



Foreign Legal Frameworks in Regulating the Maintenance of Public Safety and Public Order at the Regional Level

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Abstract: This article examines foreign legal frameworks governing the maintenance of public safety and public order at the regional level through a comparative legal approach. The study employs a normative juridical method combined with a comparative legal analysis, focusing on statutory regulations, institutional arrangements, and governance practices in selected European Union countries, particularly Germany and Spain. Data are analysed using a qualitative approach to identify patterns in the distribution of authority, coordination mechanisms, and the role of subnational actors in maintaining public order. The findings indicate that effective regulation of public safety at the regional level depends on an optimal balance between decentralisation and centralised coordination, supported by a clear delineation of competencies, a multi-level governance structure, and active public participation. The examined models demonstrate that systems integrating centralised strategic oversight with substantial regional autonomy are more adaptive and responsive to local security challenges. The devolution of powers to regional or autonomous governments enhances institutional flexibility and accelerates responses to public order disturbances. This study contributes to the academic discourse by providing a systematic comparative framework for understanding legal and institutional arrangements in public safety governance at the regional level. It also offers practical insights for policymakers by identifying transferable elements of foreign legal systems that can be adapted to strengthen national



legislation and improve the effectiveness of public authorities in maintaining public safety and public order.

Keywords: Public Safety; Public Order; Regional Level; Local Self-government, Police.

Introduction

The maintenance of public safety and public order constitutes one of the fundamental functions of the state, not only related to political stability but also serving as a primary prerequisite for achieving social welfare and sustainable development. In the context of modern states, public security is no longer understood narrowly as the sole responsibility of law enforcement agencies; rather, it is the result of complex interactions among various actors at both central and regional levels.¹ The dynamics of globalisation, increasing population mobility, and the emergence of non-traditional threats such as cybercrime, radicalism, and identity-based social conflicts demand legal frameworks that are adaptive and responsive. Therefore, the regulation of public safety and public order at the regional level has become increasingly significant, particularly in states that implement decentralisation or regional autonomy.²

In practice, different countries have developed diverse models for regulating the distribution of authority between central and regional governments in maintaining public safety.³ Constitutional structures, political history, and prevailing legal traditions generally shape these variations. Federal or quasi-federal systems tend to grant broader authority to regional governments, whereas unitary states often retain stronger central control.⁴ However, experience demonstrates that overly centralised approaches may hinder rapid responses to local disturbances, while excessive decentralisation can lead to policy fragmentation and weak interregional coordination. This condition highlights the necessity of achieving an optimal balance between

¹ S. M. Suhail Hussain, 'Public Key-Based Quantum-Resistant Security Scheme for IEEE C37.118.2 PMU Communication', *Electric Power Systems Research* 252 (2026), <https://doi.org/10.1016/j.epsr.2025.112378>.

² Mizuki Hayashi and Keita Emura, 'Security Analysis on a Public-Key Inverted-Index Keyword Search Scheme with Designated Tester', *Journal of Information Security and Applications* 98 (2026), <https://doi.org/10.1016/j.jisa.2026.104410>.

³ Hugh Mosley, 'Social Security in the United States and the Federal Republic of Germany: A Comparison of Public and Private Benefit Systems', *Policy Studies Journal* 11, no. 3 (1983): 492–503, <https://doi.org/10.1111/j.1541-0072.1983.tb00668.x>.

⁴ Samara Soares Santos et al., 'Analysis of Perceived Stress in Public Security Professionals in Brazil', *Journal of Human Growth and Development* 36, no. 1 (2026): 87–94, <https://doi.org/10.36311/jhgd.v36.16892>.

centralisation and decentralisation within legal frameworks governing public safety.⁵

In this regard, European Union countries offer compelling models for comparative analysis.⁶ Germany, as a federal state, has a clearly defined division of powers between the federal government and the Länder in matters of public security, with policing largely under regional authority.⁷ Meanwhile, Spain, a unitary state with a strong system of autonomy, grants extensive powers to its autonomous communities in managing public safety and public order, including the establishment of regional police forces in certain areas.⁸ These models demonstrate that the effectiveness of public safety governance depends on a clear delineation of competencies, effective coordination mechanisms, and the active involvement of local actors in decision-making processes.

