critical roles in facilitating the movement of capital, human populations, and information (Harcourt, 2008). In addition to this critical role, airports are also significantly affected by changes and transformations occurring on a global scale. It is evident that the liberalisation movements which began in the aviation sector during the 1970s and 1980s have had a considerable impact on the structural and functional transformation of airports. This transformation process has rendered airports an increasingly integral component of a competitive market environment (Williams, 2006).

In this new environment, both the technical and operational capabilities of airports, and their marketing and communication capacities, have begun to assume greater importance. The rapid advancements in digital technologies have fundamentally transformed the concept of marketing communication, reshaping the structure of the communication that organisations establish with their target audiences (Treadaway and Smith, 2010). It is evident that social media represents a pivotal component within the broader context of contemporary digital transformation. The proliferation of internet access and the enhanced accessibility of mobile devices have contributed to a marked increase in individuals' engagement with social media, both in terms of its prevalence and intensity. In light of these developments, social media has become a key tool in the arsenal of airport marketing communications.

This section examines the utilisation of social media by airports, a practice that is becoming increasingly prevalent. In this context, the official X account of the operator of Istanbul Airport, one of the world's major airports (ACI World, 2026), was the subject of this study. In accordance with the study, a qualitative content analysis was conducted on posts published on the relevant X account. Furthermore, the language of the posts and the types of visual elements used were evaluated descriptively. The remainder of this chapter is divided into three sections: the conceptual framework, the methodology, and the findings. The final section of the study is where the findings are discussed, and the paper concludes with a general evaluation of the results.

2. Conceptual Framework

2.1. The Changing Role of Airports

In the contemporary era, airports frequently represent the initial interface between a traveller and a nation or metropolis. These spaces have evolved to assume a profoundly symbolic and emblematic role, particularly in their function as international gateways where they often hold a monopolistic or quasi-monopolistic position in terms of supply (Doganis, 1992). In this context, the historical development of airports can be outlined as follows (Wells and Young, 2004):

- The Birth and Formation Period (1903–1938)
- The Military Influence and World War II Period
- The Modernization and Jet Age Period
- The Post-Deregulation (Liberalization) Period
- The 21st Century and Security Period

Historically, the design of airports as infrastructure investments has been primarily focused on ensuring safe air travel, with a strong emphasis on public ownership. Operating within the framework of public service, these facilities have existed for many years as non-profit entities with limited commercial activities (Graham, 2008). However, the liberalisation trends which began to emerge in the aviation sector, particularly beginning in the 1970s and 1980s, accelerated the structural and functional transformation of airports. As posited by Williams (2006), this transformation process has rendered airports a constituent of a competitive market environment.

In the post-liberalization era, airports have evolved from being merely venues for flight operations into multifaceted commercial enterprises. Doganis (1992) posits that contemporary airports are multifaceted enterprises, providing not only airline services but also retail, food and beverage, lodging, parking, and other commercial services, consolidated under a single entity. This structure has enabled airports to diversify their revenue sources and increase the share of non-aviation revenue in their total revenue. Consequently, airports have evolved into commercial entities capable of ensuring their own financial sustainability (Kapur, 1995).

This evolving structure of airports has also brought about significant spatial changes. In the contemporary era, airports are conceived as expansive complexes encompassing commercial districts, business zones, hotel facilities, and logistics infrastructure (Williams, 2006). This

spatial expansion has transformed airports from mere transit points for passengers into places where people spend time and have experiences. This has also had a considerable impact on passengers' perceptions of and expectations regarding airports (Wells and Young, 2004).

From an economic perspective, airports are regarded as significant drivers of regional development. Airports have been shown to engender both direct and indirect employment opportunities, in addition to contributing to the economic vitality of local communities and augmenting the regional competitiveness of the wider region (Wells and Young, 2004). In particularly geographically isolated regions or those with limited transportation options, airports are regarded as a pivotal instrument for economic and social integration (Graham, 2008; Williams, 2006).

In this context, airports should be regarded not only as technical infrastructures providing transportation services, but also as strategic institutions at the heart of regional development, tourism, and trade policies. In the contemporary era, characterised by the increased prevalence of international travel, airports have assumed a pivotal role in the shaping of global perceptions of nations and metropolises. As posited by Harcourt (2008), passengers' initial impressions of a destination are frequently formed in the context of the airport. The architectural design, the quality of service, and the communication methods employed have been identified as significant factors in the shaping of this perception.

The evolving role of airports has transformed them into multifaceted economic, spatial and institutional actors. This transformation has led to an increased emphasis on operational efficiency as well as strategic management, marketing and communication activities in airport operations. This novel position of airports provides a fundamental framework for understanding why marketing communication—and digital communication tools in particular—are becoming increasingly important.

2.2. Marketing Communication in Airports

The evolution of the economic and organisational structure of airports has had a significant impact on the management approaches employed by these entities. In this new environment, both the technical and operational capabilities of airports, and their marketing and communication capabilities, have become decisive factors. One of the factors contributing to this transformation is the steps taken during the liberalization period and the developments that resulted from this process.

The liberalisation process has compelled airports to adopt a more proactive approach to attracting traffic (Basso, 2006). In the contemporary context, airports are under pressure to make strategic decisions that will establish new airline connections, retain existing airlines, and increase passenger demand. This is in contrast to the traditional approach of relying on a airport's geographical location or existing passenger flows (Williams, 2006). In this context, airport marketing is defined as a systematic effort to gain a competitive advantage in a market fraught with uncertainty (Burghouwt, 2007). Marketing is not merely a tool for airports to promote themselves; it is also a management function through which they analyse market conditions and develop long-term positioning strategies. Consequently, airport marketing signifies a transition from short-term, sales-oriented endeavours to the cultivation of long-term, mutually beneficial collaborations.

A distinctive feature of airport marketing is the necessity to appeal to a large number of different target audiences simultaneously. Airports are in constant interaction with heterogeneous stakeholder groups, including airlines, passengers, visitors, the local community, public institutions, and the business community (Doganis, 1992). The multi-stakeholder structure of the organisation in question is conducive to the development of multi-faceted marketing strategies, as it precludes the adoption of a one-dimensional approach. Airport marketing activities are intended to achieve two primary objectives: firstly, to encourage airlines to initiate new routes, and secondly, to position the airport as a favoured travel destination for passengers. In this process, it is important to take into account the expectations and needs of airport employees as well. This is due to the fact that the role of employees in the delivery of services is of crucial importance in shaping the service experience.

At this juncture, marketing communication has become an integral component of airport marketing strategies. Marketing communication can be defined as all planned and unplanned communication processes that an organisation establishes with its target audiences (Lamb et al., 2011; McDonald et al., 2011). From the perspective of airports, marketing communication is not limited to promotional activities alone. As posited by Fill (2009), the quality of services provided, the passenger experience, the physical environment, and the attitudes and behaviours of employees are also integral parts of communication. Consequently, a holistic approach must be adopted in marketing communication strategies for airports.

The distinctive attributes of the service industry underscore the significance of effective marketing communication in the context of airports. The abstract nature of services, the simultaneous occurrence of production and consumption, and the difficulty of standardisation

all serve to amplify the impact of communication on the perceived quality of the service (Kotler and Armstrong, 2012). Given the predominantly experiential nature of airport services, passengers' perceptions are largely shaped by their personal experiences. Consequently, marketing communication assumes a pivotal role in the management of passenger expectations and the cultivation of a favourable perception.

At this juncture, the presence of tangible evidence that facilitates passenger perception of service quality assumes significance. Marketing communications, which are consistent and internalised by employees, must be supported by this physical evidence. Marketing communication strategies are theorised to focus on three main objectives (Lamb et al., 2011). The following processes are involved: the provision of information, the exertion of persuasion, and the act of reminding.

Another significant facet of marketing communications at airports pertains to the comprehensive management of the passenger experience. A plethora of services, ranging from check-in procedures to security inspections, and encompassing retail areas and waiting lounges, exert a substantial influence on passengers' perceptions of the airport (Wells and Young, 2004). Each of these processes should be evaluated as part of the airport's communication performance.

Marketing communication also plays a significant role in establishing and maintaining the brand identity of airports. In the context of a highly competitive environment, it is imperative for airports to develop a unique positioning that distinguishes them from their competitors. The creation of a lasting brand perception is dependent upon consistent and sustained communication activities (Fill, 2009). Airports can become recognised as preferred and memorable brands, effective in conveying the quality and value of the services they offer to their target audiences. Consequently, these endeavours have the potential to cultivate brand loyalty, thereby encouraging existing passengers who are committed to the airport to advocate for it to others.

Within this general framework, marketing and marketing communications should be considered a strategic management area in modern airport operations. The capacity of an airport to ensure its sustainability in a competitive market is contingent not only on investments in physical infrastructure, but also on the development of effective marketing communication strategies. This phenomenon provides a significant foundation for comprehending the rapid adoption of novel tools and channels in marketing communications concurrent with the digital

transformation process. The evolving demands and communication preferences of passengers necessitate that airports adapt to this new landscape.

2.3. Social Media Use in Airports in the Digitalization Process

The accelerated evolution of digital technologies has precipitated a paradigm shift in the very fabric of marketing communication, thereby reconfiguring the dynamics of communication between organisations and their target audiences. The conventional approach to marketing communication was predicated on a unidirectional transmission of messages, whereby organisations were only able to communicate with their target audiences within the confines of the available feedback channels. In the context of digitalisation, this traditional structure has been superseded by a dynamic and multifaceted communication model centred on mutual interaction (Treadaway and Smith, 2010). This transformation has rendered the nature of marketing communication even more critical in the context of airport operations, where service production and consumption occur simultaneously.

