

THE DUTCH EXPERIENCE OF IMPLEMENTING RESTORATIVE JUSTICE IN CRIMINAL PROCEEDINGS: PROSPECTS FOR UKRAINIAN JUSTICE

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Abstract

The article analyzes the Dutch experience in implementing restorative justice and the possibilities for its adaptation in Ukraine. The relevance of the topic is determined by Ukraine's European integration commitments and the need for post-conflict social cohesion. Comparative legal analysis and statistical cost assessment were used as methodological tools. The Netherlands was selected as a model case due to the widespread application of mediation and consistent state support. The study demonstrates that legislative comprehensiveness and procedural clarity significantly increase access to reconciliation. Centralized funding guarantees free services and strict selection of mediators. Moreover, large-scale information campaigns build public trust and professional support. Comparative data show that mediation is more cost-effective than traditional judicial proceedings, while simultaneously reducing the caseload of courts and accelerating conflict resolution. A distinctive contribution of the study is the formulation of comprehensive recommendations for Ukraine. The identified problems are analyzed through the lens of Dutch practice, with subsequent adaptation to domestic legal realities. Proposals include the allocation of stable state funding through redistribution of the court budget, as well as the development of educational programs and public awareness campaigns to overcome punitive justice stereotypes. The study argues that the adoption of the Dutch model could strengthen the humanistic vector of Ukraine's criminal policy.

Key words: comparative law; criminal mediation; mediation in the Netherlands; reconciliation agreement; reconciliation of parties

1. Introduction

In the context of globalization and expanding integration processes, the mutual exchange of successful practices in the field of law and law enforcement acquires particular importance. For Ukraine, which established its European course after signing the Association Agreement with the European Union in 2014, a pressing task has been the introduction of institutions that ensure the harmonization of national legislation with European legal standards (European Union & Ukraine, 2014). One such institution is restorative justice, regarded as a key instrument for the humanization of criminal policy and the enhancement of judicial efficiency. The significance of this article is not only in its description of the positive experience of the Netherlands but also in its adaptation of that experience to Ukrainian realities, with a focus on those elements that can be applied in the national context. Consequently, the material will be of interest both to scholars in the field of criminal law and criminal procedure, and to practitioners, i.e. judges, prosecutors, lawyers, mediators, as well as to representatives of state authorities

responsible for shaping justice policy.

The ideas of restorative justice are not new to legal traditions. As early as the times of Kyivan Rus, the practice of reconciliation between conflicting parties and compensation to the victim played an important role in regulating social relations (Mykytyn, 2014). However, the Ukraine's long inclusion in the Russian Empire and later the Soviet Union led to the dominance of a punitive model that largely displaced humanistic approaches (Fris, 2005). Nowadays, in the context of European integration and the internal need to strengthen social cohesion, Ukraine is renewing its interest in restorative justice, though this process is accompanied by considerable challenges. Scholarly research on restorative justice and criminal mediation in Ukraine and abroad provides an important theoretical foundation for this study.

Among foreign scholars, Bazemore and Umbreit (1995) were among the first to develop the conceptual foundations of restorative justice, emphasizing its significance for the resocialization of offenders and restoration of victims' rights. Bush & Folger (2004), in their works, examined the legal and psychological aspects of mediation, highlighting the importance of voluntariness and equality of the parties in the reconciliation process. The studies of Elbers et al. (2023) are focused on the integration of restorative practices into European legal systems and outline their advantages in reducing the burden on the judiciary.

Ukrainian scholars have also made a significant contribution to the development of this approach. Mykytyn (2014) analyzed the historical roots of reconciliation and mediation in Ukraine, emphasizing both the continuity of the traditions and the loss of humanistic practices during Soviet period. Fris (2005), in his monograph "An outline of the history of criminal law policy of Ukraine", focused on the transformation of criminal policy and emphasized the need for the humanization of criminal justice. Sirko (2024) examined the legal challenges in the field of mediation and identified key problems of law enforcement, including fragmented legislation and insufficient state financial support. Fomina (2022) analyzed recent legislative innovations in the field of criminal mediation and proposed ways of improving the law, particularly in the context of defining the role of the mediator. Dotsenko (2017) and Yurkova (2008) addressed the issue of financing and proposed the creation of mediation support funds to ensure accessibility of the procedure for socially vulnerable groups. Dubovyk (2015) and Shyshka (2021) raised the problem of low legal culture in society, which hinders the development of restorative practices, while Rohatynska (2023) examined the institutional mechanisms for integrating mediation into the criminal justice system.

