

JOURNAL
*of Global Political
Transformations*

Founder and publisher:
Verus Academic Publishing

Year of foundation: 2025

E-mail: jgpt@veruspublishing.co.uk
<https://jgpt.veruspublishing.co.uk/>

EDITORIAL BOARD

Editor-In-Chief

Ketners Karlis	Doctor of Philosophy, Professor, Faculty of Bioeconomy Development, Vytautas Magnus University, Lithuania
-----------------------	---

International Members of the Editorial Board

Daniel Silander	PhD in Political Sciences, Associate Professor, Linnaeus University, Sweden
Iuliia Tsyrf	Associate Professor, Taras Shevchenko National University of Kyiv, Ukraine

CONTENT

A. Stychynska

Diplomacy in the era of hybrid conflicts: The examples of Europe, Africa and the Middle East.....4

K. Ketners

From universalism to regionalism – the future of international law in a multipolar world16

R.M. Memwti

Crisis leadership and the legitimacy of power in world politics30

O. Opanasenko

Comparative analysis of the French, British, and American revolutions
and their role in shaping contemporary democratic ideas and institutions.....42

M. Shkilniak

Regulatory models of artificial intelligence in contemporary governance:
Comparative analysis of China, the EU and the USA.....56

Diplomacy in the era of hybrid conflicts: The examples of Europe, Africa and the Middle East

Anna Stychynska*¹ 

¹Taras Shevchenko National University, Ukraine

Abstract. The aim of the study was to justify new approaches to understanding diplomacy as an adaptive system capable of integrating military, information, legal and economic instruments for effective interaction in the context of hybrid threats. The methodology was based on a combination of an interdisciplinary approach, which included instruments of political science, international relations, security studies, law and communication studies, with the use of comparative analysis, case studies, institutional analysis and critical discourse analysis. The results of the study showed that diplomacy in hybrid conflicts has undergone qualitative changes, moving away from the classical model of inter-state negotiations in favour of a multidimensional approach integrated with military and information tools. An analysis of peacekeeping missions in Kosovo, Mali, Congo and Ukraine confirmed the decisive role of combining diplomatic and security components to achieve stability. It was found that international organisations such as the United Nations, the Organisation for Security and Cooperation in Europe, the European Union and the North Atlantic Alliance acted as key coordinators in shaping the institutional framework for responding to hybrid threats. The study highlighted the growing importance of “third parties” in conflict resolution, as demonstrated by Turkey and Qatar, which used humanitarian and economic instruments for mediation. One area of focus was countering disinformation campaigns, where the United States, France and Eastern European countries demonstrated different models of institutional responses, including legislative initiatives and the creation of specialised centres to combat propaganda. The analysis showed that the development of cyber diplomacy and institutional initiatives, in particular European strategic communications projects, have become necessary to ensure the sustainability of states. It was found that the effectiveness of diplomacy depended on the ability to combine traditional negotiation practices with new tools of digital interaction and strategic communications. Based on the analysis, it is recommended to develop integrated diplomatic strategies that combine traditional negotiations with modern tools of cybersecurity and countering disinformation, taking into account regional specifics. The results can be used to improve national and international strategies for countering hybrid threats and to develop effective diplomatic practices in the new global security environment

Keywords: peacekeeping missions; countering disinformation; cyber diplomacy; information security; coordination

INTRODUCTION

The relevance of the research topic is determined by the radical transformation of the international environment, in which diplomacy and security practices are increasingly operating in conditions of hybrid conflicts. Modern wars and confrontations go beyond traditional military logic, combining political, informational, economic and technological instruments of pressure. This creates multi-level challenges for states, international organisations

and non-state actors, as countermeasures must take into account military, diplomatic and informational dimensions simultaneously. Hybrid warfare is a key paradigm of the 21st century, which has reformatted the very nature of diplomacy, forcing it to adapt to realities where information attacks, cyber operations, terrorist proxies and instruments of economic coercion are becoming structural elements of international interaction. The problem of the

Suggested Citation:

Stychynska, A. (2025). Diplomacy in the era of hybrid conflicts: The examples of Europe, Africa and the Middle East. *Journal of Global Political Transformations*, 1(1), 4-15. doi: 10.67524/verus1/1.2025.04.

study was the lack of a comprehensive approach to the analysis of diplomacy in the context of hybrid conflicts, where classical negotiation practices are intertwined with new forms of influence that do not always fit into traditional legal or institutional frameworks.

In scientific literature, the problem of hybrid conflicts and diplomacy has been studied from various angles. M.F. Shabbir (2022) emphasised that hybrid warfare between major powers created conditions for the active involvement of non-state actors and terrorist proxy forces, such as Al-Qaeda in Afghanistan or groups used by India in Pakistan. The author argued that hybrid warfare created conditions for the integration of terrorist groups into the strategic mechanisms of states, transforming them into a structural element of hybrid threats and requiring the development of a unified comprehensive approach to counter these interrelated challenges. In a study by M.T. Teibowei (2024), the focus was on the convergence of digital diplomacy and language policy, which radically transformed global communication. The author argued that governments needed to improve their language proficiency and master digital tools in order to effectively shape global perceptions and build constructive international relations in a world that was digitally interconnected. M. Weissmann *et al.* (2021) offered a comprehensive analysis of hybrid warfare as a multi-component strategy combining conventional warfare, cyberattacks, disinformation campaigns, and diplomatic tools. Significantly, the authors not only considered examples from Ukraine, the Baltic states and Taiwan, but also proposed an original theoretical model – the ‘Hybridity Blizzard Model’ – which explained the nature of combined threats and could be used to neutralise them. B. Piskorska (2025) emphasised the transformation of the UN (United Nations, n.d.) from a “soft” power into an entity capable of applying elements of “hard” power, in particular through military aid to Ukraine and sanctions policy against Russia. The author analysed these changes in three areas: the redefinition of the EU’s international identity, institutional transformations after the Lisbon Treaty, and the adaptation of diplomacy to hybrid threats in a turbulent international environment.

C. Bjola & I. Manor (2022) showed in their study how the COVID-19 pandemic accelerated the formation of hybrid diplomacy, combining physical and virtual formats of interaction. Based on surveys of diplomats, it was proven that although virtual meetings did not replace full-fledged offline communication, they ensured the continuity of negotiation processes and contributed to the effectiveness of multilateral cooperation. W. Song & E. Fanoulis (2023) studied EU public diplomacy, focusing on its perception in different countries. They demonstrated that attitudes towards the UN’s diplomatic efforts varied depending on the socio-economic and political context, which required greater flexibility and adaptability in the application of diplomatic strategies. S. Kіçmari (2024) conducted a retrospective analysis of the functions of diplomacy enshrined in the 1961 Vienna Convention, emphasising their relevance in

the contemporary international environment. The author stressed that, despite new threats, the fundamental tasks of diplomats – representation, negotiation and promotion of peace – remained unchanged but required new methods of implementation. F. Akgül (2021) questioned the conceptual boundaries of the term “hybrid warfare”, drawing attention to the spread of the term “grey zone” in academic debates to describe the actions of Russia and China. He argued that these concepts are not identical, and that their distinction reflected a strategic shift in the United States’ focus from Russia to China, which was important for understanding the evolution of modern conflicts.

Existing works did not sufficiently explore aspects of the integration of diplomatic instruments with mechanisms for countering information threats and the practices of non-state actors in hybrid wars. The problem of the interaction of traditional diplomatic formats with new practices of cyber diplomacy and mediation, as well as the issue of the effectiveness of institutional responses by international organisations, required further consideration. The aim of this study was to identify the transformations of diplomacy in the context of hybrid conflicts and to identify institutional and practical mechanisms for its adaptation to contemporary challenges. The objectives of the study were: to analyse key cases of diplomacy in Europe, Africa and the Middle East, taking into account regional specifics; to establish the role of international organisations and “third parties” in resolving hybrid conflicts; to explore the institutional and legal frameworks for countering disinformation campaigns and cyber threats in diplomatic practice and to formulate practical recommendations for improving diplomatic strategies to counter hybrid threats.

MATERIALS AND METHODS

The key tool was a comparative research methodology that allowed for the comparison of peacekeeping missions in Kosovo, Mali, the Democratic Republic of Congo, and Ukraine based on a number of criteria, including: the institutional framework and mandate of the mission; the size and composition of the contingent; the nature of the challenges (from peacekeeping to enforcement operations); the level of integration of diplomatic, military and humanitarian components; and effectiveness in achieving stability, taking into account the political context and regional specifics. The study also covered cases of “third party” mediation (Turkey, Qatar) and institutional responses of individual states (the United States, France, Eastern European countries) to disinformation campaigns. Structural and functional analysis was used to identify transformations in diplomatic instruments under the influence of cyber operations, disinformation and economic pressure. To clarify the specifics of the institutional response to hybrid threats, the activities of a number of key institutions were analysed, such as The European Centre of Excellence... (n.d.), NATO Strategic Communications Centre of Excellence (n.d.), as well as special digital diplomacy departments in the Ministries of Foreign Affairs of the United Kingdom, France

and Ukraine. The institutional analysis method was used to study the activities of international organisations such as the UN, OSCE (Organisation for Security and Co-operation in Europe, n.d.), ECOWAS (Economic Community of West African States, n.d.), as well as the OSCE mission in Ukraine (OSCE Special Monitoring..., n.d.). The analysis examined the institutional mechanisms through which states and international organisations implement adaptation strategies in hybrid conflicts, focusing on structural elements, competencies and functional links between them.

Attention is paid to regulatory acts and documents that have become important benchmarks in the field of countering disinformation and developing cyber diplomacy. The study takes into account the Law of the United States No. 114-328, 2016, which for the first time defined information security as a component of national security, Act of the United States No. H.R. 3776 (2018), which institutionalised cyber diplomacy within the US State Department, and the activities of the Global Engagement Centre (US Department of State, n.d.), which is responsible for countering propaganda. The French experience is presented through an analysis of the legislative initiative Act of France No. 151 (2018), aimed at combating fake news. In addition, the methodology uses materials from the European External Action Service, in particular EEAS Strategic Communication Task Forces (2025) and the EUvsDisinfo (n.d.) project, which have become institutional tools for countering disinformation campaigns in Europe. The method of critical discourse analysis was used to study information attacks and their impact on diplomatic practice. In this context, the studies by G. Eady *et al.* (2023) and E. Kondratov & E. Johansson-Nogués (2023), which show the experience of the United States and France in countering external information campaigns, as well as the experience of Ukraine, where the Center for Countering Disinformation (n.d.) operates under the National Security and Defence Council of Ukraine. The method of analysing diplomatic narratives was used to study the processes of forming and using narratives in diplomatic negotiations, as well as their impact on the international image of states. Within this method, the mechanisms of narrative construction, their functional role in communication, and their integration into diplomatic practices were studied. The method of comparative typology was used to systematise regional differences in approaches to diplomacy. The analysis covered diplomatic strategies in Europe, Africa and the Middle East according to the following criteria: the degree of institutional integration and the role of international organisations; the balance between “hard” and “soft” power instruments; the nature of priority threats and security challenges; the role of non-state actors in diplomatic processes; the level of adaptation to the digital environment and information threats; the model of negotiation and mediation; the degree of integration of diplomacy with security and peacekeeping mechanisms. Structural and functional differences in diplomatic strategies between regions were assessed separately.

RESULTS

Adaptation of diplomatic practices to the challenges of hybrid conflicts

Hybrid conflicts are one of the most complex forms of contemporary threats to international security, as they combine traditional military actions with asymmetric and non-traditional instruments – cyber operations, economic pressure, information attacks and the use of non-state actors (Khan, 2025). Unlike classic interstate wars, where the line between peace and war is relatively clear, hybrid conflicts are characterised by a blurring of this line and a multi-level impact on the political, economic, information and humanitarian spheres. They arise in a space where sovereign states are increasingly forced to interact with transnational networks, private military companies, quasi-state entities or terrorist groups. In this context, diplomacy takes on new functions. Traditional diplomacy, which has developed over centuries as an instrument of inter-state communication, has undergone transformations in the 21st century. Its classical model was based on direct negotiations, the conclusion of international treaties and the maintenance of permanent diplomatic missions (Abu-Jaber, 2024). This approach remained relevant in the era of the “balance of power” and the “Cold War”, when the international system was relatively predictable and functioned according to established rules. However, in the current context of hybrid conflicts, where the boundaries between war and peace, state and non-state, open and covert are increasingly blurred, traditional diplomacy is forced to adapt by integrating new instruments and methods of influence. One of the factors behind this evolution was the emergence of multidimensional threats that could not be resolved solely through inter-state negotiations. Cyberattacks on critical infrastructure, disinformation campaigns, and manipulation of energy and food markets are shaping a new reality of conflict. In these conditions, diplomacy takes on not only the classic tasks of concluding peace agreements, but also the function of coordinating international responses to hybrid challenges. For example, the creation of The European Centre of Excellence for Countering Hybrid Threats (n.d.) in Helsinki in 2017 demonstrates that diplomatic mechanisms go beyond political negotiations and include the coordination of expert networks, scientific institutions, and security agencies.

Multilateral diplomacy plays one of the roles in the adaptation process. While the main arenas used to be the UN (United Nations, n.d.) or the Organisation for Security and Co-operation in Europe (n.d.), in the 21st century, less formalised platforms such as the “Normandy format” in the settlement of the conflict in eastern Ukraine or the “Astana process” on Syria are gaining importance. Their specificity lies in their flexibility, which allows not only states but also international organisations, regional actors and even humanitarian structures to be involved in negotiations (Rao, 2022). This format reflects a change in the nature of diplomacy, where not only the status of participants but also their real ability to influence the course of

events becomes key. The role of so-called “public diplomacy” is also growing, which was previously considered a secondary element but is becoming a leading tool in the 21st century. In response to disinformation campaigns actively used in Europe, Africa and the Middle East, states are developing communication strategies aimed at shaping a positive international image and mobilising public opinion abroad. An example of this is the NATO Strategic Communications Centre of Excellence (n.d.) in Riga, which specialises in identifying and neutralising information manipulation. This shows that diplomacy in a hybrid environment is increasingly linked to information security and communication management. Changes are also taking place at the level of bilateral diplomacy. Traditional embassies, which previously served as the main channel of communication between governments, are forced to adapt to the digital age in the 2020s. The phenomenon of “digital diplomacy” is emerging, with states actively using social networks, online platforms and specialised communication channels to directly influence audiences in other countries (Barman, 2024). The foreign ministries of the United Kingdom, France and Ukraine have entire departments dedicated to digital diplomacy, which respond quickly to crisis situations, shape information narratives and support international coalitions in the virtual environment. The adaptation of diplomacy is also evident in closer integration with military and security structures. Hybrid conflicts are often accompanied by “frozen” zones of confrontation, where diplomacy must interact with peacekeeping missions, humanitarian organisations and intelligence structures (Dursun-Özkanca, 2024). An example is the OSCE mission in Ukraine (OSCE Special Monitoring..., n.d.), which combined monitoring of the military situation with diplomatic efforts to maintain dialogue between the parties. This experience shows that diplomacy is becoming part of a broader crisis management system, where its role is determined not only by its ability to negotiate, but also by its ability to integrate various resources into a single strategy.

Peacekeeping missions, which during the second half of the 20th century were considered one of the basic instruments for maintaining international peace and security, have undergone a transformation in the 21st century. While traditional peacekeeping in the period after

World War II (1939-1945) was based on the principles of neutrality, non-interference in internal affairs and the deployment of contingents solely for the purpose of separating warring parties, in the 21st century these missions are multidimensional in nature. They include not only a military component, but also political, humanitarian, legal and economic components (Gizelis *et al.*, 2016). Contemporary practice shows that the effectiveness of peacekeeping operations is determined by the ability to combine military control over the situation with active diplomatic and institutional support for countries in crisis. The most illustrative examples in this context are Kosovo, Mali, Congo and Ukraine. In each of these cases, peacekeeping missions faced specific challenges reflecting different regional contexts. Kosovo became a kind of “precedent” for international diplomacy, as Operation KFOR (Kosovo Force), launched in 1999 under the auspices of NATO, had a mandate not only to ensure security but also to create conditions for the formation of local institutions (Szeląg, 2024). In Mali, the UN peacekeeping operation (MINUSMA – Multidimensionnelle Intégrée des Nations Unies pour la Stabilisation au Mali) faced the task of stabilising a state divided by terrorist activity and ethnic conflicts, where military presence was combined with programmes for the disarmament, demobilisation and reintegration of militants. It was the most dangerous UN mission, with over 300 casualties among peacekeepers (Boutellis, 2024). In the case of the Democratic Republic of the Congo, the MONUSCO (2025) mission – United Nations Organisation Stabilisation Mission in the Democratic Republic of the Congo – became the largest in UN history, and its evolution from an observation to a “robust” operation using offensive units illustrates the expansion of the range of peacekeeping tasks. During the mission, more than 1 million civilians were protected in 2022, but the number of internally displaced persons remains high – more than 6.9 million (Whitehurst, 2023). The Ukrainian context demonstrates another dimension – the debate over the possible deployment of peacekeepers in Donbas reflects political disagreements in the UN Security Council that block decision-making in a hybrid environment where peacekeeping becomes the subject of geopolitical competition (Murithi, 2022). A detailed comparison of these missions is presented in Table 1.

Table 1. Comparison of peacekeeping missions

Country/ Region	Organisation and name of mission	Period of activity	Main mandate	Key instruments	Achievements	Main problems
Kosovo	NATO (KFOR) + UN (UNMIK)	1999 to present	Ensuring security, supporting institution building, coordination with the EU	Military contingent (approx. 3,500 troops), civil administration, EULEX participation in police and judicial reform	Ending mass violence, launching the state-building process, reducing inter-ethnic clashes	Incomplete international recognition, political instability, tensions between Serbian and Albanian populations

Table 1. Continued

Country/ Region	Organisation and name of mission	Period of activity	Main mandate	Key instruments	Achievements	Main problems
Small	UN (MINUSMA)	From 2013 to present	Stabilisation of the country, protection of the civilian population, support for political dialogue	Military units (13,000), police forces, civilian personnel, DDR programmes	Reduction of violence in cities, facilitation of the signing of the 2015 Algiers Agreement	High casualties among peacekeepers (most dangerous UN mission), limited control in northern areas, increase in terrorism
Democratic Republic of Congo	UN (MONUSCO, formerly MONUC)	1999 – present	Protection of civilians, disarmament of armed groups, support for democratic processes	16,000 military personnel, aviation, rapid response brigades, civilian human rights missions	Demobilisation of some armed groups, support for elections, protection of large population centres	Chronic instability in the eastern provinces, sexual violence, limited resources
Ukraine (Donbas)	Discussion initiative within the UN and OSCE (OSCE mission – non-military, observation)	Since 2014 – present	Monitoring of the ceasefire regime, observation of troop movements	Civilian personnel (up to 700 observers), technical monitoring equipment (drones, cameras), reporting	Documenting violations, maintaining a minimum channel of dialogue, forming a basis for a future peacekeeping mission	No mandate for enforcement, limited access to territories, blocking of decisions in the Security Council due to Russia's position

Note: EULEX – European Union Rule of Law Mission in Kosovo; UNMIK – United Nations Interim Administration Mission in Kosovo; DDR programmes – Disarmament, Demobilisation and Reintegration; MONUC – Mission de l'Organisation des Nations Unies en République démocratique du Congo

Source: compiled by the author based on T. Murithi (2022), T. Whitehurst (2023), P. Szeląg (2024), A. Boutellis (2024)

First, the mandates of modern missions are broader than in the past: they combine military, political and institutional tasks, transforming peacekeeping into a comprehensive instrument of state-building. Secondly, peacekeeping operations are increasingly carried out in close cooperation with regional organisations and international partners, as seen in the cases of Kosovo and Mali. Thirdly, the effectiveness of such missions directly depends on the level of political support and staff security. In Mali, the high level of threats to peacekeepers reduces their effectiveness, while in Congo, despite its scale, the mission is unable to completely neutralise chronic instability. The Ukrainian example, in turn, shows that the very fact of blocking decisions in the UN Security Council can become a factor hindering the deployment of a full-fledged mission.

An alternative to classical diplomacy, which is limited by the formal framework of international organisations, may be the mediation of a “third party” in the settlement of conflicts in modern international relations. In an era of hybrid conflicts, when traditional settlement mechanisms are losing their effectiveness due to political contradictions between major powers, it is precisely mid-level mediators who are able to ensure communication between the warring parties. Turkey and Qatar are prime examples of such “new generation mediators” as they combine geopolitical ambitions with flexibility, the ability to attract financial, humanitarian and information resources, and the desire to consolidate their own authority in the international system. Turkey actively positions itself as a key mediator in the resolution of

regional conflicts in the Middle East, North Africa and even Eastern Europe (Sarı & Sula, 2024). Its role became prominent during the war in Ukraine, when Ankara facilitated the conclusion of the 2022 “grain agreement” with the participation of the UN, which allowed Ukrainian grain to be exported via the Black Sea. This example demonstrated that Turkey is capable of simultaneously maintaining relations with opposing parties – Russia and Ukraine – and acting as a guarantor of the implementation of agreements. It applied a similar tactic in the Syrian conflict, where, despite its own military presence, Ankara participated in the Astana process alongside Russia and Iran, demonstrating its ability to combine the roles of regional player and international mediator (Sofos, 2022). Qatar, in turn, specialises in soft power diplomacy and communications with various, often opposing political forces. The most famous case was Doha's mediation in the negotiations between the United States and the Taliban, which ended with the signing of an agreement in 2020 (Sadr, 2024). At the same time, Qatar is actively involved in resolving the Palestinian-Israeli conflict, providing financial support to Gaza and mediating between Hamas (Islamic Resistance Movement) and Israel. Its diplomatic success is linked not only to financial resources, but also to the image of a state that maintains contacts with a wide range of actors, from Western states to Islamist groups. In this way, Qatar creates a unique diplomatic platform where even irreconcilable opponents agree to dialogue. A distinctive feature of mediation in the 21st century is that it is not limited to formal negotiations. Turkey and Qatar actively use humanitarian

initiatives, economic programmes and information resources to strengthen their authority as neutral moderators. In practice, both states combine classic diplomatic methods (high-level meetings, signing agreements) with public diplomacy tools that ensure the legitimacy of their actions in the international community. This indicates an expansion of the concept of mediation, which encompasses not only the direct conclusion of agreements, but also the creation of an environment of trust between the conflicting parties.

Operational and strategic aspects of countering disinformation in the context of hybrid threats

Disinformation campaigns have become one of the most destructive challenges for diplomacy, as they undermine not only trust in individual political actors, but also the very institutional foundation of international relations. Unlike traditional military or economic threats, information attacks are covert, their effects are not immediately apparent, and their impact can be global. In hybrid conflicts, disinformation is used as a strategic tool to delegitimise governments, divide societies, manipulate international public opinion and weaken the positions of competitors in diplomatic negotiations. This poses fundamentally new challenges for diplomacy: not only to conduct negotiations, but also to actively fight for control over the information space, shape narratives, and create systems for the early detection of information threats. The experience of the United States shows how significant the impact of external disinformation campaigns can be on domestic political processes and, as a result, on international diplomacy. The investigation into Russia's interference in the 2016 presidential election revealed that targeted fake news was spread through social media with the aim of polarising American society. For diplomacy, this case had a double effect (Eady *et al.*, 2023). First, it raised the issue of information security as a component of national security, which needs to be defended in international negotiations. Second, it undermined confidence in the United States as a "model of democratic resilience", complicating its ability to convince partners of the need to adhere to standards of transparency and openness. In response, American diplomacy began to more actively develop cyber diplomacy mechanisms, create special units within the State Department responsible for identifying and neutralising information threats, and promote international initiatives in the field of cybersecurity. One of the steps was the creation in 2016 of a special unit within the US State Department, the Global Engagement Centre (U.S. Department of State, n.d.), which was given a mandate to coordinate countermeasures against propaganda and disinformation directed against the US and its allies. Its activities are based on the Law of the United States No. 114-328, 2016, for the 2017 fiscal year, which for the first time defined the strategic importance of information security as a component of national security. In addition, in 2018, the United States passed Act of the United States No. H.R. 3776 (2018), aimed at institutionalising cyber diplomacy

and creating the position of Special Coordinator for International Cybersecurity within the State Department.

The French experience is indicative in the context of countering disinformation campaigns during election processes. In 2017, during the presidential election, there was a large-scale attempt to influence the campaign by leaking Emmanuel Macron's campaign emails (the so-called "MacronLeaks" operation) (Kondratov & Johansson-Nogués, 2023). Although the direct impact on the voting results was minimal, the very fact of the attack revealed the vulnerability of the political system to information manipulation. France's response was to quickly establish a legislative framework to combat fake news, in particular by adopting Act of France No. 151 (2018). For French diplomacy, this situation had an additional dimension: Paris began to actively promote the issue of combating disinformation within the EU, initiated the creation of joint mechanisms for verifying information and strengthening the role of the European External Action Service in the field of strategic communications. In this way, France turned its own experience into a tool of foreign policy influence, using it to strengthen European integration in the field of information security.

Eastern Europe is vulnerable to disinformation campaigns due to a combination of several factors: the historical legacy of Soviet propaganda, the existence of "frozen" conflicts, low levels of trust in state institutions, and strong political polarisation. Ukraine, Poland, Lithuania, and Latvia are systematically targeted by information attacks aimed at undermining their foreign policy orientation and weakening their ties with the UN and NATO. In Ukraine, information operations related to the war in Donbas and Russia's full-scale invasion in 2022 play a role. Disinformation is used both on the front lines and internationally, in particular to delegitimise the Ukrainian government and discredit partner assistance. The diplomatic response has been to establish the Center for Countering Disinformation (n.d.) under the National Security and Defence Council, to actively cooperate with the UN and NATO in the field of strategic communications, and to promote international initiatives to hold accountable states that use information attacks as a tool of hybrid warfare. Ukraine actively cooperates with the European Union within the EEAS Strategic Communication Task Forces (2025), which operates within the European External Action Service and is responsible for the EUvsDisinfo (n.d.) project, aimed at exposing Russian fakes. For example, according to the EUvsDisinfo project, as of 2023, more than 15,000 examples of disinformation related to Russia have been identified and refuted. Another area of focus is cooperation with NATO through the Strategic Communications Centre... (n.d.) in Riga, which allows for the coordination of approaches to information security at the Alliance level. On the new technological front of hybrid conflicts, diplomacy is increasingly relying on big data analytics and artificial intelligence (AI) tools.

For example, machine learning algorithms are used to proactively monitor social networks for early detection of coordinated information attacks, which often precede

or accompany diplomatic or military provocations (Borges, 2024). AI allows for the analysis of incredible amounts of data in real time – from trends in the media space to bot network posts – revealing patterns of disinformation dissemination and identifying its sources with high accuracy. In addition, diplomatic agencies are experimenting with the use of AI to analyse large amounts of historical diplomatic correspondence, international treaties and transcripts of negotiations. This opens up opportunities for predictive modelling: the system can detect hidden trends, analyse the language of diplomatic documents for signs of escalation or, conversely, willingness to compromise, helping to shape preventive and more informed strategies (Gupta, 2025). Thus, Big Data and AI technologies are transforming diplomacy from a reactive to a proactive state, turning it not only into the art of negotiation, but also into a knowledge-intensive field where technological awareness becomes a critical competitive advantage.

However, this technological dimension is integrated into the diplomatic practices of different regions in different ways, depending on their specific characteristics. The regional specificity of diplomacy in the era of hybrid conflicts is shaped by historical context, socio-economic conditions, political traditions and the nature of security challenges. In Europe, diplomacy is based on institutional integration and multilateralism, as reflected in the activities of the European Union and NATO. These structures form a framework for conflict resolution, in which negotiations, legal mechanisms and a common sanctions policy play a central role. An example is the response to the Russian-Ukrainian war, when European diplomacy combined economic sanctions, political pressure and support for Ukraine through diplomatic, financial and humanitarian mechanisms. However, even within Europe, there are differences in approach: Central and Eastern European countries are more inclined to take a hard line

against aggressors, while Western European states traditionally try to combine sanctions with channels for negotiation. Africa is characterised by multidimensional conflicts in which economic, ethnic and religious factors are intertwined with the consequences of colonial heritage (Teixeira, 2024). Here, diplomacy often deals with “failed states” where national institutions are weak and international organisations play a leading role in maintaining stability. The African Union has become a central platform for diplomatic mediation, but its capabilities are limited by a lack of resources and dependence on UN and EU support. Examples include peacekeeping efforts in Mali and the Central African Republic, where regional initiatives are combined with multinational operations under the auspices of the UN. The specificity of diplomacy in Africa lies in the fact that informal channels of negotiation, mediation by traditional leaders and the use of regional mediators such as ECOWAS (n.d.) play a role here.

The Middle East is an area where diplomacy is in constant tension between regional contradictions and global interests. Here, diplomatic processes often combine traditional negotiations with the use of force mechanisms and external guarantees. The resolution of conflicts in Syria, Libya, and Yemen demonstrates the multi-level nature of diplomacy: local agreements concluded through the mediation of regional actors (Turkey, Iran, Qatar) coexist with international negotiations under the auspices of the UN. A characteristic feature is the presence of numerous “conflict triangles”, where regional rivals simultaneously act as mediators and participants in the conflict. In addition, the Middle East is an area where energy and economic levers of diplomacy are actively used, as control over resources often becomes a decisive factor in negotiations. To systematise these differences and common features, it is useful to present them in Table 2, which allows us to see more clearly the logic of regional diplomatic strategies.

Table 2. Regional specifics of diplomacy in the era of hybrid conflicts

Region	Main characteristics of conflicts	Leading actors in diplomacy	Key settlement mechanisms	Examples of conflicts and solutions	Similarities with other regions	Differences
Europe	State and inter-state conflicts, significant role of cyber and information attacks	EU, NATO, OSCE, individual member states	Sanctions policy, multilateral negotiations, support for peacekeeping missions	Response to Russian aggression against Ukraine, settlement in the Balkans	Active role of international organisations, combination of diplomacy and security mechanisms	High level of institutional integration, common sanctions policy
Africa	Intra-state and inter-ethnic conflicts, weak institutions, external dependence	African Union, ECOWAS, UN, regional states (Nigeria, South Africa)	Peacekeeping operations, informal negotiations, role of traditional leaders	Mali, Central African Republic, Sudan	Use of multilateral formats, need for external support	High role of informal actors, lack of resources, post-colonial context
Middle East	Intertwining of regional and global interests, religious and ethno-political contradictions	UN, regional states (Turkey, Iran, Saudi Arabia, Qatar), USA, Russian Federation	Third-party mediation, local agreements, energy leverage	Syria, Libya, Yemen, agreements between Israel and Arab states	Complexity of conflicts, need for international and regional formats	Dominance of geopolitical competition, strategic role of energy resources

Note: RSA – Republic of South Africa; RF – Russian Federation

Source: compiled by the author based on B. Aras & Ş. Kardaş (2021), H. Saliu (2021), V.A.G. Teixeira (2024)

An analysis of the table shows that, despite regional differences, all three cases have in common the growing role of international and regional organisations in diplomatic settlement. All regions also demonstrate the need to combine traditional negotiation processes with new approaches, such as combating disinformation, cyber threats or the use of economic leverage. At the same time, the differences are due to the level of institutional development: in Europe, diplomacy relies on integration structures, in Africa – on informal mechanisms and external support, and in the Middle East – on the balance of power between regional rivals. It is this difference that determines the effectiveness of diplomatic strategies: Europe demonstrates relative stability thanks to a high level of coordination, Africa remains vulnerable to protracted conflicts, while the Middle East is a field of permanent competition between global and regional players. Thus, regional specifics not only shape the characteristics of diplomacy, but also determine its limits of effectiveness in the era of hybrid conflicts. An analysis of regional cases in Europe, Africa and the Middle East, as well as the experience of peacekeeping missions and third-party mediation, shows that traditional diplomacy, based on direct negotiations and formal mechanisms of international law, is becoming insufficiently effective without a comprehensive approach that integrates multifaceted strategies for responding to hybrid threats.

Based on a comparative study, several systemic conclusions can be drawn regarding the transformation of diplomacy in the context of hybrid conflicts:

- diplomacy is no longer exclusively a sphere of inter-state negotiations, but has become a comprehensive crisis management system that integrates political, military, economic and information tools;
- the effectiveness of diplomatic efforts, especially in peacekeeping missions, is directly proportional to the level of political consolidation and resource provision by international organisations (UN, EU, NATO). Blocking decisions in the UN Security Council, as in the case of Ukraine, is a key limiting factor;
- three models have emerged: European (highly institutionalised, with an emphasis on sanctions and multilateralism), African (focused on peacekeeping with external support and informal mechanisms) and Middle Eastern (geopolitical competition, energy levers and third-party mediation);
- the fight against disinformation has evolved from a secondary function to a core element of diplomatic strategy, requiring the creation of specialised institutions (such as the Global Engagement Centre).

One of the key trends is the expansion of the range of diplomatic tools that combine political, economic, military and informational means of influence. Effective diplomacy in the modern world requires not only classic negotiations, but also active participation in shaping the information environment, countering disinformation campaigns, coordinating humanitarian and economic measures, and monitoring the implementation of agreements using technical

and analytical mechanisms. The experience of peacekeeping missions in Kosovo, Mali, Congo and Ukraine shows that combining diplomatic and security components is critical to achieving stability. The success of such operations depends on a combination of multilateral settlement, coordination with regional organisations and the use of mandate enforcement systems. At the same time, insufficient political support or weak local institutions significantly reduce the effectiveness of even the most ambitious peacekeeping missions, as confirmed by the example of Ukraine, where the absence of a unified UN mandate limits the possibilities of international diplomacy. Regional specifics also determine the choice of diplomatic strategies. In Europe, multilateral integration diplomacy, which combines sanctions, international negotiations and support for legal institutions, is effective. In the Middle East, the success of diplomacy depends on the ability to combine regional and global interests, take into account conflict triangles, and use economic and energy levers of influence. Despite the differences in strategies, a common feature is the need for a comprehensive approach that encompasses both political and non-physical instruments of influence.

Based on the analysis, a number of recommendations can be formulated for states and diplomats on effective practices in the era of hybrid conflicts. Diplomacy must integrate classical and modern instruments, combining negotiations with informational, economic and humanitarian measures. The effectiveness of peacekeeping missions depends on their multidimensional nature: the experience of Kosovo has demonstrated the importance of involving civil administration and restoring state institutions, while missions in Mali and Congo show that without the development of local communities and security sector reforms, military contingents alone cannot guarantee stability. The Ukrainian case highlights the importance of international presence in the form of observation missions, which ensure transparency and trust between the parties. In the field of mediation, Turkey's practice in resolving the Syrian conflict and Qatar's role as a mediator in crises in the Middle East demonstrate the importance of involving regional and neutral players who are capable of simultaneously conducting dialogue with opposing sides and ensuring the implementation of agreements. Such mediators can be decisive in cases where direct dialogue between the parties is difficult or impossible.

With regard to countering disinformation, the experience of the United States and France shows the need for systematic monitoring of the information space and the development of independent media, while Eastern European countries (in particular Lithuania and Estonia) demonstrate the effectiveness of rapid response through strategic communications and the combination of state and public initiatives. This not only reduces the impact of hostile campaigns, but also builds public trust in official information. Twenty-first century diplomacy must also combine multilateral formats (UN, OSCE, EU, African Union) with adaptation to local conditions and regional specifics, ensuring

flexibility and responsiveness to changes in the political and security situation. Negotiators must take into account the need to integrate diplomatic initiatives with peacekeeping missions, international organisations and regional alliances, which increases the legitimacy and effectiveness of actions. Ultimately, the era of hybrid conflicts is shaping a new paradigm of diplomacy, where its effectiveness is determined by the ability to act in a comprehensive, flexible and innovative manner. States and diplomats must be aware of the integrity of instruments of influence, regional and global interconnections, and the constant need to adapt to rapidly changing political and information conditions. Only such integrated and strategically balanced diplomacy can deliver real results in resolving hybrid conflicts and maintaining international stability.

