

# LEGISLATIVE PREREQUISITES FOR THE INTRODUCTION OF AN INTEGRITY CHECK IN THE NATIONAL POLICE OF UKRAINE

Azarenko Tetiana

**Annotation.** *The article, based on the analysis of international and national normative acts, examines the stages of implementation of the institution of checking the integrity of officials and officials of state authorities as one of the means of preventing and countering corruption. The legislative aspects of the integrity check in law enforcement agencies and the prerequisites for the introduction of this check in the National Police of Ukraine are considered.*

*It was determined that in recent years the institution of integrity checks has become quite widespread in Ukraine, but there is no law on conducting integrity checks of public officials, as well as a legal definition of the term “integrity”, which leads to a legal challenge to the negative results of this check. It is proposed to settle this issue by developing and adopting a relevant law with a clear definition of the main concepts, in order to avoid legal conflicts in the future.*

*The author also emphasized that this check should be carried out to a wider range of public officials, including police officers, as a law enforcement body that in its activities is endowed with powerful powers, significant administrative resources and the right to use coercion, which can affect corruption risks in activities of the National Police. At the same time, such an inspection should not violate the rights of police officers and should be carried out in accordance with the approved procedure.*

*The prospect of further research is the implementation of integrity checks in the National Police of Ukraine as an effective means of preventing and countering corruption.*

**Key words:** *integrity, integrity check, integrity testing, corruption, officials and officials of state authorities, National Police.*

## 1. Introduction.

The development of the country, its economic and social progress depends on a number of factors, one of the negative phenomena that harms the authority of the state and prevents its effective development is corruption and dishonesty of individual officials and officials of state authorities. In order to prevent these phenomena, to create an honest public service and restore trust in state bodies in general and law enforcement agencies in particular, the institute of integrity checks, which has been actively implemented in Ukraine since 2014, and therefore already has its results, which require scientific study.

## 2. Analysis of scientific publications.

Given that the integrity check is a relatively new institution for Ukraine, its introduction has aroused interest among scientists. In his works, S.V. Zhukov investigated the integrity of judges, O.O. Braverman of the National Anti-Corruption Bureau of Ukraine, V.A. Pysanets of the integrity check in law enforcement agencies. Instead, this issue requires further research, analysis of the current legislation and prerequisites for the implementation of checks on police officers.

### 3. The aim of the work.

The purpose and task of the article is to study the current state of the integrity check institute in Ukraine and the legal prerequisites for the introduction of this check for police officers.

### 4. Review and discussion.

The institution of integrity check is not new to most countries. This type of verification has been used in the United States of America for more than 50 years and is actively implemented in a number of European countries and Australia, but for Ukraine it is a relatively new mechanism for preventing corruption. Among the main factors of the introduction of integrity checks in Ukraine, the following can be distinguished: low level of trust in government institutions [1]; high level of corruption [2]; recommendation of foreign partners and consolidation of this method in numerous international legal acts.

Thus, Ukraine is a state party to the UN Convention against Corruption (UNCAC) (ratified in 2006), which clearly establishes the task of “promoting integrity, accountability and proper management of public affairs and public property” as one of its goals (Article 1(c) [3].

The Technical Guide to the United Nations Convention against Corruption, prepared by the United Nations Office on Drugs and Crime (UNODC) in collaboration with the United Nations Interregional Crime and Justice Research Institute (UNICRI), states in chapter 50 that integrity testing is one of the available countermeasures with corruption and defines it as “a method that enhances both the prevention and prosecution of corruption and has proved to be an extremely effective and efficient deterrent to corruption” [4].

The need for compliance with standards of integrity by civil servants, the introduction of integrity checks is defined by the Recommendation of the Committee of Ministers of the Council of Europe No. R (2000) 10 on Codes of Conduct for Civil Servants, the Model Code of Conduct for Civil Servants, which is attached to the Recommendation, and the International Code of Conduct for Civil Servants [5]. In addition, the World Bank defines due diligence as a powerful means of detecting corruption [6].

The OECD Guide to Managing Conflicts of Interest in the Public Sector states that “Integrity checks can be a powerful specialized tool for detecting corruption” [7].

Special attention is paid to checking the integrity of law enforcement officers, because it was the high-profile revelations of police officers committing corruption in the late 1960s and early 1970s in the United States [8] that drew public attention to this problem and the search for effective mechanisms for preventing and fighting corruption, one of which was integrity check, which later became widespread and consolidated in the regulatory acts of a others of states.