Despite the existence of substantial research, several gaps remain in contemporary Ukrainian scholarship. First and foremost, there is a lack of comprehensive legal studies that explore the experience of specific EU countries and propose mechanisms for its adaptation. Existing studies are frequently focused either on purely theoretical aspects or on the analysis of individual legislative innovations, without taking into account the interrelation between legal regulation, funding, and public perception. Moreover, the issue of the economic efficiency of mediation in comparison with traditional legal procedure remains underdeveloped which is of particular importance in the context of limited resources.

Despite the adoption of the Law of Ukraine "On mediation" (Verkhovna Rada of Ukraine, 2022), the Ukrainian model of restorative justice remains fragmented and limited in scope. Among the key challenges are the insufficient elaboration of the procedural obligations of prosecutors and courts regarding the initiation of mediation; the restricted nature of existing programs, which have primarily targeted juvenile offenders and minor crimes; financial barriers, since mediation is mainly funded by the parties or through grant programs; the low

level of legal culture and public trust in the institution of reconciliation; and the absence of a unified state policy and information campaigns aimed at promoting mediation and training professionals.

The choice of the Netherlands as a case study is determined by several factors. First, the country relatively recently, in the 2010s, introduced the institution of criminal mediation, which makes its experience chronologically comparable to that of Ukraine. Secondly, despite initial challenges, the Netherlands succeeded in creating a comprehensive system of restorative justice integrated into the Criminal Procedure Code, characterized by universal applicability and the capacity to cover all categories of crime. Third, the state provides centralized funding and mediator accreditation, ensuring both accessibility and quality of services. Finally, success was achieved through a combination of legislative clarity, financial support, and large-scale public information campaigns, which gradually transformed societal perception of mediation. An analysis of this success makes possible not only to identify the key factors of success but also to reveal institutional mechanisms that may prove effective under Ukrainian conditions.

The aim of this article is to conduct a comprehensive study of the Dutch experience in implementing of restorative justice and to develop proposals for its adaptation in Ukraine. To achieve this aim, the study pursues several objectives. These include: analyzing historical and theoretical foundations of restorative justice in Ukraine and the Netherlands; identifying the key stages of the institutionalization of mediation in the Dutch criminal process; assessing the effectiveness of the Dutch model on the basis of statistical and organizational indicators; carrying out a comparative legal analysis of the legislative frameworks of Ukraine and the Netherlands; identifying gaps and problems in the functioning of the Ukrainian model of restorative justice; and formulating recommendations for improving national legislation and practice, taking into account the Dutch experience.

The findings of the study hold both theoretical and practical significance. On the one hand, they contribute to a deeper scholarly understanding of the mechanisms through which European legal models can be adapted to the Ukrainian context. On the other hand, the recommendations proposed herein may serve as a foundation for specific legislative reforms, particularly in the areas of mediation funding and the regulation of prosecutorial and judicial responsibilities. In the light of the challenges facing Ukrainian society in the context of ongoing hostilities and post-war reconstruction, restorative justice has the potential to become an effective instrument not only of criminal policy but also of broader social integration.

2. Origins and legal integration of restorative justice in the Netherlands

The foundations of the restorative justice in the Netherlands began to take shape in the 1990s. Compared to other EU member states, it may be argued that the country embarked on this process relatively recently. However, concrete practical steps were taken even later. In 2013, the Dutch Ministry of Justice launched a pilot project entitled “Mediation on Criminal Cases” in several districts, including Amsterdam and Rotterdam (Wolthuis et al., 2019). The initiative allowed judges to temporarily suspend proceedings and refer parties to certified mediators for the purpose of reconciliation. Owing to its initial success, the project was gradually expanded to cover an increasing number of regions.