Nevertheless, existing academic studies on foreign legal frameworks governing public safety at the regional level reveal several limitations. First, some studies tend to focus primarily on institutional aspects without deeply examining the relationship between legal norms and their practical implementation.⁹ Second, other research emphasises general security policy analysis without sufficiently addressing the legal dimension and the distribution of authority across different levels of government.¹⁰ Third, certain studies explore decentralisation within the broader context of public administration but do not specifically link it to public safety and public order, which are highly sensitive domains for state stability.¹¹ These limitations indicate a clear research gap in understanding how legal frameworks concretely regulate the allocation of powers, inter-agency coordination, and the role of regional actors in maintaining public safety.

⁵ Daniel Sloot et al., 'Public Perceptions of Energy Security Risks and Energy Transition Support in France and Germany', *Cell Reports Sustainability* 3, no. 3 (2026), <https://doi.org/10.1016/j.crsus.2026.100663>.

⁶ Terance D. Miethe et al., 'Facial Recognition Technology in Policing: A National Survey of Public Support for This Technology and Privacy/Safety Concerns', *Crime & Delinquency* 71, no. 4 (April 2025): 1025–51, <https://doi.org/10.1177/00111287221150172>.

⁷ Kai Oppermann and Henrike Viehrig, 'The Public Salience of Foreign and Security Policy in Britain, Germany and France', *West European Politics* 32, no. 5 (2009): 925–42, <https://doi.org/10.1080/01402380903064804>.

⁸ Óscar Jaime-Jiménez et al., 'The new governance of public security in Spain', *Convergencia* 26, no. 81 (2019): 1–23, <https://doi.org/10.29101/crcs.v26i81.11207>.

⁹ Lala Muradova and Alberto López Ortega, 'Public Attitudes on Energy (in)Security: Evidence from Spain', *Revista Española de Investigaciones Sociológicas* 167 (2019): 19–36, <https://doi.org/10.5477/cis/reis.167.19>.

¹⁰ Dianxi Wang, 'The Relationship Between Social Capital, Public Security Perception and Trust in the Police: A Multiple Mediating Analysis', *Journal of Forensic Psychology Research and Practice*, ahead of print, 2026, <https://doi.org/10.1080/24732850.2026.2625813>.

¹¹ Oppermann and Viehrig, 'The Public Salience of Foreign and Security Policy in Britain, Germany and France'.

Building upon this gap, this study offers a novel contribution by integrating normative legal analysis with a comparative approach that emphasises governance practices at the regional level. Unlike previous studies, this research not only compares formal legal structures but also identifies emerging patterns in implementation, including how coordination mechanisms operate and how public participation is incorporated into public safety systems. Furthermore, this study develops an analytical framework that positions the balance between centralisation and decentralisation as a key variable in assessing the effectiveness of public safety regulation at the regional level. In doing so, it contributes to the advancement of constitutional and administrative law scholarship, particularly in the field of public safety governance. The research question addressed in this study is: how do foreign legal frameworks, particularly in Germany and Spain, regulate the maintenance of public safety and public order at the regional level, and what factors determine the effectiveness of such regulation? This question is crucial given the complexity of contemporary security challenges and the need for regulatory models capable of balancing national interests with local demands.

The significance of this study can be understood from both theoretical and practical perspectives. Theoretically, it contributes to the development of comparative legal studies by offering a more integrative approach that bridges normative analysis and practical implementation. The findings are expected to enrich theoretical discussions on multi-level governance in public safety. Practically, this study provides relevant recommendations for policymakers in designing more effective legal frameworks for regulating public safety and public order at the regional level. By identifying transferable elements from foreign legal systems, it opens opportunities for more contextual and responsive legal reforms. Ultimately, strengthening legal frameworks in public safety is expected to enhance the state's capacity to maintain social stability, protect citizens' rights, and create a conducive environment for national development.

