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LEADERSHIP IN LAW ENFORCEMENT AGENCIES: A COMPARATIVE ANALYSIS OF THE PRACTICES OF UKRAINE, THE UNITED STATES, AND THE UNITED KINGDOM

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Stokych V.A. Leadership in Law Enforcement Agencies: A Comparative Analysis of the Practices of Ukraine, the United States, and the United Kingdom.

The scientific article examines leadership in law enforcement agencies through a comparative analysis of the practices of Ukraine, the United States of America and Great Britain. The topic is relevant given the transformation of the security sector, the growing public demand for police accountability and the need to ensure institutional stability amid contemporary security challenges. Leadership is considered a multidimensional phenomenon that extends beyond formal managerial status and encompasses a system of professional, ethical and communicative competencies integrated into the organisational culture of law enforcement institutions.

The paper analyses theoretical approaches to distinguishing between the concepts of «management» and «leadership», outlines the structure of leadership competence and its functional significance for the effectiveness of law enforcement agencies. The features of leadership development in Ukraine under reform and martial law are highlighted, particularly the emphasis on competent training for management and the strengthening of crisis management. The American model is characterised as decentralised, focused on adaptability, innovation and the use of analytical approaches to managerial decision-making. The British approach is examined through the prism of institutional standardisation, national professional frameworks and the principle of «policing by consent», which links police effectiveness to the level of public trust.

The synthesis of the research results supports the assertion that modern approaches to leadership in the law enforcement sphere are characterised by a tendency towards professionalisation, ethical orientation and the institutionalisation of competency models. At the same time, differences between national systems reflect historical and legal traditions and the degree of managerial centralisation. The feasibility of adapting individual elements of foreign experience to the Ukrainian context, taking into account current security and legal conditions, is substantiated. The findings are based on the application of comparative-legal and systemic research methods.

Key words: leadership competence, law enforcement agencies, organisational resilience, evidence-based management, policing by consent.

Стокич В.А. Лідерство в правоохоронних органах: порівняльний аналіз практики України, Сполучених Штатів та Великої Британії.

Наукова стаття присвячена дослідженню феномену лідерства в правоохоронних органах крізь призму порівняльного аналізу практики України, Сполучених Штатів Америки та Великої Британії. Актуальність теми зумовлена трансформацією сектору безпеки, посиленням суспільних вимог до підзвітності поліції та необхідністю забезпечення інституційної стійкості в умовах сучасних безпекових викликів. Лідерство розглядається як багатовимірне явище, що виходить за межі формального управлінського статусу та охоплює систему професійних, етичних і комунікативних компетентностей, інтегрованих в організаційну культуру правоохоронних інституцій.

У роботі проаналізовано теоретичні підходи до розмежування понять «керівництво» і «лідерство», окреслено структуру лідерської компетентності та її функціональне значення для забезпечення ефективності діяльності органів правопорядку. Висвітлено особливості розвитку лідерства в Україні в умовах реформування та воєнного стану, зокрема акцент на компетентнісній підготовці керівного складу та посиленні ролі кризового управління. Американська модель охарактеризована як децентралізована та орієнтована на адаптивність, інноваційність і використання аналітичних підходів до прийняття управлінських рішень. Британський підхід розкрито через призму інституційної стандартизації, національних професійних рамок та принципу «policing by consent», що пов'язує ефективність поліції з рівнем суспільної довіри.

Узагальнення результатів дослідження дає підстави стверджувати, що сучасні підходи до лідерства в правоохоронній сфері характеризуються тенденцією до професіоналізації, етичної

орієнтації та інституціоналізації компетентнісних моделей. Водночас відмінності між національними системами зумовлені історико-правовими традиціями та ступенем централізації управління. Обґрунтовано доцільність адаптації окремих елементів зарубіжного досвіду до українського контексту з урахуванням актуальних безпекових і правових умов. Отримані результати ґрунтуються на застосуванні порівняльно-правового та системного методів дослідження.

Ключові слова: лідерська компетентність, правоохоронні органи, організаційна стійкість, «evidence-based» управління, «policing by consent».

Problem statement. In the contemporary context of the transformation of the security and defence sector, growing public expectations regarding the accountability of law enforcement agencies, and the increasing impact of global security challenges, the issue of leadership has acquired systemic significance for the effectiveness of public administration. This problem is particularly relevant in the context of the reform of Ukraine's law enforcement agencies, which is taking place amid wartime challenges and the need to adapt to European governance standards. Leadership in the law enforcement sphere is now regarded not merely as an individual characteristic of a manager, but as a comprehensive institutional capacity of an organisation, encompassing organisational culture, a system of professional training, ethical standards, and mechanisms of interaction with the community. At the same time, models of leadership implementation differ substantially depending on the type of legal system, the degree of centralisation of public administration, and the historical traditions of policing. In this regard, particular scholarly significance is attached to a comparative analysis of the practice of leadership implementation in the law enforcement agencies of Ukraine, the United States of America, and the United Kingdom, which represent different institutional models of organising law enforcement activity.

The purpose of the study is to conduct a comparative analysis of institutional models of leadership in the law enforcement agencies of Ukraine, the United States, and the United Kingdom to determine conceptual approaches to understanding leadership, identify mechanisms for the formation and development of leadership competencies, and, on this basis, substantiate the possibilities of applying foreign experience within the Ukrainian context.

