

LEGAL REGULATION OF COUNTER-TERRORISM: A COMPARATIVE ANALYSIS OF UKRAINIAN AND BRITISH LEGISLATION

ПРАВОВЕ РЕГУЛЮВАННЯ ПРОТИДІЇ ТЕРОРИЗМУ: ПОРІВНЯЛЬНИЙ АНАЛІЗ УКРАЇНСЬКОГО ТА БРИТАНСЬКОГО ЗАКОНОДАВСТВА

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This scientific article is devoted to the analysis of the main aspects of combating terrorism in Ukrainian legislation, including a comparative analysis with the anti-terrorist legislation of Great Britain, in particular the Terrorism Act 2000, Terrorism Act 2006, the Counter Terrorism Act 2008, Security and Justice (NI) Act 2007, and the Security and Justice (NI) Act 2013. The Decree of the President of Ukraine On the Concept of Combating Terrorism in Ukraine, as the main legal document aimed at combating terrorism, is analysed. An important issue in the prevention of terrorist acts is the collection of information from the population and the listening of mobile devices. This issue is analysed in relation to Ukrainian legislation (the Law of Ukraine On operative investigative activity), US legislation (the Patriotic Act), and Great Britain legislation (the Counter Terrorism Act 2008), which makes it possible to determine current trends in this area. In this aspect of combating terrorism, it is important to prevent restrictions on human rights and freedoms. Blocking the channels of its financing is an important mechanism for combating terrorism. The article analyses the difference between the concept and methods of financing terrorism in the legislation of Ukraine and Great Britain. Special attention is paid to the issue of migration and the regulation of this issue in Ukrainian and British legislation. It is emphasised that the regulation of this problem is rather weak compared to the legislation of Great Britain. The Counter-Terrorism and Security Act 2015 provides another important point in the context of counter-terrorism – to prevent people from being involved in terrorism – and has quite effective mechanisms for implementing this provision in practice. In general, the analysis carried out in the article is quite important in the context of improving the anti-terrorist legislation in Ukraine and bringing it up to world standards.

Key words: terrorism, legislation of Ukraine, legislation of Great Britain, counterterrorism, financing of terrorism, migration.

Ця наукова стаття присвячена аналізу основних аспектів протидії тероризму в українському законодавстві, у тому числі порівняльному аналізу з антитерористичним законодавством Великої Британії, мова йде про такі закони, як Закон про тероризм 2000 року, Закон про боротьбу з тероризмом 2006 року, Закон про боротьбу з тероризмом 2008 року, Закон про безпеку та правосуддя (NI) 2007 року та Закон про безпеку та правосуддя (NI) 2013 року. Проаналізовано Указ Президента України Про Концепцію боротьби з тероризмом в Україні, як основний нормативно-правовий документ, спрямований на боротьбу з тероризмом. Важливим питанням у попередженні терористичних актів є збір інформації з населення та прослуховування мобільних пристроїв. Дане питання проаналізовано у співвідношенні українського законодавства (Закону України Про оперативно-розшукову діяльність), законодавства США (Патріотичний Акт) та законодавством Великої Британії (Закон про боротьбу з тероризмом 2008 року), що дозволяє визначити сучасні тенденції у цій сфері. У такому аспекті протидії тероризму важливим є недопущення обмеження прав та свобод людини. Важливим механізмом протидії тероризму є блокування каналів його фінансування. Стаття аналізує різницю між поняттям та способами фінансування тероризму у законодавствах України та Великої Британії. Особливу увагу приділяється питанням міграції та регулюванню цього питання в українському та британському законодавстві. Наголошено на досить слабкому регулюванню даної проблеми у порівнянні із законодавством Великої Британії. Закон Великої Британії про боротьбу з тероризмом і безпеку 2015 року надає ще один важливий момент у контексті протидії тероризму – запобігати втягненню людей у тероризм, та має досить дієві механізми впровадження даної норми у практику. Загалом, аналіз, проведений у статті, є досить важливим у контексті вдосконалення антитерористичного законодавства України та піднесення його до світових стандартів.

Ключові слова: тероризм, законодавство України, законодавство Великої Британії, антитерористична діяльність, фінансування тероризму, міграція.

