

# **The impact of the legal ambiguity of "hate speech" on the Roma community in Ukraine**

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Submitted to Central European  
University  
Romani Studies Program

*In partial fulfilment for International Interdisciplinary Romani Studies Postgraduate  
Specialization Program*

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*Budapest, Hungary*

2022

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A handwritten signature in black ink, appearing to be 'Elvira Popenko', written in a cursive style.

## Abstract

*The thesis analyzes the consequences of the lack of a clear legal regulation of hate speech in Ukraine and its negative impact on the Roma, both on society and on individuals. I argue that hate speech has not only become a way of oppressing the entire Roma community on the Internet and in the media, but also forms a basis for hate. This paper contends that hate speech is rooted in stereotypes and thereby creates a false image of the Roma community. Hate speech therefore becomes one of the main reasons for hate-motivated attacks on national minorities. Likewise, the lack of clear regulation of hate speech makes it accessible to radical and nationalist groups: Ukraine's Roma community is subjected to mental and physical violence, as well as discrimination that arises from the use of hate speech on social networks and in the media. Hate speech violates the human rights of Roma individuals, namely the right to privacy and, the right to liberty and security, as well as the right to be protected from discrimination. Thus, in my work, I will demonstrate the gaps in the national legislation of Ukraine in order to prove the recent hate crimes committed against the Roma.*

**Keywords:** hate speech, Roma community, discrimination, media, social networks.

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## Abbreviations

ICERD	The International Convention on the Elimination of All Forms of Racial Discrimination
ECHR	The European Court of Human Rights

# 1. Introduction

There is no definition of "hate speech" in Ukraine and it is not enshrined in law. However, there are several definitions of "hate speech" used by Ukraine and according to The Council of Europe Committee of Ministers' Recommendation 97 (20) on "incitement to hatred" defined the term "hate speech" as a phenomenon that:

should be understood to encompass all forms of expression that circulate, incite, encourage or justify racial hatred, xenophobia, anti-Semitism or other forms of hatred based on intolerance. Forms of intolerance include intolerance expressed by aggressive nationalism and ethnocentrism, discrimination and hostility towards minorities, migrants and people of immigrant origin.<sup>1</sup>

Between 2020 and 2021, hate speech played a role in many incidents that aimed to discriminate against the Roma community and Roma individuals. According to the International Anti-Roma Hostile Project in Europe, the Peer Education Counter Antigypsyist Online Hate Speech identified many cases of Roma hostility, of which 59 per cent were associated with stereotyping as criminals, 25 per cent with ridicule of their way of life, and in 15 per cent of cases the Roma theme was used in the political struggle.<sup>2</sup> Whereas it is not possible to include all these incidents, this paper will present a few examples extracted from the Ukrainian social reality.

On the Ukrainian Internet, hate speech against Roma most infamously made headlines in 2014, when a hashtag ("*They are still not put behind bars*") was used on the "Kiev Operational" and "Municipal Ward" Facebook page, denoting posts in which attacks were carried out only by persons of Roma ethnicity.<sup>3</sup> In 2020-2021, hate speech intensified as the Ukrainian and Russian social network, *Telegram*, became popular. As posts on Telegram remain completely anonymous, it is hard to identify people who have posted on these social media platforms. Thus, various radical and nationalist groups have taken advantage of this anonymity and created many Telegram groups where they shared photos and whereabouts

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<sup>1</sup> Council of Europe, *Recommendation no. R (97) 20 of the Committee of Ministers to member states on "hate speech"* (October 1997).

<sup>2</sup> "Presentation of the results of monitoring the language of hostility against Roma" (*Ukrinform*, 22 January 2022) < <https://www.ukrinform.ua/rubric-presshall/3203655-prezentacia-rezultativ-monitoringu-movi-vorozneci-proti-romiv.html> > accessed 9 December 2021

<sup>3</sup> "They are still not put behind bars" (*Kiev Operational*, 2 October 2021) 2021 < <https://m.facebook.com/watch/?v=659055242149558> > accessed 1 December 2021

of Roma people and insulted them. One of the active members of this group created a Google map, which marked the places where attacks were allegedly carried out by persons of Roma ethnicity.<sup>4</sup>

