



Comparative Analysis of Foreign Practices in Social Protection of The Population

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Abstract

This study presents a comparative analysis of international approaches to social protection, aiming to identify effective practices and policy mechanisms used across countries with varying levels of economic development. By examining models from developed, emerging, and developing economies, the research highlights the diversity in welfare design, coverage, financing structures, and delivery systems. Particular attention is given to universal versus targeted schemes, public-private partnerships, and digital innovations in benefit distribution. The findings reveal that while high-income countries prioritize institutional efficiency and universality, lower-income nations often rely on donor support and conditional transfers. The study offers policy recommendations for countries seeking to reform or enhance their social protection systems, emphasizing the importance of context-specific strategies, inclusive coverage, and fiscal sustainability. The article provides a comparative analysis of the functioning of social protection systems in foreign countries, identifying opportunities for creatively applying this experience within the context of our country. By examining diverse approaches to social assistance, social insurance, and integrated welfare models, the study evaluates structural efficiency, inclusiveness, and financial sustainability. The analysis aims to draw adaptable insights from global practices, with a focus on enhancing national strategies for social protection that are both equitable and economically viable.

Keywords: *social protection, social services, social need, poverty, social stratification, social policy.*

INTRODUCTION

In the context of modernizing the economy and implementing profound structural changes, a theoretical and practical analysis of the formation and development stages of the social protection system is of great importance for ensuring the country's sustainable socio-economic development. Looking at global practices of social protection, this system of measures is considered an integral part of social policy. In our country, the existing robust social protection system has not only helped to mitigate the difficulties of the transition to a market economy but also led to an increase in socially targeted resources, resulting in the introduction of various types of benefits for low-income populations.

Within the framework of large-scale reforms aimed at improving the economic mechanism of the social protection system in Uzbekistan, priority is being given to enhancing the targeting and effectiveness of social assistance programs, digitalizing the social protection system, and implementing active social protection programs that are integrated with ensuring employment in the labor market. In particular, President Shavkat Mirziyoyev's statement that "a list of neighborhoods with high poverty levels will be compiled. Each year, 50 neighborhoods will be selected by the National Agency for Social Protection and local administrations, and efforts will be made to transform them into areas free of poverty and unemployment" [1] indicates that reforms in this direction will continue to remain a priority in the future.

LITERATURE REVIEW

Economists such as D.N. Rakhimova, Sh.A. Mirzayev, H.P. Abulqosimov, B.B. Bakhtiyorov, and M.O. Mirzamakhmudova have conducted in-depth scientific research on various aspects of the social protection system in our country, including its operational features, funding practices, methods for identifying social vulnerability, and ways to improve these mechanisms.

However, issues related to improving the economic mechanism of the social protection system under the specific conditions of Uzbekistan have not been analyzed in a comprehensive, systematic manner, nor treated as a specialized object of study. The relevance of the issue, its insufficient coverage in economic literature, and the potential scientific and practical value of expected outcomes formed the basis for selecting this topic as the object of research.

ANALYSIS AND RESULTS

During the research process, the following methods were used: systematic analysis, historicism and logical reasoning, induction and deduction, analysis and synthesis, comparative and selective investigation, monographic analysis, and classification techniques.

Numerous studies have been conducted in economic literature focusing on models of social protection and their implementation mechanisms. According to conclusions drawn by international experts, the distinguishing features of these models are primarily reflected in the degree of interconnection among the following components [2]: branches of the social sector (education, healthcare, culture, sports, tourism, housing, utilities, and others); labor market, employment, and unemployment rates; the level of social partnership; social protection; wage systems and labor safety; social insurance; the pension system, and other related areas.

