

DOI <https://doi.org/10.30525/2592-8813-2026-1-2>

INTERNATIONAL AND EUROPEAN STANDARDS AS A METHODOLOGICAL BASIS OF UKRAINIAN LABOUR LAW

Nataliia Cherevko,

Candidate of Sciences in Public Administration,

Associate Professor at the Department of Public Administration, Law, and Humanities,

Kherson State Agrarian and Economic University (Kherson, Ukraine)

ORCID ID: 0000-0002-5456-8887

advokat.ncherevko@gmail.com

Abstract. The article examines the role of international and European standards in forming the methodological basis of Ukrainian labour law. The system of international standards of the International Labour Organization (ILO), the United Nations (UN), as well as European standards of the European Union and the European Social Charter are analyzed. The methodological significance of international standards for the development of national labour legislation, their role as a source of law, an instrument for interpreting norms and a basis for harmonization of legislation are considered. Particular attention is paid to the processes of implementation and adaptation of international norms in the context of Ukraine's European integration aspirations. Specific ILO conventions, EU directives and their impact on the reform of Ukrainian labour legislation are analyzed. The main problems and challenges of implementing international standards are identified, including gaps in the transposition of norms, insufficient control mechanisms and the need for systematic adaptation of legislation. It is substantiated that international standards constitute not only a formal source of law, but also a methodological basis for modernizing labour relations, ensuring decent work and social protection of workers. Promising directions for further harmonization of Ukrainian labour law with international and European standards in the conditions of martial law and post-war recovery are determined.

Key words: labour law, international standards, International Labour Organization, European Union, European Social Charter, implementation, harmonization of legislation, ILO conventions, EU directives, methodology of labour law.

Introduction. Labour law in Ukraine is currently undergoing a profound transformation driven by European integration processes, the need to modernise social and labour relations, and the adaptation of legal regulation to the challenges of the contemporary labour market. In this context, international and European labour standards acquire particular importance not only as benchmarks for law-making activities, but also as a methodological foundation for reforming national labour legislation and for the development of labour law doctrine.

The relevance of this research is determined by several interrelated factors. First, Ukraine, as a member of the International Labour Organization (ILO) and a state that has declared a strategic course towards full membership in the European Union, has assumed international legal obligations to implement international and European labour standards. Second, the ratification by Ukraine of more than 70 ILO conventions and the signing of the Association Agreement with the EU have created normative and institutional prerequisites for harmonising national labour legislation with European standards (Bogush L, 2024). Third, under the conditions of martial law and in view of the prospects for post-war recovery, particular importance is attached to ensuring decent working conditions, effective social protection of workers, and the modernisation of labour relations on the basis of international standards (Burlai T. ets, 2025).

Special relevance is attached to the study of the methodological significance of international labour standards, as they shape the conceptual foundations of labour law, determine its basic regulatory principles, and serve as guidelines for both legislative activity and law enforcement practice (Dashutin

H. ets, 2022). In the context of the prolonged process of codification of Ukrainian labour legislation, the issue of compliance of draft versions of the new Labour Code with international and European standards has become critically important (Zvarych R., 2023).

Analysis of Recent Research and Publications. The issues surrounding international and European labour law standards constitute the subject of ongoing academic debate. Comprehensive studies on the role of ILO conventions in the reform of Ukrainian labour legislation have been conducted by Fedorova (Fedorova N., 2019), who substantiates the necessity of systematically incorporating international standards into the codification process of labour law and analyses the mechanisms of their implementation. Danylova and co-authors examine international principles and standards of labour law as a foundation for improving national legislation, focusing on the fundamental principles of the ILO and their reflection in Ukrainian law (Danylova V. et al., 2022).

Issues related to the adaptation of the regulatory framework on occupational safety and health to European standards are addressed in the works of Malko and co-authors (Malko A. et al., 2022), which systematize the requirements of EU directives and identify key gaps in Ukrainian legislation. Kyselova analyses the implementation of EU labour standards in the process of drafting a new Labour Code of Ukraine (Kyselova O., 2023). Specific directions of implementing international standards, particularly in the field of combating undeclared work, are examined by Bogush (Bogush L., 2024).

The purpose of this article is to provide a comprehensive study of international and European standards as a methodological foundation of Ukrainian labour law, to determine their role in shaping the conceptual framework of national labour legislation, and to identify existing problems and future prospects for the implementation of these standards in the context of Ukraine's European integration aspirations.