In addition to the use of hate speech by radical and nationalist groups to separate the Roma community from Ukrainian society, hate speech has also become a contributor to hate crimes. On October 14, 2021, some Telegram channels, such as “Kyiv is operational” and “Chronicles of Ukraine”, circulated a video stating that a Romani person had beaten up a veteran of the Anti-Terrorist Operation. The police investigated and found the information to be inaccurate. In disagreement with the police’s decision, radical groups decided to take their own measures and sent threatening letters to Roma activists. Following this, about a hundred representatives of right-wing radical and nationalist organizations protested against the residence of Roma in the city and attacked two Roma minors and one volunteer. Eyewitnesses of the incident heard discriminatory slogans.<sup>5</sup>

In addition to the Internet, hate speech began to be used not only by various communities on social networks, but also by national Ukrainian channels. On September 24, 2020, the Ukrainian channel “1 + 1” announced a plot of the “Secret materials” program entitled “Let me read your palm, dear: digitalization against gypsy tyranny”. In this story, they talked about the illegal activities of the Roma and how the Telegram communities of the “Kyiv is operational” track the Roma using a certain hashtag and creating a separate group to “supervise” the Roma.<sup>6</sup>

In many Ukrainian online publications, one can also observe unprofessionalism and hate speech against Roma. Thus, in 2021, a Ukrainian information publication called “Kherson” published an article entitled “In Kherson, a girl gave all her parental savings to a gypsy”. This article refers to the fact that on the city street a woman with Roma features intercepted a 15-year-old girl and said to her that a curse was imposed on her. To remove the curse, the

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<sup>4</sup> “The Kiev railway station will not be reconstructed, despite the chaos around.” ( *News LIVE* ,17 November 2021) <<https://novyny.live/ru/kyiv/pochemu-ukrzaliznytsia-i-vlasti-kieva-ne-khotiat-rekonstruirovat-vokzalnuui-ploshchad-rasskazyvaem-v-detaliakh-22280.html>> accessed 1 December 2021

<sup>5</sup> “Representatives of Roma organizations received threats due to a previously spread fake video” ( *Institute of Mass Information ZMINA*, 28 October 2021) <<https://zmina.info/news/predstavnyky-romskyyh-organizacziy-zayavyly-pro-pogrozy-cherez-poshyrene-ranishe-fejkove-video/>> accessed 1 December 2021

<sup>6</sup> “Announcement of the program “Secret materials” for 1+1 contains elements of xenophobia”, ( *Institute of Mass Information* 25 September 2020 ) <[https://imi.org.ua/news/anons-programy-sekretni-materialy-na-1-1-mistyt-elementy-ksenofobiyi-yuryst-imi-i35263?fbclid=IwAR09xIWT0Dor\\_PJEJ0R\\_GUzwWYGmXgKyb3SQ9pk4POOFY4RkToax\\_lq94lg](https://imi.org.ua/news/anons-programy-sekretni-materialy-na-1-1-mistyt-elementy-ksenofobiyi-yuryst-imi-i35263?fbclid=IwAR09xIWT0Dor_PJEJ0R_GUzwWYGmXgKyb3SQ9pk4POOFY4RkToax_lq94lg)> accessed 1 December 2021

girl gave 18,000 thousand dollars to a fortune teller.<sup>7</sup> There are numerous similar articles in which there is no clear and accurate information. The information resource of Zakarpattia “Pershiy.com.ua” in 2021 published an article “A group of Roma thieves was again detained in Kyiv”. The article relates that a group of people were detained near the shopping center on the outskirts of Kyiv. The man who allegedly witnessed the offense did not call the police, but decided to deal with the gang himself, as the article says, and threw a bag of flour at them.<sup>8</sup> There is a similar article on the Uzhgorod news site “ProZak”. This article is also from 2021, titled “In Uzhgorod, a 15-year-old gypsy stole two thousand dollars”. The article says that money was stolen from the cash register of the store. The police, after checking the surveillance cameras, noticed that this atrocity was committed by a minor. The article also states that it was a 15-year-old gypsy boy.<sup>9</sup>

Therefore, these articles from Ukrainian news sites are similar regardless of the region. They have the same structure, which includes a photo of the Roma or objects that are associated with the stereotypical ideas of the Roma, as well as a text of 5-10 sentences. Also, the title of the article contains the word “Gypsies” or “Roma” which is used in a negative context. There is no accuracy in the text - there is no exact date, exact location and exact information about the offender. At the same time, the article focuses on the fact that the offense was committed by representatives of the Roma ethnicity. From the above examples, we can conclude that most of the news and articles about the Roma community are negative.