Today, international organizations emphasize the expediency of introducing an integrity check as an effective method of preventing and countering corruption in the police. Thus, the report of the Organization for Security and Cooperation in Europe (hereinafter – OSCE) “Best practices in the fight against corruption” states that the exposure of rampant corruption, the implementation of measures to clean up unscrupulous police officers, the prosecution or dismissal of corrupt police officers had a short-term effect, because in a few years, new corruption scandals erupted in the police, which were repeated in cycles in different parts of the developed world. The problem, according to the authors of the report, is that the goals of the reform strategy were incorrectly formulated. They are based on the belief that to solve the problem it is enough to get rid of “rotten apples” in the form of corrupt officers, but as it turned out, this is not enough. On the contrary, methods should be developed to ensure that cases of corruption do not recur. One of these methods is integrity testing, which becomes especially important in such an important area as follow-up and monitoring. Integrity testing has now become a particularly useful tool for cleaning up corrupt police officers and maintaining their integrity [9].

The value of police integrity for society was also considered by the Geneva Center for Governance in the Security Sector, which noted that integrity tests are useful means to prevent and detect police corruption.

They can be either random or targeted, and they can form part of the police organisation's internal control system. Targeted integrity tests could also be an effective method to investigate police corruption [10].

Therefore, according to the norms of international law, the integrity check is one of the methods of detecting and preventing corruption and a mechanism for ensuring the integrity of state authorities in general and law enforcement agencies in particular, therefore, in 2014, the institution of integrity checks was actively introduced into Ukrainian legislation. After all, the political and social transformations that took place in Ukraine as a result of revolutionary events contributed to the introduction of a number of reforms, among which the anti-corruption reform and law enforcement reform were of great importance.

In October 2014, the Verkhovna Rada of Ukraine adopted a package of anti-corruption laws, each of which enshrines the institution of integrity checks as one of the means of preventing corruption, because according to the Anti-Corruption Strategy for 2014-2017, which was approved by the Law of Ukraine "On the Basics of State Anti-Corruption Policy in Ukraine (Anti-corruption Strategy) for 2014-2017 No. 1699-VII of October 14, 2014, the level and scale of corruption in the country, the effectiveness of combating corruption processes largely depend, in particular, on the integrity of elected officials. In addition, the Strategy determines that integrity checks can significantly strengthen the resistance of the public service to manifestations of corruption, as well as citizens' trust in it. Such verification was proposed to be carried out by simulating situations similar to those that arise in the daily activities of a public servant, in order to verify the integrity of the servant's behavior under certain circumstances, in order to ensure professional incorruptibility, prevent corruption among public servants, verify their compliance with their official duties, ethical standards of behavior, identification, assessment and elimination of factors leading to corruption [11].

In addition, according to the Sustainable Development Strategy "Ukraine - 2020", it was the successful implementation of checking the integrity of employees and monitoring their lifestyle, as one of the new anti-corruption mechanisms, that was supposed to ensure the proper implementation of the Anti-Corruption Strategy [12].

Indeed, an integrity check is one of the effective mechanisms for preventing corruption, which has been proven by the practice of a number of countries, but according to the Strategy, in order to ensure the observance of human rights in connection with the conduct of such checks, the procedure for their conduct should be clearly defined by law. Therefore, one of the measures that was defined in the Strategy was the adoption of the law on the conduct of integrity checks of public officials, which was supposed to determine the rules and procedure for conducting such checks, guarantees of legality and control, the consequences of the conduct (encouragement or disciplinary action), as well as the fact that such inspections are not covert investigative actions, their results cannot be used in criminal proceedings as evidence, and criminal proceedings are not opened based on their results. Also provide in the Criminal Code of Ukraine the provision that the use by specially authorized subjects in the field of anti-corruption of a situation in which the subject has already had an intention to give or receive an unlawful benefit is not a provocation for obtaining [11]. This Law became invalid on the basis of Law No. 2322-IX of June 20, 2022, but it became one of the fundamental ones in the fight against corruption and the introduction of the integrity check institute.

The development and introduction, by September 1, 2014, in the established order for consideration by the Cabinet of Ministers of Ukraine of a draft law on the procedure for conducting an integrity check of persons authorized to perform the functions of the state or local self-government, was also established by the Plan of priority measures to combat corruption, which was approved by the order of the Cabinet of the Ministers of Ukraine dated July 2, 2014 No. 647-r [13], but this provision was not implemented.