Digital strategies have been proven to facilitate a comprehensive management of the customer experience. McDonald et al. (2011) posit that digital marketing approaches increase the number of touchpoints with customers and allow organisations to monitor target audience behaviour more closely. From the perspective of airports, this signifies that communication with passengers is not confined to the physical space, but extends across a substantial timeframe – from the planning stage of the trip through the journey itself and beyond. Consequently, marketing communication is no longer confined to specific touchpoints; rather, it becomes a continuous process.

The impact of digitalisation on marketing communications has also encouraged airports to adopt a passenger-centric management approach. The accurate analysis of passenger expectations, the enhancement of satisfaction, and the cultivation of loyalty have become contingent on the effective utilisation of digital communication tools. In this context, digital platforms are regarded not only as promotional channels for airports but also as integral components of experience management (Fill, 2009).

It is evident that social media constitutes a pivotal component within the broader context of the digital transformation process. Social media is defined as online platforms that have evolved based on Web 2.0 technologies and enable users to create, share, and interact with one another (Kaplan and Haenlein, 2010). As asserted by Parker (2010), social media environments provide considerable benefits in the domain of marketing communications, owing to their cost-

effectiveness, accessibility, and expeditious nature. These characteristics render social media a strategic communication tool for airports, which have a broad and international target audience.

Social media marketing is defined as a communication process between a brand and users based on the sharing of online content and collaboration (Lamb et al., 2011). In this process, users are not merely passive recipients; they become active participants who create content, leave comments, and share their experiences. Treadaway and Smith (2010) posit that social media platforms offer brands the potential to cultivate and sustain long-term relationships that extend beyond a unidirectional transmission of messages. This characteristic serves to underscore the heightened importance of social media for organisations such as airports, which interact with a substantial number of stakeholders. In light of its escalating significance, a compendium of social media marketing strategies can be enumerated as such (Parker, 2010): It is imperative to ensure that the voice is maintained in a consistent manner. The definition of objectives and establishment of a central focus are imperative. The necessity of being selective is paramount. It is imperative to comprehend the target audience. The generation of content that is driven by the principle of value creation is of paramount importance. The provision of encouragement and the management of criticism are both important aspects of the process. The measurement and subsequent tracking of relevant data is of paramount importance. Search Engine Optimization (SEO).

A growing body of research has indicated that airports are utilising social media platforms with increasing frequency. Halpern's (2012) study indicates that platforms such as Twitter are particularly favoured by airports, with a particular emphasis on the provision of real-time updates via these channels. In contrast, Gitto and Mancuso (2019) posit that social media fulfils a marketing communication function for airports, encompassing the promotion of commercial activities, the announcement of campaigns, and the enhancement of brand visibility. It is also asserted that social media is utilised as a monitoring instrument, thereby enabling airports to track their competitors and evaluate their market position.

Another significant function of social media for airports is the collection and analysis of passenger feedback. Passengers' online posts have been shown to contain direct reflections of their perceptions and experiences regarding airport services (Martin-Domingo et al., 2019). Furthermore, it is imperative for airport operators to harness the potential of social media, which is a medium that is utilised extensively and with great freedom by passengers (Gal-Tzur et al., 2014). The aforementioned publications furnish managerial personnel with concrete insights into the areas of service quality that are either strong or weak, thus contributing to improvement

processes based on empirical data. In this regard, social media functions not only as a communication tool for airport management but also as a strategic decision-support mechanism.

Furthermore, social media has been shown to play a significant role in crisis management processes at airports. In circumstances such as flight delays, cancellations, disruptions due to weather conditions, or operational issues, social media facilitates the provision of rapid, direct, and up-to-date information (Piedade and Warnock-Smith, 2021). The timely and accurate dissemination of information during crises is of paramount importance in ensuring passenger satisfaction. Moreover, the implementation of multilingual communication strategies at airports serving an international passenger base has been identified as a key factor in enhancing the effectiveness of social media use (Akyol et al., 2016).

Nevertheless, the utilisation of social media by airports is not without its limitations and risks. It has been observed that social media users do not consistently respond positively to marketing-oriented content; promotional content that fails to consider user expectations can create a negative perception (Akar and Topçu, 2011). Consequently, it is incumbent upon airports to meticulously craft their social media content, seeking a judicious balance between the provision of information, the cultivation of engagement, and the provision of entertainment. Another significant issue that airports must prioritise in their use of social media is the need to measure the engagement results of each social media platform using appropriate measurement methods (Ahmed, 2016). This enables the assessment of the effectiveness of ongoing activities and the planning of corrective or improvement measures.

In the course of digital transformation, social media has emerged as a multifaceted and strategic marketing and communication instrument for airports. The integration of functions such as promotion, engagement, feedback, and crisis management is a key aspect of this strategy, enabling airports to cultivate sustainable relationships with their target audiences. Consequently, the integration of social media within airport marketing communication strategies through a holistic, planned, and user-centred approach is regarded as a fundamental prerequisite for attaining a competitive advantage. When implementing these efforts, a passenger-focused and integrated marketing communications approach should be adopted. It is imperative that social media is employed in a manner that is compatible with and mutually supportive of other traditional modes of communication. It is important to acknowledge the role of social media within a diverse passenger profile. However, it is equally crucial to recognise the potential of other communication tools to support social media activities.

3. Methodology

3.1. Research approach, the data source and data collection

The present study adopted a qualitative research approach. Qualitative research methods permit an exhaustive and meticulous examination of subjects (Patton, 2002). The temporal expanse of qualitative studies enables the comprehension of the sequence of events that transpired, and the assessment of causality, as opposed to a focus on isolated moments (Miles and Huberman, 1994). Qualitative analysis, by contrast, is defined as the process of deriving meaning from textual and visual data, preparing the data for analysis, and making in-depth interpretations regarding the meaning of the data. The coding process utilised during the analysis phase generally permits the establishment of a limited number of themes or categories, typically ranging from five to seven (Creswell and Poth, 2018).

The present study is an analytical investigation of posts published on the official X account of IGA Istanbul Airport. The primary rationale for the selection of IGA Istanbul Airport as the subject of this research is its status as one of the world's leading airport operators. The X social media platform, meanwhile, occupies a distinct and significant position among other social media platforms in terms of political, social, and economic communication. A notable indication of this phenomenon is the tendency of heads of state and public institutions (ministries, national assemblies, etc.) to make significant announcements primarily through their X accounts. In view of this characteristic and the platform's significance in terms of communication, the X platform was selected as the focus of this study for the analysis of IGA Istanbul Airport's social media posts.

The research data consists of 212 posts published on IGA Istanbul Airport's official X account, "iGA Istanbul Airport @igairport," dating back to January 27, 2026. The researcher first transcribed the posts from the official X account into a form based on predetermined headings. Subsequently, the text and other information included in this form that fell within the scope of the research were subjected to analysis.

3.2. Data analysis

In this study, qualitative content analysis was utilised to analyse the data. Content analysis is a widely utilised qualitative research approach within the social sciences literature (Creswell and Poth, 2018). Qualitative content analysis involves the examination of specific dimensions of meaning within qualitative data that are pertinent to the study's central research question

(Schreier, 2014). This method is employed to examine the meanings, symbolic characteristics, and expressive content of documents, media materials, or unstructured data (Merriam and Tisdell, 2016). Accordingly, qualitative content analysis was employed, with consideration given to the purpose and scope of the present study.

The reduction of data to manageable conceptual categories or themes is conducive to the holistic interpretation of the raw information obtained (Tracy, 2020). The identification of themes within documents has been demonstrated to offer insight into the manner in which individuals ascribe meaning to objects or events (Balnaves and Caputi, 2001). The following criteria are taken into account when identifying a theme: frequency across cases, the prominence of emphasis, and repetition within a case (VanderStoep and Johnston, 2009). In the present study, the data collected within this framework were examined through qualitative content analysis. This analysis resulted in the identification of themes and categories falling under these themes.

4. Findings

A comprehensive analysis of social media content published by İGA Istanbul Airport's official X account (İGA Istanbul Airport @igairport) has revealed that the institution's content dissemination strategy is organised around seven overarching themes, each of which is further categorised into distinct sub-categories (see. Fig. 1).

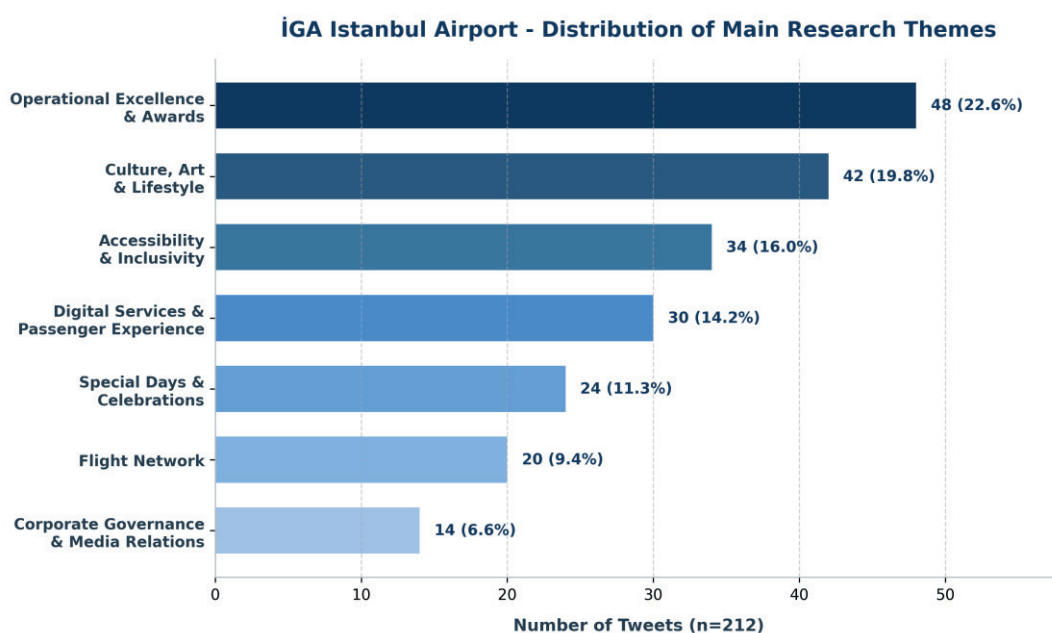


Fig. 1. İGA Istanbul Airport X (Twitter) Content Distribution & Analysis

A thorough examination of the research data revealed that 112 (52.8%) of the posts from the İGA Istanbul Airport X (Twitter) account incorporated visual media, specifically photographs or images, 68 (32.1%) featured video content, and 32 (15.1%) comprised infographics. With regard to the utilisation of languages, 124 posts (58.5%) were in Turkish, 76 (35.8%) were in English, and 12 (5.7%) contained both Turkish and English (see Fig. 2).