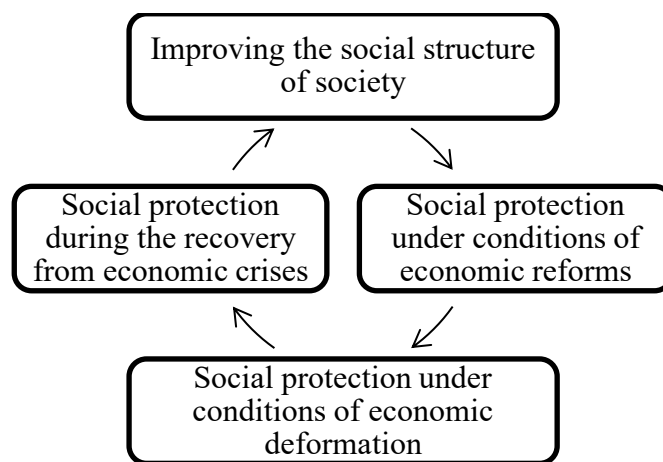


Figure 1. Directions of social protection programs and models linked to the socio-economic conditions of the country [3]

According to research on the operational conditions of social protection programs and models, social programs encompass the directions shown in *Figure 1*. The first direction is the improvement of the social structure of society. Under conditions of stable economic development, social protection programs aimed at ensuring the social stability of the country typically exhibit the following characteristics [4]: creation of favorable conditions for the free development of all social groups and ensuring the stability of their mutual relations; increasing citizens' literacy through the provision of educational services (in most cases, as seen in the experience of developed countries, special attention is paid to providing higher education to the middle-income population and ensuring their inclusive employment); reducing and balancing the differences between the interests of all social groups; ensuring adherence to the principle of social justice and creating decent living conditions for members of society.

In conditions of systemic crisis, the process of economic reform tends to deepen in national economies. In such circumstances, social protection programs or models functioning in the country are aimed at positively shaping the social and psychological mindset of the population and economically activating various social groups. Such social protection programs are characterized by the following features [5]: resolving social tensions and dissatisfaction arising due to the deterioration of the socio-economic situation, and preventing their negative consequences; systematizing the socio-economic interests of various social groups and organizing the activities of social organizations—such as political parties, charitable foundations, social movements, coalitions, and social associations—that can meet their social needs and protect their interests; prioritizing the principle of social justice by the state when addressing the socio-economic crisis and fully protecting the interests of its citizens; developing and implementing clear, targeted social policy programs aimed at improving the socio-economic conditions of all members of society and various social groups.

In conditions of forming market relations and implementing deep structural economic transformations, it is crucial not only to establish a social protection system but also to shape the social identity of society. In such a context, social protection programs are characterized by the following features [6]: revising and establishing social standards based on the country's socio-economic potential; creating favorable conditions for income generation and ensuring employment;

introducing benefits in the provision of social services and defining the state's social guarantees; ensuring strong social protection for the vulnerable segments of the population and encouraging the development of a middle class.

In global practice, social protection programs implemented during periods of recovery from crisis and economic revitalization are characterized by the following [7]: ensuring employment for population groups that lost jobs due to the crisis; reducing tensions that have arisen between different social groups and preventing their negative consequences; prioritizing the fulfillment of the state's minimum social guarantees; providing free vocational retraining and skills development for employable, unemployed groups through social services, including educational services; providing state support for social groups that suffered the most during the crisis, and so on.

The ideas expressed above prove that social protection programs for the population should be developed and implemented based on the socio-economic situation of the country. In the global system of socio-economic relations, every country chooses its development path, taking into account its unique socio-economic, legal, political, and demographic characteristics. The development path chosen by the country must directly contribute to the growth of the state's economy and raise the standard of living of the population to a new level. These state programs, including social protection programs, when recognized by other countries and creatively utilized in their practices, create the foundation for these programs to be acknowledged as models.

The differences between the models of social protection for the population lie in their organizational and legal foundations, the introduction of social privileges, and the opportunities for their utilization. The financing mechanisms of social protection programs reflect these differences. The models of social protection for the population aim to address social problems in the country and also differ theoretically and methodologically. Considering this situation, we conducted an analysis of the scientific approaches to the models of social protection for the population implemented worldwide:

First, G. Vilensky and Ch. Lebo scientifically substantiate that, under market economy conditions, social protection of the population must be carried out through the state's intervention in the economy. Based on the level of state intervention in the socio-economic relations system of the country, they distinguish between "institutional" and "residual" models of social protection.[8] In the "institutional" model of social protection, the state's intervention in the economy is high, and the costs of financing social programs are relatively high. In contrast, in the "residual" model of social protection, the state's intervention in the economy is sharply limited, and three-tier social insurance programs operate. In this model, the state only assumes responsibility for providing minimal social guarantees, while the population with labor capacity is responsible for its own welfare. The social protection of the most vulnerable groups, such as the poor, disabled, and orphaned children (up to the age where they are able to work), is an exception.