DISCUSSION

The analysis showed that diplomacy in the 21st century has undergone a profound transformation, going beyond the classical paradigm of inter-state negotiations and acquiring a complex character, where political, military, economic and information instruments are closely intertwined. This dynamic was clearly evident in Europe, Africa and the Middle East, where, despite regional specifics, there was a common trend towards the integration of multi-level mechanisms and the strengthening of the role of international organisations. The conclusions drawn were parallel to previous studies, but at the same time highlighted new dimensions of contemporary diplomacy in the era of hybrid conflicts. The analysis by N. Maliqi *et al.* (2022) focused on the changing nature of threats and the transition from traditional forms of armed violence to the use of non-traditional instruments, in particular political, economic and informational ones. In this regard, the results of this study confirmed their thesis on the need to broaden the understanding of security and integrated response. The analysis of the cases of Kosovo, Mali, Congo and Ukraine revealed that information attacks and the use of non-state actors were key factors of instability. However, unlike the researchers' generalised concept, the conclusions of this work emphasised the role of diplomacy as a mechanism for integrating various instruments, from military and sanctions to information and mediation. Thus, it was proven that the response to hybrid threats could not remain exclusively defensive or technocratic, but had to be formed through diplomatic coordination, which broadened the framework proposed by N. Maliqi *et al.* M. Jazbec's (2021) study examined the evolution of diplomatic functions in the long term and emphasised that the most striking changes occurred in the context of globalisation and the development of social media, which forced diplomacy to move to a postmodern stage. The comparison showed that these positions were confirmed by the identified trends, in particular in the analysis of disinformation campaigns in the United States, France and Eastern Europe, where social media became the main arena of diplomatic confrontation. However, unlike M. Jazbec, who focused on the

general transformation of functions, the results of this study emphasised the operational dimension of this process – the formation of specialised diplomatic structures in the United States (Global Engagement Centre), France (2018 legislative initiatives) and Ukraine (Center for Countering Disinformation at the National Security and Defence Council). In other words, the evolution described by the author in a broader context manifested itself in specific institutional decisions that gave diplomacy new characteristics related to cyber and information security.

J. Clavijo's article (2024) highlighted the growing influence of non-state actors, who were becoming full-fledged diplomatic players capable of shaping the agenda and proposing alternative solutions to global problems. The results of the study confirmed this conclusion, demonstrating the role of Turkey and Qatar as mediators who, through the use of humanitarian, economic and religious levers, operated outside the classical state models. At the same time, the cases of Africa and the Middle East revealed that the effectiveness of "third party" diplomacy depended not only on the flexibility of such actors but also on their ability to interact with international structures such as the UN or the African Union. Thus, in contrast to J. Clavijo's emphasis on the potential of non-state and transnational actors, the results showed that it was the interaction between state and non-state actors that created the conditions for real progress in conflict resolution. In the work of P. Kacziba & B. Hasan (2022), the emphasis was placed on the concept of "adaptive diplomacy", which manifested itself in the strategies of small EU states, in particular Hungary, Bulgaria, Greece, and Cyprus. The researchers emphasised that, in a multipolar environment, these countries did not choose linear or one-dimensional strategies, but combined various foreign policy instruments – from balancing between major powers to using the opportunities offered by regional alliances and pragmatically seeking new partners. This approach demonstrated the ability of small states to manoeuvre between pressure from stronger actors and their own security and development needs. In this sense, the results of the study were consistent with the authors' conclusions, as they also revealed the multidimensionality of diplomacy as a basic feature of contemporary international relations. However, unlike the researchers, who mainly considered the tactical and flexible steps of small states, the analysis emphasised that the multidimensionality of diplomacy was becoming a systemic characteristic of the global order, as it was implemented not only by small states, but also by medium and large actors, as well as supranational organisations. In addition, the study traced the role of information and cyber threats, while P. Kacziba & B. Hasan ignored this aspect. The article by A. Dandashly *et al.* (2021) highlighted another dimension of contemporary diplomatic challenges, focusing on the limitations of the UN in a period of growing multipolar competition. The authors argued that the divergent interests of the major powers undermined the UN's ability to formulate a coherent and coordinated crisis response policy, while the decline in the normative appeal of

the European Union hampered its ability to influence local societies and political elites. As a result, there were situations where UN policies were met with resistance not only from local forces but also from global competitors who deliberately used hybrid methods to limit European influence. The study confirmed this trend, emphasising that regional cases in Africa and the Middle East demonstrated the dependence of diplomatic effectiveness on the ability to combine the efforts of international organisations with the actions of local structures. However, unlike the analysis by A. Dandashly *et al.*, the study emphasised not so much the weakness of the EU as the general need for any international actor to comprehensively combine political, informational and military elements to overcome hybrid threats.

A study by P. Teodosiev (2024) emphasised that the international system was characterised by increasingly deep contradictions between major powers, particularly the United States and Russia, which undermined opportunities for constructive dialogue. The analytical focus of the study was on the impact of information technology and social media, which created structural imbalances and at the same time opened up space for new actors – China, India, Turkey, Saudi Arabia and the UAE (United Arab Emirates). This analysis highlighted the fragmentation of the international system, its transition to multiregionalism and the growth of entropy. The study confirmed many of these assertions, as it demonstrated that regional subsystems – from Africa to the Middle East – were shaped by both traditional powers and new centres of power. However, unlike P. Teodosiev's approach, which focused primarily on macro-level trends, the results of the study revealed specific mechanisms for adapting diplomacy to these processes, in particular through the involvement of a "third party", the development of cyber diplomacy, and the strengthening of the role of international institutions. Thus, the patterns identified were consistent with the concept of increasing systemic complexity, but complemented it with empirical examples of the effectiveness or limitations of diplomatic strategies. S. Lecocq's (2024) study, based on interviews with diplomats and experts in Brussels and Beirut, demonstrated the need to take into account a wider range of hybrid actors in modern diplomacy, in particular non-governmental and intergovernmental organisations. The author showed that the diplomatic practices of the UN in the Middle East and North Africa region were determined not only by official policy, but also by informal channels of communication and the spatial context. This study emphasised that classical inter-state diplomacy was losing its monopoly on agenda-setting, and that real interaction often took place outside official platforms. The results of the study confirmed this thesis, as an analysis of peacekeeping missions and third-party mediation showed that the effectiveness of diplomacy largely depended on the use of flexible and informal mechanisms that ensured channels of communication even in situations where official negotiations were blocked. At the same time, compared to the conclusions of

S. Lecocq, the study focused not only on the multifaceted nature of the actors, but also on the systematic integration of information and cyber tools into diplomatic strategies, which was not central to her analysis.

Z. Arkan's (2025) work examined the evolution of European security narratives in which hybrid threats have become central. The author showed that NATO and the UN used the theme of hybrid threats to shape their own strategic identities, interpreting them in accordance with their own approaches: NATO treated them as a civilisational challenge requiring collective defence, while the UN emphasised their systemic nature, which required technological, social and economic responses. Z. Arkan's analysis also emphasised that the war in Ukraine had brought this theme to the fore, enshrining it in official strategies. The study found a correlation with these conclusions, as it showed that both NATO and the UN had integrated hybrid instruments into their diplomatic practices, especially in the field of countering disinformation and cyber threats. However, the analysis emphasised that these narratives did not remain merely part of strategic documents, but were reflected in practical mechanisms – from the creation of specialised structures in the US and France to the institutional strengthening of Eastern European countries. This made it possible to interpret hybrid threats not only as a discursive element, but as a real factor in the transformation of diplomacy on a global scale. Summarising the results, it should be emphasised that all the analysed works highlighted the same structural changes in the international system in different ways. The study integrated these aspects, combining structural, institutional and practical levels, and showed that diplomacy in the context of hybrid conflicts was not just a reaction to change, but became a new paradigm of interaction that required adaptation, innovation and multidimensional coordination. This conclusion allowed us to view modern diplomacy as a key tool for managing instability, where effectiveness was determined by the ability to integrate various tools and forms of interaction in response to multi-layered challenges.

CONCLUSIONS

The study showed that diplomacy in hybrid conflicts has undergone a fundamental transformation. The classic model of inter-state negotiations has given way to a comprehensive, multidimensional approach that integrates political, military, informational and economic instruments of influence into a single crisis management strategy. This new paradigm requires diplomacy to function as a nerve centre for coordination between different spheres, where success is determined by the ability to adapt quickly and take proactive action. Analysis has shown that the effectiveness of such operations critically depends on the deep integration of diplomatic efforts with military and institutional components. The mission in Kosovo demonstrated the success of a model based on close cooperation between international organisations with the aim of not only ensuring security but also building state

institutions. In contrast, the experience in Mali revealed the vulnerability of peacekeeping in conditions of weak central authority and high activity of terrorist groups, where a limited mandate and heavy personnel losses restricted the scope for influence. The largest UN mission in Congo marked a transition from observation to “robust” mandates, but even these proved insufficient to overcome deep instability due to the chronic weakness of local institutions. The Ukrainian case has shown how geopolitical contradictions can paralyse traditional diplomatic mechanisms in a hybrid environment.

An analysis of the operational and strategic aspects of countering disinformation has shown that information attacks have evolved from a tactical tool into a strategic challenge to national security and international stability. The experience of the United States, France, and Eastern European countries has demonstrated the need to create specialised institutional mechanisms, such as the Global Engagement Centre in the United States or the Centre for Countering Disinformation in Ukraine. The strategic response has gone beyond refuting individual fakes, moving towards the formation of comprehensive strategic communication systems and the development of cyber diplomacy as a separate area of foreign policy. The growing importance of “third party” mediation has become another defining feature of modern diplomacy. Actors such as Turkey and Qatar have demonstrated their ability to provide communication channels where traditional formats have reached an impasse due to geopolitical contradictions. The key to the success of these mediators is a combination of flexibility, neutral status, possession of significant resources, and a willingness to operate in informal

formats. As demonstrated by the “grain deal” brokered by Turkey and Qatar’s negotiations between the US and the Taliban, the effectiveness of such initiatives is based on a pragmatic combination of classical diplomacy and “soft power” instruments.

The conclusions emphasise the development of integrated strategies that combine negotiation formats with information protection and cybersecurity mechanisms in advance; investment in the technological component of diplomacy, in particular in data analytics and artificial intelligence systems for monitoring threats; institutionalising the involvement of flexible regional mediators in the early stages of crises; and developing clearer international norms of responsibility for large-scale disinformation campaigns. The limitations of the study lie in its focus on publicly available strategies and cases from Europe, Africa, and the Middle East, which does not allow for a full assessment of the closed aspects of diplomatic activity. Prospects for further research may include the development of quantitative metrics to assess the effectiveness of diplomatic tools in hybrid conflicts, as well as an in-depth study of the impact of artificial intelligence on the diplomatic decision-making process.

ACKNOWLEDGEMENTS

None.

FUNDING

None.

CONFLICT OF INTEREST

None.

REFERENCES

- [1] Abu-Jaber, R.F. (2024). Historical phases of diplomacy development. *Contemporary Journal of Legal Studies*, 2(2), 386-405. doi: 10.70411/MJLS.2.2.2024118.
- [2] Act of France No. 151 “On Combating the Manipulation of Information”. (2018, July). Retrieved from https://www.assemblee-nationale.fr/dyn/15/textes/l15t0151_texte-adopte-seance.pdf.
- [3] Act of the United States No. H.R. 3776 “To Support United States International Cyber Diplomacy, and for Other Purposes”. (2018, June). Retrieved from <https://www.congress.gov/bill/115th-congress/house-bill/3776/text/rs>.
- [4] Akgül, F. (2021). A comparison between the concepts of gray zone and hybrid war: What is new for international security? *Journal of Security Strategies*, 17(38), 411-439. doi: 10.17752/guvenlikstrti.964066.
- [5] Aras, B., & Kardaş, Ş. (2021). Geopolitics of the new middle east: Perspectives from inside and outside. *Journal of Balkan and Near Eastern Studies*, 23(3), 397-402. doi: 10.1080/19448953.2021.1888251.
- [6] Arkan, Z. (2025). Narratives on European security and the leitmotif of hybrid threats. In *European security and hybrid threats: A narrative in the making* (pp. 39-65). Cham: Palgrave Macmillan. doi: 10.1007/978-3-031-86793-4_3.
- [7] Barman, S. (2024). Digital diplomacy: The influence of digital platforms on global diplomacy and foreign policy. *Vidya-a Journal of Gujarat University*, 3(1), 61-75. doi: 10.47413/vidya.v3i1.304.
- [8] Bjola, C., & Manor, I. (2022). The rise of hybrid diplomacy: From digital adaptation to digital adoption. *International Affairs*, 98(2), 471-491. doi: 10.1093/ia/iia005.
- [9] Borges, E. (2024). *What is social media threat intelligence?* Retrieved from <https://www.recordedfuture.com/threat-intelligence-101/intelligence-sources-collection/social-media-threat-intelligence>.
- [10] Boutellis, A. (2024). *The UN stabilization mission in Mali (MINUSMA): Peacekeeping caught in the geopolitical crossfire*. Cham: Palgrave Macmillan. doi: 10.1007/978-3-031-66466-3.
- [11] Center for Countering Disinformation. (n.d.). Retrieved from <https://cpd.gov.ua/en/>.
- [12] Clavijo, J. (2024). Diplomacy in times of pandemic and wars: Transnational actors are coming of age in an era of fragmentation and friction. *SAIS Review of International Affairs*, 44(1), 21-36. doi: 10.1353/sais.2024.a925809.
- [13] Dandashly, A., Dijkstra, H., Marafona, M., Noutcheva, G., & Paikin, Z. (2021). *Multipolarity and EU foreign and security policy: Divergent approaches to conflict and crisis response*. In *JOINT research papers* (No. 6, pp. 1-54). Roma: Istituto Affari Internazionali.

- [14] Dursun-Özkanca, O. (2024). Changing responses to a frozen conflict: The Republic of Cyprus soft balancing vis-à-vis Turkey. *International Political Science Review*, 45(1), 15-30. doi: 10.1177/01925121231177443.
- [15] Eady, G., Paskhalis, T., Zilinsky, J., Bonneau, R., Nagler, J., & Tucker, J.A. (2023). Exposure to the Russian internet research agency foreign influence campaign on Twitter in the 2016 US election and its relationship to attitudes and voting behavior. *Nature Communications*, 14(1), article number 62. doi: 10.1038/s41467-022-35576-9.
- [16] Economic Community of West African States (ECOWAS). (n.d.). Retrieved from <https://www.ecowas.int/>.
- [17] EEAS Strategic Communication Task Forces. (n.d.). Retrieved from <https://surl.li/tkoyth>.
- [18] EUvsDisinfo. (n.d.). Retrieved from <https://euvsdisinfo.eu/ua/>.
- [19] Gizelis, T.I., Dorussen, H., & Petrova, M. (2016). Research findings on the evolution of peacekeeping. *Oxford Research Encyclopedia of Politics*. doi: 10.1093/acrefore/9780190228637.013.25.
- [20] Gupta, M. (2025). *Social media intelligence: AI-powered threat detection for a safer digital world*. Retrieved from <https://innefu.com/social-media-intelligence-ai-powered-threat-detection-for-a-safer-digital-world/>.
- [21] Jazbec, M. (2021). *Diplomatic functions in the 21st century diplomacy*. *Journal of Law and Politics*, 2(1), 1-12.
- [22] Kacziba, P., & Hasan, B. (2022). *Hybrid foreign policies in the EU's eastern flank: Adaptive diplomacy*. *Eastern Journal of European Studies*, 13, 207-235.
- [23] Khan, Z.F. (2025). Cyber warfare and international security: A new geopolitical frontier. *The Critical Review of Social Sciences Studies*, 3(2), 513-527. doi: 10.59075/k9cbhz04.
- [24] Kіçmari, S. (2024). Functions of diplomacy. In *Introduction into diplomacy* (pp. 91-121). Singapore: Springer. doi: 10.1007/978-981-97-3897-7_5.
- [25] Kondratov, E., & Johansson-Nogués, E. (2023). Russia's hybrid interference campaigns in France, Germany and the UK: A challenge against trust in liberal democracies? *Geopolitics*, 28(5), 2169-2199. doi: 10.1080/14650045.2022.2129012.
- [26] Law of the United States No. 114-328 "National Defense Authorization Act for Fiscal Year 2017". (2016, December). Retrieved from <https://www.congress.gov/114/plaws/publ328/PLAW-114publ328.pdf>.
- [27] Lecocq, S. (2024). European foreign policy towards hybrid actors in the middle east and north Africa: An exploration of diplomatic practices. *Geopolitics*, 29(2), 607-629. doi: 10.1080/14650045.2023.2174432.
- [28] Maliqi, N., Racaj, M., & Totich, M. (2022). *Hybrid warfare and how to deal with hybrid warfare*. *Vizione*, 39, 235-246.
- [29] MONUSCO. (2025). Retrieved from <https://monusco.unmissions.org/en>.
- [30] Murithi, T. (2022). The failure of the United Nations Security Council in creating the framework conditions for mediation in the Russia-Ukraine crisis. *Strategic Review for Southern Africa*, 44(1), 65-92. doi: 10.35293/srsa.v44i1.4082.
- [31] NATO Strategic Communications Centre of Excellence. (n.d.). Retrieved from <https://stratcomcoe.org/>.
- [32] Organization for Security and Co-operation in Europe. (n.d.). Retrieved from <https://www.osce.org/>.
- [33] OSCE Special Monitoring Mission to Ukraine (closed). (n.d.). Retrieved from <https://surl.li/hddstk>.
- [34] Piskorska, B. (2025). *The European Union as a diplomatic actor in turbulent times*. *Studia Europejskie in European Affairs*, 29(1), 209-230.
- [35] Rao, S. (2022). *Relevance of normandy format talks in the Ukrainian crisis*. *Manohar Parrikar Institute for Defence Studies and Analyses*.
- [36] Sadr, O. (2024). How peace negotiations fail: The case of Afghanistan and the Taliban (2020-2021). *Afghanistan*, 7, 112-134. doi: 10.3366/afg.2024.0147.
- [37] Saliu, H. (2021). *The specifics and complexity of EU public diplomacy*. *Social Science Debates*, 37(96-97), 189-207.
- [38] Sarı, B., & Sula, I.E. (2024). *Turkish foreign policy in a transforming world order: Middle power strategies and prospects*. *Perceptions: Journal of International Affairs*, 29(1), 4-23.
- [39] Shabbir, M.F. (2022). *Hybrid warfare: An umbrella for terrorism in an era of great power competition?* Retrieved from <https://apps.dtic.mil/sti/html/trecms/AD1201753/>.
- [40] Sofos, S.A. (2022). *Turkey as mediator*. *The Peace and Conflict Resolution Evidence Platform*, 189-213.
- [41] Song, W., & Fanoulis, E. (2023). Global perspectives on European Union public diplomacy: An introduction. *Journal of Contemporary European Studies*, 31(1), 1-7. doi: 10.1080/14782804.2022.2156486.
- [42] Szeląg, P. (2024). The "limited recognition" problem and the international presence of the Republic of Kosovo. *Balkanica Posnaniensia. Acta Et Studia*, 31, 299-330. doi: 10.14746/bp.2024.31.15.
- [43] Teibowei, M.T. (2024). *Digital diplomacy and language in the digital age*. *Research Journal of Mass Communication and Information Technology*, 10(1), 80-88.
- [44] Teixeira, V.A.G. (2024). An incoherent state-identity approach to African regional disorder. *Conflict Resolution Quarterly*, 42(2), 259-278. doi: 10.1002/crq.21443.
- [45] Teodosiev, P. (2024). Trends in the development of modern international relations. The new challenges for diplomacy. In *Proceedings of the 15th international scientific and practical conference* (Vol. 4, pp. 275-281). Rezekne: Rezekne Academy of Technologies. doi: 10.17770/etr2024vol4.8207.
- [46] The European Centre of Excellence for Countering Hybrid Threats. (n.d.). Retrieved from <https://www.hybridcoe.fi/>.
- [47] U.S. Department of State. (n.d.). *Global engagement center*. Retrieved from <https://surl.li/pyejrp>.
- [48] United Nations. (n.d.). Retrieved from <https://www.un.org/en/>.
- [49] Weissmann, M., Nilsson, N., Palmertz, B., & Thunholm, P. (Eds.). (2021). *Hybrid warfare: Security and asymmetric conflict in international relations*. London: Bloomsbury Academic. doi: 10.5040/9781788317795.
- [50] Whitehurst, T. (2023). *The importance of the United Nations peacekeeping operations: A study on Mali, the democratic republic of Congo, and South Sudan*. *Honors Theses*, article number 3734.

From universalism to regionalism – the future of international law in a multipolar world

Karlis Ketners*¹ 

¹ Vytautas Magnus University, Lithuania

Abstract. The relevance of the study is due to the accelerated transformation of international law under the influence of multipolarity, technological changes and the growing role of regional actors. The aim of the work was to determine the prospects of legal pluralism in the context of the evolving relationship between universalism and regionalism in the modern international legal system. The research methodology was based on a comprehensive analysis of international treaties, regional agreements. The study established that classical universal treaties lost effectiveness due to intensifying geopolitical competition, technological transformations and declining trust among leading states. Contemporary initiatives increasingly implement the principle of flexible universalism, offering framework arrangements instead of binding obligations. Regional agreements demonstrate higher practical applicability, yet simultaneously reinforce asymmetry in access to legal mechanisms. The concept of legal pluralism reflects the adaptive capacity of international law under conditions of multipolarity and rapid systemic change. Current tendencies indicate that universal and regional regimes coexist in a dynamic and mutually influential manner. Universalism provides legitimacy and general principles, while regionalism offers flexibility and technical effectiveness. Their interaction produces a pluralistic legal structure, which simultaneously ensures adaptability and generates risks of fragmentation. The growing geopolitical divide between the United States and China, as well as between Russia and the European Union, prevents the emergence of truly universal norms. Competing models of governance and legal interpretation deepen regional differentiation and transform international law into a field of normative rivalry rather than consensus. The sustainability of this model depends on harmonisation of overlapping regimes and recognition of mutual legitimacy. Prospects for international law are defined by several potential trajectories. The most realistic path involves integration of universal values with regional specificity, where pluralism functions as a mechanism of legitimacy and effectiveness. The practical significance of the study is the possibility of using its results to predict the development of international legal regimes

Keywords: pluralism; legitimacy; coordination; global standards; normative

INTRODUCTION

The modern development of international law takes place in conditions of multipolarity, which radically changes the established ideas about the universalism of legal norms. If between the 1950s and 1990s the universality of international law was perceived as an axiom enshrined in the UN (United Nations) system and global treaties, the growing competition between states and regional blocs is forming a new architecture. Universal mechanisms are increasingly losing their practical significance.

In the study of J. Dugard (2023) stressed that the universalism of international law is no longer a neutral and

self-sufficient category, as it depends on political conditions and the consensus of key actors. The author emphasised that universal treaties are increasingly replaced by regional ones, which provide greater efficiency in specific circumstances. Universalism loses the ability to act as a guarantor of a single normative system and turns into one of the levels of multi-level architecture of international law. E. Han & X. Li (2024) viewed the erosion of universalism through the prism of the crisis of legitimacy of global institutions. They noted that bodies such as the UN Security Council or the World Trade Organisation are

Suggested Citation:

Ketners, K. (2025). From universalism to regionalism – the future of international law in a multipolar world. *Journal of Global Political Transformations*, 1(1), 16-29. doi: 10.67524/verus1/1.2025.16.

*Corresponding author



increasingly unable to act independently of the political interests of great powers. As a result, states lose confidence in universal mechanisms and prefer regional formats that ensure efficiency and greater control. Regionalisation appears as a practical response to the lack of efficiency of global institutions. In turn, T. Berger (2020) analysed the regionalisation of international law in the context of critical theory and analyses it as a manifestation of postcolonial transformations. The author argued that universalism has historically been associated with a Western vision of law, while the new regional legal spaces reflect the growing voices of the Global South. Regionalisation not only weakens universal institutions but also creates more inclusive and contextually oriented legal instruments.

The idea of “transitional justice” is increasingly viewed through the lens of regional initiatives in the areas of human rights, the environment, and security. Such initiatives, as documented in the study by B. Weiffen & J. Battistuzzi Penachioni (2025), can respond more effectively to local challenges, while universal norms often remain declarative and unsupported by practical implementation mechanisms. This reflects a shift in the balance toward regional law, which is increasingly gaining practical significance. The contemporary landscape of international law increasingly resembles a mosaic of intersecting and partially overlapping regimes. This fragmentation, as R.E. Kim (2020) emphasises, is an inevitable consequence of multipolarity: universal agreements are no longer able to encompass all areas of international relations. However, this arrangement should not be perceived as chaotic. On the contrary, it demonstrates the high adaptability of international law to changing political realities and the growing complexity of the global order.

Universalism in international law is increasingly subordinated to the logic of power, and legal instruments themselves are beginning to reflect the balance of interests of actors such as the United States, China, Russia, and the EU. K.J. Heller (2024) notes that this is leading to the formation of alternative regional legal spaces, where international law no longer appears as a supranational system of norms, but as a field of struggle. Regional formats serve as tools for protecting individual interests. At the same time, the process of regionalisation cannot be viewed unequivocally as a challenge to universalism. On the contrary, regional norms can serve as a kind of laboratory for legal solutions that can subsequently be integrated into the global context. In the study of L. Marotti (2022), regionalisation is not a destructive force, but a potential mechanism for updating international law and adapting it to multipolar conditions.

Research by S. Rosengrün (2022) focused on new areas of international law, particularly cybersecurity and the regulation of artificial intelligence. The author noted that universal initiatives in these areas are weak and declarative, while regional agreements showed greater practical effectiveness. This indicates that regionalisation is becoming a laboratory for the development of new standards, which may subsequently receive wider recognition. The problem

of the study is that the scientific literature still considers the erosion of universalism and the rise of regionalism mainly separately. At the same time, it is not well understood how these processes interact and what new quality of international law they form together. Particularly unresolved is whether regionalisation is a threat to the universal order, or rather a way of transforming it. The aim of the study was to assess the prospects of regionalism in international law within the context of a multipolar world. The tasks were to identify the main trends of erosion of universal norms, determine the role of regional legal initiatives in the field of security, ecology, and new technologies. Also, assess the possibilities of combining global and regional approaches in the new architecture of international law.

MATERIALS AND METHODS

The study used an interdisciplinary approach that combined the methods of international law, political science and international relations. The conceptual framework was the concept of legal pluralism. The study was conducted in three consecutive stages. The first stage involved an analysis of the practice of universal international regimes in a state of transformation or erosion, the Geneva Convention... (1949), European Convention for the Protection of Human Rights... (1950), International Covenant on Civil and Political Rights (1966), the Treaty on the Non-Proliferation of Nuclear Weapons No. INFCIRC/140 (1970), Kyoto Protocol to the United Nations... (1997), Paris Agreement (2015), the European Green Deal (2019), as well as modern initiatives in the field of cybersecurity under the auspices of the UN, Open-ended Working Group on Security... (2023). To study the field of digital policy, the legislation, and regulations of the European Union (Regulation (EU) 2016/679..., 2016), the USA (Protecting Consumer Privacy..., 2012) and China (Cybersecurity Law..., 2016) were analysed. A comparative analysis of these documents made it possible to assess which mechanisms of universalism remain relevant and which lose their effectiveness under the influence of geopolitical competition and technological changes. The second stage focused on the regionalisation of international law and an analysis of the prospects for legal pluralism in a multipolar world. A comparative approach allowed to identify typical features of regional legal regimes and identify instances of conflict between regional and universal norms. The third stage of the study was devoted to conceptualising the identified changes and predicting possible scenarios for the development of the ratio of universalism and regionalism. For this purpose, the method of scenario analysis was applied, which allowed to formulate three basic models of development: restoration of universalism, mosaic coexistence and dominance of regionalism. The specificity of the source base was the need for a comprehensive combination of normative legal acts, the practice of international and regional organisations and analytical materials. This allowed to ensure the integrity of the study and at the same time to identify trends of imbalance and fragmentation of the international legal order.

The sample type is purposeful, with an emphasis on international legal acts, political documents, donor reports and analytical reviews, which ensured the representativeness, objectivity and scientific reliability of the conclusions.

The methodological basis of the study was based on a combination of several approaches, which made it possible to comprehensively examine the relationship between universalism and regionalism in international law. The comparative legal method was used to compare universal and regional legal regimes, which made it possible to identify their strengths and weaknesses in the context of contemporary transformations in international law. The historical-legal method was used to trace the evolution of treaty regimes and coordination mechanisms, which was important for understanding the origins of contemporary models of legal pluralism. The structural-functional method was based on the study of conflicts and duplication of norms at different levels of legal systems, which made it possible to assess the effectiveness of interaction between universal and regional legal systems. Scenario analysis was used to construct predictive models of the development of international law in a multipolar environment, which made it possible to formulate potential scenarios for the relationship between universalism and regionalism.

RESULTS

Universalism of international law under the pressure of global transformations

The universalism of international law has been considered one of the key aspects of the global legal order since the mid-20th century. Its essence lies in the fact that key international norms and rules have a general, comprehensive meaning and are applied regardless of the regional affiliation of states or the peculiarities of their political regimes. From the 1950s to the 1990s, this model demonstrated considerable effectiveness, as seen in instruments such as the Geneva Convention... (1949) and the Treaty on the Non-Proliferation of Nuclear Weapons No. INFCIRC/140 (1970). Universalism provided a certain predictability, limited the abuse of force, and formed the basis for multilateral cooperation. However, in the 21st century (2000-2025), universalism began to lose its former stability and effectiveness. In this context, a paradigm shift is increasingly noticeable: from the dominance of universalism of international law to the growing role of regionalism.

The Intermediate-Range Nuclear Forces Treaty (Treaty on elimination..., 1987) became an example of the erosion of the classical system of universal treaties. Its purpose was to create an arms control mechanism that would serve as a model for developing broader disarmament standards. The document's universal nature lay in its provision for the renunciation of an entire class of weapons, the principles of which could be extended to other states. However, the limited number of signatories and the rapidly changing structure of international relations undermined its viability. A key factor was the rapid growth of China's military potential, which was not a party to the treaty and thus placed the

United States at a disadvantage. At the same time, the security rivalry between Russia and the EU deepened, weakening Russia's motivation to maintain the treaty's restrictions. Together, these circumstances, along with new technological challenges, made its extension impossible. The demise of the INF (Intermediate-Range Nuclear Forces) Treaty in 2019 (Pompeo, 2019) was a clear demonstration of the inability of the universalist model to adapt to the dynamics of multilateral competition and the changed balance of power.

A similar dynamic emerged in the case of the Kyoto Protocol to the United Nations... (1997), which aimed to develop a global framework for combating climate change. Its universalist approach sought to establish uniform emission reduction standards for all participants in the international community and gradually establish a global environmental regime. However, differences in economic development and national priorities led to highly uneven implementation of the commitments. The US (United States) decision to withdraw from the commitment system (U.S. Statement on Climate Change to OSCE, 2001) effectively deprived the protocol of global authority, and the lack of effective enforcement mechanisms rendered the agreement's implementation pro forma. As a result, the universalist model failed the test of asymmetries of interests and political will, confirming the limitations of the classical treaty system in a multipolar world.

Analysing both examples, it can conclude that the crisis of the classical universal contractual system is caused not only by specific political decisions or the withdrawal of individual states from the agreements. The problem is systemic and concerns the very foundation of universalism. First, changes in the global balance of power have led to the fact that great powers no longer perceive universal regimes as a neutral platform but view them through the prism of competitive advantages or limitations. Secondly, technological progress, in the field of arms and energy, has created new challenges that classical contractual formulas did not take into account. Thirdly, the role of non-state and new state actors that were not included in existing systems has increased, which undermined the legitimacy of the agreements. In this context, universalism is increasingly perceived as an archaic form that is unable to respond to the dynamics of modern processes.

The INF situation has shown that in the field of security, universal mechanisms face a dilemma: either they remain narrow and lose significance due to the exclusion of key actors, or they try to spread globally, but then they need to adapt to extremely different interests. In both cases, the effectiveness of universalism is threatened. In the case of the Kyoto Protocol to the United Nations... (1997), the crisis of universalism manifested itself in the sphere of global governance, where the lack of enforcement mechanisms and the asymmetry of the interests of states made the universal architecture unworkable. Both examples demonstrate that universal treaties, which in the past were considered the best way to consolidate the international order, are increasingly losing functionality. Instead of strengthening

international law, universal agreements begin to produce the opposite effect: they become a field for competition, a symbol of unwillingness to yield to national interests and a source of fragmentation of the legal space. The classical contractual system, which assumed of the readiness of states to compromise in the name of global stability, turned out to be unsuitable in conditions when competition for technological, economic and military superiority comes to the fore. This does not mean a complete rejection of universalism but indicates that its classical forms are experiencing a crisis of legitimacy and efficiency. Analysis of the erosion of the Intermediate-Range Nuclear Forces Treaty (Treaty on elimination..., 1987) and the Kyoto Protocol to the United Nations... (1997) reveals a broader trend: the universalism of international law, once a guarantor of stability, is increasingly giving way to more selective, regional or flexible forms of cooperation. This necessitates rethinking the very nature of the treaty system, the search for new tools that can combine global goals with the real interests of individual states.

The decline of the classical system of universal treaties cannot be explained by the isolated failures of individual agreements; its roots lie in systemic transformations in international relations. Three key factors consistently undermined the stabilising role of universal agreements: geopolitical rivalry, technological change, and the erosion of trust (Hoffman *et al.*, 2022). The first factor was geopolitical rivalry. After the end of the Cold War, the balance of power shifted, altering the perception of universal treaties. Instead of serving as a neutral instrument for risk reduction, they increasingly became tools for advancing the priorities of dominant players. For the United States and its allies, such agreements consolidated their strategic agenda, while Russia, China, and others viewed them as mechanisms for uneven burden sharing. In this context, bilateral or regional formats proved more attractive, as they allowed for flexible bargaining and avoided compromises on vital interests. As a result, universalism lost its character as a “common good” and became yet another arena for great power rivalry.

Technological challenges have also dealt a blow to universalism. The treaty architecture of the second half of the 20th century was developed in a relatively stable technological environment. However rapid innovations in areas such as cybersecurity, artificial intelligence, biotechnology, and space are undermining the relevance of already slow universal agreements. Cumbersome negotiation and ratification processes have failed to keep pace with technological change, leading to a growing gap between regulation and reality. At the same time, developing countries fear that universal regimes could institutionalise their technological inferiority, while developed countries strive to maintain their competitive advantage. This imbalance reduces incentives to maintain universal mechanisms in developing countries.

A third factor has been the loss of trust. Perhaps the most decisive factor has been the erosion of trust in the binding nature of commitments. The demise of the

INF Treaty (Pompeo, 2019) and the US rejection of the Kyoto Protocol (U.S. Statement on Climate Change to OSCE, 2001) demonstrated that even leading powers no longer view universal agreements as sacrosanct. For developing states, universal regimes often appear unfairly burdensome, while for developed states, they offer no guarantee of strategic benefits. This dual crisis, “from above and below”, undermines predictability as a key function of international law, replacing it with selective participation and pragmatic calculation.

The crisis of the universal contractual system is a manifestation of a broader trend where global mechanisms give way to more fragmented, but at the same time adaptive, forms of regulation. New universal initiatives of international law emerged as a response to the crisis of the classical treaty system, which revealed its vulnerability. The traditional model of universalism was based on the assumption that states are ready to conclude rigidly institutionalised agreements with clearly defined obligations and control mechanisms.

The Paris Agreement (2015) became a kind of symbol of the transition from classical to flexible universalism. Unlike the Kyoto Protocol to the United Nations... (1997), which established strict emission reduction quotas for certain groups of states, the new treaty is based on a system of voluntary nationally determined contributions. This approach is due to the recognition of the fact that in modern conditions it is almost impossible to impose universal and equal obligations for all states. The flexibility of the Paris Agreement was that it created a framework for global cooperation but left considerable room for states to independently determine the pace and scope of action. This reflects an awareness of the structural asymmetry of the international system: developed, and developing countries are in fundamentally different conditions regarding resources, technology and economic sustainability. The introduction of a voluntary mechanism allowed to attract almost all the states of the world, which was not achieved in previous universal environmental agreements. At the same time, the flexible universalism of the Paris Agreement demonstrates an important innovation in the very understanding of international law. It is no longer focused on enforcing rules, but relies on a combination of reputational pressure, mutual reporting and political motivation of states. Universalism ceases to be a static set of norms and turns into a process of constant renewal of obligations that evolve in response to changes in the global context. Such a model reflects a tendency to increase the role of “soft law” and to hybridise legal mechanisms, when rigid legal obligations are replaced by more flexible framework arrangements. This allows the universal level to remain relevant, but at the cost of weakening legal obligation. However, analysis of the Paris Agreement reveals problematic aspects of flexible universalism. On the one hand, it really provides almost universal participation, but on the other hand, it creates a risk of minimalism of obligations when states declare measures that do not correspond to the scale of a

global problem. The mechanism of voluntary contributions does not guarantee a cumulative result, since there are no effective tools for coercion or sanctions.