## 2. International human rights norms

The Ukrainian interpretation of “hate speech” is different from the international concept. For example, consider the European Court of Human Rights' interpretation of the meaning of “hate speech” in *Erbakan v. Turkey*.<sup>10</sup> In this case, the applicant, who was a member of a political party, used hate speech. In case *Erbakan v. Turkey*, the Court notes that a person in his speech emphasized the difference between “believers” and “non-believers”, thereby

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<sup>7</sup> "In Kherson, a girl gave all her parental savings to a gypsy" (*Kherson News Agency*, 6 August 2021) <<https://khersonci.com.ua/accident/54614-v-hersone-devochka-otdala-cyganke-vse-roditelskie-sberezheniya.html>> accessed 2 May 2022

<sup>8</sup> "A group of Roma thieves was again detained in Kyiv" (*Pershiy.com.ua*, 24 April, 2021) <<https://pershiy.com.ua/u-kyievi-znovu-zatrymaly-hrupu-romiv-kradiiv-video/?fbclid=IwAR1slxXbJtp-40k6GVl3wgbVYF8rJ0Bv0dtqQFZcmetLUHokz9qOE8blm1s>> accessed 2 May 2022

<sup>9</sup> "In Uzhgorod, a 15-year-old gypsy stole two thousand dollars" (*ProZak*, 1 September, 2021) <[http://prozak.info/Suspil-stvo/V-Uzhgorodi-15-richnij-cigan-vkrav-z-kasi-magazinu-dvi-tisyachi-dolariv?fbclid=IwAR2UkaDOGCygd83SJLzWuOOYFd5X5geSvU32ERshIPMp8kh5lmOPAP\\_XtDE](http://prozak.info/Suspil-stvo/V-Uzhgorodi-15-richnij-cigan-vkrav-z-kasi-magazinu-dvi-tisyachi-dolariv?fbclid=IwAR2UkaDOGCygd83SJLzWuOOYFd5X5geSvU32ERshIPMp8kh5lmOPAP_XtDE)> accessed 8 May 2022

<sup>10</sup> *Erbakan v. Turkey* ECHR (2006)

overstepping the permissible norms of freedom of political debate. By analogy with the ECHR, hate speech includes direct or indirect incitement of people to racial hatred, public and non-public speeches, which include emphasizing dislike and differences between people over religion, racial identity, and place of residence. That is, “expressions that spread, incite, propagate or justify hatred on the basis of intolerance” can be considered hate speech. hate speech also includes all kinds of discrimination, xenophobia and anti-Semitism. For another example, In *M`Bala M`Bala v. France* the applicant, a comedian, together with a professor who had been convicted on several occasions for his negative and revisionist views, acted out a skit with an actor. In this scene, these persons ridiculed Jews. In paragraph 39 of this case, the Court emphasized that the applicant, in the guise of a humorous performance, had invited one of France's most famous Holocaust deniers, convicted a year earlier for denying crimes against humanity, to honor and reward him.<sup>11</sup> In doing so, the Court found that the comedian's performance was anti-Semitism, supportive of Holocaust denial, and offensive. After analyzing these cases, we can conclude that the European Court of Human Rights considers hate speech all types of discrimination, aggressive statements that humiliate discriminate against a person or group based on race, nationality, religion, political views.

The International Convention on the Elimination of All Forms of Racial Discrimination in the concept of “hate speech” focuses more on racial discrimination. The main definition of this concept is contained in Article 4, which emphasizes that “any doctrine of racial superiority based on differentiation is scientifically false, morally reprehensible, socially unjust and dangerous”. That is, ICERD emphasizes that it condemns propaganda, as well as any actions that are based on the idea of the superiority of one race over another because of skin color and not only. Also individuals or groups of people who try to justify or promote racial discrimination and hatred in any form.<sup>12</sup> The ICERD also considers "spread" as hate speech, meaning that it covers forms of hate speech that do not require intent. In general, this broad provision and concept imposes certain obligations on states to punish racist speech.