The need for legislative regulation of the integrity check procedure is enshrined in the Final Provisions of the Law of Ukraine "On the National Anti-Corruption Bureau of Ukraine" No. 1698 VII of October 14, 2014, according to which the Cabinet of Ministers of Ukraine had to submit for consideration by the Verkhovna Rada of Ukraine within a month from the date of entry into force of this Law proposals for regulating the procedure for conducting integrity checks of persons authorized to perform the functions of the state or local self-government, as well as proposals for bringing legislative acts of Ukraine into compliance with this Law [14].



It should be noted that the Ministry of Justice has prepared a draft law “On integrity checks” which was submitted to the Venice Commission on August 13, 2015 with a request to provide an opinion on the compliance of the project with relevant international norms and European standards.

According to the Explanatory Note, the Draft Law on Integrity Checking is part of a package of initiatives aimed at “improving the system of preventing and combating corruption and its comprehensive reform in accordance with international standards and good practices of foreign countries”. It seeks to achieve this goal by introducing into the Ukrainian legal order the institution of integrity checks (also called checks for virtue in the explanatory note). Such checks should “be carried out to ensure the professional incorruptibility and the prevention of corruption of public officials, verification of compliance with their duties, ethical standards of behaviour, detect, assess and elimination of factors that lead to corruption” [15].

The Venice Commission assessed the aspiration of the legislative regulation of the integrity check institute into the Ukrainian legislation by providing its recommendations regarding this draft law, but it was never adopted. In addition, according to the 2018 report of the NACP [16], another working version of the draft Law of Ukraine “On conducting integrity checks” was prepared, but as of May 2023, it had not been adopted, which is, in our opinion, a gap in the legislation, which needs a solution.

Moreover, the legislation also lacks the key legal definition of this check - “integrity”, which leads to numerous legal appeals against the negative results of the integrity check [17, 18]. After all, regardless of the absence of the law “On integrity check” and the legal definition of this concept, the integrity check is carried out in relation to the legally defined persons authorized to perform the functions of the state or local self-government, including in relation to individual law enforcement agencies.

According to the Law of Ukraine “On State Protection of Court Employees and Law Enforcement Bodies” dated December 23, 1993 No. 3781-XII, law enforcement agencies include: the prosecutor’s office, the National Police, the security service, the Military Law and Order Service of the Armed Forces of Ukraine, the National Anti-Corruption Bureau of Ukraine, bodies of state border protection, Bureau of Economic Security of Ukraine, bodies and institutions of execution of punishments, pretrial detention centers, bodies of state financial control, fisheries protection, state forest protection, other bodies that perform law enforcement or law enforcement functions [19]. It is worth noting that as a result of anti-corruption reform and reform of the law enforcement system, changes were made to this article, according to which a new law enforcement body was added and existing ones were reformed. In addition, taking into account the high corruption risks in law enforcement activities, reformed and newly created law enforcement agencies conduct integrity checks of their employees.

Thus, the National Anti-Corruption Bureau of Ukraine, in accordance with the mentioned law, is a law enforcement body, the employees of which, when appointed to a position in the National Bureau, are notified of the possibility of carrying out an integrity check and monitoring of their lifestyle, and candidates for the position of Director of the National Anti-Corruption Bureau undergo an interview regarding compliance with the criteria of competence and integrity. Such an inspection, in accordance with the Law on the National Anti-Corruption Bureau of Ukraine dated October 14, 2014 No. 1698 VII, is carried out by the internal control unit of the National Bureau, if the results of this inspection are negative, then this is grounds for bringing the employee of the National Bureau to disciplinary action responsibility. The Director of the National Bureau annually submits information on the results of integrity checks to the President of Ukraine, the Verkhovna Rada of Ukraine and the Cabinet of Ministers of Ukraine in a written report on the activities of the National Bureau during the previous six months [14].

According to the reports, 91 integrity checks were conducted between April 2015 and December 2022, of which 8 confirmed the dishonesty of Bureau employees [20]. On the other hand, the very procedure for carrying out integrity checks and monitoring the lifestyle of NABU employees has not been approved to this day.