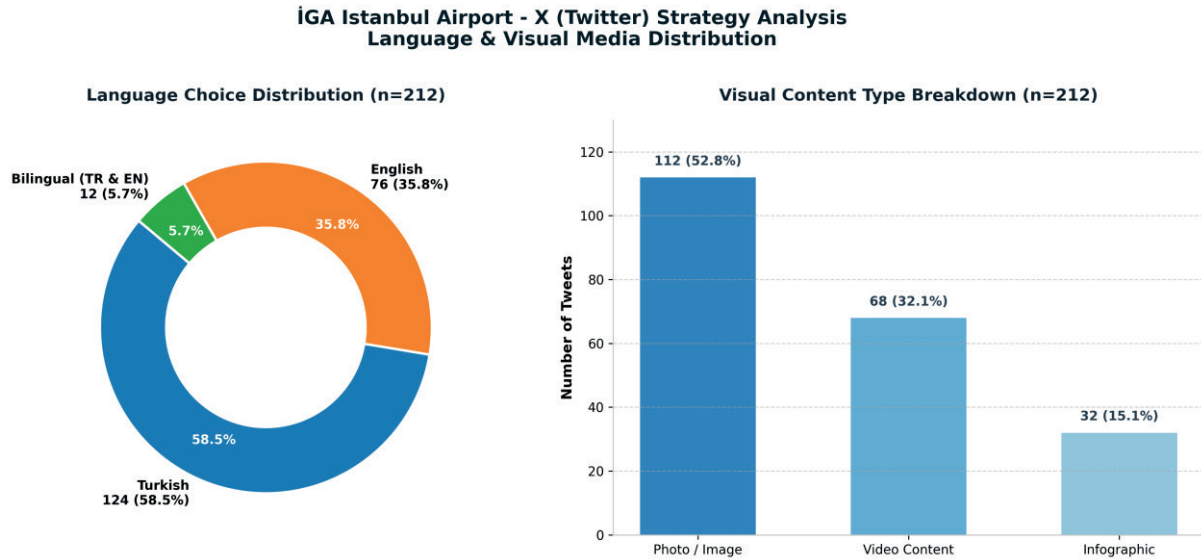


Fig. 2. İGA Istanbul Airport X (Twitter) Language & Visual Content Analysis

The initial theme that emerged from the analysis was designated "Operational Excellence and Awards," encompassing a total of 48 posts, which constituted 22.6% of the total. The following three categories were identified under this theme: The following categories are available for research: "Global Awards and Titles", "Passenger and Flight Records", and "Advanced Operational Capabilities and Seasonal Preparations".

The second theme, which comprises 42 posts (19.8%), is titled "Culture, Art & Lifestyle." The following three categories were identified within this theme: The following categories are represented: "Exhibitions", "Artistic Collaborations", and "Architectural Design".

The third theme, which encompasses 34 posts (16.0%), is entitled "Accessibility & Inclusion".

The present theme is divided into two categories: The two key concepts under discussion are "Barrier-Free Airport Solutions" and "Social Awareness and Community Contribution".

The fourth theme, comprising 30 posts (14.2%), was identified as "Digital Services and Passenger Experience." The thematic framework under discussion is comprised of three distinct categories. The following have been identified as the primary themes: "Mobile Applications and Intelligent Solutions", "Premium Travel Services", and "Free Terminal Amenities".

The fifth theme, with 24 posts (11.3%), is titled "Special Days and Celebrations." The following three categories have been identified within this theme: The following categories are to be considered: "National Holidays and Commemorative Messages", "Religious Days and Holidays", and "Sports Sponsorships and Achievements".

The sixth theme, comprising 20 posts (9.4%), is entitled "Flight Network". The present theme is divided into two categories: The following terms are to be considered in this study: "New Routes" and "Airline Partnerships".

The seventh and final theme, comprising 14 posts (6.6%), was identified as "Corporate Governance and Media Relations." Within the overarching theme, two distinct categories were delineated: "Sustainability and Business Continuity" and "Management and Media Coverage."

5. Discussion and Conclusion

The results of the present study reveal that the airport operator under investigation places significant emphasis on the accolades it has received and the accomplishments it has made in its X account posts. Moreover, the cultural activities organised by the airport and its support for such initiatives are emphasised in these posts. This type of content is among the key elements that can be evaluated within the context of the airport's positioning strategy. In an environment characterised by intense competition and rival airports with deep-rooted historical backgrounds,

it is crucial for the airport to make its distinguishing features visible. In this regard, it can be posited that through these posts, the airport is endeavouring to establish a positioning that underscores its achievements in a relatively short period of time, despite its status as a new airport. It is argued that the airport functions as a living space that offers diverse experiences, transcending its role as a mere venue for technical operations.

A further salient theme in the posts is content that demonstrates the airport's social awareness and its implementation of the activities required by this awareness. It is also evident that the airport operator's social media content includes references to its objective of continuous growth and development. It is imperative to disseminate information regarding novel air routes and collaborative initiatives, as this serves to cultivate a perception among travellers that the airport is perpetually enhancing its operational capacity and metamorphosing its identity. Furthermore, the results of the content analysis demonstrate that the airport management fosters close networks of relationships, particularly with international media organisations.

A considerable proportion of airport users utilise devices known as smartphones, and this trend has contributed to an increase in passengers' social media posts about airport services (Martin-Domingo et al., 2019). The advent of social media as a novel medium has enabled airports to enhance their business performance and market share, whilst concomitantly cultivating more robust relationships with their customers (Lee and Park, 2016). In this particular context, the analysis results indicate that IGA's social media contributions also encompass content related to mobile applications and the advantages they provide.

Furthermore, social media has emerged as a valuable tool for facilitating communication with passengers, thereby facilitating the identification of service deficiencies at airports and the development of improvements (Barakat et al., 2021; Bunchongchit and Wattanacharoensil, 2021; Drus and Khalid, 2019). These factors serve to underscore the significance of social media as a pivotal conduit for communication and information exchange within the context of

airport operations (Dhanesh et al., 2022). Furthermore, social media has been demonstrated to facilitate the management of security-related crises that may arise at airports (Bartoš and Badánik, 2019). It is evident that social media posts have the capacity to influence not only the airport's brand image but also the image of the region in which the airport is located. Furthermore, it has been observed that positive experiences at the airport can influence passengers' social media posts about the country and destination visited (Yu et al., 2026).

In the context of marketing, social media provides businesses with considerable opportunities for reaching and engaging with their target audience. However, it should be noted that merely posting on social media does not guarantee the desired results. It is imperative to commence this process with a precise identification of the target audience and a delineation of the desired outcomes of social media activities. This should be complemented by the establishment of concrete and measurable metrics to assess the success of these activities. Furthermore, it has been noted that content categories targeting only a specific segment of the target audience may negatively impact post engagement compared to a general category (Schultz, 2017). Consequently, it is imperative to meticulously select the content categories to be employed, with a view to the characteristics of the target audience.

In addition, it is imperative for businesses to customise their brand presence on each social media platform, considering the unique characteristics of the platform, the demographics of the audience, and the content preferences of the audience, with the objective of enhancing user engagement (Reimer, 2023). Another salient consideration pertains to the technical intricacies inherent in the composition of posts. For instance, factors such as the day of the week on which a post is published and the length of the post must be addressed with a professional approach (Drossos et al., 2024). Furthermore, meticulous planning is imperative for the organisation of the team tasked with the creation of social media content. This is particularly relevant in situations where multiple employees are responsible for creating social media content. In such

cases, it is essential to make arrangements to ensure that the content and communication tone are consistent across employees in order to maintain consistency in posts (Killian and McManus, 2015).

The findings of the present study suggest that the operator of Istanbul Airport, the subject of this research, employs a substantial amount of visual elements in its X posts. However, the decision of whether or not to incorporate visual elements into social media posts is also a significant area of decision-making. It has been observed that visual content, particularly that which is photographic or video-based, has been demonstrated to be an effective media format for increasing the number of 'likes' on social media posts and for encouraging the sharing of such content (Moran et al., 2020). It has been hypothesised that the incorporation of visual elements, such as animations and images, into social media posts can result in increased engagement by activating sensory receptors (Hamzah et al., 2021). However, there are various factors that must be considered when designing a post visually. For instance, it has been observed that social media posts featuring text overlaid on visual content, with the text emphasised, tend to garner fewer likes and comments. Conversely, the performance of these posts is enhanced when the text is centred, provides useful information, is positive in tone, and aligns harmoniously with the visual content (Dang et al., 2026).