Method

This study employs a comparative legal research method¹² with a qualitative approach to examine and compare legal regulations governing the maintenance of public safety and order at the regional level in several countries, namely Germany, France, Spain, and the United States. This approach is chosen because it enables the identification of the characteristics, similarities, and differences of each legal system, while also assessing the effectiveness of

¹² Catrien Bijleveld, 'Methods for Empirical Legal Research', in *Digital Decade: How the EU Shapes Digitalisation Research* (Nomos Verlagsgesellschaft mbH und Co, 2025), 3:21–40, <https://doi.org/10.5771/9783748943990-21>.

the models implemented, particularly in relation to the trend of decentralisation of authority. Data collection is conducted through library research by examining primary legal materials such as statutory regulations (including the *Polizeigesetze* in Germany, the Internal Security Code in France, and security-related regulations in Spain and the United States), as well as official documents and reports from international institutions such as Eurobarometer. In addition, secondary legal materials, including reputable journal articles, books, and previous studies, are utilised to strengthen the theoretical and analytical framework of the research.

The data analysis technique applied in this study is descriptive-comparative analysis, which involves identifying patterns of legal regulation, categorising public security systems based on their levels of centralisation and decentralisation, and comparing their effectiveness using empirical indicators such as public trust levels and crime reduction rates. The analytical process is carried out systematically through stages of data reduction, data presentation, and conclusion drawing to produce comprehensive findings. Data validation is ensured through source triangulation by cross-checking multiple relevant and credible references to maintain consistency and accuracy. Furthermore, an interpretative approach to legal norms is employed to achieve a deeper and more contextual understanding, ensuring that the findings are not only descriptive but also analytically robust and capable of contributing to the development of public security law policies in the era of decentralisation.

Results and Discussion

General approaches to organising public security in foreign countries

The effectiveness of national institutions directly depends on their ability to continuously develop, search for new areas of improvement, implement innovative solutions, modern methods, and approaches to activities that have already proven their effectiveness in foreign practice.¹³ In this context, taking into account international experience in reforming the system of ensuring public safety and order is of particular importance.¹⁴ It should be noted that it was European partners who had a significant impact on the

¹³ Mykola Andrienko et al., 'Political Leadership Effect for Civil Protection and Public Administration in European Union Countries: How Trade Tariffs and Military Threats Affect the Security and Unity of Europe to from New World Order?', *Clio. Revista de Historia, Ciencias Humanas y Pensamiento Crítico*, 5, no. 10 (2025): 1687–717, <https://doi.org/10.5281/zenodo.15550685>.

¹⁴ Firas Meshhal Abduljabbar et al., 'Securitization of Immigration and Refugee Policy in Contemporary Islamic Politics and International Law', *MILRev: Metro Islamic Law Review* 4, no. 1 (April 2025): 64–98, <https://doi.org/10.32332/milrev.v4i1.10266>.

process of police reform in Ukraine.¹⁵ An institutional manifestation of such support is the activities of the European Union Advisory Mission to Ukraine (EUAM). The implementation of initiatives within the framework of the EUAM, as well as other international organisations and state programs of foreign states, creates a basis for a critical analysis of existing problems in the activities of law enforcement agencies, in particular in the field of ensuring public safety and order at the regional level.¹⁶

As S. Berezhnoy rightly notes, in modern European states, different approaches to ensuring state sovereignty and territorial integrity have been formed, which is due to several factors, including historical and legal features of the development of the state, the level of its socio-economic and political development, as well as geographical location. In this regard, it is worth emphasising that the law enforcement experience of each country is unique and is formed under the influence of specific historical, cultural, and territorial conditions.¹⁷ This necessitates a balanced approach to borrowing foreign practices, taking into account national characteristics.¹⁸ At the same time, the experience of developed countries, in particular Western European ones, is of significant scientific and practical interest in the context of improving domestic legislation and organisational mechanisms of police activities to ensure public safety at the regional level.

At the same time, it is advisable to take into account that foreign experience covers not only the direct activities of police units, but also related components, in particular, personnel support, personnel training system, information and analytical support, and educational mechanisms.¹⁹ When analysing foreign practices, it is also necessary to take into account modern trends in the development of scientific knowledge. In the context of globalisation and intensive development of the world economy, public safety, as

¹⁵ Jeppe T. Jacobsen and Tobias Liebetrau, 'Infrastructuring Public-Private Relations: Big Tech, the Ukraine War and Implications to Security Governance', *European Journal of International Relations* 32, no. 1 (2026): 183–208, <https://doi.org/10.1177/13540661251370265>.