Currently, the world is witnessing the most significant proliferation of terrorist entities and acts of terrorism. Terrorism in the 21st century has evolved into a distinct industry, continually refining its technologies and striving to recruit as many individuals as possible. Consequently, global security is under immense threat. Therefore, cooperation among governments of nations worldwide and the sharing of expertise are of paramount importance. Crucial in the context of terrorism is its prevention and elimination, not just its mitigation. Hence, the global community must find effective mechanisms to counteract this form of aggression and actively implement them within their jurisdictions [1].

To describe observations, it is important to define the term “terrorism”, as there are a lot of them. And because of that we have to assess the most relevant and decide on the basis of which one our work will be based on.

Different sources provide us such definition of terrorism:

- Oxford Dictionary: the use of violent action in order to achieve political aims or to force a government to act [2];
- Cambridge Dictionary: (threats of) violent action for political purposes [3];
- Law of Ukraine on Combating Terrorism – a socially dangerous activity that consists in the conscious, purposeful use of violence by taking hostages, arson, murder, torture, intimidation of the population and authorities or committing other attacks on the life or health of innocent people or threat-

ening to commit criminal acts in order to achieve criminal goals [4];

- Penal Code of the French Republic (1994, as amended 2020) – acts where they are committed intentionally in connection with an individual or collective undertaking, the purpose of which is seriously to disturb public order through intimidation or terror [5].

- The Terrorism Act 2000 (Great Britain) defines terrorism as use or threat of one or more of the actions listed below (the whole list is provided in the Act), and where they are designed to influence the government, or an international governmental organisation or to intimidate the public. The use or threat must also be for the purpose of advancing a political, religious, racial or ideological cause [6].

As we can see, the special acts and codes of the mentioned countries provide us with a more detailed definition of terrorism. We can state that the definition provided in the Law of Ukraine on Combating Terrorism is quite comprehensive, but still, there is no one important detail that shows the whole complex of the nature of terrorism – its influence on the government. Not to mention that the main goal of almost all terrorist organisations is to achieve the overthrow of another government or to gain power over them. Likewise, Hamas main target is to liberate the territory of Israel and obtain complete power over this region [7]. Hamas’s goal is not as global as Al-Qaeda’s ones. This organisation remains one of the main

threats to the Western world, especially for U.S. national security. Despite the fact that in Al-Qaeda's organisational documents it is stated that their main goal is to ensure the supremacy of global Jihad, it is known that their activities are mostly directed against the Western world (especially the USA and Great Britain), to destabilise it and not to let expand its power [8].

Therefore, taking into account all the things mentioned above, the definition provided by The Terrorism Act 2000 of the Great Britain is the most appropriate one. As it states, it is "designed to influence the government or an international governmental organisation". The motive to impact the government lies in the fact that the government is the basis of the state, if it is destroyed – another one can lead the state for its purposes.

It would be great to analyse Great Britain's experience in fighting and preventing terrorism attacks, as they achieve a big result in this sphere.

To start with, the fact that the famous "war against terrorism" was declared after the September 11 attacks in the U.S. Of course, it is the biggest terrorist act the world has ever seen, and that's why it is widely accepted that the United States' policy concerning terrorism is the best one. But the term "terrorism" was well-known in Europe much earlier than in the USA. The actions of such groups as the IRA, The Red Army Faction, and ETA could be qualified as terrorist ones. That's why European countries have really long terrorism fighting experience.

This means that there is a huge importance of being ready for the problems but not waiting for them. Ukraine and the world at whole should develop a special mechanism for better counterterrorism policy and to establish an effective mechanism for implementing this strategy.

It is better to start with the Decree of the President of Ukraine on the Concept of Combating Terrorism in Ukraine. This document provides us with the main terrorism threat: "the aggressive policy of the Russian Federation, aimed at destabilising the situation in the state, including by inspiring separatist manifestations and comprehensively supporting the sabotage and terrorist activities of puppet quasi-state entities in the temporarily occupied territories in the Donetsk and Luhansk regions" [9]. It indicates a focus on a single enemy rather than the problem of terrorism per se.

In contrast, we can look through the Decree of the President of Ukraine On measures to strengthen the fight against crime in Ukraine, dated May 6, 2015. There is no single statement about the main enemy. Although at that time, the so-called DNR (formed on April 7, 2014) and LNR (formed on April 27, 2014) were already active and clearly had signs of terrorist organisations that posed a direct threat to Ukraine. Despite this, no measures were taken, including the development of a strategy to prevent the expansion of their activities, and the world community was not involved in this, as in the issue of international terrorism [10].