The analysis results indicate that IGA predominantly utilises Turkish in its social media posts. However, it is also evident that posts in English and those prepared in both Turkish and English account for a significant proportion. Furthermore, it was determined that content related to special days and celebrations is also featured in these posts. This predicament necessitates that businesses serving people from different nations and cultures – such as airports – take cultural sensitivities into account in their social media communications. It is imperative for global businesses to consider the impact of cultural differences on social media metrics, brand engagement, loyalty, and brand recommendations (Khan et al., 2016). In this regard, it is

important to continuously monitor local news and developments and to determine the impact of events that appear to occur at the local level on the overall strategy (Berthon et al., 2012). It is important to note that for such businesses to establish positive communication with international audiences, they must aim to strike a balance between authenticity and accessibility in their cultural messaging (Wei et al., 2025).

In subsequent studies, it will be feasible to conduct comparative analyses by examining social media posts from disparate airports in unison. Furthermore, an analysis of posts made on various social media platforms can facilitate the identification of potential differences between them. In future research, a more comprehensive evaluation of airports' use of social media could be achieved by analysing the engagement rates of posts and the user comments under them. This would provide more detailed insights into how airport operators utilise the increasingly important social media environment.

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CHAPTER 6

MAYEMER-PERIOD CEMETERIES IN THE EAST KAZAKHSTAN: MORTUARY ARCHITECTURE, BURIAL PRACTICES, AND MATERIAL CULTURE¹

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Introduction

The Mayemer (Mayemir) culture represents an important Early Iron Age archaeological tradition of the western and northwestern Altai and adjacent regions of Eastern Kazakhstan, generally associated with the emergence of the early Saka (or Scythian) cultural horizon. The term derives from the Mayemer area of the Upper Irtysh region, where some of the earliest archaeological materials of this tradition were identified (Samashev et al., 2017). The history of its study, however, extends back to the nineteenth and early twentieth centuries, when isolated finds and poorly documented kurgan excavations were recorded in the Altai and Upper Irtysh. Particularly important were the investigations of A. V. Adrianov in East Kazakhstan region, along the Naryn and Bukhtarma rivers in 1906, 1910 and 1911, which brought to light a number of early nomadic complexes and artefacts that later became fundamental to the identification of the Mayemer cultural horizon (Adrianov, 1916). The discovery of the so-called Mayemer “treasure,” including distinctive bronze elements of horse equipment and zoomorphic ornaments, was especially significant for the subsequent definition of the cultural tradition (Kiryushin & Tishkin, 1997).

The concept of *Mayemer culture* was formulated more systematically in the mid-twentieth century, particularly through the work of M. P. Gryaznov (1947), who sought to establish a chronological and cultural sequence for the earliest nomadic societies of the Altai and Southern Siberia. On the basis of the limited corpus then available, Gryaznov (1947) identified several characteristic features, including distinctive forms of *horse harness*, especially cheek pieces and bits, particular types of *bronze mirrors*, and the apparent absence of iron objects in the complexes attributed to the Mayemer stage. These artefacts, together with early examples of animal-style decoration, became important chronological and cultural indicators (Figure 2). At that stage, however, the archaeological record was small and consisted to a considerable extent of chance finds and incompletely documented burials. The Mayemer culture was consequently understood largely as an early chronological stage preceding the better-known Pazyryk culture rather than as a fully characterized regional archaeological tradition (Gryaznov, 1947; Kiryushin & Tishkin, 1997; Samashev, et al., 2017; Kutlu & Kutlu, 2021; Kutlu & Kutlu, 2022).

The archaeological corpus expanded considerably during the second half of the twentieth century and particularly through more recent fieldwork. Investigations at *Kurtu*, *Izmailovka*, *Zevakino*, *the Mayemer II*, *Tarasu* and other sites substantially enlarged the number of documented funerary complexes and provided a much broader basis for comparison (Arslanova, 1974; Sorokin, 1966; Yermolayeva, 2008; Samashev et al., 2017). This expansion was particularly important for Eastern Kazakhstan, where earlier research had been based on a relatively small number of isolated finds. The growing corpus demonstrated that the Mayemer horizon was represented across a broad geographical area and that its archaeological expression varied between individual cemeteries and regions. Consequently, the culture is now better understood as a regional Early Iron Age tradition sharing a recognizable set of cultural characteristics rather than as a uniform assemblage with an invariant archaeological “package.”

The chronology of the Mayemer culture has likewise undergone considerable revision. Earlier schemes generally placed the Mayemer stage in the 7th–6th centuries BC, although some scholars extended it into the 5th and even 4th centuries BC. Subsequent radiocarbon dating and comparative studies have pushed the beginning of the early Scythian sequence in the Altai further back, into the late 9th or 8th century BC, and have encouraged the use of the broader term

Arzhan–Mayemer horizon. Within this framework, Mayemer-related monuments are generally placed between the *late 9th/8th and early or middle 6th centuries BC*, although the precise boundaries differ according to individual sites and chronological models (Alekseev et al., 2005; Shulga, 2005; Tishkin, 2007, 2011). The chronological relationship between the earlier Arzhan traditions, the Mayemer complexes and the subsequent Pazyryk culture remains an important subject of archaeological discussion.

The principal evidence for defining the Mayemer tradition continues to come from funerary monuments. These include kurgans arranged in small groups or chains, sometimes marked by circular stone settings or relatively modest stone coverings. Burial chambers vary from deep or relatively narrow grave pits to stone-lined chambers and stone boxes; lateral niches are also documented. The deceased were frequently placed in an extended supine position, commonly with the head oriented toward the north or northwest. Such characteristics recur across a number of Mayemer cemeteries, although their combination and architectural expression vary considerably. The variability of burial construction is particularly important because it demonstrates that Mayemer funerary practice cannot be reduced to a single standardized form.

The association of human burials with *horses and horse equipment* constitutes one of the most distinctive features of the Mayemer archaeological repertoire. Horses may occur as complete sacrificial deposits or through selected remains, while sheep and other domestic animals were also occasionally included. Elements of horse harness—especially distinctive bronze cheek-pieces, bits and decorative fittings—are among the most useful artefacts for identifying and dating Mayemer complexes. Bronze mirrors, weapons, ornaments and zoomorphic objects provide additional components of the material repertoire. The development of early animal-style art is particularly significant, as zoomorphic representations occur on horse equipment and other bronze objects and connect the Mayemer tradition with the wider artistic developments of the early Scythian–Saka world (Gryaznov, 1947; Samshev, 2011; Tishkin, 2011; Samashev, 2022; Shulga, 2015).

At the same time, the increasing archaeological record has demonstrated that the Early Iron Age of the Altai was characterized by considerable regional diversity. This became particularly apparent through the work of P. I. Shulga, whose investigations of sites such as Gilevo-10 and Lokot-4a emphasized the distinctive character of the northwestern Altai and its foothill and steppe zones. Shulga's research demonstrated that these communities possessed specific combinations of burial customs, material culture and equestrian equipment while also participating in wider technological and stylistic developments of the early Saka world (Shulga, 2000, 2003, 2005, 2015, 2016). His work thus contributed to moving the Mayemer concept beyond its earlier use as a relatively general chronological label and toward a more regionally grounded archaeological interpretation.

A complementary development was the separation of the *Biyke culture* from the broader Mayemer category. Yu. F. Kiryushin and A. A. Tishkin (1997) argued that the term Mayemer had previously been applied too broadly to Early Saka monuments across the Altai. Their recognition of the Biyke culture as a distinct archaeological entity, concentrated primarily in the mountainous Altai and the middle Katun region, highlighted differences in burial architecture, material culture and ecological setting (Kiryushin & Tishkin, 1997; Tishkin, 2007, 2019). This distinction is important for the present study because it emphasizes that the Early Iron Age Altai comprised several contemporaneous but regionally differentiated cultural

traditions. In this framework, Mayemer is most appropriately associated with the western and northwestern Altai, its foothills and adjacent areas of Eastern Kazakhstan, rather than being used as a general label for all early Scythian monuments of the Altai.

The expansion of research has also begun to address an important imbalance in the archaeological record: the predominance of burial evidence over settlement evidence. Most of the sites traditionally used to define the Mayemer culture are cemeteries, while securely identified settlements of the same chronological horizon remain comparatively rare. Recent excavations at the *Akbaury settlement* in Eastern Kazakhstan, although the site is not formally attributed to the Mayemer culture, are nevertheless significant in this context. Akbaury lies within the broader geographical and chronological sphere in which Mayemer-related communities developed and provides new evidence for habitation, craft production and economic activities during the Early Iron Age (Samashev, 2020; Kutlu & Kutlu, 2024; Samashev et al., 2025; Samashev et al., 2026). While it would be premature to incorporate Akbaury directly into the Mayemer cultural definition, the site broadens the archaeological context within which the funerary record can be interpreted.



Figure 1. Mayemer and other EIA Saka cultures of Central Asia. After A.A. Tishkin, 2019, p. 202

Thus, the concept of the Mayemer culture has undergone a gradual transformation from Gryaznov's initial identification of a relatively poorly documented early nomadic stage to a more nuanced understanding of a regionally differentiated Early Iron Age tradition. Its principal archaeological characteristics are expressed through funerary architecture, burial treatment, horse sacrifice and equipment, bronze mirrors, weapons, ornaments and early animal-style art. At the same time, variation between cemeteries and the recognition of contemporaneous traditions such as Biyke caution against treating Mayemer as a homogeneous cultural entity. Rather, it is best understood within the broader Arzhan–Mayemer and early Scythian–Saka horizon, as a regional cultural tradition extending across the western and northwestern Altai and into Eastern Kazakhstan.