At the same time, the evolving global climate agenda has revealed an intensifying competition of regulatory paradigms among leading world actors. China, as the largest emitter of greenhouse gases, increasingly positions itself as a norm-setter in the sphere of sustainable development, linking ecological modernisation with its broader economic and technological expansion. Its model emphasises state-led planning, gradual decarbonisation, and the export of environmental standards through investment and infrastructure projects. The European Union, by contrast, seeks to institutionalise climate leadership through market mechanisms and rule-based governance, integrating environmental criteria into trade policy, taxation, and industrial regulation. This approach extends the logic of conditionality beyond the Union's borders, turning access to the European market into a tool of ecological influence. Russia finds itself in a more ambivalent position. Having long relied on fossil fuel exports, it perceives external environmental regulation as a potential constraint on national sovereignty and economic security. Consequently, Moscow promotes the idea of energy transition on its own terms, focusing on technological adaptation and regional cooperation rather than adherence to externally imposed standards. In this context, the interactions between the EU, China, and Russia reflect not merely ecological policies but deeper struggles over the rules and values that define the future global economic order. This calls into question the effectiveness of the universal level as such, it retains symbolic legitimacy, but the practical results depend on the political will of individual states and regional blocs. Flexible universalism appears not so much as a final solution to the crisis of universal contracts, but as an attempt to adapt to new conditions, which partially overcomes the issue of involvement, but does not solve the issue of ensuring efficiency.

Similar trends are emerging in the field of cybersecurity, which has become one of the newest platforms for universal initiatives under the auspices of the UN. Unlike environmental agreements, where experience has already been gained in implementing universal regimes, the digital sphere poses fundamentally new challenges. Cyberspace is simultaneously global and fragmented: governance models reflect competition between the US, China, Russia, and the EU. Under these conditions, the creation of a classic universal treaty seems virtually impossible. Instead, the UN is promoting hybrid formats of cooperation, such as non-binding political commitments to prevent attacks on critical infrastructure, limit cybercrime, and support trust mechanisms (Open-ended Working Group on Security, 2023).

These processes are built on an idea similar to the NDC (Nationally determined contribution) logic in climate policy: states retain sovereignty but accept minimum standards of behaviour. Notable initiatives include the Open-Ended Working Group (OEWG) on Responsible

State Behaviour in Cyberspace (OEWG 2021-2025), which discusses principles, confidence-building measures, and a mechanism for institutional dialogue. Furthermore, the OEWG report calls for the creation of a new permanent mechanism a Global Mechanism to further facilitate discussions on ICT (Information and Communication Technology) and security issues (Digital Watch Observatory). The advantage of this format is its inclusiveness and adaptability: even without strict compliance mechanisms, it serves as a basis for coordination. However, there are obvious limitations. First, voluntary commitments do not guarantee compliance, as there are no verification or sanctions mechanisms. Second, fundamental geopolitical differences persist: Western countries advocate the application of international law to cyberspace, while Russia and China emphasise digital sovereignty and non-interference. As a result, negotiating forums often become a forum for position-making rather than for developing binding norms. Another area of activity is capacity-building initiatives. For example, the International Multilateral Partnership Against Cyber Threats (IMPACT), supported by the ITU (International Telecommunication Union), focuses on technical support, training, and strengthening infrastructure in less developed countries (Resolution of the Plenipotentiary Conference..., 2022). While its activities do not aim to create binding norms, they illustrate that universalism in cyberspace extends beyond norms and embraces practical cooperation. However, the effectiveness of such initiatives is limited: they fail to resolve structural contradictions between states and do not create legally binding regimes. UN cyber initiatives demonstrate the potential of universalism, but also its limits. They provide a minimal level of coordination, but are unable to overcome technological asymmetries and strategic mistrust among key players. Universalism in cybersecurity remains fragile and depends more on the political will of great powers than on the legal force of instruments.

The analysis showed that universalism in the field of cybersecurity is forced to transform under the influence of a combination of structural and procedural constraints. In the classical view, the universal regime assumed the presence of clear, formally mandatory norms, verification mechanisms and sanctions for non-compliance. In the cyber sector, these elements have proved practically unsuitable: the technical nature of threats makes reliable and transparent verification impossible, and the high speed of technological change makes long negotiation cycles ineffective. The transformation of universalism affects the process of multi-stakeholder engagement. In the cyber sphere, private corporations, infrastructure providers and technical standard-forming bodies play an important role. This involvement changes the nature of the universal order: norms are formed not only between states, but also in cooperation with non-public actors, so the legitimacy and effectiveness of rules depends on the ability of such rules to combine state interests with the possibility of practical implementation in technical infrastructure. Such

multidimensionality enhances flexibility, but at the same time complicates the certainty of rules and blurs the responsibility for their implementation. Another significant consequence is the change in the distribution of the centre of gravity of rule-making. Where the universal level shows weakness in enforcement, regional, subregional and bilateral formats are formed that provide a faster response and control mechanisms based on a greater degree of trust or overlap in the interests of participants. Regional agreements provide detailed technical standards and clearer procedures of mutual assistance. Their effectiveness stems from the consideration of regional infrastructures, legal frameworks and prevailing political conditions. Such diversification violates unitarily of universalism, but increases operational efficiency in individual contexts. At the same time, it is critically significant to realise that changing the form of universalism does not mean its complete marginalisation. Framework universal norms play the role of benchmarks for rule-making at other levels and form general expectations of acceptable behaviour.

Regionalisation of legal norms under conditions of multipolar competition

The development of international law in the 21st century (2010-2025 years) is increasingly determined by the dynamics of regionalisation. While in the second half of the 20th century (1950-2000 years) the paradigm of universalism dominated, which was reflected in the creation of numerous global treaties and institutions under the auspices of the UN, at the present stage the role of regional agreements and mechanisms that form the complex architecture of “legal multipolarity” is growing. This phenomenon is not a consequence of the simple disintegration of universal regimes, but rather indicates a structural transformation of international normative, where regional formats become key laboratories of legal innovation, from which the universal system often borrows new approaches. The growing influence of regional agreements also has conceptual implications for international law. The traditional view of universality as the highest form of normative legitimacy is gradually being revised. In practice, regional mechanisms, such as the European Union or ASEAN (Association of SouthEast Asian Nations), have proven more effective, as they provide effective tools for monitoring, enforcement and policy coordination. Their effectiveness is measured by the ability to make timely decisions, the level of implementation of commitments by member states and the presence of concrete implementation mechanisms, which allow for practical results that remain problematic in global structures (Olatunji, 2023). For example, the Paris Agreement (2015) provides for a universal framework, but its implementation largely depends on regional or national strategies, such as the European Green Deal (2019).

The phenomenon of legal multipolarity is also manifested in the growing number of alternative models for regulating the same areas. In the field of digital policy, the EU promotes the concept of strict regulation of platforms and

data protection (Regulation (EU) 2016/679..., 2016), while the US adheres to a more liberal, market-oriented paradigm (Protecting Consumer Privacy..., 2012). China, in turn, is developing a regulatory framework that combines digital control and the priority of state security (Cybersecurity Law..., 2016). These approaches do not amount to universal consensus, but instead reflect different civilisational and political logics. As a result, international law increasingly functions not as a single system, but as a space of interaction between different legal centres between which states manoeuvre, sometimes using regional standards as levers in global negotiations.

Multipolarity in the field of human rights makes it impossible to have a single universal standard, but instead creates a complex pluralism in which coexistence and competition interact simultaneously. The current dynamics of the development of international law demonstrate that the growing influence of regional agreements and the formation of legal multipolarity are not a sign of the degradation of the international system, but of its structural transformation. Regionalisation creates a multi-level architecture in which the universal and the regional coexist in a complementary manner, although this interaction is often accompanied by competition and legal tension. For states, this situation means the need for strategic choices: in which areas to focus on universal principles, and where to rely on regional standards.

Regionalism in modern international law appears not only as a tool for adapting legal norms to local conditions, but also as a complex challenge to universal regimes that have traditionally been considered the basis of global law and order. One of the key aspects of this problem is that regional agreements are increasingly moving beyond subsidiary instruments and are beginning to compete with universal treaties. Universal norms are usually more general in nature, which allows a wide range of states to be involved, but at the same time reduces the degree of their detail and effectiveness. Instead, regional mechanisms create more specific standards and procedures that reflect local political, cultural and economic realities. This situation leads to hierarchical uncertainty: formally, international law does not establish a clear priority for universal or regional norms, so the resolution of conflicts depends on the specific context and interpretations. The contrast between the Euro-Atlantic and Eurasian approaches makes this dynamic particularly evident. The United States and the European Union rely on rule-based universalism, advocating the primacy of international institutions such as the UN, WTO (World Trade Organisation), and promoting legal frameworks grounded in liberal values and individual rights. In contrast, Russia and China view such frameworks as instruments of Western dominance and emphasise the principle of sovereign equality and non-interference. For Moscow, this is reflected in the concept of a “multipolar legal order,” where regional institutions like the Eurasian Economic Union act as normative counterweights to Western-led regimes. Beijing, meanwhile, advances its own model of legal regionalism

through Belt and Road mechanisms (The Belt and Road Initiative..., 2023), proposing consensus-based norms that prioritise stability and state-led development over universal obligations. Analysis of these processes shows that regionalism turns into a challenge to universalism not only because of potential contradictions of norms, but also because of a change in the very understanding of legitimacy. States participating in regional agreements perceive them as more “their own,” since they take into account local specifics and are formed with the active participation of those who are directly interested in their implementation (Marotti, 2022). This creates an effect of increased confidence in regional norms, and at the same time undermines the status of universal mechanisms as final arbitrators. When the state faces a contradiction between universal and regional norms, in practice it often leans in favour of the latter, since they seem more relevant and equipped with effective institutional mechanisms.

The human rights comparison is particularly revealing. Universal documents such as the International Covenant on Civil and Political Rights (1966) form basic principles, but regional systems such as the European Convention for the Protection of Human Rights... (1950) set higher standards and create judicial institutions capable of enforcing decisions. This suggests that regionalism not only duplicates universal mechanisms, but actually increases their effectiveness, creating a “superstructure” over general norms. At the same time, such asymmetry creates inequalities in access to protection of rights depending on the region, which calls into question the principle of universality of international law. Regionalism at the same time strengthens the practical implementation of norms and demonstrates the limits of universalism, which is unable to provide the same level of guarantees in all parts of the world. In this context, the relationship between universal and regional regimes is particularly complex. Regionalism at the same time performs an auxiliary function, detailing universal standards and increasing the level of their implementation, and forms autonomous systems with its own normative logic. Such duality is manifested in the fact that, on the one hand, regional mechanisms provide a deeper adaptation of norms to specific cultural, historical and political contexts, and on the other – create conditions for fragmentation of international law. Universalism is based on the idea of unity and equality of legal approaches, while regionalism actually legitimise the plurality of decisions and standards (Marotti, 2022). This leads to an increase in the risk of imbalance of the system of international law, within which norms are increasingly crystallised in regional forms that are not always consistent with each other.

This divergence becomes most visible when comparing Euro-Atlantic and Eurasian legal paradigms. While the EU and the US promote a rights-based approach centred on individual freedoms and judicial accountability, Russia and China advocate sovereignty-oriented models that prioritise state security and social stability over liberal rights. In these systems, human rights are often interpreted through

the lens of national interest and collective order, rather than universal moral imperatives. The European Court of Human Rights has consistently advanced doctrines of proportionality and effective remedy, ensuring that individual rights prevail even over state prerogatives. By contrast, Russia’s 2020 constitutional amendments, which gave national law precedence over international rulings, and China’s emphasis on “developmental human rights,” reflect an opposing logic one in which state sovereignty serves as the ultimate guarantor of legitimacy. In China’s “community of shared destiny” narrative, rights are framed as contingent upon collective harmony and economic stability, while in Russian legal discourse, the concept of “traditional values” is invoked to justify normative divergence from Western liberalism (Mälksoo, 2021). Such divergence institutionalises competing legal philosophies, reinforcing the regionalisation of international law and eroding the common normative foundation that universalism presupposes. As a result, the Euro-Atlantic and Eurasian blocs increasingly function as distinct normative poles, each exporting its own legal standards through trade agreements, development assistance, and multilateral diplomacy thereby transforming international law into a field of geopolitical contestation rather than convergence.

In the minds of growing multipolarity, the problem of a collision of norms will intensify. Between bipolar and unipolar systems, the current order does not allow a single centre of power to ensure convenience. Universal regimes are no longer perceived as an insane priority: their importance lies in the readiness of leading powers to recognise them as legitimate. Within the hierarchy of norms, the principle of multiple legitimacy is formed, which creates the basis for the selective stagnation of law (Kreuder-Sonnen & Zürn, 2020). This supports the idea of universalism as a system of universal rules and reinforces the importance of regionalism. Regional formats demonstrate different implementation mechanisms and avoid the institutional inertia of global structures.

The idea of global legal pluralism increasingly characterises the contemporary state of international law (Hakimi, 2020). Instead of a single hierarchical structure built around universal treaties and organisations, the system is represented by a mosaic of regional, sectoral and bilateral regimes. These regimes coexist, sometimes compete, and sometimes overlap, forming a complex network rather than a pyramid. The decline of the rigid centrality of the UN or WTO illustrates this shift: their authority is measured not by universalism itself, but by their ability to coordinate with other levels of governance. From this perspective, regionalisation should not be seen as fragmentation or collapse, but as part of a broader trend toward pluralism in global law. In a multipolar world, international law is increasingly produced through multiple centres and formats, reflecting diversity of interests and asymmetry of power. The key challenge becomes not the preservation of hierarchy, but the creation of mechanisms of coordination and harmonisation among legal regimes. Legal pluralism reflects

the structural transformation of international law: it is no longer universalist in form, but adaptive and multilayered in practice. This model provides flexibility in addressing new issues such as cybersecurity or biosecurity, but also carries risks of fragmentation and inequality. The balance between flexibility and stability will determine whether pluralism evolves into a coherent paradigm or turns into disordered fragmentation.

To more clearly reflect these trends, Table 1 summarises the key characteristics of universal and regional

approaches in international law and their contribution to the formation of a pluralistic system. The table allows comparing the functional advantages, limitations, and interaction of different regimes, demonstrating how universal norms and regional standards can coexist, complement each other and at the same time create potential conflicts. This clearly emphasises that legal pluralism is not only a conceptual model, but also a practical tool that reflects the complexity of the modern multipolar international system.

Table 1. Prospects for legal pluralism in a multipolar world

Aspect	Universalism (classical model)	Regionalism (modern trend)	Implications for international law	Application areas
Normative framework	Single universal treaties (United Nations Convention on the Law of the Sea – UNCLOS), Kyoto Protocol)	Multiple regional agreements adapted to the specifics of the region	The rise of regional agreements leads to normative fragmentation, yet enhances effectiveness in addressing region-specific issues	Maritime law (UNCLOS), global environmental governance (Kyoto Protocol, Paris Agreement)
Institutions	UN and universal conferences	Regional organisations	The global institutional landscape is increasingly characterised by overlapping and functionally specialised organisations operating at both universal and regional levels, often without clear hierarchical coordination	UN institutions (e.g. ICJ – International Court of Justice), vs. EU Court, ASEAN bodies
Coercive mechanisms	UN Security Council, international courts	Regional courts, sanction mechanisms, local arbitration	Jurisdictional competition, blurred priorities	Peacekeeping (UN vs African Union), trade dispute resolution (WTO vs USMCA panels)
The role of great powers	Determinant in shaping global rules	Balance of influence in regions where key actors dominate on a smaller scale	Resilience depends on local balances of power	U.S. role in global treaties vs. China in SCO or Belt & Road norms
Regime flexibility	Limited by consensus	Higher due to regional commonality	Regional models adapt faster to new challenges	EU regulatory responses, ASEAN's non-binding but quick instruments
Development prospects	Universalism weakens under the pressure of geopolitics	Regionalism strengthens, forming a network of legal order	The formation of “legal pluralism” as a new norm	Multipolar legal governance; hybrid legal systems

Note: USMCA – United States-Mexico-Canada Agreement, SCO – Shanghai Cooperation Organisation

Source: created by the author based on the United Nations Convention on the Law of the Sea (1982), Kyoto Protocol to the United Nations... (1997), Paris Agreement (2015), F. Zhang (2023), P. Li (2023)

The results presented in Table 1 allow for an analytical assessment of the prospects for legal pluralism in a multipolar world. A pluralistic system can provide greater flexibility in responding to new challenges, particularly in the areas of technology, cybersecurity, and environmental protection, where universal treaties fail to keep pace with rapid changes. It also follows that the coexistence of universal and regional regimes creates the opportunity for a more differentiated consideration of the specificities of individual states and regions, which increases the practical effectiveness of norms and allows for the adaptation of global standards to local conditions. At the same time, the growing divergence between the regulatory models of the US, EU, Russia, and China reveals a profound structural rift in the global legal order. The inability of these blocs to agree on

universal standards from digital governance to environmental regulation is transforming international law into a mosaic of overlapping regional systems. As a result, regional legal spaces increasingly function as autonomous systems rather than as components of a unified global order. This dynamic exacerbates the fragmentation of norm-setting processes, with transatlantic and Eurasian centres of power seeking to export their own regulatory logic to dependent or partner states. Analysis of the table reveals serious risks: without mechanisms for coordination and inter-mode dialogue, pluralism can degenerate into fragmentation, weakening the primacy and predictability of international law. In this sense, the rivalry between these normative poles shapes legal pluralism not simply as a technical result of global diversity, but as a reflection of strategic competition

for rule-making authority. The success of this concept depends on the ability of states and international organisations to develop rules of interaction, prioritise norms, and avoid conflicts between different levels of legal regulation. Overall, legal pluralism in a multipolar world has the potential to become an effective paradigm combining universal values with regional adaptability; however, its implementation will require systemic instruments for coordination and ongoing monitoring of conflicts between regimes.

The rapid growth of the role of regional agreements and the formation of various regional standards in the modern multipolar world creates new challenges for the classical model of universalism of international law. The emergence

of regional platforms, flexible multilateral initiatives and localised legal mechanisms demonstrates that universal treaties can no longer always provide the necessary efficiency and adaptability in response to technological, environmental or security transformations. In such circumstances, the development of international law can take place under different scenarios, involving different interaction of universal and regional regimes. These possible trajectories are demonstrated in Table 2, which structurally reflects three main scenarios: the restoration of universalism, pluralistic coexistence and the dominance of regionalism, providing an analytical basis for assessing the potential future of the international legal order.

Table 2. Future scenarios of the relationship between universalism and regionalism

Aspect	Scenario 1: Restoration of universalism	Scenario 2: Pluralistic coexistence	Scenario 3: Dominance of regionalism
Character of the international system	Attempt to restore a centralised, coordinated system of norms; global treaties take precedence	The international system ceases to be a single hierarchy, but its parts are linked together through common principles and minimal coordination mechanisms, which prevents it from completely disintegrating	Proliferation of regional agreements and standards; universal mechanisms are losing influence
Role of States	States actively support universal mechanisms, recognise their priority	States selectively interact with universal and regional regimes	States focus on regional and bilateral agreements, universal treaties are ignored
Priority of norms	Universal norms dominate, regional ones adapt	Priority depends on context and regulatory scope	Priority belongs to regional norms, universal frameworks play a supporting role
Coordination mechanisms	Central authority or international institution ensures coherence	Network ties and “soft law” facilitate coordination	Minimal coordination mechanisms; competition of regimes
Advantages	Unity of norms*, predictability, global legitimacy	Flexibility, adaptability, consideration of local specificities	High adaptability to regional needs, rapid response to local challenges
Risks	Ignoring regional specificities, difficulty in adapting to new areas	Conflicts between regimes, risk of legal fragmentation	Decentralisation can lead to chaotic fragmentation and weakening of the legitimacy of international law
Examples of agreements	Paris Climate Agreement; International Criminal Court (ICC); UNCLOS	Association Agreement between the EU and Mercosur	EU legal system: Treaty of Lisbon...; USMCA

Note: *by “unity of norms” mean a return to a state where global treaties and institutions are the centre of the international system, and regional mechanisms merely complement them, but do not compete with or replace them. For example, the Kyoto Protocol to the United Nations... (1997), The Intermediate-Range Nuclear Forces Treaty (Treaty on elimination..., 1987) discussed in the study

Source: created by the author based on the United Nations Convention on the Law of the Sea (1982), Kyoto Protocol to the United Nations... (1997), Agreement on the Privileges... (2002), Treaty of Lisbon... (2007), Paris Agreement (2015), United States-Mexico-Canada Agreement (2020), Association Agreement between the EU and Mercosur (2024)

Analysis of the table shows that the future of international law in a multipolar world can develop along several fundamentally different trajectories, each of which has its own advantages and risks. The universalism recovery scenario involves attempts to centrally coordinate norms and restore comprehensive global treaties. It provides a high level of predictability and consistency of international law, but in the face of rapid technological change and political multipolarity, it risks remaining non-operational and unsuitable for adaptation. The scenario of mosaic coexistence demonstrates a balance between universal

principles and regional flexibility, allowing to take into account the specifics of individual regions and respond quickly to new challenges. In this case, international law becomes more adaptive, but requires effective coordination mechanisms to avoid conflicts between different regimes and ensure the legitimacy of norms. The scenario of dominance of regionalism emphasises the autonomy of regional agreements and multilateral platforms, which increases efficiency and allows taking into account local features, but at the same time weakens the role of universal standards. It undermines the predictability and

overall integrity of international law. The growing divergence between the transatlantic bloc (the United States and the European Union) and the Eurasian powers (Russia and China) further reinforces this trend. The inability of these major actors to agree on shared regulatory or environmental standards accelerates the fragmentation of global governance. As a result, regional legal regimes increasingly become instruments of geopolitical competition rather than elements of a coherent international order. General analysis shows that no scenario is optimal in its pure form: the effective future of international law involves the integration of universal values and regional adaptability, where a pluralistic structure combines stability and flexibility, and inter-regime dialogue and coordination become key mechanisms for maintaining the legitimacy and functionality of the system.

Regionalisation of international law is one of the key trends in the modern stage of development of the global legal system. It reflects the deeper processes of political and economic multipolarity, leading to a gradual shift from the idea of a universal unified order to a multi-level system of legal regimes. This process is not reduced to simple fragmentation: regionalisation forms a new model of interaction, where universal norms coexist and intertwine with regional standards, creating a complex but more adaptive architecture. Trend analysis shows that regionalisation has a dual nature. On the one hand, it strengthens the effectiveness of international law by bringing norms closer to the specifics of local contexts, expanding opportunities for law-making innovations and creating conditions for faster response to new challenges. On the other hand, it produces risks of normative asymmetry and undermines the principle of universality, which calls into question the ability of international law to perform an integration function on a global scale. An important consequence of regionalisation is the formation of global legal pluralism, within which there is no single centre of legitimacy. Instead, stability is provided by a network of interconnected but autonomous modes. This pluralism can become both a source of flexibility and pluralism, and a factor of political manipulation, when strong states use the competition of regimes to advance their own interests. In general, the regionalisation of international law is not a deviation from the universalist tradition, but a new phase of its evolution. It reflects the adaptation of the global legal system to the conditions of a polycentric world, where the balance between universal values and regional specificity becomes the main challenge for further development.

DISCUSSION

The obtained results testify to the complex interaction of universal and regional norms in international law, which is determined by historical traditions, political priorities and legal strategic approaches of individual states. In the global context, universal norms continue to be the general basis of international law and order, while regional mechanisms function as platforms for testing new legal solutions and

adapting global standards to local conditions. Such interaction creates a dynamic model of international law, where universalism and regionalism do not contradict each other, but complement each other, increasing the practical effectiveness and legitimacy of norms. At the same time, it is noted that regional initiatives are able to form peculiar normative spaces that are partially autonomous from the global system, which emphasises the need for an integration approach in the formation of international legal standards. The findings demonstrate the relevance of further study of the mechanisms of interaction between universal and regional norms. They also highlight the need for a systematic analysis of the potential of regionalisation as a tool for strengthening international law and order in a multipolar world.

In the writings of O.A. Olatunji (2023) and A. Vetterlein & T. Schmidtke (2025), which analysed regional mechanisms for regulating international law, notes that regional agreements create opportunities for adapting universal standards to local conditions and at the same time form the basis for further integration into the global legal system. A. Vetterlein & T. Schmidtke considers regional agreements as a tool for testing new legal solutions, while O.A. Olatunji emphasises their role in the gradual harmonisation of norms with international law. These findings are partly consistent with the results of the study, which identified the potential of regional mechanisms as laboratories of new legal practices. However, unlike the position of the authors, the results of this study show that regional initiatives not only contribute to integration into the global system, but are also able to independently act as stable elements of a multipolar international law and order. They form local legal spaces with their own legitimacy. study show that regional initiatives not only contribute to integration into the global system, but are also able to independently act as stable elements of a multipolar international law and order, establishing local legal spaces with their own legitimacy. The reason for the disagreement lies in the broader focus of study, which includes political, economic and strategic aspects of the functioning of regionalism in modern international law.

In the writings of L. Kulaga & K. Turnbull (2024) and J. Hall & L. Koen (2024) noted that the development of regional law in the areas of investment and ecology creates tension with universal norms, while contributing to the renewal of the global contractual system. The results of this study are consistent with this approach: stress does exist, but it has a constructive character. At the same time, this study differs from the conclusions of J. Hall & L. Koen in that it shows the important role of the geopolitical context of regions in determining how much this tension is transformed into positive changes. The authors focus more on the normative dimension of the development of law.

The study found that multi-vector regional mechanisms can act as stable elements of a multipolar international order, and not just a preparatory stage for global integration, which expands the understanding of the

functional role of regionalism in modern law. Regional systems are able to support universalism, but at the same time form a multi-vector of legal practices, which sometimes slows down global unification. These conclusions partially coincide with the results of the study of E. Marat & L.A. McCarthy (2020), who examined the interaction of regional and universal norms in international law. The authors analysed the concept of Eurasian international law, where regional norms create an autonomous level of legal regulation that coexists with universal standards.

Approaches A. Van Engeland (2022) and G. García Escobar (2023) to universalism and regionalisation of international law demonstrate different accents in the interpretation of the relationship between global and local norms. A. Van Engeland emphasised that universalism has always been ideologically loaded and needed constant adaptation, and regionalisation is a natural reaction to the uneven distribution of power in the world system. G. García Escobar, on the contrary, emphasised the critical role of universal mechanisms, especially in the field of human rights, regardless of regional variations. The analysis of this study confirms the thesis A. Van Engeland on the need for flexible norm testing in a regional context, but demonstrates that the pessimistic predictions of G. García Escobar regarding the risk of weakening universal standards is not always justified. The results show that even in the field of human rights, regional practices can strengthen universal principles, creating additional mechanisms for control and adaptation. The discrepancies in the conclusions of the authors can be explained by the difference between the theoretical assessment of the role of universalism and the practical influence of regional initiatives on its implementation. This suggests that regionalisation is not necessarily a threat to universalism, but may be its complement and laboratory for innovative legal solutions.

In the studies of M.A. Sanchez (2023) and M. Gutierrez (2025) showed that regional judicial institutions, in particular in Africa and Latin America, do not undermine global law and order, but form an additional level of protection. The data of the conducted study confirm this thesis, since the analysis of regional legal mechanisms showed that local judicial practices can enhance the effectiveness of rule-making due to closer binding to the social and political context of the region. However, unlike the findings of M.A. Sanchez and M. Gutierrez, this study demonstrates that the effectiveness of regional institutions is often selective and largely depends on the geopolitical weight and economic potential of the region. This suggests that regionalisation does not always provide uniform support for global standards and can simultaneously strengthen some aspects of universalism, leaving others less regulated. Such a conclusion expands the arguments of previous authors, pointing to the complex interaction between global and local legal levels, which requires more flexible approaches to integrating regional decisions into the international system.

C. Efstathiopoulos (2021) and T. Berringer & M.D. Ferreira (2022) sees regionalisation as a manifestation of the

“Global South” opposing Western dominance in international law, emphasising its function as a tool of post-colonial resistance. The analysis partially confirms this thesis, because some regional initiatives really act as a way of defending autonomy in a multipolar environment. At the same time, the results of the study point to an additional aspect: regionalisation can serve as a channel for integrating new legal concepts into the global law and order, and not just as a means of resistance. This demonstrates that local legal practices are capable of performing dual functions – at the same time forming independent regional mechanisms and stimulating the adaptation of universal norms. This approach expands the authors’ argument, showing that regionalisation can be both an act of strategic autonomy and a laboratory for testing legal decisions before they are integrated globally.

In the writings of K. Von Benda-Beckmann & B. Turner (2020) and A. Acharya *et al.* (2023) noted that globalisation is accompanied by the emergence of multiple centres of law-making, transforming the traditional understanding of universalism. The authors point out that universal norms can no longer be considered as a monopoly property of international law, but act as a result of multi-level communication and interaction between different actors. The results of this study are consistent with this thesis: regional initiatives demonstrate the ability to establish new legal solutions that, through horizontal interaction, are gradually integrated into the global system. However, unlike K. Von Benda-Beckmann & B. Turner and A. Acharya *et al.*, findings emphasise that this process is not always linear and depends on the geopolitical weight of the region. It also depends on the willingness of global institutions to adapt innovations. Regionalisation is not only a laboratory of new norms, but also a factor in the multi-vector development of universal law, which expands the arguments of previous authors. F.L. Bordin & J. Odermatt (2024) in the study analysed the competition between regional and global norms, which creates space for flexible adaptation of international law. The study confirms this thesis, demonstrating that regionalisation does not destroy universalism, but changes its functions in accordance with the local context. At the same time, the results differ from the conclusions of the authors mentioned above: in this study, they found that the positive potential of this competition prevails over the risks of conflict, while the authors focus more on possible contradictions between the levels of norms.

The analysis of T.H. Morrison *et al.* (2023) emphasises the growing polycentricity of the international order, where regional practices act as “bridges” between the local and the global. These results are consistent with this thesis: multipolarity does not destroy universalism, but contributes to its renewal through horizontal networks of interaction. At the same time, the difference is that this study demonstrates the dependence of the effectiveness of such “bridges” on the readiness of global institutions to accept innovations and on the geopolitical weight of regions. T.C. Halliday (2023) and R.Y. Jennings (2024) emphasise mainly on structural

changes in the system. However, this entails the risk of double standards, which T.C. Halliday notes. The author highlighted the risks of double standards in the field of human rights arising from regionalisation. The results of this study partly confirm these caveats, but show that regional mechanisms are often the first channels for the introduction of new norms that later gain global acceptance. The difference with the studies of R.Y. Jennings lies in the focus: they concentrate more on potential negative consequences, while the study emphasises the positive role of regionalisation in strengthening universal standards in the long term.

The results of the study show that the process of regionalisation in international law does not necessarily contradict universalism, but can act as its complement and stage of updating the global system. Regular testing of new legal norms within regional initiatives makes it possible to more effectively adapt universal standards to specific political, cultural and economic conditions. Although regional mechanisms function autonomously, they are able to gradually integrate innovative solutions into the global law and order, while maintaining the principle of universalism as a normative basis. The study demonstrates that the multipolarity of the world creates space for the interaction of regional and global norms, and their complementarity, which contributes to the stability of international law and its effectiveness. At the same time, there are risks of fragmentation that arise from differences in the political and legal traditions of the regions, but they do not reduce the potential of regional systems as tools for innovation and testing of new norms. The results also emphasise that the active use of regional platforms allows states to more effectively influence the formation of global rules, while ensuring the adaptation of universal standards to local realities. This approach contributes to the development of a multi-level model of international law, where universalism and regionalism do not compete, but complement each other. In particular, regional initiatives serve as platforms for testing new legal solutions that can later be applied on a global scale, increasing their legitimacy and practical effectiveness. These findings underline the importance of a strategic combination of global and regional approaches to strengthen the international legal order and adapt it to the multipolar conditions of the modern world.

CONCLUSIONS

The analysis revealed that international law has entered a phase of transformation, characterised by the loss of stability of the universal treaty system and the strengthening of regional regulatory formats. Universal treaties have demonstrated a limited ability to adapt to new conditions, due to growing geopolitical rivalry, accelerated technological change, and weakening trust between leading actors. Under these conditions, universal mechanisms function primarily as coordination tools, ensuring a minimal level of consistency but lacking the previous degree of legal binding force. Regional initiatives are gaining increasing importance, enabling a more precise adaptation of norms to the political and institutional characteristics of individual spaces. Their advantage lies in greater practical effectiveness and the ability to detail rules, but this is accompanied by the risk of conflicts and increasing legal inequality between states not involved in regional associations. Modern international law increasingly functions on the principle of a pluralistic network, where interaction between universal and regional levels is based not on hierarchy, but on compatibility and the ability to coordinate. The prospects of this model are determined by how successfully the mechanisms for coordinating regimes and preventing fragmentation will develop, which will become a key condition for maintaining the stability of the international legal order. Further research should focus on a detailed study of inter-regime platforms, procedures for harmonising norms and mechanisms of “soft law”, as well as on the impact of technological innovations and regional conflicts on the formation of legal pluralism. This allows a deeper assessment of the prospects for the stable coexistence of universalism and regionalism in a multipolar world.

ACKNOWLEDGEMENTS

None.

FUNDING

None.

CONFLICT OF INTEREST

None.

REFERENCES

- [1] Acharya, A., Estevadeordal, A., & Goodman, L.W. (2023). Multipolar or multiplex? Interaction capacity, global cooperation and world order. *International Affairs*, 99(6), 2339-2365. doi: 10.1093/ia/iiaad242.
- [2] Agreement on the Privileges and Immunities of the International Criminal Court No. ICC-ASP/1/3. (2002, September). Retrieved from <https://surl.li/sogznd>.
- [3] Association Agreement between the EU and Mercosur. (2024, December). Retrieved from https://ec.europa.eu/commission/presscorner/detail/en/ip_24_6244.
- [4] Berger, T. (2020). The ‘Global South’ as a relational category – global hierarchies in the production of law and legal pluralism. *Third World Quarterly*, 42(9), 2001-2017. doi: 10.1080/01436597.2020.1827948.
- [5] Berringer, T., & Ferreira, M.D. (2022). Open-access power blocs and regional organisations in Latin America: A poulantzian perspective. *Revista Brasileira de Política Internacional*, 65(1). doi: 10.1590/0034-7329202200110.
- [6] Bordin, F.L., & Odermatt, J. (2024). International law of regional organisations: A comparative perspective. *International Organisations Law Review*, 21(1), 19-42. doi: 10.1163/15723747-21010002.