In 2017, criminal mediation was formally incorporated into national legislation. Specifically, Article 51h was added to the Dutch Code of Criminal Procedure (hereinafter –CCP of the Netherlands), providing a legal definition of restorative justice and outlining

its practical application. This provision authorizes prosecutors and courts to refer parties to mediation, subject to their voluntary consent. Importantly, the outcomes of mediation must be taken into account in the subsequent criminal proceedings. In this way, the CCP of the Netherlands enshrines the principles of voluntariness and procedural significance of settlement agreements (Staten-Generaal, 1926). In addition, the judiciary received methodological guidelines for prosecutors regarding the proper use of mediation. From that point onward, mediation became available in courts across all regions of the country. As of 2018, the program had secured stable, institutionalized state funding (Geenen et al., 2019), marking its transition from a pilot initiative to an established component of criminal justice. By 2020, a comprehensive infrastructure had been developed. The coordination of programs was assigned to the Council for the Judiciary, while the training of mediators was provided by the Netherlands Mediation Institute. Courts and prosecution services also introduced clear procedures for the selection of cases suitable for mediation (De Vries, 2023).

3. Implementation, scope, and procedural features

Quantitatively, the results of the first five years (2017-2022) underscore the success of the initiative. Official statistics indicate that during this period, 7.622 criminal cases were referred to mediation. The number of annual referrals demonstrated steady growth. During the pilot project in 2017, only a few dozen cases were referred to mediation. However, by 2019, this number had exceeded 1.500 cases, and by 2022, it reached 2.000 (Hoekstra et al., 2024). These figures are particularly notable given the relatively small population of the Netherlands, approximately 17 million, and the recent introduction of mediation. The sustained upward trend reflects a positive trajectory in the implementation of the program.

A distinctive feature of the Dutch practice is the absence of categorical restrictions regarding the types of offenses eligible for mediation. The Dutch Code of Criminal Procedure does not provide a specific list of offenses that can or cannot be mediated. Instead, it affirms the general accessibility of mediation for all categories of crimes (Staten-Generaal, 1926). The model is applied to both adult and juvenile offenders. The right to mediation requires that the suspect acknowledges the basic facts of the offense and demonstrates a willingness to take responsibility. In addition, the victim's informed consent is mandatory. These principles ensure that mediation is not used as a means to evade accountability.

It should also be noted that the Netherlands has the Public Prosecution Service Directive on Restorative Justice of 2020 (The Minister for Legal Protection, 2020). This document specifies procedural details for prosecutors regarding mediation. In particular, it establishes the obligation to inform parties about the possibility of mediation. The prosecutor must verify the victim's consent to participate in the procedure. In cases of successful mediation, the prosecutor may request the court to take the outcome into account. Moreover, the prosecutor may independently close the case if they consider formal punishment unnecessary (Elbers et al., 2023).

In comparison with the Dutch regulatory framework, the Ukrainian legal system exhibits a certain degree of fragmentation. Ukraine lacks universally binding guidelines analogous to those in the Netherlands. Criminal mediation is regulated by the Law of Ukraine "On Mediation" (Verkhovna Rada of Ukraine, 2022) and the Criminal Procedure Code of Ukraine of 2001 (hereinafter – CPC of Ukraine) (Verkhovna Rada of Ukraine, 2001). However, these acts provide insufficient detail regarding the procedural responsibilities of prosecutors within the restorative justice system (Verkhovna Rada of Ukraine, 2001). Criminal mediation was also governed by the Order of the Prosecutor General of Ukraine and the Ministry of Justice of Ukraine No. 172/5/10 of 2019 (Verkhovna Rada of Ukraine, 2019), which introduced the pilot "Restorative Justice Program for Juveniles". This program applied only to minor

offenses committed by juveniles and was limited in scope. The order was repealed in 2020 (Verkhovna Rada of Ukraine, 2024).

By contrast, in the Netherlands, a universal directive exists for prosecutors, including mandatory verification of the victim's consent and the possibility of case closure following successful mediation. Compared with the Dutch model, the Ukrainian approach remains largely pilot-based and restricted in terms of case categories. Therefore, the introduction of a specialized directive, following the Dutch example, could help standardize prosecutorial practice in Ukraine. The importance of a unified act lies in: ensuring a consistent procedural framework for the parties; verifying the victim's consent; considering the results of mediation; and creating conditions for more effective compensation. Overall, this measure would contribute to aligning the domestic legal system with European standards.