¹⁶ Tetiana Zaporozhets et al., 'Historical Analysis of Public Administration Mechanisms for Ukraine's National Security in Response to Russian Armed Aggression (2014-2025)', *Clio. Revista de Historia, Ciencias Humanas y Pensamiento Crítico*. 2026, no. 11 (2026): 2156–205, <https://doi.org/10.5281/zenodo.17549139>.

¹⁷ Serhii Berezhnoi, *Foreign Experience in Protecting State Sovereignty and Territorial Integrity and Potentials of Its Application in Ukraine.*, 10 (2022): 18–24, <https://doi.org/10.32849/2663-5313/2022.10.03>.

¹⁸ Iryna Dragan et al., *Public-Private Partnerships in National Security. A Case Study in the Context of the War in Ukraine: 2022-2024*, 28 December 2024, <https://doi.org/10.5281/ZENODO.14566957>.

¹⁹ Oleh Shkuta et al., 'Object and Subject of State Control in the Sphere of Legal Turnover of Narcotic Drugs, Psychotropic Substances and Their Precursors in Ukraine: Administrative, Criminal and Civil-Legal Aspect', *Journal of Drug and Alcohol Research* 12 (2023), <https://doi.org/10.4303/JDAR/236255>.

one of the basic social values, is receiving increasing attention from state institutions and society. Due to the need to effectively prevent threats and respond to them at both the national and regional levels, research in the field of emergency management is actively developing in the USA and other Western countries. In particular, multi-level concepts have been formed, based on the idea of the life cycle of emergencies, which cover all stages, from prevention to elimination of consequences.²⁰

The experience of the United Kingdom, where ensuring public safety and order at the regional level is largely based on systematic planning, especially in the field of countering terrorist threats, deserves special attention. Public incident planning (POPS) involves a comprehensive assessment of potential risks and possible consequences of terrorist acts. The relevant plans should include measures to minimise risks, take into account current threats, including possible attack scenarios, and provide for the proportional involvement of resources and the definition of the role of the police in the event of emergencies.²¹

In addition, in the United Kingdom, considerable attention is paid to the regulation of security not only during mass events, but also in places of rest, in particular in recreational and forest areas. Legislation, in particular the Health and Safety at Work Act 1974, imposes obligations to ensure public safety on employers, landowners, and operators of relevant areas. They are obliged to plan, coordinate, and implement measures to minimise risks for visitors, including monitoring the safe functioning of recreational infrastructure, such as tourist routes, recreation areas, campsites, and other facilities.²²

Taking into account the above, the experience of the United Kingdom can be effectively used in Ukraine, in particular in the field of preparation and organisation of mass events, taking into account different levels of terrorist threat. This issue becomes especially relevant in conditions of martial law and increased risks associated with sabotage activities. It is also important to borrow approaches to regulating behavior in recreational areas, since violation of recreation conditions, in particular noise pollution, negatively affects the psycho-emotional state of the population. In addition, it is advisable to implement modern technological solutions that allow for real-time collection

²⁰ Roman Pasichnyi, 'The Role of Customs Control in Ensuring Economic Security in the Conditions of European Integration Trends in the Development of Public Administration Systems', *Economic Affairs* 68, no. 2 (June 2023), <https://doi.org/10.46852/0424-2513.2.2023.21>.

²¹ Jay Wiggan, 'Reforming the United Kingdom's Public Employment and Social Security Agencies', *International Review of Administrative Sciences* 73, no. 3 (2007): 409–24, <https://doi.org/10.1177/0020852307081150>.