If we analyse the main Counter Terrorism Legislation of Great Britain (e.g. Terrorism Act 2000, Terrorism Act 2006, Counter Terrorism Act 2008, Security and Justice (NI) Act 2007, and the Security and Justice (NI) Act 2013), we won't find any indication of the main enemy in terrorism. Nevertheless, most terrorist attacks in the UK were made by Al-Qaeda.

However, indication of the main threat is not the worst point. The USA in its 2022 National Security Strategy outlines Al-Qaeda, ISIS, and associated forces as the example of terrorists and that "many of these groups still intend to carry out or inspire others to attack the United States and our interests abroad" [11]. Hence, identifying the main threat can help in setting main goals and developing a strategy to combat it. But nevertheless, this strategy should be aimed not only at a specific enemy, but at the defence of the country and society in general against any threat.

Great Britain is a great example of a preventive fight against terrorism. As it was mentioned, currently the biggest terrorist threat to Great Britain, and all of Europe in general,

is radical Islamist groups. Therefore, the main measures in the field of preventing terrorist threats in the United Kingdom are aimed at integrating Muslim society into the British environment and preventing its radicalization [12].

On the other hand, all preventive measures cannot guarantee 100% safety. Great Britain was preparing its forces to prevent terrorist attacks even before the events of 7th July 2005 in London (7/7). Despite this, the English land is witnessing the most pronounced manifestation of terrorism. After this event, Chief Constable Paul Crowther said that a lot of things have changed since 7/7, especially the big evolution in the communication system that helps to link in with Transport for London. Furthermore, changes also affected the CCTV, and it received more widespread coverage.

Certain measures have also been adopted in the USA after the 911 events. In October 2001, the US House of Representatives passed the largest anti-terrorism bill in the country's history (better known as the Patriotic Act). This law allowed law enforcement agencies to obtain permission to listen to the conversations of possible extremists by court order [1]. But on June 2, 2015, these provisions were repealed by the USA Freedom Act. Therefore, in order to obtain permission to collect information about a suspected person, US law enforcement agencies need to prove that this person is connected to terrorist activities. Thus, the mass collection of data on US citizens was suspended [13].

In Ukraine, the issue of permission to collect a person's private information is regulated by the Law of Ukraine "On operative investigative activity". In particular, Article 6 defines an exhaustive list of grounds for conducting investigative activities. Specifically, paragraph 3 of the same article allows the conduct of investigative activities in the cases provided for in Article 17 of the Law of Ukraine "On Intelligence". The first part of this article provides a reference to paragraph 8 of Article 6 of the Law of Ukraine "On Intelligence", which allows conducting investigative activities in the fight against terrorism. Also, Clause 4 of Article 6 of the Law of Ukraine "On operative investigative activity" recognizes among the grounds "the availability of generalised materials of the central executive body that implements state policy in the field of prevention and countermeasures against the legalisation (laundering) of proceeds obtained through criminal means or the financing of terrorism, obtained in the established law of order" [14; 15].

Continuing the coverage of the topic, it is also worth referring to paragraph 9 of the first part of Article 8 of the Law of Ukraine "On operative investigative activity", which among the rights of units that carry out operational and investigative activities, defines the possibility to "carry out audio and video surveillance of a person, remove information from electronic communication networks, electronic information networks in accordance with the provisions of Articles 260, 263-265 of the Criminal Procedure Code of Ukraine".

Therefore, the collection of any information of Ukrainian citizens is severely limited and allowed only in certain cases provided by law. This is a rather positive aspect, since it ensures the preservation of the basic rights and freedoms of citizens. Moreover, it is worth noting that all the measures described above can be applied "for the purpose of preventing the commission of a grave or special grave offences, preventing and stopping terrorist acts and other encroachments by special services of foreign states and organisations, if it is impossible to obtain information in another way" (P.3 of Article 8 of the Law of Ukraine "On operative investigative activity"). This proves the existence of a balance between the need for state security and the provision of human rights in Ukrainian legislation. Protection of human rights as an important element of the fight against terrorism was enshrined in the United Nations Global Counter-Terrorism Strategy adopted by the General Assembly on 5 September 2008 [16].