- [7] Cybersecurity Law of the People's Republic of China Order No. 53 of the President. (2016, November). Retrieved from <https://www.lawinfochina.com/Display.aspx?Id=22826&Lib=law&LookType=3>.
- [8] Dugard, J. (2023). The choice before us: International law or a 'rules-based international order'? *Leiden Journal of International Law*, 36(2), 223-232. doi: 10.1017/S0922156523000043.
- [9] Efstathopoulos, C. (2021). Southern middle powers and the liberal international order: The options for Brazil and South Africa. *International Journal*, 76(3), 384-403. doi: 10.1177/00207020211042915.
- [10] European Convention for the Protection of Human Rights and Fundamental Freedoms. (1950, November). Retrieved from https://www.echr.coe.int/documents/d/echr/convention_eng.
- [11] García Escobar, G. (2023). Norms versus interpretations: Human rights universality revisited. *Global Jurist*, 23(2), 183-205. doi: 10.1515/gj-2023-0001.
- [12] Geneva Convention relative to the protection of civilian persons in time of war. (1949, August). Retrieved from <https://treaties.un.org/pages/showdetails.aspx?objid=0800000280158b1a>.
- [13] Gutierrez, M. (2025). Inter-American human rights system and social change in Latin America. *Laws*, 14(2), article number 14. doi: 10.3390/laws14020014.
- [14] Hakimi, M. (2020). [The integrative effects of global legal pluralism](#). In P. Schiff Berman (Ed.), *The Oxford handbook on global legal pluralism* (pp. 557-574). Oxford: Oxford University Press.
- [15] Hall, J., & Koen, L. (2024). Taking stock of the scholarship on the relationship between international investment law and the need for raised climate ambition. *Climate Law*, 14(1), 95-125. doi: 10.1163/18786561-bja10049.
- [16] Halliday, T.C. (2023). Global legal change from below and above. *Journal of Law and Society*, 50(3), 295-321. doi: 10.1111/jols.12444.
- [17] Han, E., & Li, X. (2024). Erosion of international organisations' legitimacy under superpower rivalry: Evidence on the international court of justice. *Canadian Journal of Political Science*, 57(1), 21-42. doi: 10.1017/S000842392300063X.
- [18] Heller, K.J. (2024). The "great powers" and the formation of international law. *Chinese Journal of International Law*, 23(4), 637-687. doi: 10.1093/chinesejil/jmae038.
- [19] Hoffman, S.J., et al. (2022). International treaties have mostly failed to produce their intended effects. *Proceedings of the National Academy of Sciences of the United States of America*, 119(32), article number e2122854119. doi: 10.1073/pnas.2122854119.
- [20] International Covenant on Civil and Political Rights. (1966, December). Retrieved from <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>.
- [21] Jennings, R.Y. (2024). *The acquisition of territory in international law*. Manchester: Manchester University Press. doi: 10.7765/9781526183910.
- [22] Kim, R.E. (2020). Is global governance fragmented, polycentric, or complex? The state of the art of the network approach. *International Studies Review*, 22(4), 903-931. doi: 10.1093/isr/viz052.
- [23] Kreuder-Sonnen, C., & Zürn, M. (2020). After fragmentation: Norm collisions, interface conflicts, and conflict management. *Global Constitutionalism*, 9(2), 241-267. doi: 10.1017/S2045381719000315.
- [24] Kulaga, L., & Turnbull, K. (2024). Conflict of treaty norms and subsequent agreements in relation to the interpretation of treaties in international investment law. In P. Merkouris, A. Kulick, J.M. Álvarez-Zarate & M. Żenkiewicz (Eds.), *Custom and its interpretation in international investment law: The rules of interpretation of customary international law* (pp. 211-230). Cambridge: Cambridge University Press. doi: 10.1017/9781009255462.012.
- [25] Kyoto Protocol to the United Nations Framework Convention on Climate Change. (1997, December). Retrieved from https://treaties.un.org/pages/viewdetails.aspx?src=treaty&mtdsg_no=xxvii-7-a&chapter=27&clang=en.
- [26] Li, P. (2023). *Against multipolar imperialism: Toward socialist multipolarity*. Retrieved from <https://againstthecurrent.org/against-multipolar-imperialism-toward-socialist-multipolarity/>.
- [27] Mälksoo, L. (2021). International law and the 2020 amendments to the Russian constitution. *American Journal of International Law*, 115(1), 78-93. doi: 10.1017/ajil.2020.87.
- [28] Marat, E., & McCarthy, L.A. (2020). Justice, crime and citizenship in Eurasia: A socio-legal perspective. *Europe-Asia Studies*, 73(1), 1-7. doi: 10.1080/09668136.2020.1844964.
- [29] Marotti, L. (2022). [An unlikely duo? Regionalism and jus cogens in international law](#). *Göttingen Journal of International Law*, 12(1), 219-239.
- [30] Morrison, T.H., Bodin, Ö., Cumming, G.S., Lubell, M., Seppelt, R., Seppelt, T., & Weible, C.M. (2023). Building blocks of polycentric governance. *Policy Studies Journal*, 51(3), 475-499. doi: 10.1111/psj.12492.
- [31] Olatunji, O.A. (2023). Between regional recommendations and national implementation: An analysis of the east African community partner states' legislative responses to TRIPS obligations. *International Review of Intellectual Property and Competition Law*, 54, 673-709. doi: 10.1007/s40319-023-01318-7.
- [32] Open-ended Working Group on Security of and in the Use of Information and Communications Technologies 2021-2025 Established Pursuant to General Assembly Resolution 75/240. (2023, December). Retrieved from <https://digitallibrary.un.org/record/4031979?ln=en>.

- [33] Paris Agreement. (2015, December). Retrieved from https://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf.
- [34] Pompeo, M.R. (2019). *U.S. Withdrawal from the INF Treaty on August 2, 2019*. Retrieved from <https://2017-2021.state.gov/u-s-withdrawal-from-the-inf-treaty-on-august-2-2019/>.
- [35] Protecting Consumer Privacy in an Era of Rapid Change: Recommendations for Businesses and Policymakers. (2012, March). Retrieved from <https://www.ftc.gov/reports/protecting-consumer-privacy-era-rapid-change-recommendations-businesses-policymakers>.
- [36] Regulation (EU) 2016/679 of the European Parliament and of the Council “On the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data, and Repealing Directive 95/46/EC (General Data Protection Regulation)”. (2016, April). Retrieved from <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng>.
- [37] Resolution of the Plenipotentiary Conference of the International Telecommunication Union No. 71 “Strategic Plan for the Union for 2024-2027”. (2022). Retrieved from <https://www.itu.int/en/council/Documents/basic-texts-2023/RES-071-E.pdf>.
- [38] Rosengrün, S. (2022). Why AI is a threat to the rule of law. *Digital Society*, 1, article number 10. doi: 10.1007/s44206-022-00011-5.
- [39] Sanchez, M.A. (2023). The African court on human and peoples’ rights: Forging a jurisdictional frontier in post-colonial human rights. *International Journal of Law in Context*, 19(3), 352-366. doi: 10.1017/S1744552323000046.
- [40] The Belt and Road Initiative: A Key Pillar of the Global Community of Shared Future. (2023). Retrieved from <https://www.beltandroad.gov.hk/whitepaper.html>.
- [41] The European Green Deal. (2019). *Striving to be the first climate-neutral continent*. Retrieved from https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en.
- [42] Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community No. C 306/1. (2007, December). Retrieved from <https://eur-lex.europa.eu/eli/treaty/lis/sign/eng>.
- [43] Treaty on elimination of intermediate-range and shorter-range missiles-between USA and USSR (INF TREATY). (1987, December). Retrieved from https://media.nti.org/documents/inf_treaty.pdf.
- [44] Treaty on the Non-Proliferation of Nuclear Weapons No. INFCIRC/140. (1970, April). Retrieved from <https://www.iaea.org/sites/default/files/publications/documents/infcircs/1970/infcirc140.pdf>.
- [45] U.S. Statement on Climate Change to OSCE (EPF509 04/06/01). (2001, April). Retrieved from <https://usinfo.org/wf-archive/2001/010406/epf509.htm>.
- [46] United Nations Convention on the Law of the Sea. (1982, December). Retrieved from https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.
- [47] United States-Mexico-Canada Agreement. (2020, July). Retrieved from <https://ustr.gov/trade-agreements/free-trade-agreements/united-states-mexico-canada-agreement>.
- [48] Van Engeland, A. (2022). Human rights: Between universalism and relativism. In S. Sayapin, R. Atadjanov, U. Kadam, G. Kemp, N. Zambrana-Tévar & N. Quénivet (Eds.), *International conflict and security law* (pp. 93-113). The Hague: TMC Asser Press. doi: 10.1007/978-94-6265-515-7_5.
- [49] Vetterlein, A., & Schmidtke, T. (2025). Contextualising norms: International organisations and the creation of resilient policy norms. *Journal of International Relations and Development*, 28, 402-428. doi: 10.1057/s41268-025-00355-8.
- [50] Von Benda-Beckmann, K., & Turner, B. (2020). Anthropological roots of global legal pluralism. In P. Schiff Berman (Ed.), *The Oxford handbook of global legal pluralism* (pp. 66-141). doi: 10.1093/oxfordhb/9780197516744.013.18.
- [51] Weiffen, B., & Battistuzzi Penachioni, J. (2025). Interrogating transitional justice: The multiple meanings of a concept. *Societies*, 15(5), article number 123. doi: 10.3390/soc15050123.
- [52] Zhang, F. (2023). *Pluralism and world order: Theoretical perspectives and policy challenges*. London: Springer Nature. doi: 10.1007/978-981-19-9872-0.

Crisis leadership and the legitimacy of power in world politics

Rilinda Maqellara Memwti*¹ ¹Ministry of Justice, North Macedonia

Abstract. The aim of this research was to compare approaches to crisis management, communication strategies, engagement with the opposition, and the impact on the internal and international legitimacy of power. The methodology included a case study method, focusing on three cases: Ukraine (V. Zelensky during the full-scale war), New Zealand (J. Ardern during the COVID-19 pandemic), and Hungary (V. Orbán under conditions of energy crisis and Euroscepticism). A comparative analysis of the cases was conducted, alongside content and discourse analysis of official addresses, regulatory acts, sociological surveys, and media sources on the topic. The study found that an effective communication strategy is fundamental for consolidating society and increasing trust, as evidenced by the rise in trust in the President of Ukraine to 90% after the full-scale invasion of 2022 and the increase in trust in state institutions in New Zealand from 48% to 69% at the peak of the pandemic in 2020. These quantitative indicators illustrate the impact of leadership communication on public opinion. In contrast, polarising rhetoric, while sustaining the domestic electorate, complicates international legitimacy. In crisis conditions, effectiveness and adherence to security can temporarily outweigh procedural democratic aspects as a source of legitimacy. Ensuring national unity and engaging the opposition are key to strengthening legitimacy. It is concluded that leaders who employ transparent and empathetic communication and strive for national unity more successfully consolidate legitimacy, whereas populist approaches, while securing domestic support, lead to international tension and the risk of undermining democratic values, which is fundamental to understanding global political transformations and the challenges for democracy in the 21st century

Keywords: governance; full-scale war; pandemic; economic support; international cooperation; opposition

INTRODUCTION

The 21st century is characterised by a growing frequency of crises, presenting unprecedented challenges to national governments and international organisations. These crises span a wide spectrum – from armed conflicts and medical pandemics to economic shocks and energy instability. In a context of increasing geopolitical competition and a crisis in the liberal international order, as noted by S. Hellmüller & F. Badache (2025) in a special issue dedicated to United Nations (UN) peacekeeping operations, the issue of effective crisis leadership and ensuring the legitimacy of power becomes paramount. The authors call for a macro-level analysis of peacekeeping as a reflection of transformations in the global order, highlighting the structural constraints and opportunities of the UN in ensuring international security amidst growing competition between established and emerging centres of power. In light of this, the ability of political systems to maintain citizens' trust and support becomes fundamental to their stability and survival.

H. Keman (2025), analysing 36 democracies, concluded that a high level of institutionalised interaction between the authorities and society determines the stability of democracy and its legitimacy in the long term. This points to a profound interconnection between the functionality of state institutions, citizen trust, and stable legitimacy, which is particularly important during crises.

The problematic of the legitimacy of power acquires primary significance when traditional democratic norms and procedures may be temporarily altered or restricted under emergency conditions. A. Heck (2025), conducting a discourse analysis of debates in the Bundestag regarding arms supplies to Ukraine, demonstrated how the issue of legitimising military aid was tied to the identity of German foreign policy. The research illustrates that different political forces justified their positions through distinct temporal frameworks and national narratives, which, as argued by N.C. Crawford (2025), shape perceptions of legitimacy,

Suggested Citation:

Memwti, R.M. (2025). Crisis leadership and the legitimacy of power in world politics. *Journal of Global Political Transformations*, 1(1), 30-41. doi: 10.67524/verus1/1.2025.30.

*Corresponding author



accountability, and possibilities for action. This highlights that a crisis not only requires decisive actions but also reformats the discourse of legitimacy, forcing actors to appeal to different foundations to justify their decisions. L. Gongqing *et al.* (2025), analysing David Hume's critique of social contract theories, emphasise that political power stems not from a rational contract but from customs, historical practice, and the gradual development of institutions, and that legitimacy has emotional and cultural foundations. This approach gains significance in crisis periods, when rational arguments may give way to collective emotions and a desire for stability. W. Hatungimana (2025) investigated support for military rule in some African countries, showing that citizens, despite general support for democracy, sometimes lean towards military rule under conditions of corruption, lawlessness, or presidential ineffectiveness, with trust in the army being a key factor. This indicates that citizens may view military authority as a tool for restoring accountability, even if they formally reject abandoning the democratic system. Thus, legitimacy can be subject to re-evaluation depending on the authorities' ability to respond effectively to challenges and maintain trust.

The growth of global transactionalisation, discussed in the research by G. Ilik & A. Adamczuk (2025), limits the influence of traditional actors, such as the European Union (EU), which operate on the principle of *raison de valeur* – the promotion of values. Under these conditions, international organisations and their leaders also face legitimacy challenges. N.P. Adams (2025) proposed a new approach to defining the legitimacy of international institutions through their function, rather than solely the intentions of their founders or the positions of practitioners, applying causal analysis of the role of institutions within the context of the state system to maintain its stability. M. Westlake (2025), in a chapter exploring the interaction between elected leaders and the administrations of international and European organisations, particularly the tension that arises during reforms, demonstrated that administrations often seek to adapt to changes but simultaneously employ informal mechanisms to preserve their own prerogatives. The absence of a clearly established distribution of responsibilities makes the system vulnerable, and a more effective path would be to formalise “pacts” between leaders and administrations to prevent conflicts, which underscores the vulnerability of governance systems and the need to strengthen legitimacy through a clear delineation of responsibility. This imbalance of legitimacy can lead to politicisation and a rise in political dissensus, as shown by A. Capati & T. Christiansen (2025) using the example of the implementation of the recovery and resilience mechanism in Italy. In the context of global changes, where status symbols shape hierarchies and mechanisms of influence in international relations, as shown by P. Beaumont & P. Røren (2025), successful crisis leadership becomes not only a factor of internal stability but also a core element of international positioning and legitimacy. A leader's ability to respond effectively to challenges, consolidate the nation,

and convincingly communicate their actions influences international perception and the country's status. E. Rosi (2025) researched the interconnection between ideology and political power, showing how ideologies shape legitimisation narratives and influence the distribution of power. This means that crisis leaders, while forming their communicative strategies, are also actively engaged in constructing or reinterpreting the ideological foundations of legitimacy.

Despite a significant body of research in the field of crisis leadership and political legitimacy, there remains insufficient study of a comprehensive comparative analysis encompassing different types of crises (military, pandemic, economic/populist) and their multifaceted impact on legitimacy in national and international dimensions. This study aimed to compare strategies of crisis management, public communication, engagement with the opposition, and their impact on the legitimacy of power. The objectives of the study were: to analyse the application of crisis communications in different contexts and to compare approaches to interaction with the people and opposition forces.

MATERIALS AND METHODS

This study employed a comparative analysis of three cases of crisis leadership: Volodymyr Zelenskyy in Ukraine, Jacinda Ardern in New Zealand, and Viktor Orbán in Hungary. The analysis covered the period 2019-2025. The comparative method was applied to systematically juxtapose the approaches and outcomes in the selected cases. The comparison was conducted according to the following parameters: type of crisis, style and frequency of communication, level of centralisation of governance, nature of interaction with the opposition, policy measures, and indicators of legitimacy (levels of trust from public opinion polls, international support, external image of the state). The selection of cases was determined by their representativeness of different types of crises (military, pandemic, economic/populist) and their impact on internal and international legitimacy of authority.

For studying Volodymyr Zelenskyy's leadership in Ukraine during the period of full-scale war, beginning on 24 February 2022, the primary data sources were the official addresses and speeches of the President of Ukraine, including daily video addresses (Address of the President..., 2022; The President's address..., 2022; Address by President..., 2022). His social media activity was examined (Today I signed..., 2022; I had a very substantive conversation..., 2025). Speeches on international platforms, such as the World Economic Forum (2025) and media mentions from Forbes.ua (Davydenko & Nadelnyuk, 2023) were also considered. Additionally, normative-legal acts were analysed, such as: Decree of the President of Ukraine No. 64/2022 (2022), Decree of the President of Ukraine 478/2025 (2025) and Law of Ukraine No. 1706-VII (2025). Government decisions regarding support for the population and businesses were also studied (Temporary exemption from..., 2025). Data from national public opinion polls (Dynamics of trust..., 2025) and international

surveys (Saad, 2025) were utilised. Information concerning interaction with the opposition was also examined (The Fifth President..., 2021; Poroshenko called on..., 2025) along with reports from international organisations (OECD, 2025). The criteria for assessing legitimacy were: dynamics of trust from national polls, content of international reactions, nature of interaction with the opposition, and volume of external support.

For analysing Jacinda Ardern's crisis leadership in New Zealand during the COVID-19 pandemic, the primary data sources were her public addresses on social media (Have you downloaded..., 2022) and speeches on international platforms (New Zealand – Prime..., 2022). Normative-legal acts were examined, such as: Civil Defence Emergency Management Act 2002 No. 33 (2002) and COVID-19 Public Health Response Act 2020 No. 12 (2020). As well as strategic documents regulating the pandemic response (Ministerial Statement – COVID-19..., 2020). The national pandemic elimination strategy was also analysed (Elimination Strategy for..., 2020) along with the Managed Isolation and Quarantine (2023) policy. Furthermore, economic support programmes were studied (Wage Subsidy Integrity..., 2020; Small Business Cashflow..., 2024). Data from the Kiwis Count Survey (2025) and media source (Hills, 2025) were also taken into account. Legitimacy assessment was conducted based on indicators of public trust in the government, changes in public support for quarantine measures, and international evaluations of the effectiveness of the state's direct actions.

The case of Viktor Orbán's crisis leadership in Hungary under conditions of the energy crisis and Euroscepticism was analysed based on his official speeches (Speech by Prime Minister Viktor Orbán..., 2025; We feel for..., 2025). His social media publications were also examined (The era of emulating..., 2025). Government decisions and policies aimed at combating the energy crisis and protecting the population were considered, in particular the "utility cost reduction" policy (Brussels wants to..., 2025; Kovacs, 2025). International agreements (Hungarian foreign minister..., 2021) and data from opinion polls and media sources reflecting internal political dynamics and support ratings were also studied (A new constituency..., 2025). The legitimacy analysis included an assessment of domestic electoral support, reactions of European institutions, and specifics of employing populist rhetoric.

Furthermore, the work applied a set of qualitative methods. Content analysis was carried out by coding key themes, rhetorical constructs, and types of appeals in the public addresses and messages of the leaders. Codes included: appeals to unity, mobilisation messages, analytical-scientific arguments, emotional markers, appeals to external actors. Discourse analysis was aimed at identifying the ideological frames through which the legitimacy of authority was constructed, particularly through notions of threat, collective responsibility, solidarity, national exceptionalism, and opposition to external institutions.

RESULTS

Volodymyr Zelenskyy's leadership and national consolidation during war

Volodymyr Zelenskyy's leadership under the conditions of the full-scale invasion by the Russian Federation, which began in February 2022 (2022 – the beginning..., 2022), became a case that fundamentally altered the political image and perception of the president both domestically and on the international stage. This crisis, existential in nature, required an immediate and resolute response, mobilisation of the entire society, and consolidation of efforts among international partners. From the first hours of the invasion, Volodymyr Zelenskyy adopted a strategy of direct, open, and regular communication. His daily video addresses, recorded from the Office of the President or other locations in Kyiv, became a symbol of resilience and a manifestation of a confident leader of the Ukrainian people (Address of the President..., 2022; The President's address..., 2022; Address by President..., 2022). According to Forbes (Davydenko & Nadelnyuk, 2023), during one year of full-scale war, Zelenskyy gave over 560 addresses. These addresses were characterised by emotionality, clear messages about unity, resistance to aggression, support for the Armed Forces of Ukraine, and faith in victory. He actively used social media (Telegram (Today I signed..., 2022), Facebook (I had a very substantive conversation..., 2022), Instagram (Now in our cities..., 2022) for rapid dissemination of information and debunking disinformation, enabling him to maintain constant contact with the Ukrainian people.

International communication was also intensive: addresses to parliaments of countries worldwide, at international forums, interviews with global media. An example is the joint press conference with President Biden in December 2022 (Remarks by President Biden..., 2022), where Zelenskyy not only thanked for support but also clearly articulated Ukraine's needs. His speeches were aimed at mobilising external aid, forming an anti-war coalition, and supporting sanctions against the aggressor (World Economic Forum, 2025). Under wartime conditions, Zelenskyy demonstrated decisiveness and centralisation of governance, which is typical of crisis leadership. Martial law was promptly introduced (Decree of the president of Ukraine No. 64/2022, 2022), allowing for the swift adoption of necessary decisions for the country's defence.

Interaction with the opposition, which prior to 24 February 2022 was characterised by political confrontations and public criticism, underwent a fundamental transformation. In particular, before the full-scale invasion, there was constant confrontation between the ruling party "Servant of the People" and the largest opposition faction "European Solidarity" under the leadership of Petro Poroshenko on a number of issues, such as the fight against corruption, foreign policy course, as well as personal accusations. An example of this is the so-called "treason case" against Petro Poroshenko, which was under judicial consideration on the eve of the invasion (The Fifth President..., 2021). However, from the first days of the full-scale invasion, recognising

the threat to statehood, most opposition parties and their leaders, including “European Solidarity” and other patriotic forces, publicly declared their support for the actions of the President and the Government in repelling the aggression (Poroshenko called on..., 2025).

This consolidation manifested in the creation of parliamentary unity for the swift adoption of critically important laws related to defence, economy, and social support. For example, votes on extending martial law (Decree of the President of Ukraine 478/2025, 2025), mobilisation, as well as a series of economic initiatives (tax exemptions for businesses (Temporary exemption from..., 2025), support for internally displaced persons (Law of Ukraine No. 1706-VII, 2025) took place with broad support. Zelenskyy's leadership during the full-scale war significantly strengthened his legitimacy, which is based on leadership reinforced by the ability to mobilise the nation and represent its interests on the international stage. According to the Kyiv International Institute of Sociology (KIIS), the level of trust of Ukrainians in President Zelenskyy sharply increased after the invasion. If in February 2022, trust among Ukrainians stood at 52%, and distrust at 43%, then by March 2022 trust had reached 90% (Dynamics of trust..., 2025). This indicates a significant “rally ‘round the flag effect” under conditions of external threat. According to the L. Saad (2025) survey in July 2025, Volodymyr Zelenskyy had 52% favourable and 34% unfavourable reviews worldwide, giving a net positive rating of +18, ranking second among global newsmakers. This underscores his strong international legitimacy and recognition.

Unprecedented diplomatic activity and a consistent government position contributed to the formation of a broad international coalition in support of Ukraine, expressed in significant volumes of military, financial, and humanitarian aid from partner countries and international organisations (U.S. Security Cooperation..., 2025). Politicians and leaders of leading world countries have repeatedly publicly expressed their full trust and support for Volodymyr Zelenskyy and his government, emphasising his role as the legitimate representative of the Ukrainian people in the context of armed aggression (Remarks by President Biden..., 2022). Legitimacy challenges in Ukraine are primarily related to internal issues (corruption, pace of reforms) (OECD, 2025), but in the context of war, they recede into the background, giving way to national security. Zelenskyy's leadership is an example of transformational leadership, which, under conditions of an existential threat, consolidated the nation and secured external support.

Thus, Zelenskyy's leadership under conditions of full-scale war is an example of successful crisis management that combined direct and emotional communication, decisiveness in executive decisions, and national consolidation. This allowed not only for a significant increase in domestic trust and the legitimacy of his authority, achieving the highest levels of support, but also for mobilising unprecedented international assistance and forming an anti-war coalition. Although internal challenges persist, in

the context of external aggression, they have been significantly minimised, underscoring the priority of national security. Zelenskyy's leadership demonstrated the efficacy of a transformational approach, which not only strengthened Ukraine's position but also enhanced its legitimacy on the world stage.

The empathic crisis leadership of Jacinda Ardern during the pandemic

Jacinda Ardern, as Prime Minister of New Zealand, demonstrated a unique approach to crisis leadership during the COVID-19 pandemic that gripped the world in 2020 and had a significant impact in the 2022-2025 period. Her strategy was based on a combination of decisive measures, clear communication, and a high level of empathy. Ardern became known for her frequent and calm addresses to the nation, often conducted in an informal format (e.g., Facebook Live broadcasts from home (Have you downloaded..., 2022)). Her messages were aimed at explaining scientific data, justifying lockdown restrictions, and reassuring citizens of collective efforts to overcome the crisis. A key element of her communication was empathy; the phrase “Be strong, be kind, stay home” became a symbol of her approach. She actively used traditional media for information dissemination and social networks for direct engagement, enabling her to foster a sense of unity and shared responsibility. International addresses, such as her speech to the UN General Assembly in 2022 (New Zealand – Prime..., 2022), also underscored her leadership in the global fight against the pandemic and the importance of multilateral cooperation.

Under Ardern's leadership, New Zealand implemented some of the strictest lockdown restrictions in the world, including a complete lockdown in the early stages of the pandemic and a strategy of virus “elimination rather than “suppression”. In particular, on 25 March 2020, “Alert Level 4” was declared (Ministerial Statement – COVID-19..., 2020), which entailed a nationwide lockdown with the full closure of non-essential businesses, schools, and severe restrictions on movement. These measures were legally enshrined under the COVID-19 Public Health Response Act 2020 No. 12 (2020) and the Civil Defence Emergency Management Act 2002 No. 33 (2002). The Elimination Strategy for... (2020) envisioned not merely reducing case numbers but eradicating the virus within the country through testing, contact tracing, and strict border control. An example of this was the introduction of mandatory quarantine in Managed Isolation and Quarantine (2023) facilities for all arrivals.

These decisions, despite significant economic consequences, were aimed at protecting the lives and health of citizens. The government actively provided economic support to businesses and the population. Key measures included: the Wage Subsidy Scheme (Wage Subsidy Integrity..., 2020) to preserve jobs, which paid significant sums to businesses affected by lockdowns; small business support programmes (Small Business Cashflow..., 2024). Ardern's

management style was consultative yet decisive: she relied on expert advice from scientists and medical professionals while demonstrating a willingness to make unpopular but, in her view, necessary decisions. Interaction with the opposition was tense and featured manifestations of hostility, but decisions regarding the pandemic broadly received wide support in the early stages (Hills, 2022).

Ardern's leadership during the pandemic significantly strengthened her legitimacy, which was based on rational-legal principles bolstered by a high level of trust in her ability to govern effectively and protect citizens' interests. According to the 1News Kantar Public Poll, 53% of respondents approved of Ardern's performance as Prime Minister, while 38% expressed disapproval, giving her a net positive rating of +15. For comparison, at the peak of the pandemic in May 2020, her rating reached +76, which was among the highest approval ratings among leaders of democratic countries during that period (Poll: Approval ratings..., 2022). Trust in public services during the pandemic also increased from 48% in 2019 to 69% in 2020, and as of 2025, it is maintained at 65% (Kiwis Count Survey, 2025). Although by 2022-2023, the level of trust began to gradually decline due to the duration of restrictions, economic consequences, and "pandemic fatigue", her overall image as an effective crisis leader remained high (Elimination Strategy for..., 2020). Challenges to legitimacy related primarily to the prolonged restrictions and their impact on the economy and population's mental health; however, the overall perception of her leadership, especially on the international stage, remained positive (Baker *et al.*, 2020). Her empathic approach and science-based decisions received high praise from numerous international media outlets, which frequently cited New Zealand as an example of an effective pandemic response model (New Zealand's Covid..., 2020; Jacinda Ardern's quiet..., 2020). This strengthened New Zealand's international authority as a responsible and competent player in world politics, enhancing its legitimacy as a reliable partner.

In summary, Jacinda Ardern's leadership during the COVID-19 pandemic became a model of empathic and science-based crisis management. Through her ability for clear communication, decisive actions aimed at protecting citizens' lives, and a willingness to make unpopular decisions, she strengthened the internal legitimacy of her government, which was based on a high level of public trust. Although the duration of restrictions and their economic consequences caused a certain decline in support later, her approach gained wide international recognition, enhancing New Zealand's authority as a state capable of effectively managing global challenges while maintaining a humane approach.

The authoritarian leadership of Viktor Orbán during the energy crisis

Viktor Orbán's leadership in Hungary during the energy crisis, which intensified following the full-scale Russian invasion of Ukraine and European sanctions against

Russia (2022-2025) (2022 – the beginning..., 2022), demonstrates a model of crisis management relying on authoritarian tendencies and Eurosceptic rhetoric. Orbán's communication during the energy crisis was aimed at strengthening domestic support through nationalist and populist messages. He often portrayed the crisis as a result of the "failed" policy of the EU and "Brussels sanctions", rather than as a consequence of external factors or Hungary's own energy dependencies. Addresses to the nation, often through state media (Speech by Prime Minister Viktor Orbán..., 2025), were aimed at creating the image of a strong leader protecting national interests. He actively used terminology of "protecting" Hungary from external threats (migrants, sanctions) to consolidate his electorate. According to a July survey in the 13th constituency of Pest County (using the Computer-Assisted Telephone Interviewing (CATI) method), the ruling coalition of Viktor Orbán, Fidesz-KDNP, received 42.6% support, while the opposition party Tisza received 26.1% (A new constituency..., 2025), indicating a stable electoral advantage for the government forces even in crisis conditions.

Specifically, Viktor Orbán's posts on X (formerly Twitter) in September 2025 corroborate this strategy. For instance, on 17 September, he published a post contrasting internal "chaos" in Sweden with the alleged "safety" in Hungary, emphasising the absence of bombings, illegal migrants, and the significant number of detained smugglers in 2024, which, in his view, testified to the country's security (We feel for..., 2025). By this, he directly linked migration with danger and juxtaposed Hungary's "success" with the "failure" of other European countries, highlighting his own effectiveness in crisis situations. On 16 September, Orbán declared that the era of following the West had ended, citing problems with migrants, the disappearance of Christian traditions, and the lagging European economy (The era of emulating..., 2025). In the same post, he clearly articulated that Hungary would assert its own interests, defend its sovereignty, refuse to send funds to Ukraine, and remain a "haven of peace", stressing its unwillingness to pay for "other people's wars". These publications attest to the consistent use of anti-migration and Eurosceptic rhetoric aimed at mobilising nationalist sentiments and shifting responsibility for problems onto external actors (the EU, migrants) or onto the liberal elites of the West. Such rhetoric, which links migrants with danger and social degradation, and denies aid to a country fighting for its existence, can be interpreted as containing elements of xenophobic discourse, forming a "us versus them" narrative.

Under Orbán's leadership, Hungary responded to the energy crisis through a series of measures that often contravened pan-European policy. One of the key measures was the continuation and strengthening of the "utility cost reduction" policy (*rezsicsökkentés*), which kept gas and electricity prices for households at a fixed, subsidised level, despite rising global prices (Brussels wants to..., 2025). This created significant pressure on the state budget, as the government covered the difference between the purchase

and sale price, but ensured broad electoral support from voters who did not feel the direct impact of the energy crisis (Kovacs, 2025). Against the backdrop of the European-wide strategy of diversification and moving away from Russian energy resources, Hungary actively sought to conclude direct agreements with Russia on gas supplies, particularly via the TurkStream pipeline. Long-term contracts were concluded with Gazprom (e.g., the 2021 agreement for the annual supply of 4.5 billion cubic metres of gas) and additional volumes were discussed (Hungarian foreign minister..., 2021). This indicated Hungary's aspiration to ensure its energy security, disregarding European calls for solidarity and reduced dependence on Russia.

Orbán's legitimacy is grounded in leadership reinforced by the capacity for the constant mobilisation of his supporters through nationalist and populist rhetoric. Despite significant economic challenges related to the energy crisis and persistent criticism from EU institutions, his "utility cost reduction" strategy and anti-migration rhetoric allowed him to maintain substantial support among his electorate (Brussels wants to..., 2025; We feel for..., 2025). According to an internal poll by the Fidesz-KDNP political party, cited by Viktor Orbán himself in July 2025 during a speech in Tusnádfürdő, his party could win 80 out of 106 individual electoral constituencies if elections were held in the near future (A new constituency..., 2025). Data from Index on 6 August 2025 indicated that national polls yielded contradictory results: Medián and IDEA Intézet recorded a lead for the Tisza Party, while Nézőpont Intézet and Társadalomkutató showed an advantage for the ruling parties. This demonstrates the deep entrenchment of his political model in Hungarian society and its capacity to retain the support of a significant portion of the population even amid crisis challenges and criticism (A new constituency..., 2025). Challenges to his legitimacy came from European institutions and the liberal opposition, which criticised him for departing from democratic standards and his pro-Russian stance (Brussels wants to..., 2025). However, these

challenges failed to substantially undermine his domestic support. Orbán effectively utilised the crisis to further consolidate his hybrid model of governance, which combines democratic procedures with authoritarian practices.

In summary, Viktor Orbán's leadership during the energy crisis demonstrated the effectiveness of an authoritarian approach combining nationalist rhetoric, populist measures, and direct confrontation with European institutions. This strategy allowed him to maintain a high level of domestic legitimacy and electoral support, particularly through the policy of subsidising utility costs and consistently shifting responsibility for problems onto external actors. However, this led to a significant deterioration of Hungary's international standing and its legitimacy on the global stage, creating tension in relations with key partners and limiting the country's foreign policy influence. Orbán successfully exploited the crisis to further strengthen his hybrid model of governance.

The comparative aspect of crisis leadership and the legitimacy of power in Ukraine, New Zealand, and Hungary

A comparative analysis of the leadership of Volodymyr Zelenskyy (Ukraine), Jacinda Ardern (New Zealand), and Viktor Orbán (Hungary) under different crisis conditions reveals significant differences in approaches and their impact on the legitimacy of power. The effectiveness of crisis leadership and its influence on the legitimacy of power depend on the nature of the crisis and the chosen communication and political strategies. Zelenskyy and Ardern strengthened legitimacy through mobilisation and empathy, respectively, while Orbán utilised the crisis to consolidate power through populism and juxtaposition against external threats, which, although ensuring internal support, provoked criticism regarding democratic standards and interstate relations. For better clarity, Table 1 outlines the main aspects of the comparative analysis of crisis leadership strategies and their impact on legitimacy.

Table 1. Comparative analysis of key aspects of crisis leadership in Ukraine, New Zealand, and Hungary (2020-2025)

Aspect of leadership	Ukraine (V. Zelenskyy) – full-scale war	New Zealand (J. Ardern) – COVID-19 pandemic	Hungary (V. Orbán) – energy crisis and euroscepticism
Nature of the crisis	Existential, external military aggression	Global medical, internal socio-economic challenges	Economic (energy), political (EU), internal populist challenges
Communication strategy	Direct, daily video addresses, active use of social media, emotionality, mobilisation, international advocacy	Frequent, calm addresses, live broadcasts, empathy, explanation of scientific data	Nationalist, populist, anti-EU, use of state media, rhetoric of "protection"
Interaction with the opposition	Consolidation, establishment of parliamentary unity after the invasion's onset	General support in early stages, but with manifestations of hatred	Confrontation, use of the opposition as an "enemy" in domestic rhetoric
Managerial measures	Operational introduction of martial law, centralisation of decision-making, economic support	Strict lockdown restrictions ("Alert Level 4", "elimination" strategy), economic support	"Utility cost reduction" policy (rezsicsökkentés), direct agreements with Russia on energy resources

Table 1. Continued

Aspect of leadership	Ukraine (V. Zelenskyy) – full-scale war	New Zealand (J. Ardern) – COVID-19 pandemic	Hungary (V. Orbán) – energy crisis and euroscepticism
Impact on legitimacy	Sharp increase in domestic and international legitimacy, “rally ‘round the flag” effect	Increased trust at the peak of the crisis, gradual decline due to the duration of restrictions	Retention of domestic support through populism and confrontation with external threats
Challenges to legitimacy	Internal (corruption, reforms), but recede into the background during the war	Protracted restrictions, economic consequences, pandemic “fatigue”	Departure from democratic standards, pro-Russian stance, criticism from the EU

Note: data for Hungary show internal support for the ruling party, which indirectly reflects the government’s legitimacy under crisis conditions

Source: compiled by the author based on Elimination Strategy for... (2020), Ministerial Statement – COVID-19... (2020), Address of the President... (2022), Have you downloaded... (2022), R. Hills (2022), Decree of the president of Ukraine No. 64/2022 (2022), Speech by Prime Minister Viktor Orbán... (2025), Poroshenko called on... (2025), Brussels wants to... (2025), Dynamics of trust... (2025), Kiwis Count Survey (2025), A new constituency... (2025), OECD (2025)

A comparison of the three types of crises – military, pandemic, and energy – demonstrated that the depth and nature of the threat determine both the leadership style and the communication methods of leaders. In Ukraine, the existential danger of full-scale war shaped mobilisation and transformational leadership oriented towards the maximum consolidation of society and partners. The COVID-19 pandemic in New Zealand led to the emergence of an empathetic and scientifically grounded management style, which combined clear restrictive measures with caring communication. The Hungarian energy crisis, in turn, facilitated the entrenchment of a populist-defensive model, relying on nationalist rhetoric and juxtaposition against external actors. The chosen leadership models differently influenced the legitimacy of power. In the cases of Ukraine and New Zealand, legitimacy was strengthened through trust, solidarity, and the state’s ability to demonstrate effective actions under threat. In Hungary, however, legitimacy was primarily sustained by the internal mobilisation of supporters, reinforced by a rhetoric of

“protection”, while international support and trust in the government declined. In summary, a key trend across all three cases was the increasing role of political communication as a tool for maintaining legitimacy in crisis conditions. However, the forms of this communication differed significantly depending on the depth of the crisis, the degree of institutional openness, and political culture, determining different trajectories of strengthening or eroding trust in power.