Results and Discussion. International labour law standards constitute a coherent system of norms, principles, and recommendations developed by international organizations with the aim of regulating labour relations at the global level. A central position within this system is occupied by the standards of the International Labour Organization (ILO) and the United Nations (UN), which establish universal benchmarks for national legal systems.

The International Labour Organization, founded in 1919, is a specialized agency of the United Nations mandated to develop and supervise compliance with international labour standards. As of 2024, the ILO has adopted 190 conventions and 206 recommendations covering virtually all aspects of labour relations (Fedorova N., 2019). Ukraine has ratified 71 ILO conventions, which creates legal grounds for their application as an integral component of national legislation pursuant to Article 9 of the Constitution of Ukraine (Ostroverkh A., 2019).

ILO conventions are classified according to several criteria. Based on their significance, they are divided into fundamental, priority, and technical conventions. The eight fundamental conventions include: Convention No. 29 concerning Forced or Compulsory Labour (1930); Convention No. 87 concerning Freedom of Association and Protection of the Right to Organise (1948); Convention No. 98 concerning the Right to Organise and Collective Bargaining (1949); Convention No. 100 concerning Equal Remuneration (1951); Convention No. 105 concerning the Abolition of Forced Labour (1957); Convention No. 111 concerning Discrimination in Respect of Employment and Occupation (1958); Convention No. 138 concerning Minimum Age for Admission to Employment (1973); and Convention No. 182 concerning the Worst Forms of Child Labour (1999) (Danylova V. et al., 2022). All of these conventions have been ratified by Ukraine and constitute the normative foundation of national labour legislation.

In the sphere of labour relations, a particularly significant role is played by Convention No. 154 concerning the Promotion of Collective Bargaining (1981) and Convention No. 98 concerning the Right to Organise and Collective Bargaining (1949) (Dashutin H. et al., 2022). These instruments establish international standards for collective bargaining regulation as one of the core mechanisms of social dialogue.

The issue of undeclared work is primarily regulated through ILO recommendations and the practice of their application. The ILO regards undeclared employment as a systemic threat to social stability and national security and recommends that Member States implement comprehensive measures aimed at its detection, limitation, and prevention (Bogush L., 2024). In the context of its European integration aspirations, Ukraine is required to adapt national approaches to labour regulation in line with these recommendations. Ostroverkh substantiates that ILO conventions occupy a special position within the hierarchy of sources of Ukrainian labour law (Ostroverkh A., 2019). They prevail over norms of ordinary legislation while remaining subordinate to the Constitution of Ukraine. In cases of conflict between the provisions of the Labour Code of Ukraine and a ratified ILO convention, the latter shall prevail, a position consistently confirmed by the case law of the Supreme Court.

Venediktov examines the growing role of ILO instruments in Ukrainian judicial practice (Venediktov S., 2020). An analysis of court decisions demonstrates an increasing tendency to rely on ILO conventions in the resolution of labour disputes – both to substantiate judicial reasoning and to interpret national legal norms. In particular, ILO international standards are applied in cases concerning discrimination, unlawful dismissal, violations of freedom of association, and non-payment of wages.

The United Nations, in turn, establishes universal human rights standards within which labour rights are recognized as an integral component. The key instruments in this area include the Universal Declaration of Human Rights (1948), the International Covenant on Economic, Social and Cultural Rights (1966), and the International Covenant on Civil and Political Rights (1966) (Danylova V. et al., 2022).

Article 23 of the Universal Declaration of Human Rights enshrines the right of every person to work, to free choice of employment, to just and favourable conditions of work, to protection against unemployment, to equal pay for equal work, to just and equitable remuneration, as well as the right to form and to join trade unions. These provisions constitute the foundational basis of international labour law (Danylova V. et al., 2022).

The International Covenant on Economic, Social and Cultural Rights further elaborates labour rights, including the right to work (Article 6), the right to just and favourable conditions of work (Article 7), the right to form and join trade unions and to strike (Article 8), and the right to social security (Article 9). As a State Party to the Covenant, Ukraine is obliged to ensure the progressive realization of these rights within its national legal system (Danylova V. et al., 2022).