Similar provisions could be found in the UK's Counter-Terrorism Act 2008. Part 1, Powers to gather and share

information, contains particularities about disclosure of information and intelligence services. According to clause 3 of Part 1 “information obtained by the Security Service for the purposes of any of its functions may be disclosed by it – a) for the purpose of the proper discharge of its functions, (b) for the purpose of the prevention or detection of serious crime, or (c) for the purpose of any criminal proceedings [17]. We can see that it has quite similar provisions to Ukrainian ones. Supposedly, Ukrainian legislations provide a more precise and exhausted list of options for collection of information by law enforcement agencies, that entail better protection of human rights.

One of the mechanisms for countering the emergence of terrorist threats is blocking the channels of financial support for these actions. In Ukrainian legislation, Primarily, in Article 258⁵ of the Criminal Code of Ukraine, it is established that for the provision or collection of any assets, directly or indirectly, for the purpose of their use or the realisation that they will be used in whole or in part for any purpose by an individual terrorist or terrorist group (organisation), or to organise, prepare or commit an act of terrorism, involvement in the commission of an act of terrorism, public incitement to commit an act of terrorism, creation of a terrorist group (organisation), assistance in committing an act of terrorism, conducting any other terrorist activity, as well as attempts to commit such acts shall be punishable by imprisonment for a term of five to eight years with deprivation of the right to hold certain positions or engage in certain activities for a term of up to two years and forfeiture of property [18].

Hence, in Ukrainian legislation, among the norms that directly define the concept of terrorist financing and related issues, the main one is Article 258⁵ of the Criminal Code. Into the bargain, it is possible to mention Article 209¹ of the Criminal Code, Articles 11, 25 of the Law of Ukraine on Combating Terrorism, as well as the Law of Ukraine on Prevention and Counteraction of Legalisation (Laundering) of Proceeds of Crime, Financing of Terrorism, and Financing of the Distribution of Weapons of Mass Destruction.

If we are considering the same issue but in the UK’s jurisdiction, we can refer to the Terrorism Act 2000. The main one here is Part III “Terrorist Property”. Considering this act, it is seen that the term «terrorist financing» is not accustomed, while it is widely used the term “terrorist property”. It really means a lot, as the word “property” concerning the terrorism issue in Ukrainian legislation is used only in the Article 24 of the Law of Ukraine on Combating Terrorism, in the Article 25 Law of Ukraine on Combating Terrorism) and in the definition of the term “assets” [5]. While in the Terrorism Act 2000, the “terrorist property” means (a) money or other property which is likely to be used for the purposes of terrorism (including any resources of a proscribed organisation), (b) proceeds of the commission of acts of terrorism, and (c) proceeds of acts carried out for the purposes of terrorism [7]. That’s why we consider that using the term “terrorist property” is much more appropriate than «terrorist financing». Since the support of terrorism activity can be observed not only in money but also in other not-so obvious things.

In the context of the fight against terrorism, borders and, especially, migration control is very important. Article 258⁶ of the Criminal Code of Ukraine establishes responsibility for crossing the state border of Ukraine with terrorist intent by deprivation of liberty for a term of four to six years with or without confiscation of property. Another document that regulates this issue is the Law of Ukraine "On Immigration", in particular Article 12, grounds for cancelling an immigration permit. Clause 3 Part 1 of this article stipulates that the immigration permit is revoked if the immigrant's actions pose a threat to the national security of Ukraine, public order in Ukraine [19]. According to the definition provided by the Law of Ukraine on Combating, terrorism is a socially dangerous activity. Therefore, the immigration permit can

and should be revoked if a person is suspected of committing or preparing a terrorist act [20].

UK legislation regulates this aspect of counter-terrorism much more broadly. The Counter-Terrorism and Security Act 2015 provides many provisions to restrict entry into the country for suspected terrorists. Chapter 1 of Part 1 of this Act entails “Schedule 1 makes provision for the seizure and temporary retention of travel documents where a person is suspected of intending to leave Great Britain or the United Kingdom in connection with terrorism-related activity”. Chapter 2 provides conditions for temporary exclusion from the United Kingdom. A “temporary exclusion order” is an order which requires an individual not to return to the United Kingdom. It is stated that “the Secretary of State may impose a temporary exclusion order on an individual if conditions A to E are met”. This Act provides us 5 main condition, the main is the Condition B – “the Secretary of State reasonably considers that it is necessary, for purposes connected with protecting members of the public in the United Kingdom from a risk of terrorism, for a temporary exclusion order to be imposed on the individual”. This condition must be reviewed regularly throughout the period of the temporary exclusion order. The Condition C is not less important – “the Secretary of State reasonably considers that the individual is outside the United Kingdom”. This shows how important it is for the United Kingdom to prevent any manifestations of terrorism on its territory [20].