The present study examines burial monuments attributed to the Mayemer cultural horizon in Eastern Kazakhstan, with particular attention to their mortuary architecture, demographic composition, body position and orientation, animal deposits, and associated grave goods. The corpus considered here includes cemeteries and burial groups distributed across the Upper Irtysh and Bukhtarma River valleys and adjacent areas of Eastern Kazakhstan, including Mayemer I and II, Solnechnyy Belok, Kurtu, Izmailovka, Tarasu I, Kondratyevka XXI, Kuruk II, and the Zevakino burial ground (Table 1). These monuments occupy a geographically extensive area stretching from the Bukhtarma and Mayemer river valleys of the Altai to the Upper Irtysh and the more western areas of Eastern Kazakhstan (Adrianov 1916; Arslanova, 1974; Marsadolov & Samashev 2000; Dzhumabekova & Bazarbayeva 2011; Yermolayeva 2008; Alehin & Shulga 2003, Samashev et al., 2017; Samashev, 2022).

Table 1. Geographic and archaeological context

Cemetery / group	Location	Main investigator(s)	Investigation / excavation	Approx. chronology	Notes
Mayemer I	Near Mayemer village, Eastern Kazakhstan	A. Adrianov	1911	EIA	2 excavated kurgans; both looted
Mayemer II	Near Mayemer village, Eastern Kazakhstan	Z. Samashev; Dzhumabekova & Bazarbayeva; earlier Charikov & Samashev	Survey 1997; excavations 1968, 2009	EIA	Stone/timber architecture; wooden chamber; horse burial
Solnechnyy Belok	Near Solnechnyy Belok, Mayemer/Churçut-Su river area	A. Adrianov	1911	EIA	Human and horse burials
Kurtu	Left bank of Bukhtarma River	S. Sorokin	1960–1964	9th–8th c. BC	Stone-ring graves; horse subsidiary burial
Izmailovka	Eastern Kazakhstan; now submerged by Shulba Reservoir	A. Maksimova & A. Yermolayeva	Discovered 1977, 1998	Late 9th–7th c. BC	32 kurgans, stone enclosures and symbolic graves
Tarasu I	Katonkaragai District, Upper Bukhtarma Valley	Z. Samashev / East Kazakhstan Archaeological Expedition	1998	788–528 BC	Four burial enclosures + one kurgan excavated
Kondratyevka XXI	Near Kondratyevka, NE of Semey	A. Alehin & Shulga	—	Late 7th–early 6th c. BC	Human and horse burials
Kuruk II	Near Novo-Azovo, Ulan District	Samashev, Yermolayeva & Dzhumabekova	2017	8th–7th c. BC	Horse-accompanied burial
Zevakino	Upper Irtysh, near Zevakino	F. Arslanova	1970's	Mayemer horizon	Multiple EIA burials; thematic dataset

The cemeteries differ considerably in their architectural configuration, ranging from small stone enclosures and stone-ring graves to substantial kurgans containing stone cists, wooden chambers, log-built structures, and, in some cases, subsidiary burial pits or niches (Table 2). At the same time, several recurring elements can be identified across the region. Human burials were frequently placed within stone-lined or stone-covered structures, while crouched or flexed

body positions and particular orientations of the head appear repeatedly in the better-preserved graves (Table 3, 4). Grave goods range from relatively modest assemblages of bronze knives, mirrors, beads, and ornaments to more elaborate combinations of weapons, horse equipment, gold appliques, and animal-style objects (Table 5). Animal deposits, especially sheep and horse remains, occur in association with both human burials and funerary structures, although their form and frequency vary between sites (Table 6). Rather than treating these differences simply as evidence of separate local traditions, the following analysis compares the burial evidence according to several thematic categories in order to identify shared mortuary conventions, regional variation, chronological developments, and possible differences in the social composition of the communities represented.

Table 2 . Mortuary architecture

Site	Burial / kurgan	Superstructure	Burial structure	Pit / chamber	Covering	Architectural characteristics
Mayemer I	Kurgan 1	Kurgan	Stone-lined burial pit	2.13 × 3.10 × 1.06 m	—	Large rectangular pit
Mayemer II	Kurgan 1	Stone/timber pyramidal structure	Log-built chamber + stone cist	Chamber ca. 4 × 3 m internally	Timber roof	Truncated-pyramidal timber structure; eastern dromos
	Kurgan 2	Kurgan	Stone-covered pit + wooden sarcophagus	3.5 × 2.5 × 2.5 m	Stone slabs	Wooden trunk sarcophagus
Solnechnyy Belok	Kurgan 2	Kurgan	Burial pit	3.32 × 1.77 × 2.84 m	—	Horse burial
Kurtu	Kurgans	Stone ring	Central burial pit	ca. 0.6 m deep	Stones	Circular/oval stone structures
Izmailovka	Kurgan 5	Kurgan	Stone cist	3.2 × 2.5 m	Stone slabs	Sand-covered cist floor
	Kurgan 16	Kurgan	Stone cist + wooden coffin	Coffin 2.1 × 0.48 m	—	Coffin inserted into cist
Tarasu I	Encl. 23	Stone enclosure	Niche burial	Niche ca. 1.55 × 0.90 × 0.70 m	Wooden logs	Niche in western wall
	Encl. 24	Oval stone enclosure	Niche burial	—	Stones	Child burial
	Encl. 25	Circular stone enclosure	Subsidiary pit	—	—	Female burial
	Kurgan	Earthen mound + stone enclosure	Niche burial	1.55 × 0.90 × 0.70 m	Stones	Multiple individuals
Kondratyevka XXI	Burial 1	Circular stone enclosure	Coffin + roof structure	3.6 × 1.1 × 2.35 m	Timber	Log roof and tree-trunk coffin
	Burial 2	Circular enclosure	Animal burial	2.32 × 1.66 × 1.57 m	—	Three horses + ram
Kuruk II	Burial 6	Damaged kurgan	Stone cist	—	Granite slabs	Human + horse burial
Zevakino	26a–35	Stone enclosures / unclear	Oval or rectangular pits	Variable	Stones in some graves	Multiple burial forms

The architectural record reveals a considerable range of funerary constructions rather than a single standardized burial form. Simple stone-ring and stone-enclosure monuments occur

alongside more elaborate structures incorporating wooden chambers, tree-trunk coffins, stone cists, and niches. The Mayemer II Kurgan 1 represents one of the most elaborate examples, with a substantial stone-and-timber superstructure, a dromos, and a log-built chamber estimated to have reached nearly 2 m in height. By contrast, the stone-ring graves at Kurtu represent a comparatively simple architectural form, while Tarasu demonstrates the use of niche burials within stone enclosures. The evidence therefore suggests that architectural diversity was an integral component of the Mayemer mortuary landscape, potentially reflecting chronological development, local traditions, differences in social status, or combinations of these factors.

Table 3. Demographic data

Site	Burial	Individuals	Age	Sex	Burial type
Mayemer I	Kurgan 1	2	Adult + young	Male + male	Multiple
Mayemer II	Kurgan 1	?	Adult?	NR	Single
	Kurgan 2	?	Adult?	NR	Single
Solnechnyy Belok	Kurgan 3	1	Adult?	NR	Single
Kurtu II	Kurgan 3	1	Middle-aged	Male	Single
Tarasu I	Encl. 23	1	Adult?	NR	Single
	Encl. 24	1	Child	NR	Single
	Encl. 25	1	Adult	Female	Single
	Earthen kurgan	2	NR	NR	Multiple
Kondratyevka XXI	Burial 1	1	Middle-aged	Male	Single
	Burial 4	1	1.5–2 years	Child	Single
Kuruk II	Burial 6	1	Infant	NR	Human + animal
Zevakino	26a-1	1	Adult?	NR	Single
	26a-2	1	Adult?	NR	Single
	27	1	Adult?	NR	Single
	28-1	1	Child	NR	Single
	28-2	1	Adult	NR	Single
	29-1	?	NR	NR	Disturbed
	29-2	1	Adult	NR	Single
	30	1	Juvenile	NR	Single
	32	3	NR	NR	Triple
	33	2	NR	NR	Double
	34	4	NR	NR	Multiple
	35	3	NR	NR	Multiple

NR = not recorded; ? = uncertain because of disturbance.

The available demographic evidence demonstrates that the Mayemer-period mortuary record included *adults, juveniles, children, and infants*, although the preservation of skeletal material and the relatively limited osteological determinations prevent a comprehensive demographic reconstruction. Multiple burials are documented at Mayemer I, Tarasu, and Zevakino, while single interments predominate in better-preserved individual graves. The occurrence of children and infants is particularly important because it demonstrates that the mortuary system was not restricted to adult members of the community. At the same time, the small number of securely sexed individuals cautions against drawing conclusions about sex-based differences in burial treatment.