European labour law standards specify international approaches and define practical benchmarks for the harmonization of Ukrainian labour legislation. In the context of European integration, these standards are formed within two interconnected yet institutionally autonomous systems: the law of the European Union and the system of the Council of Europe, primarily represented by the European Social Charter. For Ukraine, which has declared the strategic objective of acquiring EU membership and is a member of the Council of Europe, both systems are of fundamental importance for the development of national labour law.

European Union labour law constitutes one of the most dynamic and well-developed branches of EU law. It is based on the founding treaties, in particular the Treaty on the Functioning of the European Union (TFEU), acts of secondary legislation (directives and regulations), as well as the case law of the Court of Justice of the European Union (Kyselova O., 2023).

The core principles of EU labour law are enshrined in Articles 151–161 of the TFEU and include the promotion of employment, the improvement of living and working conditions, adequate social protection, the development of social dialogue, investment in human resources, and the fight against social exclusion (Kyselova O., 2023). These principles are given concrete normative expression through numerous directives that establish minimum standards for the legal regulation of labour relations.

A framework instrument in the field of occupational safety and health is Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work.

It enshrines general principles of occupational risk prevention, the protection of workers' safety and health, the elimination of risk factors, as well as the provision of information and training to employees (Malko A. et al., 2022). Pursuant to the EU–Ukraine Association Agreement, Ukraine is obliged to ensure the transposition of the provisions of this directive into national legislation (Petrovska N. et al., 2023).

Of particular importance is Directive 2003/88/EC concerning certain aspects of the organization of working time, which establishes minimum standards regarding working hours, rest periods, and annual leave (Zvarych R., 2023). Specifically, it provides for a maximum weekly working time of 48 hours, a minimum daily rest period of 11 consecutive hours, a weekly rest period of at least 24 hours, and a minimum annual paid leave of four weeks. The harmonization of Ukrainian legislation with this directive is regarded as one of the priority directions of labour law reform (Zvarych R., 2023).

The current stage of development of EU labour law is characterized by its response to ongoing transformations in the labour market. Directive (EU) 2019/1152 on transparent and predictable working conditions establishes minimum requirements regarding the provision of information to employees about the terms of employment contracts and aims to enhance legal certainty in labour relations (Kyselova O., 2023). In the same context, particular attention should be paid to the Platform Work Directive (EU Platform Work Directive), adopted in 2024, which introduces regulatory standards for work performed through digital platforms (Burlai T. et al., 2022). The development of Ukrainian legislation with due regard to the provisions of this directive demonstrates a proactive approach to the harmonization process.

The European Social Charter (revised in 1996) constitutes a key instrument of the Council of Europe in the field of social and labour rights. Ukraine ratified the Charter in 2006, thereby assuming obligations in respect of 74 out of the 98 possible provisions (Stasiv O., 2022). The Charter enshrines a broad range of labour rights and establishes minimum social standards that States Parties are required to observe. Its distinctive feature lies in the existence of a supervisory mechanism in the form of the European Committee of Social Rights (ECSR). The Committee examines national reports submitted by States Parties and collective complaints, adopting decisions on the conformity of national legislation and practice with the provisions of the Charter (Stasiv O., 2022). Such decisions are of substantial importance for the interpretation and application of labour law norms in Ukraine.

The decisions of the ECSR influence the substance of Ukrainian labour law through several mechanisms: they function as an official interpretation of the Charter's provisions, establish criteria for assessing national legislation, stimulate legislative amendments, and are relied upon by national courts when interpreting legal norms (Stasiv O., 2022). In particular, decisions concerning Ukraine have revealed inconsistencies in the regulation of the minimum wage, working time, the right to strike, and other aspects of labour relations.

The standards of the European Union and those of the European Social Charter are complementary in nature and together form an integrated system of European labour standards. EU directives are characterized by a higher degree of normative detail and mandatory transposition, whereas the European Social Charter sets out general principles and minimum standards supported by a more flexible implementation mechanism (Kyselova O., 2023; Stasiv O., 2022).

For Ukraine, both systems are of legal and methodological significance. As a member state of the Council of Europe, Ukraine is obliged to comply with the provisions of the European Social Charter, while as a state aspiring to membership in the European Union, it must ensure the transposition of EU directives in accordance with the Association Agreement (Bogush L., 2024; Kyselova O., 2023). This creates a framework of dual obligations which, at the same time, enables a comprehensive and systemic approach to harmonizing Ukrainian labour legislation with European standards.