An important aspect of the Counter-Terrorism and Security Act 2015 is that it contains provisions for the possibility of obtaining a return permit for persons who have Temporary exclusion orders, and especially about the obligations of such persons after their return to the United Kingdom. The obligations include reporting to a police station, attending appointments, and notifying the police of their residence and any changes to it. These measures are very important as they are part of counter-terrorism efforts aimed at monitoring the activities of individuals suspected of involvement in terrorism upon their return to the UK [20].

The only similar provision in the legislation of Ukraine is Clause 1 of Part 1 of Article 10 of the Law of Ukraine "On Immigration" – "persons sentenced to imprisonment for a term of more than one year for committing an act that is recognized as a crime according to the laws of Ukraine, if the criminal record has not been extinguished and removed in accordance with the procedure established by law". And also paragraph 2 of part 1 of article 10 of the same law – "persons who have committed a crime against peace, a war crime or a crime against humanity, as defined in international law, or are wanted in connection with the commission of an act, which in accordance with of the laws of Ukraine is recognized as grave offence, or they have been notified of suspicion of committing a criminal offence, the pre-trial investigation of which has not been completed" [19].

These provisions in the legislation of Ukraine and Great Britain indicate actions related to the prevention of terrorism, which is a rather positive aspect. But at the moment, the legislation of Ukraine regulates this issue quite narrowly in comparison with the legislation of Great Britain. Therefore, it is important to further improve this issue in order to better control the border and prevent the spread of terrorism inside the country.

The Counter-Terrorism and Security Act 2015 provides another important element in the context of the fight against terrorism – Preventing people being drawn into terrorism. In particular, the full list of specified authorities is specified in Schedule 6, which in the exercise of their functions, have due regard to the need to prevent people from being drawn into terrorism. It is important that this Act provides a special mechanism that can be applied by local authority. This mechanism includes arranging support services, referring individuals to health or social care services if support is not deemed appropriate. These provisions are quite effective and aimed

at identifying and supporting persons at risk of involvement in terrorism at the local level [20].

As we can see from everything described above, the most important thing in the fight against terrorism is its prevention. Because it is almost impossible to interrupt an act of terrorism. Therefore, the main task of Ukraine in the field of combating terrorism is the development and successful implementation of a new strategy for preventing terrorism, not just fighting this phenomenon. Ukraine should pay attention to aspects that may be vulnerable to acts of terrorism and develop separate protection strategies for each of them. In particular, we are talking about the following manifestations of terrorism:

- informational terrorism – it is quite difficult to prevent, but it is possible to maximally eliminate calls to terrorism from national broadcasting channels. This can be achieved through the creation of information companies and trainings to counter the involvement of people in terrorist activity and generally increase the level of information literacy among the population;
- nuclear terrorism, which is a very urgent threat to the world community now. In order to fight this terrorism, it is very important to involve the entire world community, as well

as develop truly effective response strategies. It is important to prevent it, because if nuclear weapons or nuclear plants are in the hands of terrorists, stopping them in any way is quite a difficult task. This type of terrorism also includes the illegal transportation of radioactive components [1];

– sabotage, as a type of terrorism, is one of the easiest to prevent, but no less dangerous. They can be prevented by improving the state intelligence system (which is at a fairly high level in Ukraine), as well as constant monitoring of critical infrastructure and possible objects of encroachment.

Ukraine has a fairly strong legal framework in this area, but its practical implementation leaves much to be desired. Therefore, it is important to borrow the experience of foreign countries in the field of combating terrorism (especially Great Britain), in particular in matters of immigration and crossing the state border. For Ukraine, it is important not to focus on defence against one enemy, but to develop effective measures that can prevent any threat to national security. It is no less important to highlight the issue of terrorism in the mass media and to promote greater awareness of the population in order to prevent the involvement of individuals in terrorist activities.

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