Based on the conducted comparative analysis of crisis leadership strategies, a number of recommendations can be formulated aimed at enhancing the effectiveness of crisis management and strengthening the legitimacy of power. These recommendations are grounded in the identified successful practices and challenges faced by leaders in different countries. For a clear understanding of these aspects, Table 2 summarises key recommendations for enhancing the effectiveness of crisis leadership and strengthening legitimacy, categorised by area, with their positive impact and prevention of challenges.

Table 2. Recommendations for enhancing the effectiveness of crisis leadership and strengthening legitimacy

Area of recommendation	Key aspects and actions	Positive impact on legitimacy	Preventing challenges to legitimacy
Communication strategy	Transparent, direct, regular, and emotionally resonant communication; use of a broad spectrum of media; referencing expert data	Increased trust, formation of a sense of unity and shared responsibility	Countering disinformation, reducing societal polarisation
National unity and inclusiveness	Engaging the opposition and various societal groups; establishing parliamentary unity for critical decisions	Strengthening legitimacy by demonstrating a shared vision and national consolidation	Avoiding political divisions, increasing support for crisis measures
Managerial measures	Decisive, proportionate, and justified actions; temporary centralisation of power with clear limits; economic support for the population and businesses	Confirmation of the government’s ability to effectively protect citizens’ interests and ensure stability	Preventing social discontent, preserving rational-legal legitimacy
International cooperation	Active engagement with the international community; mobilisation of external support; adherence to international commitments	Strengthening international legitimacy, partners’ trust, and forming anti-crisis coalitions	Avoiding isolation, strengthening the country’s position on the global stage
Accountability and transparency	Effective parliamentary and judicial oversight; protection of freedom of speech and independent media	Preventing abuse of power, preserving democratic institutions	Countering authoritarianism, ensuring public trust in authorities

Source: compiled by the author based on the analysis of crisis leadership and scholarly approaches in the text

Generalisation of the patterns presented in Table 2 demonstrated that the effectiveness of crisis leadership is determined not by a set of prescriptions but by a combination of structural factors, which were sequentially manifested in the three cases. The analysis demonstrated that consistency and transparency of communication constitute a decisive element for strengthening trust and support, as corroborated by the examples of Ukraine and New Zealand. Conversely, an orientation towards polarising rhetoric, as illustrated by the case of Hungary, diminishes internal cohesion and complicates international cooperation. The second common pattern is the role of political inclusivity. In the studied cases, it was the degree of involvement of the opposition and civil society that determined the governments' capacity to consolidate resources and public support. Openness to broad participation fostered decision stability, whereas its disregard created additional conflict lines. The third direction concerns the proportionality of management measures. The analysis showed that decisiveness in a crisis is effective only under the condition of clear legal boundaries and publicly justified necessity. Public support is higher when restrictions are based on expert data and accompanied by compensatory socio-economic mechanisms. The fourth pattern is related to international cooperation. The case of Ukraine and New Zealand demonstrated that active participation in international initiatives and adherence to international obligations enhances partners' trust and expands response instruments. The Hungarian example indicates that a departure from multilateralism can lead to foreign policy isolation. The fifth structural factor is accountability. The preservation of parliamentary and judicial oversight, transparency in decision-making, and media independence foster long-term trust in institutions. The erosion of these mechanisms, conversely, creates risks of power concentration and weakens the democratic foundations of legitimacy. Thus, the identified directions represent patterns common to successful models of crisis leadership. Their operation manifests in states' capacity to maintain governance effectiveness and reproduce democratic legitimacy even under extraordinary conditions, creating an analytical basis for further discussion.

DISCUSSION

The obtained results of the comparative analysis of the crisis leadership of Volodymyr Zelenskyy, Jacinda Ardern, and Viktor Orbán attest that the effectiveness of legitimisation strategies in crisis conditions is determined by the nature of communication and the level of political inclusivity. This research observes a pattern: leadership models based on consistency, openness, and clarity of communication demonstrate higher effectiveness in maintaining internal and external legitimacy. These conclusions align with the study by D. Steffan & N. Venema (2025), which notes a significant improvement in Zelenskyy's image in world media after February 2022, reflecting the discourses and political positions of countries. It is argued that the coverage of a foreign political leader mirrors the elite discourses and

political positions of the countries in which these media operate. Similarly, Jacinda Ardern employed empathetic and explanatory communication, which contributed to increased trust in state institutions in New Zealand during the peak of the pandemic. Her style corresponds to the conclusions of R.E. Riggio & T. Newstead (2023), who synthesise existing knowledge on crisis leadership, define types of crises and their key dynamics, and emphasise the importance of crisis leader competencies, including the ability to interact effectively with the population. These practices confirm that transparent and emotionally intelligent communication fosters societal consolidation and increases trust in authority, even under challenging conditions.

In contrast, the results regarding Viktor Orbán indicate that nationalist and polarising rhetoric can preserve short-term internal support, but simultaneously complicates international cooperation and exacerbates institutional risks. This analysis traces a tendency: a populist-defensive discourse aids the consolidation of supporters within the country, yet is accompanied by criticism from international actors and a decline in external legitimacy. This aligns with the research of D.F. Wajner (2022), which examined transnational factors in the spread of contemporary populism. The authors showed that populists transpose the rhetoric of antagonism between "the people" and "the elites" into the global dimension to gain legitimacy, utilising the interconnection of national and international processes. M. Mos & I. Macedo Piovezan (2024) detailed how Orbán positions himself as a model for international right-wing populist movements, using anti-immigration rhetoric and the defence of "traditional values" as part of an "illiberal playbook" readily adopted by populists in other countries. Thus, the choice of communication strategy has a direct impact not only on internal but also on international legitimacy.

The obtained data indicate that in crisis conditions, the effectiveness of government actions can temporarily substitute traditional democratic procedures as a source of legitimacy. The sharp increase in trust in Zelenskyy during the war and in Ardern during the pandemic confirms this phenomenon, known as the "rally 'round the flag" effect. V.A. Schmidt (2022) in her study of European emergency politics, using the example of the EU Council and the European Central Bank (ECB), argues that the level of legitimacy depends both on the performance of actions and on the ability of political and technical executors to convincingly justify their decisions, especially during the transition from the "fast" phase of emergency politics to the "slow" phase of normalisation or delegitimation. In wartime, when an existential threat exists, Zelenskyy's legitimacy is based on his ability to mobilise the nation and secure external support, which pushes internal challenges such as corruption and the pace of reforms to the background. Simultaneously, Orbán's case raises the question of the limits of such legitimacy. His authoritarian tendencies and Eurosceptic rhetoric, while securing internal support through the policy of "utility cost reduction" (*rezsicsökkentés*), raise significant

questions regarding democratic standards and external legitimacy. R. Mittiga (2022) in his research questions the unambiguous dependence of political legitimacy on democratic norms and rights. The study proposes also considering the state's capacity to guarantee security. Using the example of the COVID-19 pandemic and the threat of climate change, it is shown that under emergency conditions, authoritarian methods can acquire legitimacy, as timely action against global crises is necessary, to avoid justifying authoritarian power.

The analysis of the three leaders aligns with the conclusions of R. Falk (2021) and S. Zhao (2021) regarding the crisis of global governance. R. Falk (2021) demonstrated that the rise of ultranationalism undermines the legitimacy of international coordination, which was particularly evident during the COVID-19 pandemic. The research of S. Zhao (2021) complements this, demonstrating that the absence of stable global leadership and rivalry between the US and China impede effective multilateral responses to global challenges. Hungary's departure from pan-European solidarity in energy policy, including direct agreements with the Russian Federation regarding gas supplies, is an example of these trends. E. Moret (2021) also analysed the rise in the practice of unilateral sanctions in the world against the backdrop of the crisis of multilateralism and changes in US foreign policy. The author examined the causes of these shifts, types of sanctions and their consequences, emphasising that the complication of the sanctions environment has a significant humanitarian impact, particularly noticeable during the COVID-19 pandemic, which further complicates global crisis management. Y.-Y. Yeh *et al.* (2023) in their study on the impact of the pandemic on public opinion and party dynamics in New Zealand and neighbouring countries, showed that a crisis can transform political orientations, changing citizens' attitudes towards authority and political parties. This, in turn, influences the perception of the legitimacy of authority and future electoral processes.

The challenges considered in this research resonate with the decline of the global influence of democracies, discussed by L. Diamond (2024). The author examined the crisis of contemporary democracies, manifested in the decline of their global influence and retreat before autocracies. L. Diamond proposed restoring democratic progress through a combination of power, performance, and legitimacy: ensuring economic development, combating corruption, and protecting key institutions – free elections, independent media, and the rule of law. The necessity of combining power, performance, and legitimacy is fundamental for restoring democratic progress. Simultaneously, China's attempts to gain international legitimacy through the expansion of BRICS+ (Brazil, Russia, India, China, South Africa) (Lee & Sims, 2025) and the promotion of alternative models of global governance based on sovereignty, cultural identity, and balanced global governance, point to increasing multipolarity and competition for legitimacy in the international system. This requires

democratic leaders not only to engage in effective crisis management but also to actively promote democratic values and practices on a global scale.

Thus, the results of this research, juxtaposed with the works of leading scholars, confirm that crisis leadership is a multifaceted phenomenon where communication, effectiveness, and capacity for consolidation play a key role in shaping and maintaining the legitimacy of authority. However, long-term legitimacy depends not only on operational measures but also on adherence to democratic principles and inclusivity of governance. The available data show that leaders who choose transparent and empathetic communication, and strive for national unity, have higher chances of strengthening legitimacy. Simultaneously, leaders who rely on populism and confrontation with external threats may achieve internal support but will face challenges on the international arena and the risk of erosion of democratic values. This is significant for understanding the paths of development of democratic institutions and the international order under conditions of increasing global crises.

CONCLUSIONS

The conducted comparative analysis of three models of crisis leadership demonstrated that the legitimacy of authority under emergency conditions is determined by a combination of communicative capability, institutional resilience, and political inclusivity. The generalisation of the obtained results showed that, regardless of the nature of a crisis, the key factor is the ability of political actors to ensure consistency and transparency of communication, explain the logic of managerial decisions, and foster a sense of common purpose within society. This conclusion aligns with contemporary research on political trust, which emphasises the growing role of public communication as a resource of legitimacy in the 21st century. The obtained data also indicate that the effectiveness of crisis management depends on the political system's capacity to demonstrate efficacy within a context of uncertainty. In existential situations, the priorities of citizens become security, promptness, and internal unity, while procedural democratic standards temporarily recede to the periphery. At the same time, the long-term resilience of the democratic order is impossible without preserving the mechanisms of accountability, transparency, and adherence to the rule of law. The comparative results showed that when institutions retain their capacity for oversight and independent evaluation of government decisions, legitimacy during a crisis is not only maintained but can also be strengthened.

The main point is that different models of crisis management demonstrate common structural patterns. Political inclusivity, openness to public dialogue, and the engagement of expert communities foster societal consolidation and cultivate a readiness to accept difficult decisions. Conversely, an orientation towards polarising rhetoric and confrontational interaction with domestic or external actors, even under conditions of short-term support, is accompanied by increased risks to institutional stability and international

engagement. The experience of various countries confirms that it is precisely the balance between decisiveness and the proportionality of measures that determines the level of trust during prolonged crises. In summary, successful crisis leadership is formed not through the charisma or individual traits of leaders, but through a combination of effective communication, an inclusive decision-making process, and the preservation of democratic control mechanisms. Such models allow not only for ensuring the state's operational capacity but also for maintaining or restoring legitimacy even under conditions of protracted emergencies.

The main directions for further research include studying the long-term consequences of crisis leadership on the quality of democratic institutions, in-depth analysis of the interaction between internal and external legitimacy

under conditions of geopolitical shifts, and the development of tools for assessing the effectiveness of communication strategies in an intercultural context. Additionally, the influence of new media and digital technologies on the formation of legitimacy during crises and the possibilities for countering disinformation can be explored.

ACKNOWLEDGEMENTS

None.

FUNDING

None.

CONFLICT OF INTEREST

None.

REFERENCES

- [1] 2022 – the beginning of the full-scale Russian invasion of Ukraine. (2022). Retrieved from <https://uinp.gov.ua/istorychnyy-kalendar/lyuty/24/2022-pochatok-povnomasshtabnogo-vtorgnennya-rf-v-ukrayinu>.
- [2] A new constituency has been created, but can Fidesz or Tisza be happy? (2025). Retrieved from <https://index.hu/belfold/2025/08/06/fidesz-kdnp-tisza-part-kozvelemenyn-kutatas-felmeres-orban-viktor-pest-varmegye-oroszaggyulesi-valasztasok/>.
- [3] Adams, N.P. (2025). Legitimacy, institutional functions, and the state system. *Critical Review of International Social and Political Philosophy*, 1-20. doi: 10.1080/13698230.2025.2499357.
- [4] Address by President Volodymyr Zelenskyy. (2022). Retrieved from <https://www.president.gov.ua/videos/zvernennya-prezidenta-volodimira-zelenskogo-2041>.
- [5] Address of the President of Ukraine. (2022). Retrieved from <https://www.president.gov.ua/videos/zvernennya-prezidenta-ukrayini-2017>.
- [6] Baker, M.G., Wilson, N., & Anglemeyer A. (2020). Successful elimination of Covid-19 transmission in New Zealand. *The New England Journal of Medicine*, 383(8), article number e56. doi: 10.1056/NEJMc2025203.
- [7] Beaumont, P., & Røren, P. (2025). Status symbols in world politics. *Cooperation and Conflict*, 60(1), 3-26. doi: 10.1177/00108367241311072.
- [8] Brussels wants to cut cuts, reduce margin, and abolish the interest stop. (2025). Retrieved from <https://kormany.hu/hirek/brusszel-a-rezsicsokkentes-az-arrescsokkentes-a-kamatstop-eltorleset-akarja>.
- [9] Capati, A., & Christiansen, T. (2025). Legitimacy and political dissensus in the implementation of the recovery and resilience facility: The case of Italy. *European Political Science*, 24, 553-577. doi: 10.1057/s41304-025-00538-4.
- [10] Civil Defence Emergency Management Act 2002 No. 33. (2002, October). Retrieved from <https://www.legislation.govt.nz/act/public/2002/0033/latest/whole.html>.
- [11] COVID-19 Public Health Response Act 2020 No. 12. (2020, May). Retrieved from <https://surli.cc/lbarvz>.
- [12] Crawford, N.C. (2025). Not redeemed from time: The deep time of world politics and the role of chronological horizons. *Australian Journal of International Affairs*, 79(1), 10-31. doi: 10.1080/10357718.2024.2424319.
- [13] Davydenko, B., & Nadelnyuk, A. (2023). *The power of words. Zelensky has spoken over 560 times since the start of the war. How his speeches influenced Ukraine and the world*. Retrieved from <https://surl.li/yvetby>.
- [14] Decree of the President of Ukraine No. 478/2025 "On the Extension of Martial Law in Ukraine". (2025, July). Retrieved from <https://zakon.rada.gov.ua/laws/show/478/2025#Text>.
- [15] Decree of the president of Ukraine No. 64/2022 "On the Introduction of Martial Law in Ukraine". (2022, February). Retrieved from <https://www.president.gov.ua/documents/642022-41397>.
- [16] Diamond, L. (2024). Power, performance, and legitimacy. *Journal of Democracy*, 35(2), 5-22. doi: 10.1353/jod.2024.a922830.
- [17] Dynamics of trust in president v. Zelensky in 2019-2025. (2025). Retrieved from <https://www.kiis.com.ua/?lang=ukr&cat=reports&id=1537&page=1>.
- [18] Elimination Strategy for Aotearoa New Zealand. (2020). Retrieved from https://www.health.govt.nz/system/files/2024-05/covid-19_elimination_strategy_banner_120821_1.pdf.
- [19] Falk, R. (2021). *Legitimacy, crises of global governance, and international relations*. In G.O. Gok & H. Mehmetcik (Eds.), *The crises of legitimacy in global governance* (pp. 285-303). London: Routledge.
- [20] Gongqing, L., Sabjan, M.A., & Mohamad, N.I. (2025). Hume's doubts about politics: A critique and reimagining of social contract theory. *Journal of Politics and Law*, 18(1). doi: 10.5539/jpl.v18n2p1.

- [21] Hatungimana, W. (2025). Democracy on the line? Political legitimacy and support for military rule in Africa. *Democratization*, 32(8), 1904-1926. doi: 10.1080/13510347.2025.2482598.
- [22] Have you downloaded your vaccine pass yet? (2022). Retrieved from <https://www.facebook.com/share/p/19iCineM1Y/>.
- [23] Heck, A. (2025). Ready, steady, no? The contested legitimacy of weapon deliveries to Ukraine in German foreign policy discourse. *Politische Vierteljahresschrift*, 66(1), 45-75. doi: 10.1007/s11615-024-00554-x.
- [24] Hellmüller, S., & Badache, F. (2025). Children of their time: The impact of world politics on United Nations peace operations. *Contemporary Security Policy*, 46(2), 177-196. doi: 10.1080/13523260.2025.2470590.
- [25] Hills, R. (2025). *How Jacinda Ardern changed the look of leadership*. Retrieved from <https://www.vogue.com/article/how-jacinda-ardern-changed-the-look-of-leadership>.
- [26] Hungarian foreign minister says agrees long-term gas deal with Russia. (2021). Retrieved from <https://www.reuters.com/business/energy/hungarian-foreign-minister-says-agrees-long-term-gas-deal-with-russia-2021-08-30/>.
- [27] I had a very substantive conversation with Alexander Lukashenko. (2022). Retrieved from <https://www.facebook.com/share/v/17LSTcsXdr/>.
- [28] Ilik, G., & Adamczuk, A. (2025). *The EU's compensatory power amid global transactionalism*. *Studia Europejskie – Studies in European Affairs*, 29(1), 155-171.
- [29] Jacinda Ardern's quiet competence triumphs in New Zealand. (2020). Retrieved from <https://www.economist.com/asia/2020/10/17/jacinda-arderns-quiet-competence-triumphs-in-new-zealand>.
- [30] Keman, H. (2025). Levels of democraticness and degrees of stateness: Viability, trust and legitimacy in 'liberal' democracies. *Zeitschrift für Vergleichende Politikwissenschaft*, 18, 505-530. doi: 10.1007/s12286-024-00617-8.
- [31] Kiwis Count Survey. (2025). Retrieved from <https://www.publicservice.govt.nz/data/kiwis-count>.
- [32] Kovacs, G. (2025). "Overhead reduction": We show what we owe Viktor Orbán. Retrieved from https://hvg.hu/360/20250526_rezsicsokkentes-energiaarak-Lanczi-Andras-Orban-Viktor-lakossag-tartozas.
- [33] Law of Ukraine No. 1706-VII "On Ensuring the Rights and Freedoms of Internally Displaced Persons". (2025, April). Retrieved from <https://zakon.rada.gov.ua/laws/show/1706-18#Text>.
- [34] Lee, B.T.F., & Sims, J.P. (2025). Legitimacy through diversity: China's leadership in the BRICS+ expansion for global balance. *Fudan Journal of the Humanities and Social Sciences*, 18(2), 265-302. doi: 10.1007/s40647-024-00411-6.
- [35] Managed Isolation and Quarantine. (2023). Retrieved from <https://www.mbie.govt.nz/immigration-and-tourism/isolation-and-quarantine/managed-isolation-and-quarantine>.
- [36] Ministerial Statement – COVID-19 – move to alert level 4 and state of national emergency. (2020). Retrieved from https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20200325_20200325_02.
- [37] Mittiga, R. (2022). Political legitimacy, authoritarianism, and climate change. *American Political Science Review*, 116(3), 998-1011. doi: 10.1017/S0003055421001301.
- [38] Moret, E. (2021). Unilateral and extraterritorial sanctions in crisis: Implications of their rising use and misuse in contemporary world politics. In C. Beaucillon (Ed.), *Research handbook on unilateral and extraterritorial sanctions* (pp. 19-36). UK: Edward Elgar Publishing. doi: 10.4337/9781839107856.00009.
- [39] Mos, M., & Macedo Piovezan, I. (2024). Leadership in international populism: How Viktor Orbán's Hungary shows the way. *New Perspectives*, 32(4), 329-346. doi: 10.1177/2336825X241282599.
- [40] New Zealand – Prime minister addresses general debate, 77th session. (2022). Retrieved from <https://media.un.org/avlibrary/en/asset/d293/d2938180>.
- [41] New Zealand's Covid strategy was one of the world's most successful – what can we learn from it? (2020). Retrieved from <https://surli.cc/shjnbu>.
- [42] Now in our cities – in Kyiv, in Sumy, in other cities and communities – they are helping the wounded after the Russian strike. (2025). Retrieved from <https://www.instagram.com/p/DOTzHAsDKnQ/>.
- [43] OECD. (2025). OECD Integrity and Anti-Corruption Review of Ukraine. In *OECD Public Governance Reviews*. Paris: OECD Publishing. doi: 10.1787/7dbe965b-en.
- [44] Poll: Approval ratings of Jacinda Ardern, Christopher Luxon revealed. (2022). Retrieved from <https://www.1news.co.nz/2022/09/28/poll-approval-ratings-of-jacinda-ardern-christopher-luxon-revealed/>.
- [45] Poroshenko called on opposition politicians to unite to repel Russian aggression. (2025). Retrieved from <https://www.ukrinform.ua/rubric-politics/3387914-poroshenko-zaklikav-opozicijnih-politikiv-obednatisa-dla-vidsici-agresii-rf.html>.
- [46] Remarks by President Biden and President Zelenskyy of Ukraine in Joint Press Conference. (2022). Retrieved from <https://bidenwhitehouse.archives.gov/briefing-room/speeches-remarks/2022/12/21/remarks-by-president-biden-and-president-zelenskyy-of-ukraine-in-joint-press-conference/>.
- [47] Riggio, R.E., & Newstead, T. (2023). Crisis leadership. *Annual Review of Organizational Psychology and Organizational Behavior*, 10(1), 201-224. doi: 10.1146/annurev-orgpsych-120920-044838.
- [48] Rossi, E. (2025). What can epistemic normativity tell us about politics? Ideology, power, and the epistemology of radical realism. *Topoi*, 44(1), 77-88. doi: 10.1007/s11245-024-10142-8.

- [49] Saad, L. (2025). *Pope Leo most favourably viewed of 14 newsmakers*. Retrieved from <https://news.gallup.com/poll/693155/pope-leo-favorably-viewed-newsmakers.aspx?>
- [50] Schmidt, V.A. (2022). European emergency politics and the question of legitimacy. *Journal of European Public Policy*, 29(6), 979-993. doi: 10.1080/13501763.2021.1916061.
- [51] Small Business Cashflow Loan Scheme COVID-19. (2024). Retrieved from <https://www.ird.govt.nz/covid-19/business-and-organisations/sbcs>.
- [52] Speech by Prime Minister Viktor Orbán at a conference organised to evaluate Hungary's EU Presidency. (2025). Retrieved from <https://surli.cc/ijwlsx>.
- [53] Steffan, D., & Venema, N. (2025). From comedian to leader of the free world: Volodymyr Zelensky's news portrayal around the globe. *Journalism*. doi: 10.1177/14648849251365840.
- [54] Temporary exemption from tax obligations for businesses from frontline territories: Who is eligible and how to obtain it. (2025). Retrieved from <https://tax.gov.ua/nove-pro-podatki--novini-/924745.html>.
- [55] The era of emulating the west is over. (2025). Retrieved from <https://surl.li/vwvvrl>.
- [56] The fifth President of Ukraine has been informed of suspicion of treason and aiding the activities of terrorist organizations. (2021). Retrieved from <https://dbr.gov.ua/news/kolishnomu-prezidentu-ukraini-povidomleno-pro-pidozru-u-derzhavnij-zradi-ta-spriyanni-diyalnosti-terroristichnih-organizacij>.
- [57] The President's address on the second morning of a large-scale war. (2022). Retrieved from <https://www.president.gov.ua/videos/zvernennya-prezidenta-na-drugij-ranok-masshtabnoyi-vijni-2025>.
- [58] Today I signed an application for Ukraine's membership in the European Union. (2022). Retrieved from https://t.me/V_Zelenskiy_official/751.
- [59] U.S. Security Cooperation with Ukraine. (2025). Retrieved from <https://www.state.gov/bureau-of-political-military-affairs/releases/2025/01/u-s-security-cooperation-with-ukraine>.
- [60] Wage Subsidy Integrity and Fraud Programme. (2020). Retrieved from <https://www.msd.govt.nz/about-msd-and-our-work/work-programmes/wage-subsidy-integrity/index.html>.
- [61] Wajner, D.F. (2022). The populist way out: Why contemporary populist leaders seek transnational legitimation. *The British Journal of Politics and International Relations*, 24(3), 416-436. doi: 10.1177/13691481211069345.
- [62] We feel for the Swedish people – trapped in disorder while their leaders spend their time pointing fingers. (2025). Retrieved from https://x.com/PM_ViktorOrban/status/1968193476081717314.
- [63] Westlake, M. (2025). Reform-related conflictual dynamics between democratic political legitimacy and ethical administrations in EU institutions and international organisations. In A. Alemanno (Ed.), *The law and governance of the EU public ethics system: An institutional perspective* (pp. 59-85). Cham: Palgrave Macmillan. doi: 10.1007/978-3-031-80372-7_4.
- [64] World Economic Forum. (2025). Retrieved from <https://geneva.mfa.gov.ua/posolstvo/vsesvitnij-ekonomichnij-forum>.
- [65] Yeh, Y.-Y., Tsai, C.-h., & Yamada, M. (2023). *Public opinion, policy responses, and party politics under the COVID-19 pandemic: Examining Taiwan and its strategic neighbors*. Lanham: Lexington. doi: 10.5771/9781666940985.
- [66] Zhao, S. (2021). *Rhetoric and reality of China's global leadership in the context of COVID-19: Implications for the US-led world order and liberal globalization*. In S. Zhao (Ed.), *China's big power ambition under xi Jinping* (pp. 3-18). London: Routledge.

Comparative analysis of the French, British, and American revolutions and their role in shaping contemporary democratic ideas and institutions

Oleg Opanasenko*¹ 

¹ Mykola Gogol State University of Nizhyn, Nizhyn, Ukraine

Abstract. A comparative analysis of the French, American, and British revolutions is relevant for understanding the origins and evolution of contemporary democratic ideas and institutions. The purpose of the study was to conduct a comprehensive comparative analysis of these revolutions to identify their common and distinctive features, and to determine their role in the development of democratic principles. The study used a set of methods, in particular, comparative historical, institutional, comparative typological and historical genetic, which helped to carry out a comprehensive comparative analysis of revolutions and determine their role in the development of democratic ideas and institutions. The results of the study showed that despite significant differences in socio-economic and political conditions, the French, American, and British revolutions were based on a common ideological foundation – the ideas of the Enlightenment and the concept of natural law. These revolutionary events played a key role in establishing the fundamental principles of freedom, equality, and popular sovereignty, which later became the cornerstones of the contemporary democratic paradigm. Revolutions made a significant contribution to the establishment of liberal democratic values, contributed to the development and institutionalisation of representative democracy, parliamentarism, and laid solid foundations for the consolidation of the principles of constitutionalism and the rule of law. Comparative analysis revealed that each of the three revolutions offered its own unique model of political structure, due to specific national traditions and historical circumstances. These models later became prototypes and a source of inspiration for the development of contemporary democratic systems in different countries of the world, their adaptation and synthesis in accordance with local socio-cultural contexts. The results of the study are of theoretical importance for deepening understanding of the historical origins and evolution of democratic ideas and institutions, and practical value for improving strategies for democratic development, political reform, and optimisation of training courses in political science, history, theory of state, and law

Keywords: educational ideas; liberal and democratic values; constitutionalism; institutional changes; political modernisation; principles of freedom and equality

INTRODUCTION

The French, American, and British revolutions are key historical events that have had a significant impact on the development of contemporary democratic ideas and institutions. The relevance of the research topic is conditioned by the need for an in-depth investigation of the historical origins of modern democracy and the role of revolutionary events in its establishment. Understanding the common patterns and differences between the French, American, and British revolutions can contribute to a better understanding of the essence of democratic processes and institutions, and provide valuable lessons for democratic development.

The analysis of the scientific literature indicates a significant attention of researchers to the study of certain aspects of the French, American, and British revolutions. In particular, the evolution and typology of revolutions, and their role in political change was considered by L. Grinin (2022), the researcher analysed different types of revolutions and their impact on the transformation of society, but did not pay enough attention to a comparative analysis of the impact of these three revolutions on the development of democratic ideas and institutions. The American Revolution in the context of the development of contemporary constitutionalism and the protection of human rights was

Suggested Citation:

Opanasenko, O. (2025). Comparative analysis of the French, British, and American revolutions and their role in shaping contemporary democratic ideas and institutions. *Journal of Global Political Transformations*, 1(1), 42-55. doi: 10.67524/verus1/1.2025.42.

*Corresponding author



investigated by G. Stourzh (2020). The researcher studied key constitutional documents and ideas that emerged during the American Revolution, but did not conduct a comparative analysis with other revolutions.

The role of local institutions and civil society in the development of a modern state in the context of multi-level democracy was analysed by J.M. Sellers *et al.* (2020). The researchers analysed the interaction between different levels of government and the participation of citizens in political processes, but did not pay attention to the impact of revolutions on these processes. The influence of the military revolution on political change and the emergence of democracy and autocracy in early modern Europe was studied by B. Downing (2020). The researchers considered the transformation of political regimes under the influence of changes in the military sphere, but did not analyse the role of specific revolutions in the establishment of democratic institutions.

The French Revolution of 1787-1804, its causes, course, and consequences were analysed in detail by P.M. Jones (2021). The researcher examined the key events and ideas of the French Revolution, its impact on the development of French society. Constitutionalism in the American Revolution, its features and significance for the development of the American political system was examined by G.S. Wood (2021). The researcher analysed the ideas and documents that established the basis of the American Constitution, but did not make a systematic comparison with other revolutions in terms of their impact on democratic processes.

Despite a significant amount of research devoted to certain aspects of these revolutions, their comparative analysis remains fragmentary and does not always include the full range of their impact on the development of democracy. One of the key challenges is the diversity of the historical, cultural, and socio-political contexts in which these revolutions took place. This makes it difficult to identify common patterns and differences between them and assess their role in shaping democratic ideas and institutions. In addition, there are difficulties in defining and operationalising the concept of “democratic ideas and institutions”, which can lead to different interpretations and conclusions. Another problem was the need to consider the long-term consequences and impact of these revolutions on the further development of democracy. This requires not only an analysis of the immediate results of revolutions, but also a study of their role in shaping political culture, civil society and democratic traditions in the respective countries and regions. The purpose of this study was to determine the role of the French, American, and British revolutions in shaping democratic ideas and institutions through their comparative analysis. To achieve this goal, the following tasks were set:

1. To analyse the historical context, background, and causes of each of the three revolutions to better understand their features and similarities.

2. To investigate the key ideas, principles, and values that were put forward and implemented during these

revolutions, and to assess their impact on the development of democratic thought.

3. To compare the constitutional, institutional, and legal changes that occurred as a result of each of the revolutions, and determine their role in the development of contemporary democratic systems.

MATERIALS AND METHODS

The methodological basis of the research was the fundamental principles of historicism, objectivity, and consistency, which provided a scientifically based and comprehensive approach to the study of revolutionary processes in their dynamics, development, and relationship with the broad socio-political and socio-cultural context of the era. Compliance with the principle of historicism allowed considering each of the revolutions as a unique historical phenomenon due to the specific circumstances of its time, and also identifying their general patterns and trends. The principle of objectivity led to an unbiased and balanced analysis of revolutionary events, avoiding ideological biases and anachronistic assessments. The application of a systematic approach helped to understand revolutions as integral and interrelated phenomena that cover various spheres of public life and have a complex impact on further historical development.

An important role in the study was played by the use of the comparative historical method, which identified common features and differences of the French, American, and British revolutions, to trace universal patterns and specific features of their course. The comparative historical method identified typologically similar and distinctive characteristics of revolutions, determined the degree of their radicality, the scale of social transformations, and the impact on the further development of democratic institutions. The institutional approach was used to investigate the political and legal consequences of revolutions, in particular, the transformation of the system of state power, the establishment of the principles of constitutionalism, the division of power, and parliamentarism. The historical and genetic method was used to identify the origins and evolution of the democratic ideas of the Enlightenment, and to trace the connection between the revolutionary principles of freedom, equality, popular sovereignty and contemporary liberal democratic values. The comparative typological method was used to identify common models of political structure that were established as a result of revolutions in France (centralised republic), the United States (presidential federal republic), and Great Britain (parliamentary constitutional monarchy). The use of this method determined the typological features of political regimes established as a result of revolutionary upheavals.

The material basis consisted of fundamental historical, political, legal, and historiographical studies devoted to the French, American, and British revolutions, and the development of democratic institutions and constitutionalism. The analysis of the French Revolution was based on the research by L. Hunt (2004), R. Koekkoek (2020),

P.M. Jones (2021), D. von Güttner (2021), G. Gill (2023). The American Revolution – R. Middlekauff (2007), P. Maier (2008; 2012), R. Allison (2011), C. Green (2020), G.S. Wood (2021); the British Revolution – L.G. Schworer (1981), J. Morrill (1992), P.D. Halliday (2012), J.M. Collins (2020), D. Brown (2020), T. Venning (2023). The theoretical basis for the comparative analysis of revolutionary processes and democratic transformations was formed by G. Lawson (2019), S. Berman (2019), J. DeFronzo (2021), M.E. Fischer (2021) and L. Grinin (2022). These sources formed the conceptual and factual basis for studying the causes of revolutions, their political and legal consequences, and their impact on the development of contemporary democratic ideas and institutions.

RESULTS

Historical background, causes, and course of revolutions

The French Revolution of 1789-1799 was a turning point in the history of not only France, but the entire Europe. Its background was the deep socio-economic and political contradictions that accumulated over the centuries of the absolutist monarchy (Wolfreys & Haynes, 2020). France remained a country with powerful feudal remnants, where privileged classes – the nobility and clergy – retained their tax immunities and dominated political life (Ritchie, 2020). The country was experiencing a severe financial crisis caused by its involvement in the American War of Independence, mismanagement, and the wastefulness of the court (Burke, 2022). Educational ideas, which gained popularity among the educated part of society, undermined the ideological foundations of absolutism and called for the establishment of a republic, ensuring the rights and freedoms of citizens.

The immediate causes of the revolution were the discontent of the Third Estate (the bourgeoisie, peasants, and artisans) with their lack of rights and their desire for reform. The Third Estate, which made up the vast majority of French society, was deprived of political rights and burdened with feudal duties in favour of privileged classes – the nobility and clergy. It was the Third Estate that produced the bulk of the national wealth and paid the biggest share of taxes, which caused outrage and demands for fair representation in government bodies (Blackman, 2019).

The convocation of the Estates General by King Louis XVI in May 1789, for the first time in 175 years, to address financial problems became a catalyst for the revolutionary events. The French monarchy found itself on the brink of bankruptcy as a result of the court's excessive spending, its involvement in the American War of Independence, and an inefficient tax system. Louis XVI hoped that representatives of the estates would agree to the introduction of new taxes and loans, but instead faced demands for radical socio-political transformations (von Güttner, 2021).

The refusal of the Third Estate to submit to the old voting order, according to which the privileged estates had an advantage, led to a political crisis and the proclamation of the National Assembly. In accordance with feudal tradition,

at meetings of the Estates General, each estate had one vote, regardless of the number of representatives. This meant that the nobility and clergy could block any decisions of the Third Estate. Deputies of the Third Estate, led by Mirabeau and Syes, declared that they represent 96% of the French nation, and declared themselves the National Assembly, which has the right to pass laws by a majority vote (Dunn, 2008).

The course of the revolution was rapid and dramatic. On July 14, 1789, the Paris rebels stormed the Bastille, a symbol of absolutism and royal despotism. This medieval prison fortress embodied the arbitrariness of monarchical power, and its fall marked the beginning of revolutionary changes in French society (Lüsebrink & Reichardt, 1997). The National Assembly adopted the Declaration of the Rights of Man and of the Citizen, which consolidated the principles of liberty, equality, and fraternity. This document became a programmatic manifesto of the French Revolution, incorporating the main ideas of the Enlightenment about natural human rights, popular sovereignty, and the social contract (Koekkoek, 2020).

The estate system was abolished, and a constitutional monarchy was introduced with the restriction of the King's power. However, attempts by Louis XVI and his supporters to suppress the revolution led to the overthrow of the monarchy and the proclamation of a republic in September 1792. Louis XVI secretly called on European monarchies to intervene against revolutionary France, which gave rise to radical forces to accuse him of treason and execute him in January 1793 (Jones, 2021).