In Article 20 of the International Covenant on Civil and Political Rights, hate speech includes not only actions but also intentions. Thus, Article 20(2) states that “[A]ny advocacy of national, racial or religious hatred that constitutes an incitement to discrimination, hostility or violence shall be prohibited by law”. This concept is ambiguous and many forms of

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<sup>11</sup> *M`Bala M`Bala v. France* ECHR (2015)

<sup>12</sup> International Convention on the Elimination of All Forms of Racial Discrimination, *Article 4*



expression may fall under this article and denote hate speech. For this or that expression to be interpreted as hate speech, it must include “propaganda”, namely national, racial or religious hatred, and “discrimination, enmity or violence”. Moreover, if this expression was unintentional, it does not carry any obligations or punishment.<sup>13</sup>

The meaning of the hate speech can also be found in the Convention on the Prevention and Punishment of the Crimes of Genocide, namely in Article 3(C). Like the ECHR, the Convention also interprets hate speech as “Direct and public incitement to commit genocide”.<sup>14</sup> That is, hate speech is also considered an incitement or a call to commit genocide. That means the Rome Statute of the International Criminal Court in Article 25 also mentions a particular act will be punished if it incites, facilitates or directly and publicly incites others to commit genocide.<sup>15</sup> Based on the analysis of these two international documents, it can be concluded that any action that can be considered incitement or instruction to commit genocide is publicly considered hate speech.

We can conclude that none of the international instrument has a single concept and interpretation of "hate speech". At the same time, it can be noted that all international norms associate hate speech with all types of discrimination. Some legal norms also refer to hate speech for actions, statements, as well as propaganda of genocide. It can also be noted that words both with intent and without intent, can refer to hate speech. In summary, it can be determined that, according to international norms, hate speech includes intentional or unintentional acts aimed at inciting national, racial or religious hatred and humiliation of national honor and dignity, or insult of feelings in connection with religious beliefs, and direct or indirect restriction of the rights or establishment of direct or indirect privileges of citizens on the grounds of race, color, political, religious and other beliefs, sex, disability, ethnic and social origin, property status, place of residence, language or other characteristics.

### 3. The Ukrainian legal system

As was previously stated, there is no precise definition of “hate speech” in Ukrainian legislation, which already creates a problem in identifying hate speech. At the same time, Article 28 of the Law of Ukraine On Information states that “information cannot be used to

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<sup>13</sup> Natalie Alkiviadou *“The Legal Regulation of Hate Speech: The United Nations Framework as the Common Denominator for Europe and Asia”* (EAILG, Vol. 10, 2020)

<sup>14</sup> Convention on the Prevention and Punishment of the Crime of Genocide, Article 3

<sup>15</sup> Rome Statute of the International Criminal Court, Article 25

incite interethnic, racial, religious hatred, as well as encroachment on human rights and freedoms”.<sup>16</sup> Also, in accordance with Article 4 of the Law of Ukraine On Television and Radio Broadcasting, “the state, by all possible legal means, must not allow in information and other television and radio programs a purposeful unreasonable aggravation of attention to violence and cruelty, inciting racial, national and religious positive perception of them”.<sup>17</sup>

The above norms do not directly cover hate speech in Ukrainian legislation, but are related to the notion of abuse of the right to information and violation of the rights of minorities and other groups. The lack of a definition makes it easier to incite hatred, as Ukrainian law fails to define it precisely and therefore does not punish it properly. On the example of the aforementioned case of using the hashtag of the information group "Kyiv is operational" to designate crimes committed only by persons from the Roma community, as well as indicating their location. These actions violate Article 32 of the Constitution of Ukraine<sup>18</sup>, as well as Article 8 of the European Convention on Human Rights<sup>19</sup>. Also, in accordance with Article 15 of the Code of Ethics of the Ukrainian Journalists “ [N]o one can be discriminated against because of their gender, language, race, religion, national, regional or social origin or political preferences.”<sup>20</sup> Moreover, this code is optional, and exists only as a recommendation and moral rule.