In October 2014, the prosecutor’s office was also reformed. According to the Law of Ukraine “On the Prosecutor’s Office” dated October 14, 2014 [21], the prosecutor is required to undergo an annual secret integrity check, which is conducted by internal security units in the manner approved by the Prosecutor General. For the first time, this procedure was approved by the Order of the General Prosecutor’s Office of Ukraine dated June 16, 2016 No. 205 “On approval of the Procedure for conducting secret checks of the integrity of prosecutors in the prosecutor’s office of Ukraine”, however, according to the Order dated

December 29, 2022 No. 293, a new one entered into force on January 1, 2023 the procedure for conducting a secret check of the integrity of prosecutors [22]. Information on ensuring legality and integrity in the activities of the prosecutor's office is contained in the report on the activities of the prosecutor's office, which the Prosecutor General submits to the Verkhovna Rada of Ukraine every year by April 1.

Law enforcement agencies in the sphere of protection of the economic security of the state have also undergone significant reforms. In 2021, according to the Law "On the Bureau of Economic Security of Ukraine" dated January 28, 2021 No. 1150-IX, the Bureau of Economic Security of Ukraine was established. When a person is appointed to a position in the Bureau, about the possibility of carrying out an integrity check and lifestyle monitoring in relation to him, and negative results of an integrity check or monitoring of the employee's lifestyle are grounds for bringing persons to disciplinary responsibility [23]. These checks are carried out in accordance with the Procedure for carrying out integrity checks and monitoring the lifestyle of employees of the Economic Security Bureau of Ukraine. [24]

On the other hand, the National Police, which was reformed in 2015, does not check the integrity of police officers. We believe that police officers who perform important law enforcement functions, namely: ensuring public safety and order, protecting human rights and freedoms, as well as the interests of society and the state, and combating crime, must meet the criteria of integrity. In addition, the National Police occupies a key place in the fight against corruption. Otherwise, the presence of broad powers, significant administrative resources and the right to use coercion can affect corruption risks in the activities of this law enforcement agency, which in turn can lead to distrust on the part of the public, discrimination of the authorities, and negatively affect the investment climate of Ukraine. At the same time, integrity checks must be conducted in accordance with the law and according to a clearly defined procedure, respecting the rights of police officers.

We also agree with the opinion of Taras Semkov, who noted that the number of law enforcement officers whose integrity is not checked is significant. For example, the number of employees of the National Police is much larger than that of NABU, whose activities are also often associated with the risk of corruption manifestations, so the implementation of this institute should be systemic in nature, extending to employees of all law enforcement agencies [25, p. 15].

The need to introduce police integrity testing was also emphasized by a group of scientists who noted that the information obtained as a result of a negative police integrity test can serve as a basis for describing corruption risks, analyzing the factors that generate them, and formulating recommendations for improving integrity in bodies and police departments. Therefore, in order to ensure the objectivity of such testing, it is necessary to develop and approve the procedure for its conduct, which should be fixed in the internal normative documents of the National Police [26].

As of May 2023, the further implementation of mechanisms of integrity in the National Police and integrity in public service, as one of the principles on which the policy of the National Police to prevent and counter corruption is based, is enshrined in the Anti-Corruption Program of the National Police of Ukraine for 2017 [27], 2018 [28], and 2019–2021 [29] and 2022–2024 [30]. Instead, the integrity of the National Police is not regulated by the Law of Ukraine "On the National Police of Ukraine" dated July 2, 2015 No. 580-VIII [31], which is, in our opinion, a gap in the legislation. We believe that integrity checks should also be implemented for police officers. This inspection must be carried out in accordance with the established procedure, respecting the rights of police officers.

## **5. Conclusions.**

Therefore, since 2014, Ukraine has taken significant steps to counter and overcome corruption by adopting a package of anti-corruption legislation, creating relevant anti-corruption bodies and implementing an integrity check mechanism. Instead, such an inspection, in our opinion, should be regulated by a relevant law with a clear definition of the concept of integrity and with an approved procedure for conducting the inspection, specified subjects, grounds and legal consequences of such an inspection, observing the basic rights and freedoms of a person and a citizen.

Secondly, in our opinion, the circle of subjects for which integrity checks should be carried out should be expanded. We believe that the integrity check, as one of the effective tools for preventing and combating corruption, should also be carried out in the National Police of Ukraine.