²² Hyunho Kim, Mark Button, and Julak Lee, 'Public Perceptions of Private Security in Shopping Malls: A Comparison of the United Kingdom and South Korea', *International Journal of Law, Crime and Justice* 53 (2018): 89–100, <https://doi.org/10.1016/j.ijlcrj.2018.03.010>.

and analysis of information, forming a holistic risk assessment system and increasing the effectiveness of law enforcement agencies in ensuring public safety and order.²³

In foreign countries, the organisation of public security and order is formed under the influence of historical, political, legal, and socio-economic factors, which determine the existence of various models of its legal regulation. At the same time, the analysis of modern approaches allows us to identify several common trends that characterise the organisation of the public security system at the regional level.²⁴ First of all, a key feature of most developed countries is the multi-level organisation of the public security system, which involves the division of powers between the national, regional, and local levels of government. This approach provides a combination of strategic management by central government bodies and a prompt response to local challenges by regional and municipal institutions. The national level, as a rule, is responsible for the formation of state policy, regulatory and legal regulation, and coordination of activities, while the regional and local levels ensure the practical implementation of measures to maintain public order.

The second important characteristic is the decentralisation of powers in the field of public security. In most countries, there is a tendency to transfer a significant part of the functions to regional authorities and local self-government bodies. This allows us to take into account the specifics of individual territories, the level of the crime situation, and the social and cultural characteristics of the population. At the same time, the degree of decentralisation varies depending on the form of government: in federal states (for example, Germany, the USA) it is more pronounced, while in unitary states (France, Italy) it is combined with elements of centralised control.²⁵

An essential element of modern approaches is the institutional differentiation of public security entities.²⁶ In foreign countries, functions in this area are performed not only by national police bodies, but also by regional and municipal units, gendarmerie, specialised services, and non-state institutions. The development of municipal police, which monitors compliance with local

²³ Pasichnyi, 'The Role of Customs Control in Ensuring Economic Security in the Conditions of European Integration Trends in the Development of Public Administration Systems'.

²⁴ Olha Hryhorash et al., 'The Development of Small Business as a Source of Formation of Local Budget Revenues in Ukraine', *Investment Management and Financial Innovations* 15, no. 1 (2018): 133–140, [https://doi.org/10.21511/imfi.15\(1\).2018.12](https://doi.org/10.21511/imfi.15(1).2018.12).

²⁵ Iegor Dymko et al., 'Integrated Approach to the Development of the Effectiveness Function of Quality Control of Metal Products', *Eastern-European Journal of Enterprise Technologies* 6, no. 3 (90) (2017): 26–34, <https://doi.org/10.15587/1729-4061.2017.119500>.

²⁶ Bereznoi, Serhii (2022). Foreign experience in protecting state sovereignty and territorial integrity and potentials of its application in Ukraine. *Entrepreneurship, Economy and Law*, 10, 18–24, doi <https://doi.org/10.32849/2663-5313/2022.10.03>

rules, ensures order during mass events, and also performs preventive functions, is of particular importance. Special attention deserves a clear regulatory demarcation of competences between different levels of government and security entities. In most foreign countries, legislation defines in detail the powers of each body, which allows to avoid duplication of functions and conflicts of jurisdiction. Such an approach ensures increased management efficiency and promotes proper coordination of activities.²⁷

An important trend is also the orientation towards preventive activities.²⁸ In modern conditions, the emphasis is gradually shifting from responding to offenses to their prevention.²⁹ This is implemented through the implementation of crime prevention programs, analytical risk forecasting, and active interaction with the public. In this context, the concept of “community policing” has become widespread, which involves a partnership between the police and the population, involving citizens in solving security issues and building trust in law enforcement agencies. An equally important aspect is the use of modern information technologies in the field of public security. Many countries actively use video surveillance systems, automated databases, analytical platforms for crime prediction, as well as digital tools for interacting with the population. This allows for increasing the efficiency of law enforcement agencies and ensuring a rapid response to threats.³⁰

In addition, a characteristic feature is interdepartmental and intersectoral interaction, which involves coordinating the activities of the police, local governments, social services, educational institutions, and public organisations.³¹ Such an integrated approach allows taking into account various aspects of ensuring security and increases the effectiveness of preventive measures. Thus, general approaches to organising public security in foreign countries are based on the principles of multi-level decentralisation, clear

²⁷ Yevhen Leheza et al., ‘The Essence of the Principles of Ukrainian Law in Modern Jurisprudence’, *Revista Juridica Portucalense* 32 (2022): 342–63, [https://doi.org/10.34625/issn.2183-2705\(32\)2022.ic-15](https://doi.org/10.34625/issn.2183-2705(32)2022.ic-15).