The radicalisation of the revolution reached its peak during the Jacobin dictatorship of 1793-1794, which was accompanied by mass terror, executions of "enemies of the revolution", and state intervention in the economy. The Jacobins, led by Robespierre, sought to build a republic of virtue based on the principles of democracy, social equality, and revolutionary patriotism. To combat internal and external counter-revolution, they resorted to extraordinary measures, including mass arrests, show trials, and guillotine executions (Gill, 2023). The Thermidorian Coup of 1794 led to the downfall of the Jacobins and the establishment of the more moderate regime of the Directory. The new government abandoned the policy of terror and revolutionary experiments in the economy, but failed to ensure stability and public confidence in the face of prolonged wars with European monarchies (Jones, 2021).

The American Revolution of 1775-1783 led to the independence of thirteen British colonies in North America and the establishment of the United States. Its prerequisites were the growth of self-awareness of the colonists, their desire for self-government and protection of their rights, and contradictions in the economic interests of the mother country and colonies. During the 18th century, the population of the colonies grew rapidly, and local trade, agriculture, and industry developed. However, the colonies remained in a state of political and economic dependence on the United Kingdom, which restricted their rights to self-government and free trade (Middlekauff, 2007).

Britain sought to strengthen control over the colonies, restrict their trade, and increase tax revenues. After winning the Seven Years' War of 1756-1763, the British government found itself in a state of financial crisis and was seeking new sources of revenue. Parliament began introducing new taxes and fees for the colonies, including the Sugar Act of 1764 and the Stamp Duty Act of 1765. These laws caused outrage among colonists who felt that they violated their rights as British subjects and were imposed without their consent (Allison, 2011).

The reasons for the revolution were attempts by the British Parliament to impose new taxes and fees on the colonies without their consent. The stamp duty act of 1765, which imposed a tax on printed materials, documents and playing cards, sparked a wave of protests and boycotts of British goods. The colonists argued that they could not be taxed by a parliament in which they did not have representation. Under pressure from protests, parliament abolished stamp duty, but declared its right to impose taxes on colonies (Miao, 2021). The Tea Act of 1773, which granted the East India Company a monopoly on tea imports to the colonies, led to a protest in Boston known as the "Boston Tea Party". On 16 December 1773, a group of colonists disguised as Native Americans boarded British ships in Boston Harbour and threw 342 crates of tea overboard. This action was a symbolic challenge to the British authorities and the monopoly of the East India Company (Siri, 2012).

The colonists demanded representation in parliament and compliance with the principle of "No taxation without representation", but the British government refused to make concessions. Prime Minister Lord North and King George III insisted on the colonies' unconditional submission to imperial authority. In response to the "Boston Tea Party", Parliament passed the "Intolerable Acts", which closed the port of Boston, restricted the self-government of the colony of Massachusetts, and allowed those suspected of sedition to be sent to Britain to stand trial (Mair, 2012). The course of the revolution began with armed clashes between colonists and British troops at Lexington and Concord in April 1775. A colonist militia known as the Minutemen resisted attempts by British troops to confiscate weapons and ammunition. These clashes marked the beginning of hostilities and forced the colonists to prepare for a long struggle against the mother country (Blackstone, 2023). The Continental Army was established, led by George Washington, who by then had gained credibility as a member of the Seven Years' War and a member of the Virginia House of Burgesses. Under his command, the Continental Army, despite its lack of experience, resources, and discipline, managed to resist the British regular troops and win decisive victories (Bowers, 2019).

On July 4, 1776, the Second Continental Congress in Philadelphia adopted the Declaration of Independence, which proclaimed the creation of a new state – the United States of America. The Declaration, written by Thomas Jefferson, proclaimed the colonies' independence from Great Britain and established the principles of popular sovereignty,

equal rights for citizens, and the right to rise up against despotic rule. It became a manifesto of the American Revolution and a model for future anti-colonial movements (Mair, 2008). The War of Independence lasted until 1783 and ended with the victory of the Americans due to the support of France and Spain. The decisive moment came with the surrender of General Cornwallis' British army following the Battle of Yorktown in 1781. The French fleet blockaded Chesapeake Bay, preventing the arrival of British reinforcements, and the combined American-French army forced the British to surrender (Allison, 2011).

The Paris Peace Treaty of 1783 recognised the independence of the United States and established the borders of the new state. The United States received territory up to Mississippi in the West, the Great Lakes in the North, and Florida in the South. The treaty also guaranteed Americans the right to fish off the coast of Canada and settled debt and compensation issues for loyalists (Allison, 2011). In 1787, the US Constitution was adopted, which consolidated the republican system, the federal system, and the principles of the separation of powers. The Constitution created a strong federal government with an extensive system of checks and balances, and ensured the supremacy of federal law over state law. The Bill of Rights of 1791 supplemented the Constitution with guarantees of civil liberties and protection from arbitrariness of the authorities (Green, 2020).

The British revolution of the mid-17th century, also known as the English Revolution or Civil War, led to the temporary overthrow of the monarchy and the establishment of the republic. It was precipitated by disputes between the King and Parliament over the extent of royal power, religious conflicts between Anglicans, Puritans, and Catholics, and socio-economic changes linked to the development of capitalist relations. During the first half of the 17th century, a new gentry class and bourgeoisie were formed in England, interested in limiting absolutism and protecting their economic interests. The spread of puritanism has led to an increase in religious opposition to the official Anglican Church and the policies of Stewart monarchs (Morrill, 1992).

The revolution was sparked by King Charles I's attempts to establish an absolute monarchy and do without Parliament. Charles I, who succeeded to the throne in 1625, sought to follow the example of continental monarchs and rule without restrictions from Parliament. The introduction of the Ship Money tax in 1634 without the consent of Parliament caused public outrage and the Hampden trial. John Hampden, a member of Parliament for Buckinghamshire, refused to pay the tax, considering it illegal and unjustified. Although the court ruled in favour of the crown, Hampden's case set a precedent for challenging royal arbitrariness (Keen & Slemrod, 2021). The conflict between the King and Parliament escalated after the Long Parliament was convened in 1640. This Parliament, convened by Charles I amidst a political crisis and a war with Scotland, demanded that the king curtail his powers. In particular, the Parliament sought the abolition of illegal taxes, the

dismissal of royal advisers and ministers, guarantees of the inviolability of deputies, and the regular convocation of Parliament. These requirements were set out in the document “Grand Remonstrance”, adopted by Parliament in 1641 (Collins, 2020).

The execution of the King’s adviser, the Earl of Strafford, on charges of treason was the point of no return in the King’s confrontation with Parliament. Thomas Wentworth, Earl of Strafford, was one of Charles I’s closest associates and embodied his absolutist aspirations. Parliament accused Strafford of abusing power, violating the laws of the kingdom, and planning to send an Irish army to England to suppress the opposition. Under pressure from Parliament and the London mob, Charles I was forced to sign the bill of attainder against Strafford, effectively sentencing him to death in May 1641 (Gallo, 2022).

The course of the revolution began with a civil war between Royalists (supporters of the King) and Parliamentarians (supporters of Parliament) in 1642. The reason for the outbreak of war was the attempt of Charles I to arrest the leaders of the parliamentary opposition in January 1642. A failed arrest attempt forced the king to leave London and begin assembling a royalist army. The major battles of the Civil War took place at Edgehill (1642), Marston Moor (1644), and Naseby (1645), where the parliamentary forces led by Oliver Cromwell and his “New Model Army” achieved victory (Hobson, 2020).

The war ended with the defeat of the Royalists and the execution of Charles I in January 1649 on charges of treason, violation of parliamentary privileges, and the introduction of illegal taxes. The King’s execution was preceded by a trial organised by parliament, which adopted a special act establishing the High Court of Justice. Charles I refused to recognise the legitimacy of this court and did not take the opportunity to acquit himself. The execution of the monarch by a parliamentary verdict was an unprecedented event in English history and shocked the European public (Hobson, 2020).

After the execution of Charles I, a republic was proclaimed under the name “English Commonwealth”. The monarchy and the House of Lords were abolished, and real power was concentrated in the hands of Oliver Cromwell, leader of the Parliamentary army, and his allies in the Independent Party. Cromwell led a military campaign against the Royalists in Ireland and Scotland, brutally suppressing their resistance. The established Republican regime relied on the army, censorship, and extraordinary

courts, which angered both Royalists and radical Puritans (Brown, 2020).

The establishment of Cromwell’s Protectorate in December 1653 marked the end of the revolution and the transition to a sole dictatorship. Cromwell dissolved the remnants of the Long Parliament and passed the “instrument of government” constitution, which gave him the title of Lord Protector with extensive powers. The Protectorate regime relied on censorship, repression of the opposition, and restrictions on civil liberties. The Protectorate’s foreign policy was aimed at strengthening English power and fighting competitors at sea – Holland and Spain (Brown, 2020).

After Cromwell’s death in 1658, the Republican regime was unable to retain power in the face of political instability and economic crisis. General George Monk, the commander of troops in Scotland, called for the restoration of the monarchy and the convocation of a new parliament. In 1660, Charles II Stuart, the son of the executed King, returned to the English throne, marking the restoration of the monarchy. Despite Charles II’s attempts to strengthen royal power, Parliament retained its influence and passed a number of acts aimed at limiting absolutism (Venning, 2023).

The so-called Glorious Revolution of 1688 finally consolidated the principles of constitutional monarchy and the rule of Parliament, limiting the power of the King and passing the bill of rights. The reason for the revolution was an attempt by King James II, who belonged to the Catholic Stuart dynasty, to strengthen his power and change religious policy in favour of Catholics. The parliamentary opposition, led by William of Orange, Stadtholder of the Netherlands and son-in-law of James II, landed in England and forced the King to abdicate. William III of Orange and his wife Mary II Stuart were proclaimed the new monarchs, having agreed to the terms set out by Parliament in the Bill of Rights. This document forbade the King to suspend laws, collect taxes, and maintain the army without the consent of Parliament, guaranteed freedom of election and speech in Parliament, and declared the independence of the judiciary (Schwoerer, 1981). The Bill of Rights was one of the cornerstones of the British constitutional monarchy.

A comparative analysis of the French, American, and British revolutions reveals both common features and significant differences between them. Table 1 compares key aspects of these revolutions, including time frames, prerequisites, causes, slogans, results, leaders, documents, the presence of terror, and major changes that occurred during the revolutionary events.

Table 1. Comparison of revolutions

Criteria	French Revolution	American Revolution	British revolution
Time	1789-1799	1775-1783	1642-1660
Background	Feudal remnants, financial crisis, the impact of the Enlightenment	Colonial dependence, economic contradictions with the mother country	Conflict between the King and Parliament, religious contradictions
Reasons	Discontent of the Third Estate, convocation of the Estates-General	Laws on stamp duty and tea, the lack of representation in parliament	Attempts to establish absolutism, Ship Money, the Hampden case
Slogans	Liberty, equality, fraternity	Life, freedom, the pursuit of happiness	Freedom from royal arbitrariness, parliamentary rights

Table 1. Continued

Criteria	French Revolution	American Revolution	British revolution
Result	Overthrow of the monarchy, the republic, Napoleon's empire	Independence from Great Britain, the establishment of the United States	Temporary overthrow of the monarchy, republic, constitutional monarchy
Leaders	Lafayette, Mirabeau, Robespierre, Napoleon	Washington, Jefferson, Adams	Cromwell, Fairfax, Pym
Documents	Declaration of the Rights of Man and of the Citizen, and the Constitutions of 1791, 1793, and 1795	Declaration of Independence, US Constitution	Grand Remonstrance, the Bill of Rights 1689
Terror	Jacobin terror, mass executions	Absent	Absent
Changes	Abolition of estates, agrarian reform, metric system	Republican form of government, federal structure	Establishment of a republic, restriction of royal power, strengthening of Parliament

Source: compiled by the author

Thus, a comparative analysis of the French, American, and British revolutions allowed identifying both common features and significant differences between them. All three revolutions were caused by the crisis of the old order, dissatisfaction with the existing system of government, and the desire for change. They were based on the ideas of Enlightenment, natural human rights, and social contract. Each of the revolutions had its own specific causes, goals, and features of the course. The French Revolution was the most radical and bloody, leading to the overthrow of the monarchy and the establishment of the republic, but ended with the rise of Napoleon's imperial power. The American Revolution aimed to achieve independence from Great Britain and assert republican principles of government, as reflected in the Declaration of Independence and the US Constitution. The British Revolution was the first in chronological terms and the most limited in its consequences, leading to the temporary establishment of a republic and eventually the establishment of a constitutional monarchy and the supremacy of Parliament. Despite all the differences, these three revolutions were important milestones on the way to consolidating the ideas of democracy, human rights, and civil liberties, laying the foundations for the contemporary political system in Europe and America.

The role of revolutions in the development of democracy and contemporary democratic ideas and institutions

The French, American, and British revolutions played a key role in shaping and asserting the democratic principles that later became the basis for the development of democratic systems. These revolutions contributed to the establishment of democracy, the expansion of representation, the development of a system of rights and freedoms of citizens, and the establishment of constitutionalism and the rule of law. The French Revolution was a powerful impetus for the development of the ideas of popular sovereignty and representative democracy. The creation of the National Assembly, which declared itself representatives of the French nation, marked the transition from an absolutist monarchy to a new form of government based on the will of the people (Hunt, 2004). The Declaration of the Rights of Man and of the Citizen of 1789 declared that the source of all power

is the nation, and the law is the expression of the universal will. The introduction of universal suffrage for men during the radical phase of the revolution, although short-lived, was an important step towards increasing political participation and equality of citizens (Jones, 2021).

The American Revolution established a republican form of government based on the principles of popular sovereignty, representation, and federalism. The 1776 Declaration of Independence proclaimed that governments derive their powers from the consent of the governed, and that the people have the right to alter or abolish a government if it becomes destructive of their rights. The US Constitution of 1787 established a federal republic with a division of power between the national government and the states, and a system of representation through elected bodies – Congress and the President (Maier, 2008).

The British revolution, although it did not lead to the establishment of a republic, significantly strengthened the role of Parliament as a representative body and limited the power of the monarch. Even before the revolution, the English Parliament gradually expanded its powers, in particular, through the right to control taxation and spending. The conflict between Charles I and parliament, which led to the Civil War, was caused precisely by the question of the limits of royal power and the prerogatives of Parliament (Keen & Slemrod, 2021). The victory of the parliamentary forces and the execution of the King in 1649 marked the triumph of the idea of popular sovereignty, albeit in a limited form. After the restoration of the monarchy in 1660, the principle of the regular convocation of Parliament, and its control over finances were legally consolidated (Schwoerer, 1981).

The French Revolution made a significant contribution to the development of the concept of human rights and civil liberties. The Declaration of the Rights of Man and of the Citizen of 1789 proclaimed the inalienable human rights to freedom, property, security, and resistance to oppression. It also established the principle of equality of all citizens before the law and abolished class privileges (Koekkoek, 2020). Although these principles were not always respected during the revolution, especially during the Jacobin terror, the Declaration itself became a model for subsequent generations of human rights activists.

The American Revolution and the US Constitution provided a powerful impetus for the development of civil liberties. The Bill of Rights, passed in 1791 as the first ten amendments to the Constitution, guaranteed fundamental freedoms such as freedom of speech, press, assembly, religion, the right to a fair trial, and protection from unjustified searches. These rights were considered natural and inalienable, which the government should protect, not restrict. Although in practice these freedoms have not always been extended to everyone, especially slaves and indigenous peoples, the very principle of constitutional protection of human rights has become an important asset of American democracy (Wood, 2021).

The British revolution, although less well known for its contribution to the development of human rights, still took important steps in this direction. The Habeas Corpus Act of 1679 established the principle of protecting personal freedom from arbitrary arrest and unjustified imprisonment (Halliday, 2012). The Bill of Rights of 1689, passed after the Glorious Revolution, guaranteed freedom of speech in parliament, banned cruel and unusual punishments, and limited the monarch's power to appoint and dismiss judges (Schwoerer, 1981). These documents laid the foundation for the development of British civil liberties and the rule of law in the following centuries.

The French Revolution contributed to the establishment of the principles of constitutionalism and separation of powers. The constitutions of 1791, 1793, and 1795, although different in content and duration, established written rules for the organisation of public power and the relationships between its branches (Jones, 2021). They also consolidated certain rights and freedoms of citizens, albeit with varying degrees of guarantees. The principle of the separation of powers into legislative, executive and judicial branches, drawn from the ideas of Montesquieu, became a key element of the French constitutional system (Vile, 2012). Although these principles were not always

followed in practice, especially in the context of the revolutionary dictatorship and the Napoleonic empire, the very idea of constitutional restriction of power became an important asset of the revolution.

The American Revolution created a unique model of constitutionalism based on the principle of the supremacy of the Constitution as the highest law of the country. The US Constitution of 1787 established clear limits on the powers of the federal government and states, a system of checks and balances between branches of government, and a mechanism for amending the Constitution (Galie *et al.*, 2020). An important element of the American model was judicial control over the constitutionality of laws, first applied by the Supreme Court in *Marbury v. Madison* in 1803 (White, 2024). This practice allowed the judiciary to interpret the Constitution and protect citizens' rights from encroachments by the legislative and executive branches.

The British Revolution, although did not create a written constitution in the contemporary sense, helped to limit the arbitrariness of the monarch and establish the rule of law. The Petition of Right of 1628 and the Bill of Rights of 1689 established the principle of the inviolability of private property and prohibited the King from levying taxes without the consent of Parliament. They also guaranteed the independence of the judiciary from the influence of the monarch and the protection of citizens from illegal arrests and punishments (Schwoerer, 1981). These documents, together with common law and constitutional customs, formed the unwritten constitution of Great Britain, based on the principles of parliamentary sovereignty and the rule of law. The French, American, and British revolutions made a significant contribution to the development and establishment of democratic principles. Table 2 compares the impact of these revolutions on key aspects of democratic development, in particular, democracy and representation, citizens' rights and freedoms, constitutionalism, and the rule of law.

Table 2. Comparison of the impact of revolutions on the development of democracy

Criteria	French Revolution	American Revolution	British revolution
Democracy and representation	National Assembly, universal suffrage for men	Republicanism, federalism, elected authorities	Strengthening the role of Parliament, regular elections
Rights and freedoms of citizens	Declaration of the Rights of Man and of the Citizen, equality before the law	The Bill of Rights: freedom of speech, of the press, of religion, and of assembly	Habeas Corpus Act, freedom of speech in Parliament, prohibition of cruel punishments
Constitutionalism and the rule of law	Written constitutions, separation of powers	Constitution as the highest law, judicial control	Limiting the arbitrariness of the monarch, independence of the courts, unwritten constitution

Source: compiled by the author

Thus, the French, American, and British revolutions made significant contributions to the development and affirmation of democratic principles such as democracy, representation, human rights, constitutionalism, and the rule of law. Despite the differences in historical conditions and currents, these revolutions laid the foundations for the development of contemporary democratic systems and became a model for subsequent generations of fighters for

freedom and democracy. The French, American, and British revolutions played a key role in shaping contemporary democratic ideas and institutions. These revolutions helped to establish liberal-democratic values, foster the development of representative democracy and parliamentary government, lay the foundations for the rule of law and constitutionalism, and influence the subsequent development of democratic movements and revolutions in other countries.

The French Revolution put forward the slogans “Liberty, equality, fraternity”, which became the quintessence of liberal democratic values. Liberty was understood as liberation from feudal fetters and absolutist power, ensuring natural human rights (Koekkoek, 2020). Equality provided for the abolition of class privileges and equality of all before the law. Fraternity symbolised the idea of national unity and solidarity. These values are reflected in the Declaration of the Rights of Man and of the Citizen of 1789 and subsequent constitutions (Jones, 2021).

The American Revolution proclaimed the inalienable human rights to life, freedom, and the pursuit of happiness. The Declaration of Independence of 1776, written by Thomas Jefferson, stated that all people are created equal and are endowed by the God with certain inalienable rights, including the right to life, freedom, and the pursuit of happiness. This idea, based on John Locke’s theory of natural rights, became the cornerstone of American political philosophy and constitutionalism (Morrill, 1992). The US Constitution, adopted in 1787, and the Bill of Rights, ratified in 1791, guaranteed the protection of individual freedoms, equality before the law, and freedom of speech, of the press, of religion, and of assembly. The US Constitution was the first written constitution in the modern sense that clearly defined the powers of the federal government and the rights of states. The Bill of Rights, consisting of the first ten amendments to the Constitution, consolidated basic civil liberties and became a model for many other countries (Maier, 2008). The American model of liberal democracy, based on the principles of constitutionalism, federalism, power sharing, and civil liberties, has become a model for many countries around the world that have sought to build a democratic society.

The British Revolution established the right to resist tyranny and the inviolability of the individual. The Petition of Right of 1628, passed by the English Parliament, condemned the practice of imprisonment without trial and restricted the monarch’s powers. This document was an important step in the fight against royal absolutism and the establishment of the rule of law (Schwoerer, 1981). The Habeas Corpus Act of 1679 established the principle of presumption of innocence and protection against unlawful arrests. This law required the courts to issue a Habeas Corpus Act requiring the detainee to be brought to court to verify the legality of his arrest. The Habeas Corpus Act was one of the cornerstones of the British legal system and provided protection of personal freedom from the arbitrariness of the authorities (Halliday, 2012). The Bill of Rights of 1689, passed after the Glorious Revolution, proclaimed freedom of speech in parliament, banned harsh punishments, and established the supremacy of Parliament over the monarch. This document limited the King’s power, prohibiting him from suspending laws, imposing taxes, and maintaining the army without the consent of Parliament. The Bill of Rights became the foundation of the British constitutional monarchy and consolidated the principles of parliamentary sovereignty and the separation of powers

(Schwoerer, 1981). These documents laid the foundations for a British constitutional monarchy based on the rule of law, parliamentary control over the executive branch, and respect for individual rights.

The French Revolution contributed to the establishment of the principles of representative democracy through the creation of elected authorities. The National Assembly formed during the revolution proclaimed itself representatives of the French nation and bearers of popular sovereignty. They abolished feudal privileges, proclaimed the Declaration of the Rights of Man and of the Citizen, and began drafting a new Constitution (Jones, 2021). The Constitution of 1791 introduced a constitutional monarchy in France with an elected legislative body – the Legislative Assembly. This Constitution limited the power of the king by granting legislative powers to a unicameral parliament elected based on property qualification. Although suffrage was limited, the very principle of representative government was an important step towards democratisation (Jones, 2021).

The Constitution of 1793, adopted at the height of the revolution, did not last long, established universal suffrage for men and proclaimed the principle of direct democracy. This radical Constitution abolished the property qualification, introduced national elections and referendums, and granted social rights such as the right to work, education, and social assistance. Although it was not implemented, the 1793 Constitution became a symbol of revolutionary aspirations for democracy and social justice (Jones, 2021). The American Revolution created a model of a federal republic with a developed system of representative authorities. The US Constitution of 1787 introduced a bicameral Congress consisting of the Senate and House of Representatives. The Senate represented the interests of the states, with two senators from each state elected by the state legislature. The House of Representatives was formed through direct elections based on proportional representation from each state (Maier, 2008). The legislative power of Congress, which had the power to make laws, declare war, regulate trade, and impose taxes, was balanced with the executive power of the president, who was elected by indirect voting through the electoral college, and the judiciary, headed by the Supreme Court, whose members were appointed by the president with the consent of the Senate. This system of checks and balances, based on the ideas of Montesquieu and Locke, was designed to prevent the usurpation of power and to ensure a balance between the branches of government (Maier, 2008). The American model of a federal republic with a division of power and representative government has become a classic model of the constitutional structure of democratic states and a role model in many countries of the world.

The British revolution strengthened the role of Parliament as a representative body of government and contributed to the development of Parliamentarism. Even before the revolution, the English Parliament gradually expanded its powers, in particular, in matters of taxation and control over the expenses of the crown. Since the Magna Carta of

1215, English monarchs have been forced to accept restrictions on their power and recognise the right of Parliament to participate in the legislative process and the establishment of taxes (Gibbs, 2023). During the revolution, Parliament became the centre of opposition to the King's absolutist claims and the scene of political struggle. The conflict between Charles I and Parliament, which refused to provide the King with funds for a war with Scotland without concessions on his part, led to a civil war. The victory of parliamentary forces in the Civil War of 1642-1651 under the leadership of Oliver Cromwell led to the execution of King Charles I on charges of treason and the establishment of a republic (Schwoerer, 1981). The restoration of the monarchy in 1660 took place on the terms of the "Glorious Revolution" of 1688, which finally established the supremacy of Parliament over the monarch. The bill of rights of 1689, passed by parliament after the abdication of James II, established the principle of regular convocation of Parliament, its control over taxation, and freedom of parliamentary debate. The monarch could no longer suspend laws, impose taxes, or maintain an army without the consent of Parliament (Venning, 2023). Subsequently, a system of party-parliamentary government developed in the United Kingdom, with the House of Commons playing a leading role and the Cabinet being accountable to it. During the 18th century, the principle of forming a government of representatives of the party that had a majority in the House of Commons was established. The Prime Minister, who headed the cabinet, had to secure the support of the parliamentary majority. Thus, the executive branch became derived from the legislative branch and controlled by it (Schwoerer, 1981). The British revolution laid the foundations for parliamentary democracy and inspired similar processes in other European countries.

The French Revolution laid the foundations for the concept of a state governed by the rule of law through the adoption of the Declaration of the Rights of Man and of the Citizen and written constitutions. The Declaration of 1789, adopted by the National Assembly, proclaimed the inalienable human rights to freedom, property, security, and resistance to oppression. It also established the principles of the rule of law, the distribution of power, and responsibility of officials. According to the Declaration, the law was to be an expression of the common will, and all citizens were to be equal before it. No person could be charged, arrested, or imprisoned in any other way than in cases defined by law (Kaczor, 2023). The constitutions of 1791, 1793, and 1795, adopted at different stages of the revolution, despite their differences, were based on the ideas of popular sovereignty, representative rule, and legality. They proclaimed the French people to be the sole source of authority, established a system of separation of powers between the legislative, executive and judicial branches, and guaranteed the fundamental rights and freedoms of citizens (Jones, 2021). Although in practice these principles were often violated during revolutionary upheavals, terror, and wars, the very idea of constitutional restriction

of power and subordination of the state to the law became an integral part of the French political tradition and influenced the constitutional development of other countries.

The American Revolution created one of the first written constitutions in the modern sense, which consolidated the principles of constitutionalism and the rule of law. The US Constitution, drafted and ratified in 1787-1788, established the federal structure of the state, a clear division of power into legislative (Congress), executive (President) and judicial (Supreme Court) branches, and a system of checks and balances between them. Legislative power was limited to the list of powers delegated to Congress, while other powers remained with states or people (Maier, 2008). The Bill of Rights of 1791, consisting of the first ten amendments to the Constitution, supplemented it with guarantees of personal rights and freedoms of citizens. He defended freedom of speech, freedom of the press, freedom of assembly, freedom of religion, the right to bear arms, the inviolability of the person and private property, the presumption of innocence, the right to a fair trial, etc. (Wood, 2021). Therefore, the US Constitution has become not only a means of organising the state, but also a guarantor of human rights and limiting the power of the state over the individual. The principle of judicial control over the constitutionality of laws, first applied by the US Supreme Court in *Marbury v. Madison* in 1803, allowed the judiciary to protect the Constitution from encroachments by other branches of government. The Supreme Court has recognised the right to interpret the Constitution and invalidate congressional laws that contradict it. This established the supremacy of the Constitution as the highest law of the country and laid the foundations for the development of constitutional control in other countries (White, 2024).

The British revolution, despite the lack of a written Constitution, contributed to the establishment of the principles of the rule of law and the restriction of royal arbitrariness. A petition on the law of 1628, passed by Parliament, condemned the practice of arbitrary arrests and incarceration without trial, forced soldiers to stand in the homes of civilians, and the introduction of martial law in peacetime. It obliged the King to comply with the laws and not violate the rights and freedoms of his subjects (Halliday, 2012). The Habeas Corpus Act of 1679 established the right of a person detained on suspicion of having committed an offence to request a court order to verify the lawfulness of detention (*habeas corpus*). The court had to deal with the detainee's case quickly and either release the culprit or transfer them to a court of appropriate jurisdiction. This act has become an important guarantee of personal freedom and protection from illegal incarceration (Halliday, 2012).

The Bill of Rights of 1689, passed by Parliament after the Glorious Revolution, limited the power of the monarch, forbidding him to stop the operation of laws, collect taxes and maintain the army in peacetime without the consent of Parliament. It also proclaimed freedom of parliamentary elections, freedom of parliamentary debate, and banned cruel and unusual punishments (Schwoerer, 1981). The Act

of Settlement of 1701 established new rules for succession to the throne, excluding Catholics from the line of succession. It also guaranteed the independence of judges, who were henceforth appointed for life, not at the discretion of the monarch, and could only be removed on the recommendation of both houses of Parliament. The Act consolidated the principle of ministers' accountability to Parliament by prohibiting the monarch from pardoning a minister who had been convicted by Parliament (Daly, 2020). These constitutional acts, along with common law and parliamentary precedents, formed a unique British model of an unwritten constitution based on the principles of the rule of law, parliamentary sovereignty, independence of the courts, and executive accountability. Despite the lack of a single document, the British constitution evolved within the legal tradition and became a model for the legal systems of many countries around the world.

The French Revolution had a huge impact on the further development of democratic and national liberation movements in Europe and the world. The ideas of freedom, equality and popular sovereignty put forward during the revolution inspired participants in the revolutions of 1830 and 1848 in France, Belgium, Germany, Italy, and the Austrian Empire. These revolutions, known as the "Spring of Nations", were directed against absolutist regimes and aimed at establishing constitutional government, national liberation, and unification. Although most of them were defeated, they contributed to the spread of democratic and liberal ideas and paved the way for future changes (Sperber, 2005). The Paris Commune of 1871 was the first attempt to establish socialist democracy and a kind of prologue to the revolutions of the 20th century. The rebellious workers and artisans of Paris proclaimed the creation of a self-governing commune based on the principles of direct democracy, electability, and recall of all officials, equality and solidarity. The commune lasted only 72 days and was brutally suppressed by government forces, but left a memory as the first attempt at workers' self-government and became a symbol of the revolutionary struggle for the socialist and communist movements (Merriman, 2014).

The French Revolution also contributed to the spread of nationalism and the idea of the right of nations to self-determination. The proclamation of the French nation as a community of free and equal citizens, united by a common will and shared interests, challenged the traditional dynastic states and legitimised the aspirations of oppressed nations to establish their own nation states. This affected the national liberation movements in Latin America, where the Creoles, influenced by the ideas of the Enlightenment

and the experience of the United States and France, began to struggle for independence from the Spanish and Portuguese crowns. In the Balkans, Serbian, Greek, and Bulgarian rebels tried to win freedom from Ottoman rule. In Ukraine, the ideas of freedom and equality inspired figures of the Brotherhood of Saints Cyril and Methodius and the Ukrainian People's Republic. In Poland, the memory of the Constitution of 3 May 1791 and the Kościuszko Uprising fuelled the national liberation struggle throughout the 19th century (Hobsbawm, 1992). Thus, the French Revolution gave a powerful impetus to the development of national movements and the struggle for state independence in Europe and the world.

The American Revolution had a significant impact on the development of democratic and national liberation movements in the Western Hemisphere. The successful struggle of the North American colonies for independence from Great Britain became a model for the colonial peoples of Latin America. The wars of independence in Venezuela, Colombia, Argentina, Chile, Peru, and Mexico in the first quarter of the 19th century led to the creation of independent republics modelled on the United States (Racine, 2010). The ideas of federalism, republicanism and constitutionalism, which drew on the experience of the American Revolution, were incorporated into the constitutional drafts of San Martín, Bolívar, O'Higgins and other leaders of the Latin American revolutions (Adelman, 2006).

The British Revolution had a less immediate but equally important impact on the development of democratic institutions and movements. The establishment of a constitutional monarchy and the supremacy of Parliament in Britain became a model for many European countries in the 19th century. The British model of gradual reform of the electoral system and the expansion of suffrage during the Chartist movement of the 1830s and 1840s and the reforms of 1832, 1867, and 1884 was adopted by many countries in Europe and the British Commonwealth (Lang, 1999). The British experience of peaceful evolution from an aristocratic to a democratic political system was an alternative to the revolutionary path demonstrated by France.

A comparative analysis of the French, American and British revolutions demonstrates their key role in shaping modern democratic ideas and institutions (Table 3). Despite the differences in socio-economic and political conditions, these revolutions were based on common ideas of Enlightenment and natural law, proclaiming the principles of freedom, equality, and self-government of the people. They contributed to the establishment of liberal democratic values, the development of representative democracy and parliamentarism, the rule of law, and constitutionalism.

Table 3. Comparison of the role of revolutions in the development of democratic ideas and institutions

Criteria	French Revolution	American Revolution	British revolution
Liberal and democratic values	Liberty, equality, fraternity	Life, freedom, the pursuit of happiness	Right to resist tyranny, inviolability of the individual
Representative democracy and parliamentarism	National assembly, universal suffrage	Congress, bicameral parliament	Strengthening the role of the House of Commons and the Cabinet

Table 3. Continued

Criteria	French Revolution	American Revolution	British revolution
Rule of law and constitutionalism	Declaration of the Rights of Man and of the Citizen, written constitutions	US Constitution, Bill of Rights, judicial review	Habeas Corpus Act, Bill of Rights, rule of law
Influence on further democratic movements and revolutions	Revolutions of 1830 and 1848, Paris Commune, national liberation movements	Wars of independence in Latin America, constitutionalism	Chartist movement, electoral law reforms, spread of the British model

Source: compiled by the author

The revolutionary experience of France, the United States, and Britain became a source of inspiration for democratic and national liberation movements in various parts of the world during the 19th and 20th centuries. Each of these revolutions offered its own model of political structure, which corresponded to national traditions and historical circumstances. The French Revolution emphasised the ideas of popular sovereignty, a centralised republic, and radical social transformation. The American Revolution embodied the principles of federalism, constitutionalism, and liberal democracy. The British Revolution combined the traditions of parliamentarism with the ideas of a limited monarchy and progressive reform. These models have become the basis for the development of contemporary democratic systems around the world, their adaptation and synthesis in various national contexts.

DISCUSSION

The comparative analysis of the French, American, and British revolutions and their role in shaping modern democratic ideas and institutions presented in this study made a significant contribution to contemporary scientific discourse. The results clearly demonstrate that despite the differences in socio-economic and political conditions, these revolutions had a common ideological basis in the ideas of Enlightenment and natural law, asserting the principles of freedom, equality and popular sovereignty.

When comparing these findings with the results of other studies, it is worth noting, first and foremost, the conceptual consensus regarding the assessment of revolutions as key milestones on the path to the establishment of democracy. In particular, J. DeFronzo (2021) also considered the French, American, and British revolutions as turning points that laid the foundations of the contemporary democratic system. The researcher thoroughly analysed the prerequisites, course, and consequences of these revolutions, tracing their impact on the transformation of political institutions and public relations. Conclusions of J. DeFronzo revealed significant coincidences with the results of this study regarding the defining role of Enlightenment ideas as the ideological basis of revolutions. Both papers emphasised the key importance of educational concepts of natural human rights, social contract, and popular sovereignty for legitimising revolutionary transformations and laying the foundations for representative government. J. DeFronzo paid more attention to the analysis of the socio-economic prerequisites for revolutionary upheavals, in particular, the growth of contradictions between

feudal remnants and capitalist relations, the aggravation of antagonism between the Third Estate and the privileged strata. Instead, the present study focused primarily on the political dimension of transformation, highlighting in detail institutional changes, the restructuring of the power system, and the adoption of new principles of legitimacy. Therefore, despite the commonality of fundamental assessments, these papers differ somewhat in the placement of accents and the subject field of analysis.

M.E. Fischer (2021) offered a comparative analysis of the processes of development of democratic regimes, considering revolutions as the starting point of their emergence. The researcher compared political transformations in different countries of the world, highlighting common patterns and specific features of democratisation. In this case, M.E. Fischer highlighted the analysis of the French, American, and British revolutions as key events that marked the beginning of the establishment of contemporary democratic institutions and practices. The researcher noted the defining role of these revolutions in the delegitimisation of absolutist regimes, the political emancipation of the Third Estate, the restriction of the power of the monarch, the establishment of the principles of power distribution and constitutionalism. These findings showed a clear conceptual affinity with the results of this study, which also treats revolutions as crucial milestones on the way to the establishment of representative democracy and the rule of law. However, M.E. Fischer focused more on a comparative analysis of the institutional design of post-revolutionary democracies, highlighting in detail the common and distinctive features in the organisation of electoral systems, parliamentarism, checks, and balances in different countries. On the other hand, this study delved somewhat less into a comparative analysis of the institutional design of democracies, but rather emphasised the commonality of ideological foundations and driving forces of revolutions themselves. Therefore, despite the proximity of the conclusions, studies differ somewhat in the focus of comparative analysis – if M.E. Fischer focused more on the post-revolutionary institutionalisation of democracy, the current research mainly highlighted the ideological origins and dynamics of revolutionary transformations.