**References:**

1. Materialy kruhloho stolu «Perspektyvy modernizatsii v Ukraini i tendentsii zmin suspilnoi svidomosti» 11 liutoho 2013 roku. Kyiv: Instytut sotsiologhii NAN Ukrainy. URL: <https://dif.org.ua/article/perspektivi-modernizatsii-v-ukraini-i-tendentsii-zmin-suspilnoi-svidomosti>.
2. Indeks spryiniattia koruptsii-2013// Transparency International Ukraine URL: <https://ti-ukraine.org/research/indeks-koruptsiji-cpi-2013>.
3. United nations convention against corruption. United nations office on drugs and crime Vienna/ United nations New York, 2004.
4. UNODC (2009), Technical Guide to the UNCAC, Article 50 II. 4.5., p. 186.
5. UN Doc. A/RES/51/59, Action against Corruption, 28 January 1997.
6. Gramckow H. (2011), Preventing Corruption in Prosecution Offices: Understanding and Managing for Integrity, Justice&Development Working Paper Series, No. 15/2011, page 11.
7. OECD (2005), Managing Conflict of Interest in the Public Sector, p. 68 ("Integrity Testing Policy").
8. By David Burnham Graft Paid to Police Here Said to Run Into Millions The New York Times Archives April 25, 1970 URL: [https://www-nytimes-com.translate.goog/1970/04/25/archives/graft-paid-to-police-here-said-to-run-into-millions-survey-links.html?\\_x\\_tr\\_sl=en&\\_x\\_tr\\_tl=uk&\\_x\\_tr\\_hl=uk&\\_x\\_tr\\_pto=sc](https://www-nytimes-com.translate.goog/1970/04/25/archives/graft-paid-to-police-here-said-to-run-into-millions-survey-links.html?_x_tr_sl=en&_x_tr_tl=uk&_x_tr_hl=uk&_x_tr_pto=sc).
9. OSCE (2004), Best practices in combating corruption, Chapter 12, page 141 ("Integrity testing").
10. Police integrity testing: thematic brief. DCAF 2020 p. 4.
11. Pro zasady derzhavnoi antykoruptsiinoi polityky v Ukraini (Antykoruptsiina stratehiia) na 2014-2017 roky: Zakon Ukrainy vid 14 zhovtnia 2014 roku № 1699-VII URL: <https://zakon.rada.gov.ua/laws/show/1699-18#Text>.
12. Pro Stratehiu staloho rozvytku «Ukraina – 2020»: Ukaz Prezydenta Ukrainy vid 12 sichnia № 5/2015 URL: <https://zakon.rada.gov.ua/laws/show/5/2015#Text>.
13. Pro zatverdzhennia planu pershocherhovykh zakhodiv z podolannia koruptsii: Rozporiadzhennia Kabinetu Ministriv Ukrainy vid 2 lypnia 2014 r. № 647-r URL: <https://zakon.rada.gov.ua/laws/show/647-2014-p#Text>.
14. Pro Natsionalne antykoruptsiine biuro Ukrainy: Zakonu Ukrainy vid 14 zhovtnia 2014 roku № 1698 VII URL: <https://zakon.rada.gov.ua/laws/show/1698-18#n450>.
15. On the draft law on integrity checking of Ukraine: Interim opinion no. 819/2015 CDL-AD(2015)031/ Adopted by the Venice Commission at its 104th Plenary Session (Venice, 23-24 October 2015)/ Strasbourg, 26 October 2015.
16. Zvit pro diialnist Natsionalnoho ahentstva z pytan zapobihannia koruptsii za 2018 rik URL: <https://nazk.gov.ua/wp-content/uploads/2020/10/01.02-295.pdf>.
17. Postanova Verkhovnoho sudu Ukrainy vid 06 liutoho 2018 roku po spravi № 800/249/17. URL: <https://reyestr.court.gov.ua/Review/72288703>
18. Rishennia Verkhovnyi Sud u skladi kolehii suddiv Kasatsiinoho administratyvnoho sudu vid 12 travnia 2021 roku sprava №9901/349/20 (administratyvne provadzhennia №P/9901/349/20) URL: <http://iPLEX.com.ua/doc.php?regnum=96907648&red=1000034a1234b67b49b1b390790616ff9cfc1e&d=5>.
19. Pro derzhavnyi zakhyst pratsivnykiv sudu i pravookhoronnykh orhaniv: Zakonom Ukrainy vid 23 hrudnia 1993 roku № 3781-XII. URL: <https://zakon.rada.gov.ua/laws/show/3781-12#Text>.