²⁸ Anna Katarrzyna Nowaak, ‘Facilitating Academic Mobility and Knowledge Exchange to Promote Continuous Learning and Collaboration’, *Nusantara Education* 5, no. 1 (March 2026): 1–12, <https://doi.org/10.66325/nusantaraeducation.v5i1.254>.

²⁹ Bohdan Torokhtii et al., ‘Legal Regulation of Social Security Principles in the Countries of the European Union and Ukraine’, *Nusantara: Journal of Law Studies* 5, no. 1 (March 2026): 229–51, <https://doi.org/10.66325/nusantaralaw.v5i1.227>.

³⁰ Daniela Nicoleta Sahlian et al., ‘Pension Benefits Adequacy and Social Security Budget Sustainability-What Influences the Resilience of Public Pension Systems in Central and Eastern European Countries?’, *Economic Computation and Economic Cybernetics Studies and Research* 59, no. 2 (2025): 126–41, <https://doi.org/10.24818/18423264/59.2.25.08>.

³¹ Barak Ariel, ‘The Substitutability and Complementarity of Private Security with Public Police: The Case of Violence Against Women and Girls in the Rail Network of the United Kingdom’, in *Competitive Government: Public Private Partnerships*, Part F1694 (Springer, 2023), 193–221, https://doi.org/10.1007/978-3-031-42406-9_9.

separation of powers, preventive focus of activities, use of modern technologies, and active interaction with the public. Their integrated application ensures a high level of efficiency of the public security system and can be used as a guideline for improving the national legislation of Ukraine.

Experience of the European Union countries

The experience of the European Union countries in the field of legal regulation of ensuring public safety and order at the regional level is characterised by a variety of models that have been formed under the influence of national legal traditions, the form of state structure, and the level of decentralisation of power. At the same time, despite the existing differences, common approaches are inherent in most EU member states, among which the key place is occupied by a multi-level organisation of the security system, a clear division of powers, the development of municipal institutions, and an orientation towards preventive activities. In the Federal Republic of Germany, ensuring public safety is based on the principles of federalism, according to which the main powers in this area belong to the states. The state police (Landespolizei) carry out the majority of functions related to maintaining public order, including the prevention of offenses, patrolling, responding to offenses, and ensuring security during mass events. The Federal Police (Bundespolizei) performs more highly specialised tasks, in particular, the protection of the state border, transport infrastructure, and strategic facilities. This approach allows for the effective combination of centralised coordination with broad regional response capabilities to threats.³²

The French model of public security is of a mixed nature and combines elements of centralisation and decentralisation. The National Police and the Gendarmerie, which are subordinate to the central executive authorities, play an important role; however, at the regional level, their activities are coordinated through the institution of prefects as representatives of the state. At the same time, the municipal police, which are created by local governments and perform auxiliary functions related to ensuring public order, monitoring compliance with local rules, and preventing offenses, are actively operating. This model provides a balance between centralised management and local autonomy. Spain has one of the most decentralised public security systems in Europe, due to the presence of autonomous communities with broad powers. In addition to the national law enforcement agencies (Policía Nacional and Guardia Civil), a number of regions have their own police units with a significant range of powers. In particular, in Catalonia there is the Mossos d'Esquadra, and in the

³² Nicholas Dorn and Michael Levi, 'European Private Security, Corporate Investigation and Military Services: Collective Security, Market Regulation and Structuring the Public Sphere', *Policing and Society* 17, no. 3 (2007): 213–38, <https://doi.org/10.1080/10439460701497303>.

Basque Country there is the Ertzaintza, which perform most of the functions of ensuring public security in their respective territories. The legislative consolidation of the powers of these bodies ensures a clear demarcation of powers and contributes to the effective functioning of the system.³³