Table 4. Body position and orientation

Site	Burial	Body position	Side	Head orientation	Notes
Mayemer I	Kurgan 1	Disturbed	—	—	Two males
Solnechnyy Belok	Kurgan 3	Supine	—	West	Human burial
Kurtu II	Kurgan 3	Flexed	Left	West	Face east
Tarasu I	Encl. 23	Crouched / flexed	—	NE	Face west
	Encl. 25	Crouched	Right	NE	Female
Kondratyevka XXI	Burial 1	Originally supine?	—	NW	Position reconstructed from leg bones
Kuruk II	Burial 6	Disturbed	—	N	Infant
Zevakino	26a-1	Crouched	Right	S	—
	26a-2	Crouched	Left	S	—
	27	Crouched	Right	S, 15° W	—
	28-1	Crouched	Right	S	Child
	28-2	Crouched	Right	SW	Skull displaced
	29-2	Crouched	Right	S	—
	30	Crouched	Right	SW	Juvenile
	32	Crouched	Right	SW	3 individuals
	33	Crouched	Right	SW	2 individuals
	34	Crouched	Right	S/W	4 th individual oriented W
	35	Crouched	—	S	3 individuals

Body position constitutes one of the more consistent elements of the better-preserved Mayemer-period burials. Flexed or crouched interments are documented at Kurtu and Tarasu and are particularly prominent at Zevakino. At Zevakino, all sufficiently preserved individuals for whom position could be established were placed in a crouched position, predominantly on the right side, with the head directed south or southwest. The evidence from Kurtu similarly demonstrates deliberate flexion, with the adult male in Kurgan 3 placed on his left side with the head toward the west and face toward the east. Nevertheless, the occurrence of supine burials, as at Solnechnyy Belok and Izmailovka, indicates that crouched burial should not be regarded as an exclusive or universal Mayemer practice. Instead, flexed/crouched burial appears to represent an important recurring practice within a broader repertoire of mortuary treatments.

Table 5. Grave goods

Site	Burial	Weapons/tools	Ornaments	Mirrors	Pottery	Horse equipment	Other
Mayemer I	Kurgan 1	—	—	Bronze mirror	—	—	Sheep bones
	Kurgan 2	—	Gold tiger plaques	Bronze mirror	—	—	Gold strips
Mayemer II	Kurgan 1	Iron objects	Earring; beads	—	—	—	Carnelian/turquoise
	Kurgan 2	—	—	—	—	Bronze bit, cheekpieces, buckle	Horse + sheep + dog
Solnechnyy Belok	Kurgan 2	—	—	—	—	Bronze bit + ~40 fittings	Horse + sheep
Kurtu II	Kurgan 3	—	—	—	—	Bone cheekpieces	Horse burial
Izmailovka	Kurgan 5	Iron object/knife	—	—	—	—	—
	Kurgan 6	—	Paste/carnelian beads	—	—	—	—
	Kurgan 16	—	Turquoise/paste beads; bone buttons	—	Birch-bark vessel	—	Coffin
	Kurgan 21	—	—	Bronze Animal Style mirror	Ceramic vessel	—	Tiger motif
	Encl. 23	Bronze knife	Gold plaque, earrings, gold fittings, beads	Bronze mirror	—	Arrow-sheath hooks	Felt/birch bark
Tarasu I	Encl. 25	—	Bird-of-prey ornament	—	—	—	—
Kondratyevka XXI	Burial 1	Bronze arrowhead	Belt plaques	—	—	—	Coffin
Kuruk II	Burial 6	Bone arrowhead	—	—	—	Horse	Horse burial
Zevakino	26a-1	Bronze sickle-shaped knife	—	—	—	—	Sheep ribs
	27	—	Bronze wire ring	—	—	—	—
	32	—	Bronze bell-shaped ornament; beads	Bronze disc mirror	—	—	—
	34-4	—	—	—	Vessel fragments	—	—
	35-1	Bronze knife	—	—	—	—	Sheep ribs

35-3

Bronze
knife

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The grave-goods assemblages display marked differences in quantity, material, and social significance. Some graves contain only a single object or a small number of personal items, whereas others contain elaborate combinations of ornaments, weapons, mirrors, beads, horse equipment, and gold appliqués. Particularly rich assemblages occur at Mayemer I Kurgan 2 and Tarasu Enclosure 23, where gold animal-style objects occur alongside bronze objects and ornaments. The recurrent appearance of bronze mirrors, horse equipment, weapons, and ornaments nevertheless provides a recognizable material repertoire across several cemeteries. The presence of Animal Style objects—including the gold tiger plaques from Mayemer and the tiger-decorated mirror from Izmailovka—also connects the mortuary assemblages to the wider artistic traditions of the Early Saka period.



Figure 2. Bronze mirror from the Mayemer hoard. The State Hermitage Museum. From the archive of Z. Samashev.

Table 6. Animal deposits

Site	Burial	Animal	Quantity	Position / context	Interpretation
Mayemer I	Kurgan 1	Sheep	—	Near human burial	Offering
Mayemer II	Kurgan 2	Horse	1	Southern part of pit	Horse burial
	Kurgan 2	Small ruminant	1+	Southern part	Animal offering
	Kurgan 2	Dog	1	Southern part	Animal deposit
Solnechnyy Belok	Kurgan 2	Horse	1	Burial pit	Horse burial
	Kurgan 2	Sheep	1	Near horse head	Offering
Kurtu II	Kurgan 3	Horse	1	Subsidiary pit	Horse burial
Kondratyevka XXI	Burial 2	Horse	3	On platforms	Horse burial
	Burial 2	Ram	1+	Pit floor	Animal offering
Kuruk II	Burial 6	Horse	1	SE corner of pit	Horse accompaniment
Zevakino	26a-1	Sheep	—	Near head	Animal remains
	26a-2	Sheep	—	Near head	Animal remains
	28-2	Sheep	—	Beside forearm	Animal remains
	34-3	Sheep	—	Near head	Animal remains
	35-1	Sheep	—	Near head	Animal remains

Animal deposits represent one of the most significant recurring components of the funerary record. Two distinct practices can be distinguished: complete or substantially complete animal burials, particularly involving horses, and partial animal offerings, especially sheep remains. Horse burials are documented at Mayemer II, Solnechnyy Belok, Kurtu, Kondratyevka XXI, and Kuruk II. At several of these sites, the horses were accompanied by elements of harness equipment, demonstrating that the animal was not simply deposited as food but was associated with the deceased through the symbolic and practical equipment of riding. The horse burial at Kurtu is particularly instructive because it occupied a subsidiary pit separate from the human grave. At Zevakino, by contrast, the animal evidence consists primarily of sheep ribs placed near the deceased, representing a substantially different form of offering.

Table 7. Comparative data of Mayemer period burials

Mortuary characteristic	Mayemer II	Kurtu	Izmailovka	Tarasu	Kondratyevka XXI	Kuruk II	Zevakino
Stone enclosure/ring	✓	✓	✓	✓	✓	✓	✓
Stone cist	✓	—	✓	—	—	✓	—
Wooden chamber/coffin	✓	—	✓	—	✓	—	—
Niche burial	—	—	—	✓	—	—	—
Crouched/flexed burial	?	✓	—	✓	—	?	✓✓
Supine burial	—	—	✓	—	✓	—	—
Horse burial	✓	✓	—	—	✓✓	✓	—
Sheep offering	✓	—	—	—	✓	—	✓
Bronze mirror	—	—	✓	✓	—	—	✓
Gold objects	—	—	✓	✓	—	—	—
Weapons/tools	✓	—	✓	✓	✓	✓	✓
Multiple human burial	—	—	✓	✓	—	✓?	✓✓

✓ = documented; ✓✓ = particularly prominent; — = not documented in the selected sample; ? = evidence insufficient

The comparative evidence indicates that the Mayemer-period mortuary tradition cannot be reduced to a single standardized burial rite. Instead, it is characterized by a shared repertoire of practices expressed through locally and chronologically variable combinations. Stone constructions are particularly widespread, while crouched or flexed burial, animal deposition, bronze mirrors, weapons, ornaments, and horse-related equipment recur across different parts of the region. At the same time, elaborate timber chambers and coffins occur only in selected contexts, while horse burial is concentrated in particular cemeteries and is absent from others. The variability is therefore significant in its own right and should not necessarily be interpreted as evidence for separate cultural groups. The archaeological record of the Mayemer steppe itself has been characterized as displaying variability in funerary practice, potentially reflecting the interaction and mixture of different traditions.

Taken together, the evidence suggests that Mayemer-period mortuary practices in Eastern Kazakhstan were structured around a recognizable but flexible set of architectural and ritual conventions. Stone enclosures and kurgan constructions provided the principal framework for burial, while internal arrangements ranged from simple pits to niches, stone cists, wooden coffins, and substantial log-built chambers. Flexed and crouched interments form an important component of the burial repertoire, although supine and heavily disturbed burials demonstrate that this practice was not universal. Animal deposits, particularly horses and sheep, further distinguish the funerary assemblages, with complete horse burials representing a more elaborate form of animal accompaniment than the partial sheep offerings recorded at several sites. Grave goods similarly range from individual bronze tools and ornaments to rich assemblages incorporating mirrors, horse equipment, gold appliques, and animal-style imagery. Rather than indicating a rigidly standardized rite, this combination of recurring practices and local variation suggests a shared mortuary tradition expressed through different architectural, social, and chronological contexts.

On the other hand, over the past several decades, a number of other Early Iron Age Saka burial grounds have been identified in the East Kazakhstan region, including those in the Shilikti Valley, Eleke Sazy, Akzhailau, and Bozay areas (Toleubayev, 2018; Samashev, et al., 2023; Kutlu, 2021; Omarov et al., 2024). Although the cultural attribution and chronological position of some of these sites remain insufficiently defined, their geographic distribution, material culture, burial architecture, and broader chronological characteristics display notable similarities with sites traditionally associated with the Mayemer cultural horizon. These similarities suggest that such cemeteries may contribute to a broader understanding of the development and regional distribution of the Mayemer-period funerary tradition in eastern Kazakhstan, while their precise cultural affiliations require further comparative and chronological investigation.