Statistics from the Dutch Ministry of Justice indicate that in 2019, approximately 96% of cases referred to mediation were under the jurisdiction of the first-instance court. The remaining cases were either at the appeal stage or handled by the prosecutor (Wetenschappelijk Onderzoek- en Datacentrum, 2019). This demonstrates that judges actively utilize this instrument. At the same time, in 2020-2021, there was a significant increase in the proportion of cases in which the prosecutor initiated mediation prior to the commencement of court proceedings (Hoekstra et al., 2024). Thus, case review through mediation is increasingly employed at the early stages of proceedings, confirming its growing role within the Dutch criminal justice system.

However, it is important to note that the Dutch experience also faced several challenges during the implementation of restorative justice. One such challenge was the initially low level of understanding and awareness of mediation among participants in the process. In the early stages of implementation, not all criminal justice professionals fully understood the new procedure (Elbers et al., 2023). As a result, many suspects and victims did not receive adequate information. To address this issue, the government launched a large-scale public information campaign and implemented training programs for legal professionals. Thanks to this active state-led effort, mediation gained a high level of public trust and gradually became an integral part of the country's criminal justice system (Elbers et al., 2023). Dutch researcher Van Zwieten (2021) notes that today mediation is "well received by society and supported by legal professionals and courts". He attributes this success to years of promotion, government outreach, and professional training. Following its introduction, both the government and professional communities invested resources in educating citizens about the benefits of the procedure. Over time, this fostered a stable demand and trust within the legal community, establishing mediation as a recognized and viable alternative to formal court proceedings (Van Zwieten, 2021).

In Ukraine, a similar problem exists, as society currently does not have a high level of trust in the institution of restorative justice. Historically, the idea of justice has been shaped primarily through punishment. This perception is a legacy of the repressive Soviet legal model (Romanadze et al., 2022). Punishment is still often seen as the sole indicator of restored justice, while reconciliation or compensation are frequently considered insufficient. Consequently, victims are reluctant to voluntarily participate in mediation, as it may appear to them as a "concession" to the offender. The general public similarly tends to view mediation as a lenient option for wrongdoers. Researchers note that this punitive stereotype is deeply entrenched and obstructs the development of restorative approaches (Laundra, 2022). Another challenge is the overall level of legal culture: people are accustomed to relying on state institutions and courts. Compromise is perceived as unattractive, and parties are often unwilling to make concessions. As a result, demand for mediation remains low (Katsiora, 2021).

A partial solution can be seen in recent legislative changes. Fomina (2022) argues that a clear definition of the mediator's role could improve public perception of the procedure. It is also necessary to launch information campaigns, educational programs, and training sessions. These initiatives would clarify that mediation provides an opportunity for all parties involved in a conflict. Gradually, such measures help build trust and reshape perceptions of justice. As a result, a culture of dialogue is likely to strengthen over time, giving the restorative justice system a real opportunity to develop in Ukraine.

Although the Dutch restorative justice system is one of the youngest, it has already demonstrated remarkable effectiveness. Its main advantage lies in its comprehensiveness and accessibility. Mediation is possible for any category of offenses, for all groups of offenders, and at all stages of proceedings. In practice, every criminal conflict involving a specific victim has the opportunity to be resolved restoratively. This broad scope of application significantly increases the number of cases in which the parties reach mutually acceptable agreements, while minimizing situations in which reconciliation fails due to formal restrictions.

Moreover, a high level of state support and procedural quality in mediation has been observed. In the Netherlands, mediation is centrally funded by the government, ensuring that participants receive services free of charge and are assisted by highly qualified professionals. In contrast, Ukrainian practice currently lacks such stable financial support. Additionally, Dutch legislation imposes clear requirements on mediators. The law mandates accreditation and specialization in criminal cases. Each mediation session is thoroughly documented, and the results are monitored by the Ministry of Justice. Consequently, cases are resolved significantly faster than in court, and agreements reached by the parties reduce the number of court hearings, thereby contributing to the overall efficiency of the judicial system.