Second, T. Tilton and N. Furniss categorize the models of social protection for the population into the following groups [9]: The "positive" model of social protection – In this model, social assistance is separated from the free socio-economic market relations system by the government, and priority is given to targeted social protection programs. This model is based on the Beveridge model and is also referred to in economic literature as the "Anglo-American" or "Anglo-Saxon" model of social protection. The "social security" model of social protection – In this model, universal social protection programs apply to all social strata of society, and every citizen is provided with universal social benefits. The "welfare" model of social protection – In this model, priority is given to providing social services aimed at improving the living standards and quality of life of the population, and active social protection programs play a key role.

Third, Swedish scholar K. Esping-Andersen, in his analysis of the social protection programs, argues that as socio-economic relations develop, there should be a systematic stratification of the social protection system. This process leads to the extension of citizens' social rights.[10] The scholar identifies the following types of social protection systems: The "liberal" social protection model – This model is aimed at reducing the level of social deprivation in the country, and social protection programs are directed toward socially disadvantaged groups. The "conservative-corporatist" model of social protection – This model focuses on preserving the welfare of the population during their working life, with an emphasis on social insurance programs, and social security programs take on compensatory significance. This model is also known as the Bismarck model of social protection. The "social-democratic" model of social protection – In this model, social benefits are equitably distributed in both in-kind and monetary forms, representing a balanced approach to social assistance. The goal of this program is income redistribution, and it is widely used in Scandinavian countries.

The Danish economist Esping-Andersen proposed examining the welfare state through three interrelated levels [11]: De-commodification level, where the state ensures people can live socially secured lives independent of the labor market; Redistribution level, where the social state is divided into social classes and aims for social integration and equality; Private-public appearance, where the state defines its relative role in ensuring welfare alongside the market and family.

In this context, Esping-Andersen used three key indicators of social protection: pensions, sickness benefits, and unemployment benefits. His analysis revealed three ideal types of welfare regimes [12]: Social-democratic regime (characteristic of Scandinavian countries), where labor organizations and small farmers unite into various associations

and unions, the state ensures full employment, redistributes universal benefits, and satisfies the demands of the middle class. Conservative-corporatist regime, predominantly found in continental European countries, where the state conducts social policy based on the reliance on the middle class. Liberal social security regime, characteristic of English-speaking countries, where the state focuses its welfare efforts on protecting the disadvantaged or poor social strata.

According to Esping-Andersen's analysis, the social protection system in developed countries can be classified into the following three levels [13]: universal welfare state regime; informal security regime; insecurity regime;

Fourth, N. Ginsburg divides the models of social protection into "socialist" and "liberal" models. [14]. The "socialist" social protection model is characterized by a high level of state social guarantees. In this model, the state implements a closed economic policy and regularly carries out price indexation programs to maintain the purchasing power parity of the population's income at a high level. The "liberal" social protection model operates in an open economic policy environment, where the establishment of free market relations and the regular implementation of active social programs to improve the welfare of socially disadvantaged groups are key characteristics. Fifth, some economists have studied the social protection programs implemented in Latin American countries. In this group of countries, it is believed that a "Catholic" or "Latin American" model of social protection has developed. [15] In this model, the state allocates relatively low spending for financing social protection programs, and the protection of socially vulnerable groups is carried out based on the ideology of Christianity, relying on family members, relatives, charitable foundations, sponsors, religious institutions, and churches. Sixth, A. Gautier, in his academic research, continues the studies conducted by Swedish scholar K. Esping-Andersen and classifies social protection models into the following groups: [16] social-democratic model; conservative model; liberal model.