International and European standards perform a multifunctional methodological role within the system of Ukrainian labour law. They operate not only as formal sources of law, but also as a con-

ceptual foundation for the development of labour law doctrine, an interpretative tool for legal norms, and a guideline for both legislative activity and law-enforcement practice.

Pursuant to Article 9 of the Constitution of Ukraine, international treaties ratified by the Verkhovna Rada of Ukraine constitute an integral part of the national legal system (Ostroverkh A., 2019). Consequently, ratified ILO conventions and the European Social Charter have direct effect in Ukraine and may be applied by courts and other public authorities without the adoption of additional implementing acts.

International standards may also be viewed as an interpretative instrument. Even in cases where a relevant convention has not been ratified by Ukraine, it may still be used as an authoritative source for interpreting national labour legislation. ILO recommendations, despite lacking binding legal force, play an important role in clarifying the content of labour rights and obligations (Venediktov S., 2020). In a similar manner, the practice of the European Committee of Social Rights is of crucial importance for the interpretation of the provisions of the European Social Charter (Stasiv O., 2022). The Committee's decisions establish evaluative benchmarks for national legislation and law-enforcement practice, identify systemic shortcomings, and stimulate legislative reforms. Ukrainian courts and administrative authorities may rely on the decisions of the ECSR when interpreting national norms that correspond to the provisions of the Charter.

When international standards are considered as a methodological foundation for the reform of labour law, it should be emphasized that the mechanical transplantation of European norms without proper adaptation may lead to a decrease in the effectiveness of labour regulation. The reform of Ukrainian labour legislation, including the development of a new Labour Code, must therefore be carried out with due regard to international standards (Fedorova N., 2019), (Kyselova O., 2023). Fedorova emphasizes that ILO conventions should be systematically integrated into the codification process rather than referenced in a merely declarative manner (Fedorova N., 2019). Kyselova analyses the implementation of EU standards in the preparation of the draft Labour Code of Ukraine, highlighting the necessity of a contextualized transformation of EU directives that takes into account the specific features of the national legal system (Kyselova O., 2023).

In this regard, Tsyhanchuk provides a critical assessment of draft versions of the Labour Code from the perspective of their compliance with international standards (Tsyhanchuk N., 2021). The author identifies numerous inconsistencies, particularly with respect to working time, the duration of leave, dismissal procedures, and mechanisms of collective bargaining. Such deficiencies indicate insufficient integration of international standards into the law-making process and underscore the need for a methodological rethinking of approaches to legislative regulation.

The methodological significance of international standards becomes particularly pronounced in the context of the digital transformation of labour relations (Burlai T. et al., 2022).

The process of implementing international and European standards into the labour legislation of Ukraine represents a complex and multidimensional phenomenon. It encompasses not only the formal legal transposition of norms, but also the transformation of the legal system, institutional mechanisms, law-enforcement practice, and legal culture. Its effectiveness largely depends on the state's ability to ensure coherence between international obligations and the actual socio-economic conditions governing the functioning of the labour market.

One of the key challenges of implementation lies in the fragmented and inconsistent transposition of international and European norms into national legislation (Petrovska N. et al., 2023), (Tsyhanchuk N., 2021). In many cases, the harmonization process is limited to the formal reproduction of certain provisions of EU directives or ILO conventions, without due consideration of their systemic nature and internal logic.

Effective implementation of international standards is impossible without the operation of efficient institutional mechanisms for monitoring compliance (Bogush L., 2024), (Nahorna A. et al., 2022).

Even where international norms are formally incorporated into domestic legislation, their practical enforcement frequently remains declarative in character.

The implementation of international and European standards requires substantial financial, organizational, and human resources (Malko A. et al., 2022), (Petrovska N. et al., 2023). The European model of labour law is based on a high level of investment in occupational safety, risk prevention, staff training, and the institutional capacity of supervisory authorities.

The modernization of production equipment, the introduction of occupational safety management systems, the provision of personal protective equipment, and the training of occupational safety specialists require stable and continuous funding. Under conditions of limited budgetary resources, structural economic instability, and the consequences of martial law, these tasks become significantly more complicated (Burlai T. et al., 2025). As a result, international standards often remain normative reference points without adequate material foundations for their full-scale implementation.