Italy demonstrates an example of a multi-level and functionally differentiated system of ensuring public security, within which both national (Polizia di Stato, Carabinieri) and local (Polizia Locale) law enforcement agencies operate. Coordination of activities is carried out through prefects, who represent the central government in the localities. Municipal police perform administrative control functions, ensure public order and comply with local regulations.³⁴ A characteristic feature of most EU countries is the active implementation of the concept of "community policing", which involves close interaction between the police and the public, focusing on the needs of the population and preventing offenses. Within the framework of this concept, partnership programs between the police and citizens are implemented, advisory bodies are created, and mechanisms for public participation in ensuring security are introduced.³⁵ An important aspect is also the use of modern technologies in the field of public security. EU countries actively use video surveillance systems, automated databases, analytical tools for crime prediction, as well as digital platforms for interaction with the public. This allows to increase in the efficiency of law enforcement agencies and ensures a more efficient response to threats. In addition, at the level of the European Union, security policy is coordinated through the activities of institutions such as Europol, which promotes the exchange of information between member states, as well as the development of common approaches to combating crime and ensuring public order.³⁶

Therefore, the experience of the European Union countries demonstrates the effectiveness of models based on a combination of decentralisation, clear regulatory regulation, multi-level organisation of the security system, and active interaction with the public. This approach can be

³³ Yevhen Leheza, Larysa Yerofieienko, and Volodymyr Komashko, 'Peculiarities of Legal Regulation of Intellectual Property Protection in Ukraine under Martial Law: Administrative and Civil Aspects', *Revista Justiça Do Direito* 37, no. 3 (2023): 157–172, <https://doi.org/10.5335/rjd.v37i3.15233>.

³⁴ Christian Kaunert, 'The Area of Freedom, Security and Justice: The Construction of a "European Public Order"', *European Security* 14, no. 4 (2005): 459–83, <https://doi.org/10.1080/09662830500528161>.

³⁵ Pierangelo Isernia and Philip P. Everts, 'European Public Opinion on Security Issues', *European Security* 15, no. 4 (2006): 451–69, <https://doi.org/10.1080/09662830701306060>.

³⁶ Kai Oppermann and Alexander Höse, 'Public Opinion and the Development of the European Security and Defence Policy', *Eur. Foreign Aff. Rev.* 12, no. 2 (2007): 149–67, <https://doi.org/10.54648/eerr2007015>.

used in Ukraine, taking into account national characteristics and modern challenges, in particular in conditions of martial law and European integration processes.³⁷

Table 1: Comparative analysis of public security models in EU countries

Criterion	Germany	France	Spain	Italy
Form of government	Federal state	Unitary State	Unitary state with autonomi es	Unitary State
Level of decentralisation	High	Average	High	Medium
Main security actors	Landespolizei, Bundespolizei	National Police, Gendarmerie, Municipal Police	Policía Nacional, Guardia Civil, regional police	Polizia di Stato, Carabinieri, Polizia Locale
Role of the regional level	Definitive	Coordinated through prefects	Dominant in autonomi es	Limited but important
Municipal police	Limitedly developed	Widely developed	Operates in parallel	Actively functioning
Regulatory regulation	Land laws on police	Internal Security Code	Law on Security Forces and Corps	National legislation + local acts
Separation of powers	Clear between the federation and the states	Clear but with centralised control	Legislatively detailed	Defined but partly overlapping

³⁷ Yevhen Leheza et al., 'Interpretation of Regulatory and Legal Acts in Contemporary Contexts: Foreign Experience, Comparative Perspectives, and Pathways for Regulatory Reform', *NUSANTARA: Journal Of Law Studies* 5, no. 1 (February 2026): 102–22, <https://doi.org/10.5281/zenodo.18727992>.

Criterion	Germany	France	Spain	Italy
Orientation on prevention	High	High	High	Medium–high
Community policing	Actively implemented	Developing	Actively applied	Moderately developed
Use of technologies	High level	High level	High level	Medium–high
Coordination between levels	High	High-through prefects	High but complex	Medium
Main advantages	Flexibility, adaptability	Balance of governance	Autonomy and efficiency	Multi-tier system
Main disadvantages	Complexity of coordination	Centralisation risks	Fragmentation of the system	Duplication of functions

Source: Author's Interpretation

Comparative analysis shows that models of public security organisation in the European Union countries differ significantly depending on the form of state structure, the level of decentralisation, and the traditions of national law. Federal Germany demonstrates high decentralisation: the main part of the functions is assigned to the state police authorities, which allows for effective consideration of regional characteristics and prompt response to threats. Unitary countries such as France and Italy combine centralised management with regional coordination, where prefects and local units ensure interaction between levels of government. Spain deserves special attention, where autonomous regions have a significant amount of authority, which ensures local efficiency, but at the same time creates the risk of fragmentation of the system and complicates coordination between national and regional authorities. Municipal police in all countries perform auxiliary functions, but it is most developed in France and Germany, which contribute to the adaptation of law enforcement activities to the needs of communities.