The Dutch experience demonstrates the effectiveness of sustained state funding for mediation. The country has a unified system for mediator accreditation. In Ukraine, by contrast, mediation largely relies on grants and volunteers, making it vulnerable. When the state covers service costs and a professional council oversees quality, the procedure becomes accessible nationwide. International practice shows that mediation is adaptable to different cultural contexts. It fosters dialogue and trust, i.e. values that are particularly crucial for post-conflict societies. Ukraine is currently facing aggression and requires mechanisms to strengthen social cohesion. Widespread implementation of restorative justice could provide a significant impetus for reconciliation.

4. Comparative analysis, challenges, and policy recommendations for Ukraine

Ukrainian scholar Sirko (2024) emphasizes the need to ensure financial accessibility of mediation. He highlights the importance of support programs that would make services available to all. The researcher proposes the establishment of special funds to cover the costs for parties unable to pay for a mediator. The solution lies in state funding of mediation. To achieve this, an appropriate legal framework should first be established. Amendments are proposed to the Law "On Free Legal Aid" of 2011. Specifically, it is suggested that Article 13, Part 2, after point 3, be supplemented with a new point 4 as follows: "4) Organization and payment, from the state budget, of mediator services and other necessary expenses directly related to the conduct of criminal mediation between the victim and the suspect (accused)" (Verkhovna Rada of Ukraine, 2022). These amendments would remove financial barriers for vulnerable groups. The purpose of the proposed changes is to provide a clear definition of the types of free secondary legal aid and to ensure coverage of the relevant costs. This would eliminate financial obstacles for participants and guarantee stable state funding of the procedure.

For completeness, it is proposed to amend Part 1 of Article 14 by adding a new point 30 after point 29 as follows: 30) victims, suspects, and accused persons who have provided written consent to participate in criminal mediation – are entitled to the legal services specified in points 2 and 3 of Part 2 of Article 13 of this Law, as well as to the services and expenses specified in point 4 of Part 2 of Article 13 of this Law.” These legislative changes are intended to ensure access to free mediator services and appropriate procedural support for all parties involved.

In Ukraine, there is no stable state funding for mediation. The Law of Ukraine “On Mediation” places the financial responsibility on the participants themselves (Verkhovna Rada of Ukraine, 2022). Although state allocations exist for restorative justice programs, these are applied only within a pilot program for juveniles. For adults, mediation is predominantly a private service, and access to such mechanisms largely depends on the financial capacity of the parties involved.

It should also be noted that stable funding for mediation gradually reduces the workload of investigators and judges. The associated costs can be covered from the same budgetary lines as those allocated for court expenses. Additional funds are required only during the initial phase of program implementation, but in the long term, significant savings can be realized. Examples from the Netherlands confirm this. There, restorative justice, including the work of mediators, is funded by the state. Hearings of medium complexity require approximately 6-10 hours, with an average market rate of around €150 per hour, amounting to approximately €900-1,500 for the entire process between two sessions (Rijksoverheid, n.d.).

Next, a comparison with the cost of a court case is warranted. The annual budget of the judiciary in the Netherlands amounts to €1.25 billion, with courts handling approximately 1.7 million cases each year (Council of Europe, 2024). Consequently, the average “internal” cost per case is calculated as follows: $\text{€1.250.000.000} \div 1.700.000 \text{ cases} \approx \text{€735 per case}$. This figure covers salaries, administrative, and technical expenses but does not include investigation or party-related costs. When a case proceeds through the full process, from indictment to verdict, preparatory and main hearings, participation of the prosecutor, clerk, translators, and invited experts all contribute to additional costs. In such instances, the actual expense can easily reach several thousand euros.

Thus, even under a basic scenario, two court days render the costs of mediation at least comparable to court proceedings. In cases involving more hearings, mediation proves to be less expensive, as evidenced by the experience in the Netherlands. Over the long term, this approach generates substantial economic benefits compared to the traditional justice model.