A major obstacle to effective implementation is the insufficient level of legal culture and legal awareness among participants in labour relations (Malko A. et al., 2022), (Venediktov S., 2020). Many employers perceive international standards as abstract declarations lacking direct practical relevance, while employees frequently remain unaware of the scope of their labour rights and the mechanisms available for their protection.

The absence of a systematic legal education policy leads to situations in which even ratified ILO conventions and the provisions of the European Social Charter are rarely applied in everyday law-enforcement practice. This highlights the need to develop a sustainable culture of referencing international standards in the activities of courts, supervisory authorities, trade unions, and employers.

The legal regime of martial law creates specific conditions for the functioning of labour law and significantly complicates the process of harmonization with international standards (Burlai T. et al., 2025), (Zvarych R., 2023). On the one hand, the state is compelled to respond rapidly to security challenges, ensure national defence, and maintain the continuity of critical infrastructure, which may justify temporary restrictions on certain labour rights.

On the other hand, international labour standards retain their binding force even under emergency conditions, except in clearly defined cases of derogation. Zvarych, analysing the guarantee of a forty-hour working week during wartime, substantiates the necessity of adhering to the principle of proportionality between defence needs and the preservation of fundamental social guarantees (Zvarych R., 2023). This demonstrates that martial law cannot be regarded as a legitimate basis for a systemic departure from international labour standards.

Prospects for Harmonization. Despite the existence of numerous challenges, the process of harmonizing Ukrainian labour law with international and European standards demonstrates significant potential for further development.

First, a key перспектив lies in completing the codification of labour legislation based on the systematic integration of ILO conventions and EU directives. The new Labour Code should not merely formally reflect international standards, but also reproduce their methodological rationale – the priority of decent work, employment stability, social dialogue, and a preventive approach to the protection of workers' rights.

Second, an important direction involves the development of special legislation in areas requiring more detailed regulation. This includes the legal framework for work performed through digital platforms, sectoral models of occupational safety and health, as well as institutions of social dialogue, which would enable flexible and targeted implementation of international standards.

Third, strengthening compliance monitoring mechanisms represents a promising avenue, particularly through expanding the powers of labour inspectorates, introducing a risk-based approach, developing electronic monitoring systems, increasing liability for violations, and ensuring effective interagency coordination.

Fourth, enhancing the level of legal culture and professional awareness of international labour standards acquires fundamental importance. The development of educational programmes for employers and employees, the implementation of information campaigns, professional training for labour law specialists, and the integration of international labour standards into legal education curricula will create the necessary conditions for their effective operation.

Fifth, the intensification of social dialogue within the process of implementing international standards will contribute to balancing the interests of the state, employers, and employees, while also increasing public trust in reforms and strengthening their social legitimacy.

Sixth, the use of international technical assistance plays a significant role (Bogush L., 2024), (Kyselova O., 2023). The potential of the ILO, the European Union, and other international organizations can be effectively utilized in the preparation of draft legislation, the enhancement of institutional capacity of public authorities, the conduct of expert assessments, and the adoption of best international practices.

Seventh, particular importance attaches to the adaptation of international standards to the needs of Ukraine's post-war recovery (Burlai T. et al., 2025), (Burlai T. et al., 2022). In the reconstruction process, international labour standards may serve as a methodological foundation for state employment policy, ensuring a balance between economic growth and the principles of decent work, social protection, and sustainable development.

International and European standards constitute a comprehensive system of norms and principles that shape contemporary approaches to the legal regulation of labour relations. For Ukraine, their implementation represents not only the fulfilment of international obligations, but also a fundamental prerequisite for the modernization of labour legislation and the promotion of decent work.

Conclusion. The methodological significance of international standards is reflected in their function as a source of law, an instrument of legal interpretation, and a basis for legislative harmonization. At the same time, the process of their practical realization remains problematic due to its fragmented nature, limited resources, insufficient effectiveness of supervisory mechanisms, as well as challenges arising from the legal regime of martial law.

Prospects for further harmonization are associated with the completion of labour law codification, the development of specialized legal regulation, the strengthening of institutional control mechanisms, the intensification of social dialogue, and the use of international technical assistance. In the post-war period, international labour standards may serve as a methodological foundation for the restoration of the labour sphere and the sustainable socio-economic development of Ukraine.