Seventh, experts from the European Commission distinguish the following models of social protection: Continental (Bismarck model), Anglo-Saxon (Beveridge model), Scandinavian (Northern Europe model), and Southern European (Mediterranean or rudimentary)[17]. The Bismarck model is one of the widely spread models in EU countries and is also referred to as the continental model. In this model, the level of social protection is directly related to the duration of the population's professional activity and work experience, with social insurance being its core foundation. According to this model, social insurance expenses are financed through established insurance contributions. The principles of this model were created in the late 19th century by the German Emperor Otto von Bismarck, based on progressive social legislation, and it later served as a model for many countries. Even at that time, the three forms of social insurance currently in place in Germany were already established: pension and disability insurance, sickness insurance, and insurance for accidents at work. This model is in practice in Germany, Austria, France, Belgium, the Netherlands, and Luxembourg. The Bismarck model is based on commutative fairness, and social contributions are determined by the size of social insurance payments. In Germany, the social protection system that was formed in the late 19th century under this model has since evolved, with fiscal policy playing an increasing role in financing the social protection system. This model played a crucial role during the Covid-19 pandemic that began in 2020, helping to prevent the spread of infectious diseases among the population. Unlike other countries, Germany's population, with more than 90% possessing medical insurance policies, was able to conduct a stress test, enabling the early identification of cases, preventive treatment, and control of the disease. As a result, Germany experienced less harm from the pandemic compared to other countries, and the duration of the pandemic was shorter. The Beveridge model is reflected in the social protection programs of the United Kingdom and Ireland and is known as the Anglo-Saxon model of social protection. This model fundamentally differs from the previous one in both its direction and organizational structure. Its foundation is based on the report submitted by British economist Lord W. Beveridge to the UK government in 1946. Beveridge's research was significantly influenced by Keynesian principles. The dynamics of social production and employment were primarily expressed through demand-based payments, where redistribution to low-income social groups increased the purchasing demand of mass buyers. Beveridge developed the principles of universality, uniformity, and the unification of social services within the social protection system. The universality principle ensures that all population groups are equally covered by social protection services. The uniformity and unification of social services are interlinked principles that involve providing the same size pensions and benefits and the same conditions for their payment. Beveridge correctly evaluated that the same social contributions and insurance premiums would lead to equal pensions being paid.

A key feature of this model is that before receiving social benefits, a family's income is checked to ensure eligibility. While the model is consistent, there are certain variations in each country. For example, in the United Kingdom, the national health system provides free medical services to all citizens regardless of income. In contrast, in Ireland, medical services are only provided free of charge to low-income individuals. The "Scandinavian" model of social protection is widely used in the Nordic countries of Denmark, Norway, Sweden, and Finland. In this model, the use of social services is manifested as a citizen's right, and every citizen is required to contribute to the social security system through insurance premiums and social payments in the form of taxes. Unemployment insurance is separate from this and is financed through the state's social protection system, adhering to the principle of voluntarism. The distinctive feature of the Scandinavian model is that it ensures social protection for society against various social risks and life situations. All social strata in these countries can benefit from this model, and they do not have the obligation to make social insurance

payments. This model is characterized by a high level of social protection for the population. In recent years, in Southern European (PIGS countries [Portugal, Italy, Greece, Spain][18]) nations, a “Catholic” social protection model has evolved into what is called the “Rudimentary” social protection model. This model is recognized by the European Commission as the “Southern Europe” model, and it is characterized by the following features [19]: the priority of family and church in providing social protection to the population; a low level of social protection for the population; social protection measures are targeted at socially disadvantaged groups; the existence of self-managed independent insurance organizations; social protection costs are covered by various social contributions and other sources, including charitable donations.