A thorough study by J.I. Israel (2019) offered a more critical look at the legacy of the Enlightenment and its impact on revolutionary processes. The researcher conducted a large-scale analysis of the philosophical foundations, political ideas, and socio-cultural context of the age of reason, tracing their influence on the revolutionary events

of the late 18th century. J.I. Israel put forward a bold thesis about the ambiguity and inconsistency of the influence of educational ideology on socio-political transformations. According to the researcher, despite the unquestioningly emancipatory pathos of the educational ideas of freedom, equality, and progress, their radical implementation during the French Revolution paradoxically turned into an escalation of violence, the establishment of a Jacobin dictatorship and, in general, a deviation from the liberal and constitutional project of moderate Enlightenment. Più Grande Casino, revolutionary terror and Napoleon's imperial ambitions were regarded by J.I. Israel as disappointing results of an attempt to uncompromisingly implement an educational utopia by means of political radicalism. This rather contradictory concept to a certain extent calls into question the unequivocally approving assessment of the role of revolutions in the processes of democratisation, which can be traced in the present study. However, it is worth noting that the critical optics of J.I. Israel focused almost exclusively on the case of the French Revolution, while tangential analysis of the American and British revolutions was virtually nonexistent. Instead, this paper offered a more balanced and comparative view of revolutionary events, treating all three revolutions as equally significant factors in establishing the contemporary democratic paradigm. Consequently, whilst J.I. Israel's warnings about the ambiguity of the revolutionary legacy undoubtedly merit attention, they are not sufficiently substantiated within the broader comparative context presented in this study.

A valuable contribution to the discussion about the impact of revolutions on the development of democracy was the paper by S. Berman (2019). The researcher provided a panoramic overview of political transformations in Europe from absolutism to the present, considering the French Revolution as a turning point in the transition to new forms of political structure. Noting its role in proclaiming the principles of freedom and equality, S. Berman emphasised the contradictory nature of the revolution that turned into Jacobin terror and Napoleon's authoritarianism. This interpretation complements the more unambiguous assessments of the French Revolution presented in this study. Similarly, analysing the British revolution as an example of the gradual evolution towards democracy through the limitations of royal power, S. Berman offered an alternative vision of ways of democratisation, different from the revolutionary paradigm.

G. Lawson's (2019) theoretical model appeared to be extremely helpful for understanding the nature of revolutions. The researcher offered a structural and functional scheme for analysing revolutionary processes, which covers the pre-revolutionary situation, revolutionary scraping, post-revolutionary stabilisation, and consolidation of the new regime. The application of this model to the French, American, and British revolutions allowed identifying both universal patterns and specific features of each case. Conclusions of G. Lawson were in tune with the conclusions of this study regarding the crucial importance of

the ideological factor in the mobilisation of the revolutionary masses. The researcher focused more on the structural prerequisites and dynamics of the deployment of revolutions, while the present study focused on their political and institutional consequences.

A systematic understanding of the role of social movements in the processes of political transformation was proposed by S. Tarrow (2022). The researcher considered the French and American revolutions as large-scale examples of collective action that led to a radical change in the social system. S. Tarrow reported the defining role of the masses as the driving force behind revolutions and the consolidation of new forms of political organisation. These observations correlate with the findings of this study regarding the key importance of broad civic participation in revolutionary events. However, if S. Tarrow focused on highlighting the organisational aspects of collective action, this paper offered a broader conceptualisation of revolutions as turning points on the road to democracy.

A significant contribution to the conceptualisation of the problem of democracy and difference was offered by the collection edited by S. Benhabib (2021). Researchers analysed the challenges posed to democratic theory and practice by issues of identity, citizenship, and inclusion in the context of the growing diversity of contemporary societies. Although the collection did not directly focus on the analysis of revolutions, its conceptual framework seemed extremely heuristic for understanding the legacy of the French, American, and British revolutions in the context of asserting the principles of freedom and equality. The revolutionary transformations analysed in detail in this study laid the foundations for a contemporary model of citizenship based on the ideas of universal human rights and democratic participation. As the authors of the collection rightly pointed out, this model was historically shaped within the context of homogeneous national communities and did not always consider dimensions of difference and inclusion. Reflecting on the legacy of the revolution through the lens of the inclusion and representation of diverse identities is therefore an important step towards a more inclusive vision of democracy.

CONCLUSIONS

The study involved a comprehensive comparative analysis of the French, American, and British revolutions, identification of their common features and differences, and determination of their role in the development of contemporary democratic ideas and institutions. As a result of investigating the historical prerequisites, causes and course of each of the revolutions, it was established that they were caused by the crisis of the old order, dissatisfaction with the existing system of government, and the desire for change. The French Revolution was caused by the deep socio-economic and political contradictions of the absolutist monarchy; the American Revolution – by colonial dependence and economic contradictions with the mother country; and the British Revolution – by the conflict between the King and Parliament, and religious disputes.

The analysis of key ideas and principles put forward during the revolutions showed that they are based on the ideas of the Enlightenment and natural law. All three revolutions proclaimed the principles of freedom, equality, and popular sovereignty, albeit with different accents. The French Revolution championed the slogans “Liberty, Equality, Fraternity”; the American Revolution championed the inalienable human rights to life, liberty, and the pursuit of happiness; and the British Revolution championed the right to resist tyranny and the right to personal liberty. Revolutions also promoted the ideas of human rights, representative government, and constitutionalism.

A comparison of the constitutional and institutional changes that occurred as a result of revolutions allowed assessing their impact on the development of democracy. The French Revolution established the principles of popular sovereignty, republicanism and radical social reform; the American Revolution established a republican form of government, federalism, and a system of checks and balances; and the British Revolution established the supremacy of Parliament and a constitutional monarchy. All three revolutions laid the foundations for representative democracy, the rule of law, and the protection of human rights, albeit with varying degrees of success and duration. The study convincingly proved the defining role of the French, American, and British revolutions in the development of contemporary democratic ideas and institutions. They became a model for subsequent democratic movements and revolutions, contributed to the establishment of liberal democratic values, the development of parliamentarism and constitutionalism. Each of the revolutions offered its own model of political structure, which corresponded to

national traditions and historical circumstances. These models have become the basis for the development of contemporary democratic systems around the world and their adaptation and synthesis in various national contexts.

It is worth noting certain limitations of this study. It focused mainly on the political and ideological aspects of revolutions, paying less attention to their socio-economic dimension. The analysis focused on three of the most significant revolutions in Europe and America, leaving out other examples of revolutionary transformations. The study did not aim to provide a detailed analysis of the long-term consequences of the revolutions and their impact on the subsequent development of individual countries and regions. Prospects for further research include the expansion of the geographical scope of comparative analyses of revolutions, an in-depth study of the interplay between revolutionary processes and the evolution of democratic thought, examination of the long-term consequences of revolutions for the development of individual countries and regions, drawing lessons from revolutions for contemporary democratic transformations, and conducting an interdisciplinary analysis of revolutions to create a comprehensive picture of revolutionary processes.

ACKNOWLEDGEMENTS

None.

FUNDING

None.

CONFLICT OF INTEREST

None.

REFERENCES

- [1] Adelman, J. (2006). *Sovereignty and revolution in the Iberian Atlantic*. Princeton: Princeton University Press.
- [2] Allison, R. (2011). *The American revolution: A concise history*. Oxford: Oxford University Press.
- [3] Benhabib, S. (Ed.). (2021). *Democracy and difference: Contesting the boundaries of the political*. Princeton: Princeton University Press.
- [4] Berman, S. (2019). *Democracy and dictatorship in Europe: From the Ancien Régime to the present day*. Oxford: Oxford University Press.
- [5] Blackman, R.H. (2019). *1789: The French revolution begins*. Cambridge: Cambridge University Press.
- [6] Blackstone, K.E. (2023). *Hardest conflict: Morale in the continental army during the American revolutionary war, 1775-1783*. Edinburgh: University of Edinburgh.
- [7] Bowers, T.A. (2019). *The life and soul of an army: Discipline and professionalism in George Washington's continental army, 1775-1776*. (Doctoral dissertation, The George Washington University, Washington, USA).
- [8] Brown, D. (2020). Republic. In *Empire and enterprise* (pp. 167-192). Manchester: Manchester University Press. doi: 10.7765/9781526132000.00013.
- [9] Burke, E. (2022). *The end of the old financial regime, 1781-1793*. In T. Jackson (Ed.), *Impunity and capitalism: The afterlives of European financial crises, 1690-1830* (pp. 141-176). Cambridge: Cambridge University Press.
- [10] Collins, J.M. (2020). The long parliament and the law of necessity in seventeenth-century England. *Past & Present*, 247(1), 3-35. doi: 10.1093/pastj/gtz053.
- [11] Daly, P. (2020). Judicial independence and accountability in the British constitution. In E. Hirsch Ballin, G. van der Schyff & M. Stremler (Eds.), *European yearbook of constitutional law 2019* (pp. 143-170). The Hague: T.M.C. Asser Press. doi: 10.1007/978-94-6265-359-7_7.
- [12] DeFronzo, J. (2021). *Revolutions and revolutionary movements*. New York: Routledge. doi: 10.4324/9781003102649.
- [13] Downing, B. (2020). *The military revolution and political change: Origins of democracy and autocracy in early modern Europe*. Princeton: Princeton University Press.

- [14] Dunn, S. (2008). *The deaths of Louis XVI: Regicide and the French political imagination*. Princeton: Princeton University Press.
- [15] Fischer, M.E. (2021). *Establishing democracies*. London: Routledge.
- [16] Galie, P.J., Bopst, C., & Kirschner, B. (2020). *Bills of rights before the bill of rights. Early state constitutions and the American tradition of rights, 1776-1790*. London: Palgrave Macmillan.
- [17] Gallo, J. (2022). *Charles I—dead is better*. Retrieved from <https://scholarworks.uvm.edu/items/f4c0c22a-7bb5-49a6-9549-4af4e8992b42>.
- [18] Gibbs, S. (2023). *Lordship, state formation and local authority in late medieval and early modern England*. Cambridge: Cambridge University Press.
- [19] Gill, G. (2023). *Revolution and terror*. Oxford: Oxford University Press.
- [20] Green, C. (2020). *United/States: A revolutionary history of American statehood*. *Michigan Law Review*, 119(1), 1-69.
- [21] Grinin, L. (2022). Evolution and typology of revolutions. In J.A. Goldstone, L. Grinin & A. Korotayev (Eds.), *Handbook of revolutions in the 21st century: The new waves of revolutions, and the causes and effects of disruptive political change* (pp. 173-200). Cham: Springer International Publishing. doi: 10.1007/978-3-030-86468-2_6.
- [22] Halliday, P.D. (2012). *Habeas corpus: From England to empire*. Cambridge: Harvard University Press.
- [23] Hobsbawm, E.J. (1992). *Nations and nationalism since 1780: Programme, myth, reality*. Cambridge: Cambridge University Press.
- [24] Hobson, J. (2020). *Charles I's executioners: Civil war, regicide & the Republic*. Barnsley: Pen and Sword History.
- [25] Hunt, L. (2004). *Politics, culture, and class in the French revolution: With a new preface*. London: University of California Press.
- [26] Israel, J.I. (2019). *The Enlightenment that failed: Ideas, revolution, and democratic defeat, 1748-1830*. Oxford: Oxford University Press.
- [27] Jones, P.M. (2021). *The French revolution 1787-1804*. London: Routledge. doi: 10.4324/9781003156185.
- [28] Kaczor, C. (2023). The declaration of independence: Inalienable rights, the creator, and the political order. *Nova et Vetera*, 21(1), 249-274. doi: 10.1353/nov.2023.a919156.
- [29] Keen, M., & Slemrod, J. (2021). *Rebellion, rascals, and revenue: Tax follies and wisdom through the ages*. Princeton: Princeton University Press.
- [30] Koekkoek, R. (2020). The kindred spirit tie of congenial principles. In *The citizenship experiment* (pp. 26-56). Leiden: Brill. doi: 10.1163/9789004416451_003.
- [31] Lang, S. (1999). *Parliamentary reform 1785-1928*. London: Routledge.
- [32] Lawson, G. (2019). *Anatomies of revolution*. Cambridge: Cambridge University Press.
- [33] Lüsebrink, H.J., & Reichardt, R. (1997). *The Bastille: A history of a symbol of despotism and freedom*. Durham: Duke University Press.
- [34] Maier, P. (2008). *The declaration of independence and the constitution of the United States*. New York: Random House Publishing Group.
- [35] Maier, P. (2012). *American scripture: Making the Declaration of Independence*. New York: Knopf Doubleday Publishing Group.
- [36] Merriman, J. (2014). *Massacre: The life and death of the Paris commune*. London: Hachette UK.
- [37] Miao, M. (2021). *Kindling the flame of revolution*. *The History Teacher*, 55(1), 121-136.
- [38] Middlekauff, R. (2007). *The glorious cause: The American revolution, 1763-1789*. Oxford: Oxford University Press.
- [39] Morrill, J. (1992). The causes of the British civil wars. *The Journal of Ecclesiastical History*, 43(4), 624-633. doi: 10.1017/S0022046900002001.
- [40] Racine, K. (2010). "This England and this now": British cultural and intellectual influence in the Spanish American independence era. *Hispanic American Historical Review*, 90(3), 423-454. doi: 10.1215/00182168-2010-002.
- [41] Ritchie, N. (2020). *French revolution, 1789-1799*. Oxford: Oxford University Press. doi: 10.1093/OBO/9780199846719-0169.
- [42] Schwoerer, L.G. (1981). *The declaration of rights, 1689*. Baltimore: Johns Hopkins University Press.
- [43] Sellers, J.M., Lidström, A., & Bae, Y. (2020). *Multilevel democracy: How local institutions and civil society shape the modern state*. Cambridge: Cambridge University Press.
- [44] Siry, S.E. (2012). Defiance of the patriots: The boston tea party and the making of America – by Benjamin L. Carp. *Historian*, 74(1), 100-101. doi: 10.1111/j.1540-6563.2011.00314_10.x.
- [45] Sperber, J. (2005). *The European Revolutions, 1848-1851*. Cambridge: Cambridge University Press.
- [46] Stourzh, G. (2020). *The American revolution, modern constitutionalism, and the protection of human rights*. In K. Thompson (Ed.), *Truth and tragedy* (pp. 162-176). London: Routledge.
- [47] Tarrow, S. (2022). *Power in movement*. Cambridge: Cambridge University Press.
- [48] Venning, T. (2023). *The fall of Cromwell's Republic and the return of the king*. Barnsley: Pen & Sword.
- [49] Vile, M.J.C. (2012). *Constitutionalism and the separation of powers*. Carmel: Liberty Fund.
- [50] von Güttner, D. (2021). *French revolution: The basics*. London: Routledge. doi: 10.4324/9781003157748.
- [51] White, C. (2024). *The establishment of the American judicial system through Marbury vs. Madison*. *Tenor of Our Times*, 13(1), article number 16.
- [52] Wolfreys, J., & Haynes, M. (Eds.). (2020). *History and revolution: Refuting revisionism*. London: Verso Books.
- [53] Wood, G.S. (2021). *Power and liberty: Constitutionalism in the American revolution*. Oxford: Oxford University Press.

Regulatory models of artificial intelligence in contemporary governance: Comparative analysis of China, the EU and the USA

Mykhailo Shkilniak^{*1} 

¹Department of Management, Public Administration and Personnel, Western Ukrainian National University, Ternopil, Ukraine

Abstract. The rapid development of artificial intelligence and its penetration into critically important spheres of social life have confronted global governance with unprecedented challenges that require the development of balanced regulatory approaches. The aim of this study was to compare the main regulatory models of artificial intelligence governance in the world's leading regions – China, the European Union and the United States of America – and to identify areas of divergence as well as potential opportunities for mutual influence and adaptation within the contemporary political and ethical context. The research methodology was based on a combination of comparative, analytical and case-study methods. The regulatory frameworks and policies of the EU, the USA and China were analysed, along with case studies from Estonia, the African Union and leading technology corporations, which made it possible to identify differences in approaches to the regulation and practical application of artificial intelligence. The results of the study demonstrated that artificial intelligence has become a strategic resource shaping a new configuration of global power balances. The European regulatory model ensured a comprehensive approach to risk assessment through a multi-level classification of systems. The Chinese model demonstrated the effectiveness of centralised control and rapid scaling, while the American approach retained a fragmented character due to the absence of a single federal law. A trend was identified whereby international organisations play a role in shaping universal ethical standards, yet their capacity to ensure real coordination remains limited. It was found that the European Union's "Brussels effect" contributes to the transnationalisation of European norms, while China and the United States disseminate their own models through digital diplomacy and corporate expansion respectively. Certain countries, such as Estonia, have demonstrated a successful combination of digitalisation of public administration with democratic principles, using cryptographic protection mechanisms and decentralised access to data. The results of the study may serve as a basis for developing adaptive strategies for artificial intelligence governance in countries with different levels of institutional development and may contribute to the formulation of international agreements in the field of digital policy

Keywords: digital sovereignty; cybersecurity; algorithmic governance; digital authoritarianism; social networks; electronic governance; administrative efficiency

INTRODUCTION

The rapid development of artificial intelligence (AI) and its integration into spheres of social life have created a qualitatively new level of challenges for global governance. AI has ceased to be merely a technological tool and has become a strategic resource capable of influencing the balance of power in international relations, economic transformations and social structures. At the same time, the absence of unified approaches to its regulation at the global level has led to policy fragmentation, intensifying geopolitical competition

between states and creating risks of increasing inequality in access to technologies.

Previous studies laid the foundation for understanding the dynamics of AI governance but did not eliminate certain gaps. The study by V.I. Espinosa & A. Pino (2025) focused on the case of Estonia, where e-government based on principles of transparency, trust and security contributed to economic transformation and increased social welfare. The authors demonstrated that the successful integration of the e-government model was made possible by

Suggested Citation:

Shkilniak, M. (2025). Regulatory models of artificial intelligence in contemporary governance: Comparative analysis of China, the EU and the USA. *Journal of Global Political Transformations*, 1(1), 56-68. doi: 10.67524/verus1/1.2025.56.

*Corresponding author



a comprehensive combination of legal and technological innovations. The work of E. Erman & M. Furendal (2024) emphasised that, despite the widespread discourse on “AI governance”, the theoretical basis remained insufficiently developed. The authors pointed to a deficit of procedural legitimacy in existing regulatory models and argued that delegating governance functions to algorithms undermined democratic principles. They proposed a conceptual framework for assessing the legitimacy of global regulatory mechanisms, but the empirical dimension of their model was limited. In the study by I. Ulnicane *et al.* (2022), concepts from social studies of science and technology were applied to explain the formation of AI policies. The authors analysed the role of expectations and competition in new technological sectors, revealing that policies were often the result of interactions between academic communities, governments and corporations. The article by A. Taihagh (2021) emphasised that the rapid development of autonomous systems, particularly for military purposes, created unprecedented governance challenges. The author showed that regulatory frameworks lagged behind technological change and that governments’ institutional capacities remained insufficient.

In the work of R.J. Neuwirth (2024), a shift in emphasis from national to global regulation was proposed. The author argued that, in order to minimise AI-related risks, regulatory discussions must be integrated into the broader context of the UN Sustainable Development Goals. The study considered AI as a factor of cognitive transformation of global governance but did not provide concrete mechanisms for implementing this vision in interstate interaction. The work of R. Radu (2021) presented the first comprehensive analysis of national AI strategies adopted between 2017 and 2019. It demonstrated that most states preferred ethics-oriented approaches rather than legal frameworks, which led to the formation of hybrid governance models. R.B.L. Dixon (2023) proposed a universal governance model based on an analysis of the approaches of China, the USA and the EU. The author identified seven recommendations for integrating ethical principles into policy, drawing attention to vulnerable groups facing the greatest risks. Discussions on effective artificial intelligence governance took place at the intersection of political, ethical and economic dimensions, but their theoretical and practical integration remained limited, highlighting the need for research capable of proposing institutionally and normatively balanced regulatory approaches.

The aim of this study was to conduct a comparative analysis of regulatory approaches to artificial intelligence governance in China, the European Union and the United States of America, with an emphasis on their conceptual differences, ethical orientations and institutional implementation mechanisms. The objectives of the study were to: conduct a comparative analysis of regulatory approaches to artificial intelligence in China, the EU and the USA; identify key challenges and differences between state, supranational and corporate models of AI governance; and

generalise promising directions for mutual influence and adaptation of regulatory practices in order to enhance the ethical nature, transparency and effectiveness of artificial intelligence policies.

MATERIALS AND METHODS

The methodological framework of the study combined comparative, analytical and case-study methods, enabling a systematic analysis of approaches to AI regulation in the world’s leading political and legal systems. The core tool was comparative legal and institutional analysis, through which regulatory frameworks and policy implementation mechanisms in the European Union, the United States of America and China were examined. The main sources included A New Generation of Artificial Intelligence Development Plan (State Council of the People’s Republic of China Document No. 35, 2017), The EU Artificial Intelligence Act (2021), AI Bill of Rights (Blueprint for an AI Bill of Rights, 2022) and the AI Risk Management Framework (2023). For the ethical dimension of the study, the Recommendation on the Ethics of Artificial Intelligence (2023), which defines universal principles for the responsible use of algorithmic systems, was used. Content analysis was conducted through thematic coding of regulatory acts and strategic documents according to the following categories: regulatory framework; institutional governance structure; areas of AI application; ethical and security risks; level of international integration; and manifestations of “soft power”.

Coding was carried out by two researchers using the NVivo software environment, ensuring interpretative consistency (double coding) and systematic organisation of the material. The comparison of characteristics employed thematic matrices in Excel, which made it possible to summarise differences between models according to defined criteria. Document selection criteria included representativeness of models (supranational, national and corporate), relevance (primarily post-2020), the presence of ethical and human rights provisions, and the ability to demonstrate extraterritorial influence – particularly the EU’s “Brussels effect” (Bradford, 2020).

The study also incorporated auxiliary case studies: the African Union (2024) as an example of a collective regional approach; Estonia with its Kratt Strategy and the X-Road – Interoperability services (n.d.) platform as a case of democratic digitalisation; and Turkey, India and Latin America for analysing specific political dynamics in interaction with digital platforms. At the level of corporate practices, the activities of Google (n.d.), Microsoft (n.d.), OpenAI (n.d.), NVIDIA (n.d.), Netflix (n.d.) and TikTok (n.d.) were examined, demonstrating different forms of corporate influence on AI policy.

The theoretical foundation is provided by the concept of “soft power” (Nye, 2004), used to interpret how AI technologies are transformed into instruments of political, economic and cultural influence by states and corporations. The limitations of the study are related to the fact

that the analysis is based on official documents that reflect declared policy rather than actual practice; corporate sources may contain elements of strategic positioning; and different jurisdictions publish documents of varying scope and structure, complicating standardised comparison. Despite this, the chosen approach ensured the comprehensiveness of the analysis and made it possible to identify structural differences between AI regulatory models in the world's leading regions.

RESULTS

Theoretical and conceptual foundations of global governance in the age of AI

The evolution of the concept of global governance reflects a complex process of transformation of the international system, from the dominance of state-centred models to the emergence of multi-level and networked regulatory mechanisms. Whereas classical approaches to global governance focused on the actions of sovereign states, intergovernmental organisations and the system of international law, by the end of the twentieth century a clear trend had begun to take shape towards the inclusion of non-state actors – transnational corporations, international non-governmental organisations and global financial institutions (Nwokike, 2022). The digital age has radically accelerated this process, creating conditions for new forms of power and influence based on control over information flows and data infrastructure. It is during this period that the notion of global governance has gradually been supplemented by the categories of “digital sovereignty”, “cybersecurity” and “algorithmic governance”. Artificial intelligence is one of the most powerful catalysts of this transformation, because it not only expands the toolkit of state and supranational actors, but also changes the very nature of political and administrative practices. In public administration, the deployment of machine-learning algorithms makes it possible to optimise decision-making processes, reduce bureaucratic costs and anticipate societal needs on the basis of “big data” analysis (Bajracharya, 2024). In the political domain, artificial intelligence alters the structure of public communication. Algorithms that drive the operation of digital platforms become new “architects” of political discourse, determining which topics gain public salience and which groups receive greater opportunities to articulate their interests. This, in turn, creates new mechanisms of mobilisation and control that often extend beyond classical democratic procedures. In administrative terms, AI appears as a tool for managerial efficiency. The automation of public-service procedures demonstrates the technology's potential to build transparent and citizen-oriented governance systems (Anshari *et al.*, 2025). Here, algorithms are able not only to process information but also to act as intermediaries between the citizen and the state, reducing bureaucratic barriers and increasing trust in institutions. At the same time, however, risks associated with algorithmic “black boxes” grow: when the logic

of decision-making remains opaque, there is a danger of power being concentrated in the hands of technological elites or private corporations that control the software.

The challenges that arise in the process of integrating artificial intelligence into global governance encompass a set of interconnected problems that have both immediate political and administrative consequences and strategic implications for the international system. One of the most acute issues is the security dimension (Hu *et al.*, 2021). The use of AI in national defence and cyber protection opens new possibilities for developing effective mechanisms for threat detection and attack forecasting. Yet it also raises the problem of autonomous weapons systems that can make decisions without human control. This brings up questions of accountability for the actions of such systems, particularly in cases involving violations of international humanitarian law. An example is the debates surrounding the use of unmanned combat drones in conflicts in the Middle East, where the use of algorithms for target identification is often accompanied by the risk of false positives and civilian casualties (Bornu, 2025). Equally important is the ethical dimension of AI use. Algorithms can reproduce – or even amplify – existing biases embedded in the source data used for training. This is particularly evident in automated recruitment, credit-scoring systems or algorithmic moderation on social networks. For example, studies in the United States have shown that some justice-sector algorithms display a tendency to systematically overestimate the risk of reoffending among African Americans, thereby undermining the principle of equality before the law. Another defining challenge is inequality of access to technology. The gap between technologically advanced countries and states of the Global South intensifies the problem of asymmetry in global governance. Regions lacking adequate infrastructure and investment in AI development risk being excluded from the processes of shaping new rules and standards. For instance, African countries depend on importing ready-made digital platforms created in the United States or China, effectively creating a new form of “digital coloniality” (Akıner, 2024). This constrains their ability to influence the international agenda while also creating risks of dependence on foreign technology corporations. Thus, unequal access becomes not only a socio-economic issue but also a geopolitical factor (Costa, 2023).

At the same time, despite numerous challenges, the application of artificial intelligence in global governance opens up significant potential for addressing supranational problems. These include optimising responses to climate change, monitoring the spread of epidemics, managing migration flows and ensuring food security. In these areas, machine-learning technologies can process data volumes that traditional methods could not analyse and provide states with tools for strategic decision-making at the global level. Table 1 systematises the main challenges and opportunities associated with the use of AI in global governance.

Table 1. Key challenges and opportunities of AI use in global governance

Issue dimension	Key challenges	Examples	Potential opportunities	Examples
Security	Autonomous weapons systems without adequate oversight; cyber threats and algorithmic attacks	Use of combat drones in Syria; AI-enabled cyberattacks in Europe	Development of predictive analytics systems for national security and cyber defence	AI systems for detecting cyberattacks in the EU; forecasting terrorist threats in the USA
Ethics	Algorithmic bias; privacy violations; discrimination in access to services	Risk-assessment systems in the USA that discriminated against African Americans	Development of international standards for ethical AI use	UNESCO “Recommendation on the Ethics of AI”; the EU AI Act
Inequality of access	Digital coloniality; lack of infrastructure in developing countries	Africa and South Asia dependent on importing US and Chinese platforms	Technology transfer programmes; international co-operation in AI	African AI development strategy; UN digital inclusion initiatives
Global problems	Lack of co-ordination in regulation; risk of fragmentation of international rules	Divergent models: EU AI Act; absence of a single law in the USA; state control in China	Use of AI to address supranational challenges	UN climate-change monitoring systems; AI-supported analysis of COVID-19 spread

Source: compiled by the author based on Y. Hu *et al.* (2021), The EU Artificial Intelligence Act (2021), Recommendation on the Ethics of Artificial Intelligence (2023), S. Costa (2023), African Union (2024), M. Basu & M.D. Nath (2024), T.Z. Bornu (2025), R. Arslan *et al.* (2025)

An analysis of the table shows that artificial intelligence is simultaneously a source of threats and a powerful resource for improving the effectiveness of global governance. The most critical are security risks linked to autonomous weapons systems and cyber threats, as these can extend beyond the scope of traditional international law. Ethical challenges create the need to develop universal norms that would regulate algorithm use and guarantee the protection of human rights. Inequality of access clearly demonstrates that the digital divide between countries can entrench new forms of global hierarchy, in which leading states and corporations become the primary centres of power. At the same time, the opportunities opened by AI are no less significant: from creating predictive-analytics systems for security to developing global strategies for responding to climate and humanitarian challenges. This indicates that the task of the international community is to balance risk minimisation with maximising AI's potential, which requires co-ordination at the level of international organisations, harmonisation of regulatory frameworks and the development of inclusive co-operation programmes.

In international relations, artificial intelligence is increasingly viewed not only as a technological tool or an economic resource, but also as a powerful driver of “soft power”. The concept of “soft power”, proposed by J.S. Nye (2004), rests on a state's ability to influence other countries through the attractiveness of its culture, political values and institutions, rather than through coercion or economic pressure. Artificial intelligence, given its universal and global character, becomes a new dimension of this category, as it allows states to project their technological standards, cultural narratives and models of digital development onto the international arena. Competition over the right to set regulatory frameworks for AI use is particularly significant in this context. By promoting The EU Artificial Intelligence Act (2021), the European Union is effectively shaping a normative standard that can extend far beyond Europe. This process is often compared to the

so-called “Brussels effect”, whereby EU legal practices become a global norm due to the economic attractiveness of the European market and high requirements for ethics and transparency (Bradford, 2020). In this way, the EU uses AI regulation as an element of its “soft power”, emphasising a commitment to human rights, privacy protection and democratic values. As a result, this supports public trust and the effectiveness of digital services within member states, while also setting standards for the international use of technologies.

China has chosen a different path, treating artificial intelligence as an instrument for promoting a model of digital authoritarianism (Zeng, 2020). Large-scale investments in facial-recognition technologies, social credit systems and control over digital platforms have formed a distinctive governance model that is exported to countries in Africa, Latin America and the Middle East through “digital diplomacy”. For many states seeking effective mechanisms to control social processes, the Chinese experience becomes an attractive template, strengthening Beijing's influence without the need for direct coercion. In effect, technologies become carriers of ideology, and algorithms become instruments for shaping an international image. The United States, in turn, advances its “soft power” through innovation ecosystems and the global leadership of technology corporations. Companies such as Google (n.d.), Microsoft (n.d.), OpenAI (n.d.) and NVIDIA (n.d.) act as “ambassadors” of an American model of AI development based on market principles, open innovation and competitiveness. The export of American software products and research practices creates not only economic dependence but also cultural and value-oriented alignment, as AI technologies are integrated into the everyday practices of millions of users worldwide. An example is the global spread of chatbots built on American models, which not only provide technological functionality but also embed certain standards of communication, language and information interpretation in users' perceptions (Chen *et al.*, 2024).

A distinct vector of using AI as a “soft power” resource is educational and scientific diplomacy. States that invest in international exchange programmes, grants and research laboratories in the AI field effectively build a positive image and expand their circle of partners. Three major centres of power are clearly visible here: China, the USA and the European Union. China actively develops a network of Confucius Institutes with a focus on technological innovation (Flew & Hartig, 2014), while the USA supports numerous Fulbright (n.d.) programmes, in which researchers have opportunities to work on AI-related projects. The European Union, in turn, uses Horizon Europe (n.d.) to fund international research that demonstrates its commitment to global scientific collaboration. All these initiatives correspond to basic selection criteria: representativeness (reaching a global audience), extraterritoriality (creating international research hubs) and human rights (a public declaration of value standards associated with academic freedom).

The cultural dimension of AI within “soft power” manifests itself in control over algorithmic systems that govern global digital platforms. Netflix (n.d.) and TikTok (n.d.) shape a unified cultural agenda through recommendation algorithms that affect the accessibility and popularity of cultural products. Control over a platform means control over global cultural trends: TikTok provides China with an additional channel of influence, while American platforms ensure the USA’s resistant leadership in digital culture. The European Union, unlike the USA and China, seeks to balance these dynamics through regulatory initiatives, where the operationalisation of effectiveness is defined by the level of algorithmic transparency and compliance with human-rights standards in the digital services sphere. Thus, in contemporary international relations, artificial intelligence is a powerful instrument of “soft power” operating on several levels. Regulatory frameworks allow states to spread their values and political models; technology corporations create economic and cultural dependence; educational and scientific programmes generate a positive image; and digital platforms shape global cultural trends. All of this suggests that, in an era of digital transformation, “soft power” ceases to be a purely humanitarian instrument and increasingly rests on technologies, algorithms and innovation ecosystems. The balance between different models of AI use in “soft power” will determine the future character of global governance and the distribution of influence among the world’s leading states.

Examples from regions illustrate how the triad (China – USA – EU) is reflected in local contexts. In Latin America, a key phenomenon has been the dominance of closed messaging services and short-video platforms in political mobilisation (Rincón & Uribe-Rincón, 2024). WhatsApp is used as a grassroots co-ordination network and a channel for disseminating political messages that bypass moderation; mass mailouts and group “meshes” have provided tools for rapid mobilisation and the spread of disinformation, especially during elections in Brazil (Breuer, 2025). The closed nature of these networks

reduces audit possibilities and strengthens “information bubbles” (Adrian *et al.*, 2021). At the same time, TikTok has opened a space for leaders’ direct communication with young people, strengthening the emotional dimension of politics. In Turkey, digital platforms operate under a regime of strict legal control: legislation expands the state’s powers to block content and access data, which – against the backdrop of polarisation – turns social media into a regulated field of communication. This is accompanied by technical instruments of influence and the use of bot networks to manipulate the agenda (Duygu, 2023), resulting in constraints on freedom of speech and forcing the opposition towards underground channels. In India, platforms function in a linguistically and culturally diverse environment with a vast user base. WhatsApp and localised social networks have become spaces both for mass campaigns and for “popular” mobilisation, while encryption has complicated external oversight and stimulated the development of civic fact-checking initiatives (Maréchal *et al.*, 2021). At the same time, the government has increased pressure through the IT Rules (The Information Technology..., 2021), which formalised platforms’ obligations. Studies show the spread of microtargeting and multilingual campaigns, which raise disinformation risks and simultaneously require localised moderation mechanisms (Kazemi *et al.*, 2022).

In summary, several levels of using AI as an instrument of “soft power” can be distinguished: regulatory (the EU sets standards and transparency), cultural (the USA and China promote their own platforms and algorithms), educational and scientific (global exchange programmes and research funding), and mobilisation and communication (Latin America, Turkey and India as regional cases). As a politico-technological factor, digital platforms also generate practical directions for counteraction and adaptation. Effective approaches include combining technical solutions (tools for detecting bot networks, algorithms for identifying co-ordination), regulatory reforms (transparent content-removal procedures, independent appeals mechanisms) and societal interventions (media literacy, localised fact-checking initiatives and partnerships between platforms and civil society) (Antoliš, 2024). In Latin America, projects are already being tested that combine local fact-checking with technical “tiplines” for collecting message samples from WhatsApp; in India and Turkey, initiatives are emerging to adapt interfaces and ad-verification mechanics to linguistic diversity. However, a persistent obstacle is resource asymmetry: technological solutions require access to platform data and analytical capacities, which are often the privilege of the platforms themselves or high-resource actors. Consequently, a policy of transparency and access to aggregated data becomes a central element for academic research and public oversight.