As for preventive focus and interaction with the population, the concept of “community policing” is actively used in Germany, Spain, and France, which allows for increasing public trust in the police and reducing the

level of offenses.³⁸ The use of modern technologies in the field of security, in particular analytical systems, video surveillance, and digital platforms for interaction with the population, is a common feature of all the countries studied and contributes to more effective risk management and ensuring public safety. The shortcomings of the systems identified in the analysis are excessive centralisation in France, which can slow down the response to local threats, and fragmentation of powers in Spain, which sometimes complicates coordination between autonomous regions and national authorities. The Italian system, although multi-level, demonstrates the risk of duplication of functions between different units, which requires improved regulation of interaction.

Conclusion

The findings of this study reveal that there are diverse models for managing public safety and order across the countries examined, shaped by differences in state structure, levels of decentralisation, and legal traditions. Despite these variations, several common patterns emerge as key determinants of effectiveness, particularly the combination of centralised strategic management with the delegation of authority to regional and local governments. Models such as those in Germany and Spain demonstrate that well-managed decentralisation enhances flexibility and responsiveness to local challenges, although it requires strong coordination mechanisms. Furthermore, a clear legal delineation of powers plays a crucial role in preventing overlaps of authority and strengthening institutional synergy. Local law enforcement institutions are also significant, especially in implementing preventive approaches and the concept of community policing, which contribute to increased public trust and stronger partnerships between authorities and communities. However, the study also identifies several limitations, including the risks of excessive centralisation, system fragmentation, and duplication of functions, highlighting the need for continuous improvement in coordination mechanisms and legal frameworks.

Based on these findings, this study recommends the development of an adaptive public security governance model that integrates decentralised approaches, strengthens the role of local governments, and optimises preventive functions through collaboration with the community. The use of information technology should also be enhanced as a strategic tool for monitoring, risk analysis, and rapid response to potential security threats. For future research, it is suggested to conduct more contextual and empirical studies, such as field research or local-level policy analysis, to assess the effectiveness of existing models directly. In addition, further studies may expand the scope by comparing a wider range of countries or

³⁸ Sandra Lavenex and Wolfgang Wagner, 'Which European Public Order? Sources of Imbalance in the European Area of Freedom, Security and Justice?', *European Security* 16, nos 3–4 (2007): 225–43, <https://doi.org/10.1080/09662830701753972>.

incorporating interdisciplinary perspectives, thereby generating more comprehensive and applicable recommendations for the development of responsive and sustainable public security policies.

Author Contributions Statement

Artem Kysko conceived and developed the overall structure of the study, developed the main arguments, and guided the process of preparing and writing the manuscript. Maksym Pochtovyi and Serhii Petrov made significant contributions to the theoretical analysis and interpretation of the results, offering critical conclusions that strengthened the legal and methodological aspects of the study. Meanwhile, Andrii Korenev and Roman Mrochko played a key role in conducting the literature review, collecting relevant data, and refining the discussion to ensure coherence between the regulatory framework and the current realities of legislative development. All authors actively participated in the review and final approval of the manuscript, ensuring its academic accuracy and integrity.

AI Usage Statement

The authors state that artificial intelligence (AI) applications were used on a small scale to assist with language correction, grammar correction, and rephrasing in academic writing. There was no use of AI when generating research data, conducting analysis, interpreting legal materials, or developing arguments and conclusions in the study. All the substantive work, including intellectual contributions such as conceptualisation, legal analysis, comparative assessment, and findings interpretation, was done entirely by the authors. The authors assume complete responsibility for the contents, correctness, and originality of this work.

Conflict of Interest

The author declares that there is no potential conflict of interest, whether financial, professional, or personal, that could have influenced the research findings, data interpretation, or conclusions presented in this article. The research was conducted independently and objectively to ensure academic integrity and transparency.

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