Lastly, in the works of A. Sapir, social protection models in the countries of the European Union are analyzed more extensively and divided into the following groups: Nordic Europe, Anglo-Saxon, Continental, and Mediterranean countries.[20] In the ninth, scientific research in economic literature aimed at studying the models of social protection for the population, E. Bukodi and R. Roberts classify the models of social protection into the following groups: social-democratic, liberal, Southern European, corporate, and mixed social protection models [21]. In our opinion, the distinct features of social protection models for the population are characterized by the volume and efficiency indicators of their financing costs. These models also differ in their organizational structure and configuration, as well as in the role of institutions providing social protection, including social insurance, social assistance (charitable organizations, nursing homes, orphanages, and others), social security, healthcare, and educational services in the country's implemented social policy measures. In economic literature, until the end of the 20th century, the following models were recognized and practiced as classical models of social protection: liberal (USA, UK, Australia, Ireland, Canada, New Zealand), corporate (Japan, South Korea), and social-democratic (Scandinavian countries). As a result of the transformation of these models, it is believed that other types of social protection models for the population have emerged. By the early 21st century, due to the deepening processes of globalization in the world economy, the above three models were gradually adapted and refined to meet the demands of a market economy. Experts from the International Labour Organization currently distinguish the following three models, which are characteristic of the modern era [22] : Neoliberal (based on the liberal model, aimed at improving the living standards of the population with labor capacity); Corporate-liberal (based on the corporate model, aimed at improving the living standards of family life); Social-liberal (based on the Scandinavian model, aimed at reducing universal social benefits and increasing the targeting of the social protection system, i.e., focusing on providing strong social protection for the population in need).

Analyses show that the regular implementation of social protection programs for the population under market economy conditions is a crucial factor in the socio-economic development of the country's economy. This is because the efficiency indicator of social programs is reflected in the economic relations system, and it is appropriate to state this. In our opinion, as market relations continue to form in our country, it is appropriate to gradually complement the structural components of the social protection system in our country with the characteristics of the liberal (or neoliberal) model. In this case, the state provides citizens with only minimal social guarantees and prioritizes active social protection programs. In global practice, the following types of financing for social protection programs have been formed [23]: state financing; private sector financing; mixed financing.

In the conditions of a market economy, in order to reduce the state's intervention in the economy and establish a free socio-economic relations system, most developed countries are placing significant emphasis on utilizing private sector resources in the financing of social protection programs. This type of financing is implemented based on social partnership between the state and the private sector. In world practice, the following types of living standards are distinguished [24]: Prosperity refers to the use of resources that ensure the comprehensive development of a person; Well-being refers to rational consumption within scientifically grounded standards that ensure the expanded reproduction of a person's physical and intellectual abilities; Poverty refers to the use of material resources within the lower boundary of the workforce's reproduction; Destitution describes the use of essential material resources at a minimal level according to biological standards.

In strengthening the targeting of social policy, measures to support the socially vulnerable groups of the population are of significant importance. In this case, the socially vulnerable population is divided into absolute and relatively poor groups. Absolute poverty (destitute population) refers to a group of people in the country's population who are provided with goods and services at a level below the established minimum living standard. Relative poverty (underprivileged population) refers to a group of people who are provided with goods and services at a level below the average living standard in the country. Based on the minimum living standards and the minimal consumption budget, it is possible to distinguish the following groups of the population, based on their income levels and material well-being: "Poor" families those where the per capita income is below or equal to the minimum living standard; "Underprivileged" families those where the per capita income is between the minimum living standard and the minimal consumption budget; "Well-off" families those where the per capita income is between the minimal consumption budget and a reasonable consumption budget; "Wealthy" families those where the per capita income is above the reasonable consumption budget level. [25]

CONCLUSIONS AND RECOMMENDATIONS

At the beginning of the 21st century, there is a focus on strengthening the targeting of social protection programs for the population globally, encouraging individuals to take care of their own well-being regarding their living standards and to use social insurance services. Attention is also being given to the efficient use of the state's allocated expenses for social protection and reducing their volume. In terms of social protection for the population, through the priority directions of social policy implemented in global practice, we consider it necessary to incorporate the following structural elements into our country's practice: Social protection system for the population (providing pensions for individuals who are unable to work due to the loss of labor capacity or those with dependents such as children or other family members, creating appropriate living conditions for them, and other related measures); Social insurance (temporary compensation for lost wages due to retirement or unemployment, etc.); Social services (investing in human capital, i.e., investing in the rehabilitation and expansion of a person's productive and moral potential); Labor market and employment provision (ensuring a balance between demand and supply of labor in the job market, introducing new jobs, training and retraining the workforce, etc.).

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