Further academic research should be directed toward the analysis of practical mechanisms for the implementation of specific ILO conventions and EU directives, as well as the assessment of their impact on law enforcement and judicial practice.

References:

1. Bogush, L. (2024). Implementation of the EU recommendations on the undeclared labour prevention in Ukraine: Directions, features, prospects. *Intellect XXI*, (4). <https://doi.org/10.32782/2415-8801/2024-4.2>
2. Burlai, T., Novak, I., & Novak, A. (2025). The creation of Ukrainian legislation for social support of digital platform workers. *Ukrainian Society*, 2, 140–156. <https://doi.org/10.15407/socium2025.02.140>
3. Danylova, V., Izyumska, S., & Yaroshenko, O. (2022). International principles and standards of labor law as a basis for improving labor legislation of Ukraine. *The Indian Journal of Labour Economics*, 65, 1063–1078. <https://doi.org/10.1007/s41027-022-00409-2>
4. Dashutin, H., Lahutina, I., & Inshyn, M. (2022). The right to conclude collective agreements and collective bargaining: International standards and the legislation of Ukraine. *Comparative Law Review*, 27, 73–95. <https://doi.org/10.12775/clr.2022.005>

5. Fedorova, N. (2019). The role of International Labour Organization conventions in reforming labor legislation of Ukraine. <https://doi.org/10.36952/uail.2019.3.109-114>
6. Holoborodko, T., Kravchenko, D., & Kravchenko, K. (2024). International treaties in the social and labor sphere. *Grail of Science*, (10), 26–31. <https://doi.org/10.36074/grail-of-science.10.05.2024.026>
7. Ivanova, H. (2020). Integration of Ukrainian and European legislation in the field of labor law.
8. Kyselova, O. (2023). Implementation of EU standards in the labor sphere during the development of the new Labor Code of Ukraine. *Economic Affairs*, (1), 29–36. <https://doi.org/10.46852/0424-2513.1s.2023.29>
9. Malko, A., Petrovska, N., & Novak, A. (2022). Adaptation of occupational safety legislation to European standards. *Municipal Economy of Cities*, 6(173), 160–169. <https://doi.org/10.33042/2522-1809-2022-6-173-10-160-169>
10. Nahorna, A., Sokolova, M., & Kononova, I. (2022). Implementation of international standards ratified by Ukraine to reduce occupational diseases and injuries. *Ukrainian Journal of Occupational Health*, (2), 83–95. <https://doi.org/10.33573/ujoh2022.02.083>
11. Nikolaichuk, L. (2019). Issues of harmonization of Ukrainian labor legislation with the legislation of the European Union.
12. Novak, A. (2019). International Labour Organization Convention No. 184 on safety and health in agriculture and Ukrainian legislation. <https://doi.org/10.31548/LAW2020.01.006>
13. Ostroverkh, A. (2019). International Labour Organization conventions as sources of labor law of Ukraine. <https://doi.org/10.32782/2524-0374/2019-6/47>
14. Petrovska, N., Novak, A., & Malko, A. (2023). Analysis of adaptation of Ukrainian occupational safety legislation to European Union acts. *Law and Security*, (3), 40–49. <https://doi.org/10.32631/pb.2023.3.04>
15. Shcherbyna, V. (2020). International Labour Organization and Ukrainian labour legislation: A comparative legal analysis of norms and standards.
16. Stanishevsky, O. (2025). International standards in the field of occupational safety and health: Current state and adaptation in the context of harmonization of national legislation. *Actual Problems of Law: Theory and Practice*, (50), 179–188. <https://doi.org/10.33216/2218-5461/2025-50-2-179-188>
17. Stasiv, O. (2022). Influence of the decisions of the European Committee of Social Rights on the content of labor law. *Visnyk of Lviv University*, (74), 147–156. <https://doi.org/10.30970/vla.2022.74.147>
18. Tsyhanchuk, N. (2021). Non-compliance with international labor standards in the codification of labor legislation.
19. Venediktov, S. (2020). The significance of International Labour Organization acts for judicial practice in Ukraine.
20. Zvarych, R. (2023). Guarantee of the forty-hour working week in the context of European integration during the war in Ukraine. *New Ukrainian Law*, 6, 18–25. <https://doi.org/10.51989/nul.2022.6.1.18>