4. Conclusions

This research shows that the role of the Court has shifted from negative legislator to positive. The study demonstrated that the success of the Dutch restorative justice model resulted from a combination of interrelated factors. First, the universal nature of the legal framework created the broadest possible scope for reconciliation between parties. This flexibility is reinforced by clear normative provisions. Dutch legislation establishes explicit duties for prosecutors to inform the parties, verify their voluntary consent, and take the outcomes of mediation agreements into account when making procedural decisions. A high level of state funding ensures free and quality access to the procedure. In addition, ongoing monitoring by the Ministry of Justice provides adequate oversight of results. Finally, large-scale public information campaigns and professional training programs have fostered societal trust in mediation. The cumulative effect of these factors has led to a noticeable reduction in the workload of the court system and significant budgetary savings. Even under conservative estimates, mediation proves less costly than full court

proceedings.

For Ukraine, which seeks both to harmonize its criminal justice system with European standards and to address the consequences of military aggression, the Dutch experience is particularly valuable. Implementation of appropriate legal reforms is necessary. Simultaneously, a dedicated budget line for mediator services should be established. Part of the funding could be obtained through the reallocation of resources from the court system. Effective functioning of the restorative justice institution is expected to reduce state expenditures on judicial proceedings. A nationwide information and education campaign would contribute to the gradual overcoming of societal resistance. Thus, an adapted Dutch approach could render mediation a fully functional and economically justified instrument for restoring social justice in Ukraine.

References

- Bazemore, G., & Umbreit, M. (1995). Rethinking the sanctioning function in juvenile court: Retributive or restorative responses to youth crime. *Crime & Delinquency*, 41(3), 296–316. <https://doi.org/10.1177/001128795041003002>
- Bush, R. A. B., & Folger, J. P. (2004). *The promise of mediation: The transformative approach to conflict* (2nd ed.). San-Francisco: Jossey-Bass.
- Council of Europe. (2024). Evaluation of the judicial systems 2024 (data 2022): The Netherlands. Retrieved from <https://rm.coe.int/netherlands-2024-2022-/1680b1f6e2>
- De Vries, J. J. (2023). Mediation in de politiefase van het strafproces. *Tijdschrift voor Herstelrecht*, 23(1), 24–44. <https://doi.org/10.5553/TvH/1568654X2023023001004>
- Dotsenko, A. Yu. (2017). International experience in the application of agreements in criminal proceedings. *Private and Public Law*, 41, 1–5.
- Dubovyk, O. I. (2015). Prospects for the implementation of restorative justice in Ukraine. Visnyk of Zaporizhzhia National University. *Legal Sciences*, 1(2), 51–56.
- Elbers, N., Becx, I., & Lauwaert, K. (2023). Herstelrecht. In N. Elbers, C. van den Berg, & M. Kragting (Eds.), *What works: Effectieve ondersteuning voor slachtoffers* (pp. 179-193). Den Haag: Broom Criminologie.
- European Union & Ukraine. (2014). Association Agreement between Ukraine, of the one part, and the European Union, the European Atomic Energy Community and their Member States, of the other part. Document No. 984/011. Retrieved from https://zakon.rada.gov.ua/laws/show/984_011#Text
- Fomina, T. H. (2022). Mediation in criminal proceedings: Novelties of legislation and prospects for its improvement. *Law and Safety*, 84(1), 104–114.
- Fris, P. L. (2005). *An outline of the history of criminal law policy of Ukraine*. Kyiv: Atika.
- Geenen, M.-J., Kalter, M., Van Mazijk, T., Uitslag, M., & Lamkaddem, M. (2019). *Mediation in strafzaken: Geborgd in kwaliteit*. Utrecht: Hogeschool Utrecht.
- Hoekstra, M., Van Riezen-den Bak, R., & Teeuwen, G. (2024). *Victim-offender mediation during the criminal justice process in the Netherlands*. The Hague: Wetenschappelijk Onderzoek- en Documentatie Centrum.
- Katsiora, O. (2021). Problems and the state of development of mediation in Ukraine. *Grani*, 24(7–8), 21–25. <https://doi.org/10.15421/172174>
- Laundra, K. (2022). Restorative justice in Ukraine: Understanding practices and challenges. *The International Journal of Restorative Justice*, 5(2), 263–280. Retrieved from <https://poruch.com.ua/wp-content/uploads/2022/09/Restorative-Justice-in-Ukraine-IJRJ-Laundra-2022-vol52.pdf>
- Mykityn, Yu. I. (2014). History of criminal procedural policy in the field of reconciliation and mediation in Ukraine. *Current Issues of Improving the Current Legislation of Ukraine*, 35, 231–244.
- Plas, B. (2019). Mediation bij ZSM Midden-Nederland. *Tijdschrift voor Herstelrecht*, 1, 9–21. Retrieved from https://www.boomportaal.nl/tijdschrift/TvH/TvH_1568-