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CHAPTER 7

AN EXAMINATION OF INCLINATION TO ETHICAL VALUES ACROSS GENERATIONS AND DEMOGRAPHIC CHARACTERISTICS

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Introduction

Broadly defined, ethical values comprise the fundamental principles and beliefs that guide individual behaviour, shape the quality of interpersonal relationships, and contribute to the sustainability of social life. Values such as love and respect, justice and honesty, and cooperation may influence not only personal choices but also attitudes within the family, education, working life, and the public sphere. The adoption of these values and their expression in everyday conduct are important for building social trust, managing differences within a shared society, and fulfilling collective responsibilities. Ethical values, however, should not be regarded as fixed attributes expressed to the same degree and in the same way by every individual. Family background, educational experience, social relationships, and historical circumstances may all shape an individual's orientation towards ethical values.

The concept of a generation entails more than identifying people born within a particular period; it also calls for attention to the historical and social conditions in which their lives have taken shape. Economic change, technological development, educational opportunities, forms of communication, and shifts in social norms may affect the shared experiences of different age groups. Examining differences in values across generations is therefore relevant to understanding how ethical orientations relate to social context. At the same time, generations should not be treated as internally homogeneous: people within the same generation may differ in education, family circumstances, occupational experience, and socioeconomic position. Accordingly, generational comparisons should be interpreted with due regard to individual and demographic diversity.

Previous studies have examined inclination to ethical values in educational, occupational, institutional, and individual contexts. The present study focuses on comparing participants from Generations X, Y, and Z within a single research framework, without restricting the inquiry to a particular occupation or field of education. It assesses whether the groups differ statistically in love and respect, justice and honesty, cooperation, and the overall scale score. Demographic characteristics, including gender, marital status, and education, are also considered in recognition that inclination to ethical values may not be explained by generational membership alone.

Literature Review

Ethics constitutes the applied dimension of morality (Öcal, 2007, p. 12). Ethical values therefore play an important role in shaping individuals' behaviour, decisions, and relationships with others in daily life. Individuals' orientations towards these values may be associated with their social environment, education, occupational experience, and personal characteristics. For this reason, inclination to ethical values has been examined from various perspectives in studies of different age and occupational groups.

A substantial part of the research on inclination to ethical values has focused on students. Taş (2018) examined university students' inclination to ethical values and found associations with various demographic and social characteristics. Altınok (2020) considered this inclination in the context of education, while Üzüm and Sivrikaya (2016) investigated students at vocational schools. Kırca et al. (2020) studied nursing students, and Akin (2017) examined social work students. Together, these studies show that ethical values have been investigated across different areas of education.

Other studies address the relationship between inclination to ethical values and occupational characteristics or individual dispositions. Rençber et al. (2021) identified significant relationships between the entrepreneurial inclinations of undergraduate and associate degree students and their views on ethical values. Çavuşoğlu (2020) found that accounting professionals' inclination to ethical values varied by occupational experience and educational attainment. Tilki et al. (2022) examined this inclination among students preparing for the accounting profession. In a study of healthcare workers, Sadykova et al. (2021) identified a positive relationship between perceived organisational democracy and inclination to ethical values. Akduman and Karahan (2022) assessed the relationship between inclination to ethical values and happiness in the context of personality traits. Öcal and Üstün (2006) examined ethical perceptions among economics students through the issue of bribery, including gender differences in ethical orientation. Örselli and Gökçe (2010) conducted an empirical examination of social and administrative ethical values and dilemmas in Türkiye.

Generational differences in ethical values have also attracted scholarly attention. The social, economic, and cultural conditions encountered by people raised in different periods may contribute to differences in their value judgements. In this context, Atab et al. (2013) used a qualitative approach to examine perceptions of

business ethics among different generations in Türkiye. Interviews with members of the Baby Boomer, X, and Y generations revealed both similarities and differences in their approaches to business ethics.

Yıldız and Giray Yakut (2019) examined whether perceptions of workplace ethics differed by gender and generation in a study of 828 employees in Türkiye. They found that women reported more positive ethical perceptions than men and that significant differences also existed between generations. They further concluded that Generation Y could be more tolerant of unethical workplace behaviour than Generation X. Their study illustrates the relevance of a generational perspective to ethical perceptions.

Twenge et al. (2010) compared work values among individuals who were high school seniors in different periods. They identified generational differences in the importance attached to leisure, material rewards, and social values. These findings suggest that value priorities may vary with the period in which individuals grew up.

Nevertheless, other research has found that generational differences are not always pronounced. In a study of 1,019 employees from Türkiye and the United States, Gürbüz and Aytekin (2020) examined work attitudes, personal values, and work ethics across generations. They found limited evidence of strong and consistent generational differences and noted that generational classifications may not yield the same results across social and cultural contexts.

Klopotan et al. (2020) examined the Baby Boomer, X, Y, and Z generations with regard to the importance of business ethics, attitudes towards ethical issues, and factors affecting ethical behaviour. Their research represents another effort to consider ethical issues across several generations within the same study.

Taken together, the literature associates inclination to ethical values with individual, social, and occupational characteristics, while findings on generational differences do not consistently point in the same direction. Much of the research on generations has also concentrated on working life and business ethics.

The present study examines inclination to ethical values across Generations X, Y, and Z beyond the setting of working life. By comparing the overall scale score alongside love and respect, justice and honesty, and cooperation, it allows a more detailed assessment of similarities and differences among the generations and contributes to the existing literature on ethical values.

Aim and Scope of the Study

This study aims to determine whether inclination to ethical values differs across Generations X, Y, and Z. Participants are compared on the subdimensions of love and respect, justice and honesty, and cooperation, as well as on the overall scale score. The study also examines whether inclination to ethical values varies by gender, marital status, educational attainment, and other demographic characteristics.

The primary research question is: “Does individuals’ inclination to ethical values differ significantly across generations?”

Convenience sampling, a non-probability sampling method, was used. Data were collected from accessible individuals who agreed to participate in the study.

Sample size tables developed for this purpose were consulted when determining the target sample. Following data collection, responses were reviewed, and missing or erroneous data and outliers were assessed. The analyses were conducted using data from 1,140 participants.

Inclination to ethical values was measured using the 16-item, three-subdimension Inclination to Ethical Values Scale developed by Kaya (2015).

Participant Characteristics

After missing and erroneous responses and outliers had been excluded, the study included 1,140 individuals. Women constituted 61.9% of the sample and men 38.1%.

With regard to marital status, 69.8% of participants were unmarried and 30.2% were married. Thus, unmarried individuals made up the majority of the sample.

University-educated participants accounted for the largest share of the sample (49.7%), followed by high school graduates (35.1%) and primary school graduates (9.9%). Participants with a master’s degree accounted for 4.1%, those who were literate without a listed formal qualification for 0.8%, and those with a doctorate for 0.4%.

Regarding generational membership, 56.5% of participants belonged to Generation Z, 22.5% to Generation X, and 21.0% to Generation Y. Thus, more than half of the sample comprised Generation Z participants.

Findings

Table 1. Kaiser–Meyer–Olkin (KMO) and Bartlett’s Test Results for the Scale

Scale	KMO	Bartlett’s test χ^2	p
Inclination to Ethical Values Scale	0.933	9,349.742	< .001

Before factor analysis, the Kaiser–Meyer–Olkin (KMO) measure was used to assess whether the collected data were suitable for factor analysis, particularly in terms of sampling adequacy. According to Kaiser and Rice (1974), KMO values between 0.50 and 1.00 may be regarded as acceptable.

Bartlett (1950) proposed a chi-square test to evaluate the overall statistical significance of the correlation matrix in principal component analysis. Table 1 presents the KMO measure and Bartlett’s test of sphericity for the Inclination to Ethical Values Scale. The KMO value was 0.933. As this value exceeds 0.50 and is relatively close to 1, it indicates adequate sampling for factor analysis. Bartlett’s test yielded a chi-square value of 9,349.742 ($p < .001$), indicating statistically significant correlations among the scale items. Together, these results support the suitability of the data for factor analysis and the investigation of a meaningful component structure.

Principal component analysis was used to examine the scale’s structure, and the rotated component matrix was considered. Quartimax rotation with Kaiser normalisation was applied to obtain a more distinct and interpretable structure. Components with eigenvalues greater than 1 were retained. Item assignment was assessed by considering component loadings, cross-loadings, and the theoretical dimensions to which the items belonged. The resulting analyses of the scale structure are presented below.

Table 2 presents the percentages of variance explained by the subdimensions of the Inclination to Ethical Values Scale and the internal consistency results.

Table 2. Explained Variance and Reliability of the Inclination to Ethical Values Scale Subdimensions

Scale	Subdimension	Variance explained (%)	Cronbach's alpha
Inclination to Ethical Values Scale	Love and respect	36.753	0.849
	Justice and honesty	14.853	0.899
	Cooperation	10.107	0.745
Overall scale		61.714	0.911

As shown in Table 2, the love and respect component explained 36.753% of the total variance, justice and honesty explained 14.853%, and cooperation explained 10.107%. Together, the three components explained 61.714% of the total variance. The three-component structure therefore accounted for a substantial proportion of the variation in the scale items.

Cronbach's alpha coefficients were examined to assess the internal consistency of the scale. The coefficient for the full scale was 0.911; the coefficients for love and respect, justice and honesty, and cooperation were 0.849, 0.899, and 0.745, respectively.

Because the Cronbach's alpha coefficients for the overall scale and all subdimensions exceeded 0.70, the instrument and its subdimensions may be considered to have adequate internal consistency (Boateng et al., 2018). These results support the use of the Inclination to Ethical Values Scale in the subsequent analyses.