Comparative analysis of the experience of states and international institutions

State practices in applying artificial intelligence in governance differ markedly in terms of strategy, institutional

organisation, funding models and accountability mechanisms – ranging from centralised plans and strong state direction to a “state as purchaser” model and initiatives based on partnerships with the private sector. For example, the Chinese approach is characterised by a high level of centralised strategic planning, a clear state orientation towards technological dominance, and intensive integration of AI into the security sector and urban management (Allen, 2019). The official A New Generation of Artificial Intelligence Development Plan (State Council of the People’s Republic of China Document No. 35, 2017) set time-bound goals and priorities up to 2025 and 2030, defining state investment, the creation of national research centres and clusters, and a system of incentives for private actors. In practice, this has resulted in large-scale public funding programmes for research, the establishment of industrial parks and preferential support for companies capable of delivering large-scale solutions in the public sector. Within this strategy, AI deployment in urban governance and mass-surveillance instruments has become a standard showcase for efficiency and technical capability; at the same time, such integration has driven the development of algorithmic control and profiling systems, strengthening the state’s capacity for preventive governance while creating challenges for transparency and privacy protection. One element of the Chinese model is the rapid translation of scientific advances into applied systems at provincial and municipal level, accompanied by substantial public procurement and close co-operation between local administrations and major technology firms (Lin, 2025). A practical embodiment of China’s state-industrial model is the “City Brain” project in Hangzhou (Caprotti & Liu, 2022), which combined large volumes of sensor data, telecom data and urban information systems with computer-vision and traffic-optimisation algorithms. Following a pilot launch in 2016, the system reportedly demonstrated concrete improvements in traffic flow and congestion reduction, strengthening the case for scaling the project and exporting the technology to other cities (including international projects). However, techno-economic successes have been accompanied by questions about data control, the terms of public-private partnerships and the long-term creation of a platform for monitoring civic activity – i.e. the “price of transparency” society pays for speed and efficiency. In administration on this scale, the absence of clear mechanisms for external auditing of algorithmic decisions increases the risks of abuse and erroneous decisions in critical situations. Operationalisation of metrics here is based on techno-economic indicators (traffic, response speed), while mechanisms of external audit and human-rights protection remain weak – reflected in the “transparency and human rights” criterion. Representativeness is ensured through scale (coverage of megacities), and extraterritoriality through exporting technologies to third countries.

The Estonian case demonstrates a practically antagonistic model: a state that prioritises digitalisation as a service-oriented transformation aimed at improving the

transparency, accessibility and efficiency of public services while preserving legal safeguards and an architecture of decentralised access to data (Lillemets, 2023). Unlike a model centred on centralised control, the Estonian approach is based on infrastructure solutions – for example, X-Road – Interoperability services (n.d.) for secure data exchange between state registers – alongside “one-stop shop” principles for citizens and mandatory cryptographic protection of transactions. At the policy level, Estonia adopted national strategies aimed at creating ethical, human-centred AI – such as the Kratt Strategy (New e-Estonia fact-sheet..., 2020) – which combine the rollout of practical public-sector solutions (bureaucracy chatbots, tax-fraud detection systems, natural-resource monitoring) with an emphasis on algorithmic openness, workforce training and international co-operation. Specific cases, such as the Bürokratt chatbot network or computer-vision systems for environmental monitoring, illustrate an effort to deliver measurable benefits to citizens (reduced time to access services, improved anomaly-detection accuracy) without abandoning legal certainty and auditability (Kaun & Männiste, 2025). This balance is achieved through standardised interfaces, open APIs and clear auditing protocols, which reduce barriers to oversight by both the public and independent institutions.

The US model differs from both of the above through the dominance of the private sector as innovator and solution provider, alongside fragmented federal regulation. Recent federal initiatives have focused on developing standards, guidance and risk-governance frameworks – such as the AI Risk Management Framework (2023) – seeking to establish a technical and administrative basis for safe and ethical AI use without imposing direct, strict regulation on development as such. The US approach is more inclined towards instruments that incentivise innovation and experimentation (pilot programmes, grants, partnerships with universities), while also paying attention to guidance on accountability, verification and safety testing. At the political level, framework documents have emerged – for example, Blueprint for an AI... (2022) – which outline citizens’ rights in the age of automated systems; on the other hand, regulatory behaviour may shift depending on the administration and political direction, creating uncertainty for long-term investment in responsible practices. The set of American approaches includes active use of public procurement to shape market standards, the encouragement of open research ecosystems and close co-operation with industry leaders to develop testing and certification methods. Metrics are operationalised through risk-management and audit indicators, as well as through research on trust in technologies (Anderson *et al.*, 2023).

The effectiveness of AI implementation in public administration depends not only on the technical sophistication of systems but also on the presence of risk-control mechanisms: procedures for assessing impacts on human rights, standards for algorithmic audits, requirements for data transparency and contractual conditions in public

procurement. Here, Estonia is an example of formalising such mechanisms at an early stage, whereas in the US projects combine technical risk-management frameworks with voluntary industry initiatives; China, meanwhile, faces issues of external oversight and international legitimacy. Given technological dynamics, political will and international constraints, an optimal national strategy requires hybrid solutions: clear strategy and investment (as in China), an orientation towards rights, inclusiveness and openness (as in Estonia), and support for an innovation-oriented ecosystem (as in the US), but with much stronger international mechanisms for co-ordination and the harmonisation of baseline standards (Parisini, 2025).

With regard to evaluating outcomes, practical indicators of effectiveness should include a set of quantitative and qualitative metrics: service delivery time and automation error rates for public services; changes in security indicators and response speed in the event of critical incidents for urban-management systems; the number of recorded and addressed cases of bias or unlawful data use; and levels of public trust, measured through regular surveys and independent audits. Constructing such metrics requires a multidisciplinary approach (law, ethics, computer science, sociology) and the creation of regulatory frameworks for transparent reporting on effectiveness. In this sense, national initiatives to develop risk-governance standards (including NIST (National Institute of Standards and Technology) frameworks) and guidance on citizens' rights (for example, the AI Bill of Rights) form a basis for such assessments and can serve as reference points for adapting local policies. Comparative analysis shows that each model has clear advantages and structural limitations. China's centralised model enables rapid scaling and synergy of national resources, but it is more vulnerable to risks of authoritarian use and reduced transparency; the Estonian model shows that combining digital infrastructure with principles of openness and human rights delivers resistant operational outcomes for citizens, but scaling it in larger and politically more diverse states may be constrained by institutional and resource limitations; the American model stimulates innovation and the emergence of global technology leaders, but the lack of a coherent regulatory field creates risks of inequality, unregulated experimentation and problems of standards interoperability internationally. These differences directly affect which instruments states choose: centralised procurement and national platforms; modular service architectures with open-source components; or combinations of state incentives and corporate innovation.

Regulatory frameworks in the field of artificial intelligence in the twenty-first century constitute one domain of global governance, because it is through legal and ethical norms that it is determined how new technologies are integrated into political, economic and social processes. The European Union, the United States and UNESCO are leading centres for developing such approaches, but each pursues a distinct logic of normative design and strategic positioning. This generates both competition for dominance

in standard-setting and a need to develop minimal global conventions that could ensure compatibility and mutual recognition of regulatory frameworks. The European Union demonstrates the most systematic and ambitious approach to building legal norms for AI, embodied in the preparation and adoption of The EU Artificial Intelligence Act (2021). This legal instrument, for the first time in world practice, creates a comprehensive classification of AI systems by risk level – from “minimal” to “unacceptable”. The latter category includes practices such as social scoring used for total control over citizens, as well as real-time biometric identification except in clearly defined cases. A distinctive feature of the AI Act is its emphasis on preventive control and certification of technologies at the stage of their development. In this way, the EU seeks to implement a “regulation through risk” logic that combines the protection of human rights with innovation competitiveness. The law has an extraterritorial character: any company seeking access to the European market must comply with its requirements.

The American approach is far more fragmented and pragmatic, which is explained by both political culture and the structure of public administration in the United States. Unlike the EU, Washington has not created a single codified AI law; instead, regulation is carried out through a combination of “soft law”, sectoral standards and strategic initiatives. A central place in this system is occupied by Blueprint for an AI... (2022), published by the White House in 2022. This document is not legally binding, but it provides a framework for protecting citizens' rights in the age of algorithms, emphasising principles such as transparency, non-discrimination, the ability to opt out of automated decisions and the right to an explanation. In parallel, the United States is actively developing guidance from the NIST, in particular the AI Risk Management Framework (2023), which aims to establish a unified approach to assessing and mitigating risks associated with algorithmic use. UNESCO's initiatives in AI have a different character, as the organisation does not possess coercive instruments comparable to state laws and instead develops global framework norms and recommendations. In 2021, the Recommendation on the Ethics of Artificial Intelligence (2023) was adopted, becoming the first comprehensive global document oriented towards ethical standards for AI use. This instrument is based on four fundamental principles: respect for human rights, inclusiveness, sustainable development and the promotion of peace. The emphasis is on preventing the deepening of inequalities, given the risk that countries with limited resources will remain outside the development process for new technologies. UNESCO insists on the need to develop national strategies that take into account not only technical but also cultural, social and educational features. In addition, the organisation's recommendations are aimed at establishing mechanisms of transparency, accountability and access to technology for countries of the Global South. This makes UNESCO's initiatives a compensatory factor countering asymmetry between technological giants and less developed states.

In summary, these three approaches reflect different models of global governance. The EU seeks to establish strict legal standards underpinned by its economic strength and ability to project norms beyond its jurisdiction. The United States develops a decentralised, innovation-oriented regulatory model in which the private sector plays the leading role and the state provides only framework guidance. UNESCO, in turn, offers a universalist, value-driven approach that attempts to balance the interests of different groups of actors and to give voice to less

developed countries. At the same time, these approaches are not only in competition but also complementary: UNESCO's recommendations can provide a basis for global discussions; American flexibility supports the speed of innovation; and European legal norms protect human rights and democratic values. In the longer term, the synthesis of these three vectors may become the foundation for creating a truly effective and fair system of global AI regulation. A more detailed comparison of these regulatory models is presented in Table 2.

Table 2. Regulatory models of AI use in different regions

Parameter/ Region	European Union (AI Act)	United States (federal initiatives and voluntary standards)	China (state strategy and regulatory initiatives)	UNESCO (Recommendation on the Ethics of AI)
Policy objective	Protection of fundamental rights, prevention of harm; establishment of unified legal standards for the EU market	Promotion of innovation and competitiveness while mitigating risks; establishing principles without mandatory, unified codification	National technological leadership; economic and security uses of AI; accelerated commercialisation and meeting state needs	Development of ethical and legal guidance, universal principles (respect for human rights, inclusiveness, sustainable development)
Legal status and binding force	Codified law (entered into force); mandatory requirements for high-risk systems; bans on unacceptable practices	Predominantly "soft law": executive documents (Executive Orders), NIST guidance, frameworks without mandatory federal sanctions	Combination of directives, technical standards and sectoral rules; strong role of executive power and administrative acts; rapid issuance of norms based on strategic plans	Intergovernmental recommendations endorsed by member states; no direct coercive force, but commit to implementing principles in national policies
Approach to risk and scope	Risk-based: classification of systems (minimal-limited-high-unacceptable); mandatory conformity assessment for high-risk	Framework and risk-management orientation (NIST AI RMF) with voluntary application; focus on risk-management processes across the life cycle	Pragmatic, industry-oriented classification: priorities include security, information control, public-order management; operational restrictions for specific uses (e.g. chatbots, deepfakes) via specific administrative acts	Ethical approach: principles for assessing impacts on human rights, transparency requirements, responses to inequalities; call for national impact assessments
Implementation instruments	Certification/conformity assessment, documentation requirements, mandatory human-in-the-loop/control in some applications; fines and administrative sanctions	Public procurement as an incentive, R&D grants, publication of guidance; sectoral codes, voluntary audits; separate state-level laws	Centralised public R&D funding programmes, public procurement, priority industrial clusters; administrative guidance on content moderation and data localisation	Technical assistance to countries, methodological tools for national strategies, audit and impact-assessment guidance; promotion of education and inclusive programmes
Accountability mechanisms	Supervisory authorities (national AI bodies, audits), mandatory registration of high-risk systems, fines; extraterritorial effect via market access	Political and administrative oversight, sectoral regulators in specialised areas; public and market pressure	Administrative control, operational instructions for providers, co-operation with security services/police; limited public audit due to control of the information environment	Monitoring of implementation through member-state reporting mechanisms; recommendations on institutional mechanisms for implementation
Transnational action/extraterritoriality	Clear extraterritorial effect (market impact – non-EU firms must comply)	Smaller extraterritorial effect; greater reliance on private-sector co-operation and voluntary international standards	Bilateral technology agreements, export of platforms and solutions; practical impact via infrastructure projects (digital export)	Orientation towards global uptake of principles; focus on developing countries; no coercive extraterritoriality, but offers a standard ethics model
Impact on innovation and business ecosystem	Standardisation may raise entry barriers for smaller actors, but promotes "trustworthy AI" and creates market advantage for certified products	Flexibility supports rapid innovation cycles and corporate leadership, but risks "regulatory arbitrage"	State stimulates industry through investments and public contracts; rapid scaling model, but with risks of market centralisation around key players	Support for inclusive innovation policies, grant and educational assistance to strengthen capacity in low-resource regions

Table 2. Continued

Parameter/ Region	European Union (AI Act)	United States (federal initiatives and voluntary standards)	China (state strategy and regulatory initiatives)	UNESCO (Recommendation on the Ethics of AI)
Human-rights and inequality safeguards	Strong emphasis on fundamental rights; inadmissibility of social scoring; privacy protection	Rights focus via non- binding guidance (AI Bill of Rights), but implementation depends on sectoral standards	Priority on security and public order; human rights present in documents, but implementation often subordinated to state interests; risks of rights restrictions	Human rights and preventing the deepening of inequalities are central; call for technology-transfer and access policies

Source: compiled by the author based on G.C. Allen (2019), The EU Artificial Intelligence Act (2021), Blueprint for an AI... (2022), AI Risk Management Framework (2023), Recommendation on the Ethics of Artificial Intelligence (2023), X. Lin (2025), E. Parisini (2025)

The regulatory models presented in the table reflect three main logics of state AI policy: rights-oriented (EU), innovation-market (USA) and state-industrial (China), complemented by a universalist ethical framework (UNESCO). These logics are shaped by a combination of political priorities, institutional capacity and economic interests. A shared feature is that all approaches recognise the need for risk governance, protection of certain rights and the creation of trust in technologies, but they differ in the preferred means: legal bans and certification (EU), voluntary technical frameworks and market incentives (USA), state programmes and control of access/content (China), and international ethical co-ordination (UNESCO). The existence of a strong “Brussels effect” means that the EU acts as a catalyst for global standard harmonisation through its market weight and extraterritorial requirements on suppliers. This creates a practical need for American and Chinese companies to adapt products to European norms, while also generating tension between economic efficiency and legal compliance. The American model, in the absence of a single strict law, encourages rapid diffusion of innovation, but this can complicate the establishment of unified global standards without active international co-operation. China’s strategy shows that state co-ordination enables rapid scaling of applications, but creates barriers to adopting international ethical norms where they conflict with national interests. UNESCO’s recommendations serve as a balancing element, offering general principles for international dialogue and support for less developed countries.

Prospects for global co-ordination depend on three practical conditions. First, the need to develop a minimal “international package” of binding norms protecting basic rights (for example, banning total social scoring and establishing minimum transparency guarantees for systems that affect people’s lives). Such a package could be negotiated intergovernmentally and based on UNESCO principles, but should include implementation mechanisms (for example, cross-border agreements or mutual recognition of certificates). Second, institutional mechanisms for technical co-operation are needed: joint test environments for model evaluation, workable formats for algorithmic audits and standardised metrics for impacts on human rights and security. This would require the involvement of independent organisations, intergovernmental institutions and academic

centres. Third, asymmetry must be addressed: financially and technically weaker countries must gain access to funding, technology transfer and capacity building, to avoid repeating a “digital coloniality” scenario. UNESCO and regions with strong standards (the EU) can serve as sources of such support programmes. Concrete practical recommendations to initiate co-ordination include establishing a multi-stakeholder technical certification centre, developing a basic “black-and-white” classification of unacceptable practices (agreed by most countries), and implementing technical-assistance mechanisms for Global South countries (grants to create national AI audit institutions). At national level, this implies combining elements of all models: risk-based legislation (as in the EU), innovation incentives (as in the USA) and state co-ordination of strategic directions (as in China), but with mandatory human-rights safeguards and transparent audit procedures. From a research perspective, further studies should focus on the empirical measurement of each model’s effectiveness: comparative studies of the impact of regulatory decisions on innovation indicators (patents, investment), human rights (complex indicators of discrimination and violations) and market competitiveness. Practical steps for the research community include developing replicable methods for algorithmic audits, political-economy models for assessing extraterritorial regulatory effects, and sets of indicators for evaluating “implementation readiness” in low-resource countries.

DISCUSSION

In the discussion dimension of the study, it was important to compare the findings with previous scholarly work, which made it possible not only to identify the consonance of conceptual approaches but also to delineate differences in interpretations of artificial intelligence as an instrument of global governance and as a source of political and legal transformation. In F. Filgueiras (2022), emphasis was placed on the early stage of AI policy formation, which was examined through the lens of policy and governance regimes. The typology proposed by the author helped to explain the dynamics of interaction between actors, institutions and ideas that determined the strategic vectors of national approaches. Unlike the present study, which demonstrated that AI has already become a catalyst for a fundamental transformation of global governance

and has contributed to new centres of power, F. Filgueiras focused on a formative stage in which the main contours of political regimes were only beginning to take shape. Conclusions about the dual nature of AI policy – between technological development and regulatory instruments – correlated with the divergence between the Chinese, European and American models identified in this research. At the same time, a key difference is that this analysis emphasised geopolitical consequences and the emergence of algorithmic governance as a new form of power, whereas Filgueiras treated the issue primarily through an institutional and normative lens. J. Zeng's (2022) monograph provided a comprehensive analysis of the phenomenon of "AI with Chinese characteristics", revealing the multi-layered nature of Beijing's approach. The author argued that China's strategy was not limited to centralised geopolitical steering, but was to a significant extent shaped by economic actors and exhibited bottom-up features. This position contrasted with the conclusions of the present study, in which the Chinese model was described as an instrument of centralised governance with high risks for human rights. Common ground remained the recognition that Chinese specificity has shaped a new variety of digital authoritarianism, capable of combining the effectiveness of technological solutions with the securitisation of society. At the same time, this analysis indicated that the success of China's strategy depended on achieving a balance between economic growth, social stability and ideological control, which aligned with the present study's thesis about AI being used as a tool of geopolitical power and as a vehicle for exporting authoritarian practices. However, the present study emphasised the foreign-policy dimension and the global diffusion of "digital authoritarianism", whereas J. Zeng focused on domestic political and economic determinants.

In E. Erman & M. Furendal (2025), the principal emphasis was on the role of non-state actors in legitimising global AI governance. The authors distinguished two analytical dimensions – "democratic agents" and "agents of democracy" – arguing that transnational corporations have insufficient legal grounds for the former status but considerable moral and market authority for the latter. Compared with these conclusions, the findings of the present study revealed a more critical dependence of the global architecture on corporate structures, which not only performed auxiliary or indirect functions but in practice shaped the contours of international policy. This was evident in the US case, where the absence of a single federal legislative framework delegated a significant share of regulatory and innovation processes to corporations. Thus, whereas in Erman and Furendal corporate participation was viewed as potentially legitimised through moral and epistemic authority, the present study's results pointed to a deeper structural dependence of national models on corporations, creating additional challenges for democratic accountability.

B. Neupane (2024) focused on the integration of AI and big data into public-administration processes, emphasising

efficiency, transparency and scalability through cloud environments. It was illustrated that such technologies enabled a new level of responsiveness and resource optimisation, while being accompanied by privacy risks and ethical dilemmas. Comparison with the present study's conclusions showed that similar opportunities have indeed been realised in governance practices, particularly in China and Estonia, where digital administration systems demonstrated high effectiveness in public services. The difference lay in emphasis: whereas B. Neupane interpreted digital transformation primarily as a technological and operational shift, the present study highlighted its geopolitical dimension, in which technologies became resources for strategic competition and factors reshaping the international balance of power. Thus, shared features in assessments of AI's potential for public administration were confirmed, while a more complex political and security configuration of its use was also underscored. S. Mokry & J. Gurol (2024) emphasised that global initiatives to regulate AI have become not only normative instruments but also means of geopolitical competition. The authors stressed that China, the USA and the EU sought to position themselves as leaders in AI governance, and that the process of global co-ordination proved subordinate to a logic of competition for influence. This conclusion resonated with the present study's findings, which developed the idea that algorithmic governance is gradually forming new centres of power and that AI technologies are becoming instruments of "soft power". At the same time, this analysis showed that international institutions, including the UN and UNESCO, have been insufficiently effective in harmonising divergent approaches, whereas S. Mokry & J. Gurol primarily emphasised the competitive nature of regulatory initiatives and the risks of fragmentation. A further distinction was this study's emphasis on empirical examples – such as China's "City Brain" programme or the European AI Act – demonstrating concrete mechanisms through which AI is transformed into an instrument of power.

In H. Roberts *et al.* (2023), a comparative analysis of Chinese and European models identified the key difference as a gap between Beijing's innovation-economic focus and Brussels' ethical-legal emphasis. The authors concluded that closing regulatory gaps would require mutual borrowing of the strengths of both approaches. This logic aligned with the present study's conclusions, which likewise stressed divergence between China's centralised model and Europe's rights-protecting model. At the same time, the present analysis situated the issue in a broader context: AI was defined not merely as an object of innovation or regulation, but as a catalyst for the formation of new global hierarchies of power. The difference lay in scale of interpretation: whereas H. Roberts *et al.* limited themselves to recommendations for bilateral improvement, the present study demonstrated the geopolitical consequences of technological rivalry and AI's role in reshaping the architecture of the international order. R.B.L. Dixon (2022) systematised more than ninety AI

governance initiatives formulated by various governmental, private, academic and multilateral structures. On this basis, the author identified fundamental AI principles intended to underpin the development of coherent policy recommendations. This approach corresponded with the present study's findings in recognising the importance of multi-level interaction between state and non-state actors. However, whereas R.B.L. Dixon emphasised the search for universal principles and the possibility of forming a globally coherent governance system, the present analysis suggested the opposite dynamic: global regulation remains fragmented, and international institutions do not demonstrate sufficient effectiveness. Another distinct emphasis of this study was the role of AI as a strategic resource of geopolitical influence, whereas Dixon prioritised conceptualising ethical and legal principles. In summary, all the works reviewed supported the thesis that AI regulation extends far beyond technical or administrative tasks and has become part of broader political and geopolitical processes. This allowed the conclusion that contemporary dynamics of AI regulation combine elements of pragmatic competition and ideological confrontation with attempts to identify universal principles; however, it is the geopolitical dimension that appears decisive in shaping the architecture of the future global order.

CONCLUSIONS

The study illustrated that artificial intelligence has become a catalyst for a fundamental transformation of global governance, shifting from a technological tool to a strategic resource of geopolitical influence. This is reflected in the emergence of new centres of power, a rethinking of the concept of digital sovereignty, and the rise of algorithmic governance as a new form of exercising power. A comparative analysis of national approaches in China, the EU and the USA revealed deep divergence in their regulatory philosophies: the Chinese model demonstrated the effectiveness of centralised state steering and rapid technological scaling in projects such as "City Brain" in Hangzhou, but with significant human-rights risks through social credit systems and mass surveillance; the European approach developed the most comprehensive rights-protecting regulatory system through the 2021 AI Act, combining preventive risk control with a four-tier classification of AI systems; the American strategy retained a fragmented, innovation-oriented

character, assigning a substantial role to private corporations in the absence of a single federal law, instead relying on the "Blueprint for an AI Bill of Rights" and the NIST "AI Risk Management Framework" as voluntary guiding principles. The study also found that AI technologies have become powerful instruments of "soft power": China exports a model of "digital authoritarianism" through digital diplomacy initiatives in African and Latin American countries; the EU offers a normative model grounded in the protection of human rights and democratic values; and the USA projects its innovation ecosystem through the global dominance of technology corporations.

The paper further concludes that existing international institutions (the UN and UNESCO) have proved insufficiently effective in harmonising such divergent approaches, contributing to fragmentation of global regulation and rising geopolitical tension in the context of US-China technological confrontation. At the same time, the experience of certain countries, notably Estonia, demonstrated the feasibility of combining a high level of digitalisation (via the X-Road interoperability platform and the "Kratt" strategy) with adherence to democratic principles and human rights through mechanisms of transparency, decentralised data access and cryptographic protection. The study is limited by its comparative focus on only three actors (China, the EU and the USA) and their strategies, which does not fully capture the dynamics of global AI governance, including the role of smaller states, international organisations and under-resourced private actors. Future research prospects include deeper analysis of the empirical consequences of implementing specific regulatory models, the development of mechanisms for adapting AI governance frameworks to developing countries, and the exploration of possibilities for creating new hybrid institutions for global co-ordination under conditions of technological hegemony.

ACKNOWLEDGEMENTS

None.

FUNDING

None.

CONFLICT OF INTEREST

None.

REFERENCES

- [1] Adrian, T., Ferati, E., Gates, I., Liu, L., Mendoza, K., Potnis, S., Schenk, Z., Srinivas, A., & Zachary, T. (2021). *Misinformation in global media: Causes, consequences, and accountability*. Seattle: Henry M. Jackson School of International Studies University of Washington
- [2] African Union. (2024). *Continental artificial intelligence strategy: Harnessing AI for Africa's development and prosperity*. Addis Ababa: African Union.
- [3] AI Risk Management Framework. (2023). Retrieved from <https://www.nist.gov/itl/ai-risk-management-framework>.
- [4] Akiner, N. (2024). *A theoretical approach to the digital colonialism in the context of media imperialism*. In *7th International conference on social science research* (pp. 131-141). Durres: ICONSR.
- [5] Allen, G.C. (2019). *Understanding China's AI strategy: Clues to Chinese strategic thinking on artificial intelligence and national security*.

- [6] Anderson, M., Faverio, M., & Gottfried, J. (2023). *Teens, social media and technology 2023: YouTube, TikTok, Snapchat and Instagram remain the most widely used online platforms among U.S. teens*. Retrieved from <https://www.pewresearch.org/internet/2023/12/11/teens-social-media-and-technology-2023/>.
- [7] Anshari, M., Hamdan, M., Ahmad, N., & Ali, E. (2025). Public service delivery, artificial intelligence and the sustainable development goals: Trends, evidence and complexities. *Journal of Science and Technology Policy Management*, 16(1), 163-181. doi: 10.1108/JSTPM-07-2023-0123.
- [8] Antoliš, K. (2024). Disinformation supported by artificial intelligence from dynamic research to holistic solutions. *Public Security and Public Order*, 35, 11-23. doi: 10.13165/PSPO-24-35-02.
- [9] Arslan, R., Özseven, T., & Aydın, M.M. (2025). Transforming European cybersecurity: AI-powered threat analysis, quantum age, blockchain/crypto risks, and regulatory strategies. *International Journal of Engineering and Applied Sciences*, 17(2), 81-93. doi: 10.24107/ijeas.1619600.
- [10] Bajracharya, K. (2024). *Big data and artificial intelligence integration in modernizing governance and public administration practices*. *Global Research Perspectives on Cybersecurity Governance, Policy, and Management*, 8(12), 34-47.
- [11] Basu, M., & Nath, M.D. (2024). *A study of the role of artificial intelligence in monitoring environmental and health issues in the post-COVID-19 pandemic era for sustainable living*. In X. Savarimuthu, S. Subramani & A.N.J. Raj (Eds.), *Artificial intelligence for multimedia information processing: Tools and applications* (pp. 132-166). Boca Raton: CRC Press.
- [12] Blueprint for an AI Bill of Rights. (2022). *The White House*. Retrieved from <https://bidenwhitehouse.archives.gov/ostp/ai-bill-of-rights/>.
- [13] Bornu, T.Z. (2025). The challenge of artificial intelligence in the middle east conflicts. *The American Journal of Political Science Law and Criminology*, 7(05), 115-129. doi: 10.37547/tajpslc/Volume07Issue05-14.
- [14] Bradford, A. (2020). *The Brussels effect: How the European Union rules the world*. Oxford: Oxford University Press.
- [15] Breuer, A. (2025). *From polarisation to autocratisation: The role of information pollution in Brazil's democratic erosion*. Bonn: German Institute of Development and Sustainability (IDOS). doi: 10.23661/idp2.2025.
- [16] Caprotti, F., & Liu, D. (2022). Platform urbanism and the Chinese smart city: The co-production and territorialisation of Hangzhou City Brain. *GeoJournal*, 87(3), 1559-1573. doi: 10.1007/s10708-020-10320-2.
- [17] Chen, T., Gascó-Hernandez, M., & Esteve, M. (2024). The adoption and implementation of artificial intelligence chatbots in public organizations: Evidence from US state governments. *The American Review of Public Administration*, 54(3), 255-270. doi: 10.1177/02750740231200522.
- [18] Costa, S. (2023). *Artificial intelligence: Ethical and political challenges*. Santos Costa.
- [19] Dixon, R.B.L. (2022). *Artificial intelligence governance: A comparative analysis of China, the European Union, and the United States*. (Professional paper, University of Minnesota Twin Cities, Minneapolis, MN).
- [20] Dixon, R.B.L. (2023). A principled governance for emerging AI regimes: Lessons from China, the European Union, and the United States. *AI and Ethics*, 3, 793-810. doi: 10.1007/s43681-022-00205-0.
- [21] Duygu, U. (2023). *Between politics and social media: Examining domestic information operations through the Twitter controversy in Türkiye*. (Master's thesis, Sabancı University, Istanbul, Türkiye).
- [22] Erman, E., & Furendal, M. (2024). Artificial intelligence and the political legitimacy of global governance. *Political Studies*, 72(2), 421-441. doi: 10.1177/00323217221126665.
- [23] Erman, E., & Furendal, M. (2025). The democratic role of non-state actors in the global governance of artificial intelligence. *Critical Review of International Social and Political Philosophy*, 1-26. doi: 10.1080/13698230.2025.2520037.
- [24] Espinosa, V.I., & Pino, A. (2025). E-Government as a development strategy: The case of Estonia. *International Journal of Public Administration*, 48(2), 86-99. doi: 10.1080/01900692.2024.2316128.
- [25] Filgueiras, F. (2022). Artificial intelligence policy regimes: Comparing politics and policy to national strategies for artificial intelligence. *Global Perspectives*, 3(1), article number 32362. doi: 10.1525/gp.2022.32362.
- [26] Flew, T., & Hartig, F. (2014). *Confucius institutes and the network communication approach to public diplomacy*. *The IAFOR Journal of Asian Studies*, 1(1), 1-18.
- [27] Fulbright (n.d.). Retrieved from <https://fulbright.org.ua/uk/>.
- [28] Google. (n.d.). Retrieved from <https://www.google.com/?hl=uk>.
- [29] Horizon Europe. (n.d.). Retrieved from https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe_en.
- [30] Hu, Y., Kuang, W., Qin, Z., Li, K., Zhang, J., Gao, Y., Li, W., & Li, K. (2021). Artificial intelligence security: Threats and countermeasures. *ACM Computing Surveys*, 55(1), 1-36. doi: 10.1145/3487890.
- [31] Kaun, A., & Männiste, M. (2025). Public sector chatbots: AI frictions and data infrastructures at the interface of the digital welfare state. *New Media & Society*, 27(4), 1962-1985. doi: 10.1177/14614448251314394.
- [32] Kazemi, A., Garimella, K., Shahi, G.K., Gaffney, D., & Hale, S.A. (2022). *Research note: Tiplines to uncover misinformation on encrypted platforms: A case study of the 2019 Indian general election on WhatsApp*. Retrieved from <https://surl.li/ybdztz>.

- [33] Lillemets, P. (2023). *Estonia – a digital government in digital transformation*. (Master's thesis, Tallinn University of Technology, Tallinn, Estonia).
- [34] Lin, X. (2025). A model of big data-based governance: China's national government big data platform and an analysis of its governance competence. *Chinese Political Science Review*, 10, 289-328. doi: 10.1007/s41111-025-00279-1.
- [35] Maréchal, N., Renieris, E., Rydzak, J., Hartmann, I.A., Obar, J.A., Gaur, A., Macpherson, L., Karanicolas, M., & Keton, A. (2021). *Tackling the 'fake' without harming the 'news': A paper series on regulatory responses to misinformation*. Wikimedia/Yale Law School Initiative on Intermediaries and Information.
- [36] Microsoft Dynamics 365. (n.d.). Retrieved from <https://www.microsoft.com/uk-ua/microsoft-365>.
- [37] Mokry, S., & Gurol, J. (2024). Competing ambitions regarding the global governance of artificial intelligence: China, the US, and the EU. *Global Policy*, 15(5), 955-968. doi: 10.1111/1758-5899.13444.
- [38] Netflix. (n.d.). Retrieved from <https://www.netflix.com/tr-en/>.
- [39] Neupane, B. (2024). *Artificial intelligence and big data technologies to optimize government decision-making processes in cloud-based environments*. *Journal of Artificial Intelligence and Machine Learning in Cloud Computing Systems*, 8(11), 1-12.
- [40] Neuwirth, R.J. (2024). The global institutional governance of AI: A four-dimensional perspective. *International Journal of Digital Law and Governance*, 1(1), 113-153. doi: 10.1515/ijdlg-2024-0004.
- [41] New e-Estonia factsheet: National AI "Kratt" strategy. (2020). Retrieved from <https://e-estonia.com/new-e-estonia-factsheet-national-ai-kratt-strategy/>.
- [42] NVIDIA. (n.d.). Retrieved from <https://www.nvidia.com/en-us/drivers/>.
- [43] Nwokike, L.I. (2022). *The rising profile of international non-governmental organizations and their roles in contemporary concept of international governance*. *International Journal of Law and Clinical Legal Education*, 3, 161-171.
- [44] Nye, J.S. (2004). Soft power. *Foreign Policy*, 80, 153-171. doi: 10.2307/1148580.
- [45] OpenAI. (n.d.). Retrieved from <https://openai.com/>.
- [46] Parisini, E. (2025). Governing artificial intelligence in the defence sector: A comparative analysis of EU and US institutions. *Global Public Policy and Governance*, 5, 114-138. doi: 10.1007/s43508-025-00115-x.
- [47] Radu, R. (2021). Steering the governance of artificial intelligence: National strategies in perspective. *Policy and Society*, 40(2), 178-193. doi: 10.1080/14494035.2021.1929728.
- [48] Recommendation on the Ethics of Artificial Intelligence. (2023). UNESCO. Retrieved from <https://www.unesco.org/en/articles/recommendation-ethics-artificial-intelligence>.
- [49] Rincón, O., & Uribe-Rincón, C. (2024). Political communication in Latin America. In A. Casero-Ripollés & P.C. López-López (Eds.), *The Routledge handbook of political communication in Ibero-America* (pp. 19-31). London: Routledge. doi: 10.4324/9781003388937.
- [50] Roberts, H., Cows, J., Hine, E., Morley, J., Wang, V., Taddeo, M., & Floridi, L. (2023). Governing artificial intelligence in China and the European Union: Comparing aims and promoting ethical outcomes. *The Information Society*, 39(2), 79-97. doi: 10.1080/01972243.2022.2124565.
- [51] State Council of the People's Republic of China Document No. 35 "A New Generation of Artificial Intelligence Development Plan". (2017, July). Retrieved from http://www.gov.cn/zhengce/content/2017-07/20/content_5211996.htm.
- [52] Taeihagh, A. (2021). Governance of artificial intelligence. *Policy and Society*, 40(2), 137-157. doi: 10.1080/14494035.2021.1928377.
- [53] The EU Artificial Intelligence Act. (2021). Retrieved from <https://artificialintelligenceact.eu/>.
- [54] The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules. (2021). Retrieved from <https://www.meity.gov.in/static/uploads/2026/02/550681ab908f8afb135b0ad42816a1c9.pdf>.
- [55] TikTok. (n.d.). Retrieved from <https://www.tiktok.com/uk-UA/>.
- [56] Ulnicane, I., Knight, W., Leach, T., Stahl, B.C., & Wanjiku, W.G. (2022). Governance of artificial intelligence: Emerging international trends and policy frames. In M. Tinnirello (Ed.), *The global politics of artificial intelligence* (pp. 29-55). Boca Raton: CRC Press. doi: 10.1201/9780429446726-2.
- [57] X-road – interoperability services. (n.d.). Retrieved from <https://e-estonia.com/solutions/interoperability-services/x-road/>.
- [58] Zeng, J. (2020). Artificial intelligence and China's authoritarian governance. *International Affairs*, 96(6), 1441-1459. doi: 10.1093/ia/iaa172.
- [59] Zeng, J. (2022). *Artificial intelligence with Chinese characteristics: National strategy, security and authoritarian governance*. Singapore: Palgrave Macmillan Singapore. doi: 10.1007/978-981-19-0722-7.

Journal of Global Political Transformations

**Volume 1, No. 1
2025**

E-mail: jgpt@veruspublishing.co.uk
<https://jgpt.veruspublishing.co.uk/>