[654X_2019_019_001_003](#)

- Rijksoverheid. (n.d.). Wat kost mediation? Retrieved from <https://www.rijksoverheid.nl/onderwerpen/rechtspraak-en-geschiloplossing/vraag-en-antwoord/wat-kost-mediation?utm>
- Rohatynska, N. Z. (2023). Powers of local government officials to perform notarial acts: concept, content, and grounds for criminal liability. *Scientific Notes of Lviv University of Business and Law*, 39, 421–426. <https://doi.org/10.5281/zenodo.10898053>
- Romanadze, L., Marazaki, N., Serhieieva, S., & Krestovska, N. (2022). Roadmap for the implementation of court-related mediation in Ukraine. Retrieved from <https://surl.li/cfmnzy>
- Shyshka, N. V. (2021). The concept of “mediation” as an alternative form of dispute resolution: On the problem of legal understanding. *Juridical Scientific Electronic Journal*, 4, 297–301. <https://doi.org/10.32782/2524-0374/2021-4/72>
- Sirko, V. S. (2024). Legal challenges in mediation: A review of the most common problems and legal disputes arising in the mediation process. *Legal Scientific Electronic Journal*, 11, 580–583.
- Staten-Generaal. (1926). Wetboek van Strafvordering. Retrieved from <https://wetten.overheid.nl/BWBR0001903/2025-02-04>
- The Minister for Legal Protection (2020). Policy framework for restorative justice provisions during the criminal process. Retrieved from <https://zoek.officielebekendmakingen.nl/kst-29279-829.html?utm>
- Van Zwieten, J. (2021). Netherlands. How to make mediation work? Retrieved from <https://surl.li/kxuujz>
- Verkhovna Rada of Ukraine. (2001). Law of Ukraine No. 2341-III “Criminal Code of Ukraine”. Retrieved from <https://zakon.rada.gov.ua/laws/show/2341-14#Text>
- Verkhovna Rada of Ukraine. (2011). Law of Ukraine No. 3460-VI “On Free Legal Aid” Retrieved from <https://zakon.rada.gov.ua/laws/show/3460-17#Text>
- Verkhovna Rada of Ukraine. (2019). Order No. 172/5/10 “On the implementation of the pilot project ‘Restorative program for juveniles suspected of committing a criminal offense’.” Retrieved from <https://zakon.rada.gov.ua/laws/show/z0087-19#Text>
- Verkhovna Rada of Ukraine. (2022). Law of Ukraine No. 1875-IX “On mediation”. Retrieved from <https://zakon.rada.gov.ua/laws/show/1875-20#Text>
- Verkhovna Rada of Ukraine. (2024). Order of the Ministry of Justice of Ukraine No. 2175/5/175 “On repealing the order of the Ministry of Justice of Ukraine and the Prosecutor General’s Office of Ukraine of January 21, 2019”. Retrieved from <https://zakon.rada.gov.ua/laws/show/z1117-24#Text>
- Wetenschappelijk Onderzoek- en Datacentrum. (2019). Justice thesaurus. Retrieved from <https://english.wodc.nl/documents/regulations/2020/11/08/justice-thesaurus-version-2019>
- Wolthuis, A., & Claessen, J., Slump, G., & van Hoek, A. (2019). Dutch developments: restorative justice in legislation and in practice. *The International Journal of Restorative Justice*, 2, 118–134. <https://doi.org/10.5553/IJRJ/258908912019002001007>
- Yurkova, H. V. (2008). The application of the principle of publicity at the stages of pre-trial proceedings. *Law and Security*, 65, 1–10.