20. Zvity pro robotu/ Natsionalne antykoruptsiine biuro Ukrainy/ URL: <https://nabu.gov.ua/activity/reports/>.
21. Pro prokuraturu Zakonu Ukrainy vid 14 zhovtnia 2014 roku № 1697-VII URL: <https://zakon.rada.gov.ua/laws/show/1697-18#Text>.
22. Pro zatverdzhennia Poriadku provedennia taiemnoi perevirky dobrochesnosti prokuroriv: Nakaz Heneralnogo prokurora 29 hrudnia 2022 roku № 293 URL: <https://zakon.rada.gov.ua/laws/show/v0293905-22#Text>.
23. Pro biuro ekonomichnoi bezpeky Ukrainy: Zakon Ukrainy vid 28 sichnia 2021 roku № 1150-IX URL: <https://zakon.rada.gov.ua/laws/show/1150-20>.
24. Pro zatverdzhennia Poriadku zdiisnennia perevirok na dobrochesnist ta monitorynhu sposobu zhyttia pratsivnykiv Biuro ekonomichnoi bezpeky Ukrainy: Nakaz Biuro ekonomichnoi bezpeky Ukrainy vid 19 lystopada 2021 roku № 19 URL: <https://zakon.rada.gov.ua/laws/show/z0094-22#Text>.
25. Taras Semkiv. Vprovadzhennia instytutu perevirok na dobrochesnist v zakonodavstvo Ukrainy. Visnyk Natsionalnoi akademii prokuratury Ukrainy № 2(48)2017 S. 11–16.
26. Drozd Oleksii, Havryliuk Liudmyla, Bratel Serhii, Dotsenko Oleksand, Lakiichuk Yaroslava. Testing of Integrity of Police Officers: The Realities of Today. Journal of Legal, Ethical and Regulatory Issues. Research Article: 2021 Vol: 24 Issue: 2.
27. Pro zatverdzhennia Antykoruptsiinoi prohramy Natsionalnoi politsii Ukrainy na 2017 rik: Nakaz Natsionalnoi politsii Ukrainy vid 24 liutoho 2017 roku № 176. URL: <https://media-www.npu.gov.ua/npu-pre-prod/sites/24/uploaded-files/nakaz%20NPU176.pdf>.
28. Pro zatverdzhennia Antykoruptsiinoi prohramy Natsionalnoi politsii Ukrainy na 2018 rik: Nakaz Natsionalnoi politsii Ukrainy vid 2 kvitnia 2018 roku. URL: <https://dp.npu.gov.ua/pro-politsiiu/zapobihannia-i-protydiia-koruptsii/antykoruptsiini-prohramy-npu-otsinka-koruptsiinykh-ryzykiv-u-diialnosti-npu>.
29. Pro zatverdzhennia Antykoruptsiinoi prohramy Natsionalnoi politsii Ukrainy na 2019-2021 roky: Nakaz Natsionalnoi politsii Ukrainy vid 20 bereznia 2019 roku № 246. URL: <https://dp.npu.gov.ua/pro-politsiiu/zapobihannia-i-protydiia-koruptsii/antykoruptsiini-prohramy-npu-otsinka-koruptsiinykh-ryzykiv-u-diialnosti-npu>.
30. Pro zatverdzhennia Antykoruptsiinoi prohramy Natsionalnoi politsii Ukrainy na 2022-2024 roky: Nakaz Natsionalnoi politsii Ukrainy vid 30 hrudnia 2021 roku № 1088. URL: <https://dp.npu.gov.ua/pro-politsiiu/zapobihannia-i-protydiia-koruptsii/antykoruptsiini-prohramy-npu-otsinka-koruptsiinykh-ryzykiv-u-diialnosti-npu>.
31. Pro Natsionalnu politsiiu: Zakon Ukrainy vid 2 lypnia 2015 roku № 580-VIII URL: <https://zakon.rada.gov.ua/laws/show/580-19#Text>.

---

**Tetiana Azarenko,**  
*Postgraduate student*  
*Scientific institute of public law, Kyiv, Ukraine*  
*e-mail: [lita\\_tanya@ukr.net](mailto:lita_tanya@ukr.net)*  
*ORCID ID: 0000-0002-0553-4306*