At the same time, responsibility for the use of hate speech carries certain consequences. Article 6 of the Law of Ukraine on Information<sup>21</sup> on hate speech can lead to hate crimes and include criminal elements, depending on the action and the consequences. Accordingly, Article 161 of the Criminal Code of Ukraine<sup>22</sup> “[I]ntentional actions aimed at inciting national, racial or religious hostility and hatred, at humiliation of national honor and dignity or the image of citizens in connection with their religious beliefs”. According to the above example, slogans and violent actions committed by nationalist and radical groups against Roma on October 17, 2021, can be interpreted as “public calls for pogroms, arson, destruction of property, seizure of a building or structure, forced eviction of citizens” in accordance with Article 295 of the Criminal Code of Ukraine.<sup>23</sup> According to Article 29 of

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<sup>16</sup> “The Law of Ukraine on Information”, *Article 28*

<sup>17</sup> “The Law of Ukraine on Television and Radio Broadcasting”, *Article 4*

<sup>18</sup> Constitution of Ukraine, *Article 32*

<sup>19</sup> The European Convention on Human Rights, *Article 8*

<sup>20</sup> Commission on Journalistic Ethics of Ukraine, “*Code of Ethics of the Ukrainian Journalist*” (9 December 2021) <<https://cje.org.ua/ethics-codex/>> accessed 9 December 2021

<sup>21</sup> “The Law of Ukraine on Information”, *Article 6*

<sup>22</sup> Criminal Code of Ukraine, *Article 161*

<sup>23</sup> Criminal Code of Ukraine, *Article 295*

the Constitution of Ukraine<sup>24</sup> and Article 5 of the European Convention on Human Rights<sup>25</sup>, these actions violate the right to liberty and security. According to the Additional Protocol to the Convention on Cybercrime in Ukraine<sup>26</sup>, such criminal acts are monitored on the Internet by the Cyber Police of Ukraine. In addition, complaints about threats and hate speech on the Internet, in particular on social networks, mainly against Roma, LGBT, ethnic groups, are not properly investigated by the police, as they are considered insignificant. This means that due to the lack of clear signs of “hate speech” and the ineffectiveness of the Criminal Code of Ukraine and other legislative acts of Ukraine, monitoring and suppressing hate speech is practically impossible.

Unlike international and regional documents, Ukrainian legislation does not contain a direct definition of the term "hate speech". Although international norms do not have a single definition of this concept, it differs from the Ukrainian interpretation of hate speech. The Ukrainian notion of "hate speech", unlike the international one, does not distinguish between types of discrimination to which hate speech can be attributed. Also, this concept does not imply that even if the statement has indirect intent, it refers to hate speech and violates the rights of an individual or group of persons. International instruments define hate speech somewhat broadly and focus on discrimination, which makes it possible to trace and attribute certain actions to hate speech. It is to be noted that hate speech according to international norms includes both actions and intentions. Thus, the lack of a clear concept and a list of the elements of hate speech in Ukrainian law, which include "incitement" and "causality", it is a problem for the judiciary to define actions as hate speech.

## 4. Conclusion

In conclusion, Ukrainian legislation does not contain a law on inciting hostility on the Internet and defining "hate speech", which makes it an accessible tool for anti-Roma groups. The problem of the absence of this concept has a negative impact on the lives of the Roma population in Ukraine. By spreading false information, using hate speech, nationalist groups form false and stereotypical ideas about Roma society in Ukraine. In other words, the Roma are perceived as uneducated and involved in criminal activities, which leads to discrimination. I argue that today one of the main reasons for the violation of the right to liberty and security and the right to protection against discrimination, the right to privacy of

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<sup>24</sup> Constitution of Ukraine, *Article 29*

<sup>25</sup> Council of Europe, “European Convention on Human Rights”, *Article 5*

<sup>26</sup> Additional Protocol to the Convention on Cybercrime in Ukraine

the Roma community is the inability of the authorities to properly regulate hostility. At the moment, hate speech is a broad and controversial concept, as there is no generally accepted concept in Ukrainian law. Criteria for defining hate speech are also contradictory, as international and regional documents set different standards. To solve this problem it is necessary to clearly define the concept of "hate speech", as well as the signs and manifestations of this phenomenon, to promote the monitoring of hate speech and to involve governmental and non-governmental organizations in its study.

Criteria for the so-called admissibility or hostility of freedom of speech must also be defined by law. In particular, a distinction must be made between verbal expressions as an objective assessment of the phenomena in society to which freedom of speech applies and expressions as manifestations of hatred or enmity that demean a person or group that are considered hate speech. However, speaking of the need for the legislative formulation of the concept of "hate speech", which in international law usually borders on the understanding of discrimination, it should be recognized that this problem still needs careful study. It should also be emphasized that journalists should take their work more seriously and adhere to the Code of Ethics of Ukrainian Journalists, as it currently serves as a moral norm that does not bear legal responsibility.

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