Table 3 reports the component loadings of the items in the Inclination to Ethical Values Scale.

Table 3. Component Loadings of the Inclination to Ethical Values Scale Items

Scale	Subdimension	Items	Component loading
Inclination to Ethical Values Scale	Love and respect	I respect people of all ages.	0.804
		I feel affection for people of all ages.	0.739
		I strive to fulfil the responsibilities of being human.	0.798
		I want people to trust me.	0.788
		I avoid damaging public property.	0.728
		I try to be transparent in what I do.	0.673
		I generally consider myself patient.	0.366
		I do not abuse the trust people place in me.	0.688
	Justice and honesty	I do not discriminate regardless of the circumstances.	0.697
		I act impartially regardless of the circumstances.	0.728
		I act fairly regardless of the circumstances.	0.689

Scale	Subdimension	Items	Component loading
		I treat all people equally regardless of the circumstances.	0.646
		I act honestly regardless of the circumstances.	0.520
	Cooperation	I take initiative when doing new things.	0.766
		I try to serve as a role model for others.	0.719
		I enjoy working cooperatively with others.	0.614

As shown in Table 3, loadings for the love and respect items ranged from 0.366 to 0.804. The highest loading (0.804) was observed for “I respect people of all ages”; the loading for “I generally consider myself patient” was lower than those of the other items (0.366). If 0.30 is taken as the minimum acceptable threshold, all items in this subdimension meet that criterion (Costello & Osborne, 2005). Alpar (2013, p. 277) also regards loadings in the range of 0.30–0.40 as acceptable for interpretation.

Loadings for the justice and honesty items ranged from 0.520 to 0.728. The highest loading (0.728) was obtained for “I act impartially regardless of the circumstances”, and the lowest (0.520) for “I act honestly regardless of the circumstances”.

Loadings for the cooperation items ranged from 0.614 to 0.766. The highest loading (0.766) was observed for “I take initiative when doing new things”, and the lowest (0.614) for “I enjoy working cooperatively with others”.

Normality was assessed for the total scale score and the subdimension scores. Shapiro–Wilk tests for love and respect, justice and honesty, cooperation, and the total Inclination to Ethical Values Scale score all yielded p values below .05, indicating

departures from normality. Accordingly, comparisons by demographic characteristics were conducted using the Mann–Whitney U test or the Kruskal–Wallis H test.

Table 4. Inclination to Ethical Values Scale Results by Generation

Scale/subdimension	Generation	n	Median rank	χ^2	Kruskal–Wallis p
Love and respect	Generation X	257	63.8.65	21.806	<.001
	Generation Y	239	60.0.40		
	Generation Z	644	53.2.21		
Justice and honesty	Generation X	257	62.4.06	14.461	.001
	Generation Y	239	59.7.40		
	Generation Z	644	53.9.14		
Cooperation	Generation X	257	57.7.29	9.525	.009
	Generation Y	239	62.3.84		
	Generation Z	644	54.7.99		
Total ethical values score	Generation X	257	62.9.03	20.425	<.001
	Generation Y	239	61.0.73		
	Generation Z	644	53.2.21		

The total inclination to ethical values score differed significantly by generation ($p < .001$). The mean ranks were 629.03 for Generation X, 610.73 for Generation Y,

and 532.21 for Generation Z. Their ordering indicates that the total score was highest in Generation X and lowest in Generation Z.

The results for the subdimensions are as follows.

There was a statistically significant difference between generations in love and respect ($p < .001$). The mean ranks were 638.65 for Generation X, 600.40 for Generation Y, and 532.21 for Generation Z. Thus, Generation X had the highest rank and Generation Z the lowest, with Generation Y in between.

A significant generational difference was found for justice and honesty ($p = .001$). The mean ranks were 624.06 for Generation X, 597.40 for Generation Y, and 539.14 for Generation Z. Generation X ranked highest and Generation Z lowest, while Generation Y fell between them.

A significant difference between generations was also found for cooperation ($p = .009$). The mean rank was highest for Generation Y (623.84), followed by Generation X (577.29) and Generation Z (547.99).

Table 5. Pairwise Comparisons Between Generations

Scale/subdimension	Comparison	Adjusted p	Direction of difference
Love and respect	X–Y	0.585	—
	X–Z	< .001	X > Z
	Y–Z	.018	Y > Z
Justice and honesty	X–Y	1.000	—
	X–Z	.001	X > Z
	Y–Z	.056	—
Cooperation	X–Y	0.339	—
	X–Z	0.674	—
	Y–Z	.007	Y > Z
Total ethical values score	X–Y	1.000	—
	X–Z	< .001	X > Z
	Y–Z	.005	Y > Z

According to the pairwise comparisons in Table 5, Generations X and Y did not differ significantly in love and respect ($p = .585$). In contrast, the X–Z ($p < .001$) and Y–Z ($p = .018$) comparisons were significant. As the mean ranks of Generations X and

Y exceeded that of Generation Z, Generation Z scored lower on love and respect than both other generations.

For justice and honesty, only the X–Z difference was significant ($p = .001$), with a higher mean rank for Generation X. Neither the X–Y ($p = 1.000$) nor the Y–Z ($p = .056$) comparison was significant.

For cooperation, neither X–Y ($p = .339$) nor X–Z ($p = .674$) differed significantly. The Y–Z difference was significant ($p = .007$), with a higher mean rank for Generation Y.

For the total inclination to ethical values score, X–Y did not differ significantly ($p = 1.000$), whereas X–Z ($p < .001$) and Y–Z ($p = .005$) did. The higher mean ranks of Generations X and Y indicate that Generation Z had a lower total score than either group.

Overall, Generation Z had lower scores on love and respect and on the full scale than Generations X and Y. Generation X had a higher mean rank than Generation Z for justice and honesty, while Generation Y had a higher mean rank than Generation Z for cooperation.

Table 6. Differences in Inclination to Ethical Values Scale Scores by Demographic Characteristic

Demographic variable	Scale/subdimension	p
Gender	Love and respect	.022
	Justice and honesty	.073
	Cooperation	0.819
	Total ethical values score	.025
Marital status	Love and respect	< .001
	Justice and honesty	< .001
	Cooperation	0.199
	Total ethical values score	< .001
Educational attainment	Love and respect	.069
	Justice and honesty	0.590
	Cooperation	.019
	Total ethical values score	.069

The Mann–Whitney U test indicated statistically significant gender differences in love and respect ($p = .022$) and the total ethical values score ($p = .025$). The mean ranks favoured women. No significant gender difference was found for justice and honesty ($p = .073$) or cooperation ($p = .819$). By marital status, significant differences were found for love and respect, justice and honesty, and the total score (all $p < .001$), with higher mean ranks among married participants. The difference in cooperation between unmarried and married participants was not significant ($p = .199$). By educational attainment, no significant differences were found for love and respect ($p = .069$), justice and honesty ($p = .590$), or the total score ($p = .069$). Cooperation, however, differed significantly by educational attainment ($p = .019$). University graduates scored higher on cooperation than primary and high school graduates, and participants with a master's degree scored higher than primary school graduates. These comparisons indicate higher cooperation scores in the specified groups.

When compared with the analyses based on factor scores, the findings for demographic variables largely converged. The convergence is particularly evident for gender in love and respect, and for marital status in love and respect, justice and honesty, and the total score. Nevertheless, the results should be interpreted in light of the differences in scores and methods used in the two analyses.

Conclusion and Discussion

This study compared inclination to ethical values among Generations X, Y, and Z and identified significant differences between them. A notable finding is that Generations X and Y were similar in their overall inclination to ethical values, while both had higher scores than Generation Z. This finding suggests that individuals raised in different periods may differ in their orientations towards ethical values.

The generational differences were not uniform across the subdimensions. Generations X and Y scored higher than Generation Z on love and respect. For justice and honesty, a significant difference favouring Generation X was found between Generations X and Z. These results indicate that orientations towards values such as love, respect, justice, and honesty may differ across generations.

Cooperation showed a different pattern: Generation Y scored higher than Generation Z, while Generation X did not differ significantly from either generation. It would therefore be inappropriate to conclude that one generation ranks above the others across all aspects of inclination to ethical values. Different generations may stand out on different ethical dimensions.

These findings align in broad terms with the work of Atab et al. (2013) and Yıldız and Giray Yakut (2019), which identified generational differences relating to ethical values. Gürbüz and Aytekin (2020), however, noted that generational differences are not always strong or consistent. The absence of significant differences between Generations X and Y in the present study, together with the variation across subdimensions, likewise suggests that generational orientations towards ethical values should not be reduced to a single characteristic.

Some differences were also identified by demographic characteristics. Women scored higher than men on love and respect and on the overall scale. Married participants scored higher than unmarried participants on love and respect, justice and honesty, and the overall scale. Significant differences in some subdimensions were

also reported by maternal educational attainment and parental occupation. These findings indicate the relevance of considering demographic and family characteristics alongside generation when examining inclination to ethical values.

Although significant generational differences were identified, individual characteristics such as age, education, and marital status should also be considered when interpreting them. Moreover, the use of convenience sampling limits the extent to which the findings can be generalised to all members of Generations X, Y, and Z.

In conclusion, inclination to ethical values varied across generations, and the pattern differed across love and respect, justice and honesty, and cooperation. An important contribution of this study is its examination of the distinct subdimensions alongside the overall scale score. The findings contribute to a more nuanced understanding of generational orientations towards ethical values and provide a starting point for further research. Future studies using other sampling methods and more diverse participant groups could help assess whether these findings extend to broader populations.

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