Status of the study of the issue. The issue of leadership is interdisciplinary and is examined across the fields of management, sociology, psychology, and law [1]. In the works of Ukrainian scholars O.M. Bandurka, K.L. Buhaichuk, M.A. Kostiuchenko, Ya.S. Ponomarenko, and V.O. Tiurina, primary attention is devoted to distinguishing between the concepts of "management" and "leadership," to the formation of leadership competence, and to the modernisation of the system of professional training for managerial personnel in law enforcement agencies. American researchers E. Flynn, V. Herrington, and A. Winter examine police leadership through the lenses of adaptability, evidence-based decision-making, and innovation, emphasising its role in ensuring organisational resilience, particularly in times of crisis. The British scholarly tradition focuses on the institutional standardisation of leadership competencies, the ethical foundations of policing, and the interrelationship between leadership and the maintenance of public legitimacy within the framework of the concept of "policing by consent." Despite the thoroughness of existing research, a comprehensive comparative generalisation of the Ukrainian, American, and British models of leadership requires further development.

Presentation of the Main Material. The issue of leadership has occupied a significant place in scholarly discourse since antiquity. In contemporary conditions, it remains at the centre of research conducted by representatives of various fields of knowledge. In particular, in economic theory, management, and the psychology of management, primary attention is paid to the figure of the manager, the analysis of managerial approaches, methods, and technologies of organisational influence. Sociological studies focus on the role of the leader in the functioning of social groups of various types. Psychological science, in turn, focuses on examining the individual and personal characteristics of the leader, considering them as a key element of the system of interpersonal interaction within which relations of influence, dominance, and subordination are manifested. For pedagogical science, the issue of developing leadership qualities and identifying effective mechanisms for enhancing an individual's leadership potential becomes of fundamental importance [1, p. 181].

For employees of the law enforcement sphere, and especially for persons of the managerial staff, leadership constitutes one of the defining professional characteristics. It is rightly emphasised that a leader's orientation toward the professional growth of personnel, mentoring, and the formation of a supportive organisational culture creates conditions for the realisation of employees' potential, which ultimately has a positive effect on the overall performance of the entire body [2, p. 115]. At the same time, effective leadership presupposes the ability to ensure the satisfaction of the basic needs of any social community. First, this involves awareness of a common goal and direction of movement. Second, the formation of a cohesive team. Third, consideration of the individual interests of each of its

members [3, p. 111]. In this context, the position of Ya.S. Ponomarenko is well-founded, according to which leadership in law enforcement bodies should be understood as the process of exerting influence on individuals or a group of persons in order to achieve a common goal. At the same time, this refers not to a unilateral managerial influence but to an interaction of a dialogical nature that forms a stable connection between the leader and his or her followers [4, p. 173].

Under contemporary conditions, leadership is reasonably regarded as one of the key characteristics necessary for a manager to ensure the effective functioning of the unit he or she heads [5, p. 29]. At the same time, scholarly literature emphasises the need to distinguish between the concepts of "leadership" and "management." Management is traditionally associated with formally established authority and official relations, whereas leadership is formed within the sphere of informal interaction. The position of a manager is determined by regulatory acts and staffing structure, and his or her powers are granted by a higher governing body. A leader, however, is not appointed by an administrative decision; his or her authority is recognised by members of the collective. A leader emerges from among persons who occupy a similar or equal official position and acquires influence due to personal qualities and the trust of others. Thus, while management functions primarily within the plane of legal, political, and organisational relations, leadership is primarily psychological in nature [5, p. 28].

The study of the implementation of leadership within the law enforcement system of Ukraine necessitates a preliminary determination of the range of bodies classified as law enforcement agencies. The normative consolidation of the relevant list is contained in Article 2(1) of the Law of Ukraine "On State Protection of Court Employees and Law Enforcement Officers" [6]. At the same time, such an approach gives rise to certain reservations, since the legislator has in fact limited himself or herself to listing the relevant institutions without defining systemic features that would allow them to be distinguished from other state bodies. This creates the need to amend the legislation in the event of an expansion of the list of such bodies, which indicates the imperfection of the chosen construction.

Within the doctrine of administrative law, attempts have been made to formulate criteria for classifying bodies as law enforcement agencies. In our opinion, the position of O.M. Muzychuk is well-founded, as he proposes a system of features that comprehensively characterises law enforcement bodies. Among them are: 1) establishment in accordance with the procedure prescribed by law as state bodies predominantly belonging to the executive branch of power; 2) orientation of their activities toward ensuring the protection and defense of human rights and freedoms, as well as the interests of society and the state; 3) determination of the law enforcement function as the principal one within the structure of their powers; 4) the existence of the right to apply measures of state coercion; 5) endowment with special powers for the prevention, detection, and investigation of offenses, etc. [7, pp. 172–173]. This approach is the most reasonable and appropriate.

In the context of transforming the national system of law enforcement agencies, a revision of approaches to defining the role and functional purpose of the head is underway. If, under the dominance of the administrative-command model of management, the issue of developing leadership qualities in fact remained on the periphery of scientific and practical interest, at the present stage, it is precisely the personal and professional characteristics of the head that are considered a determining factor in the effectiveness of the activities of police bodies and units. Alongside an appropriate level of professional training, particular importance is attached to the ability to form and maintain one's own authority, a strategic vision of the unit's development, readiness to provide subordinates with professional support, and to demonstrate examples of proper official conduct, developed communicative competencies, as well as the capacity to serve as a moral reference point for the collective [8, pp. 57–58].

Scientific studies emphasise that the development of leadership qualities directly correlates with increased staff motivation, enhanced team cohesion, and the effectiveness of managerial decision-making, particularly under conditions of uncertainty and risk. Thus, V.O. Tiurina substantiates the proposition that the formation of a manager's leadership traits positively influences subordinates' ability to engage in teamwork and increases their readiness to perform complex professional tasks [9, p. 92]. These parameters may be used as analytical indicators for further comparison with the corresponding characteristics of leadership in other national legal systems.

A more structured approach to assessing leadership competence has been proposed by M.A. Kostiuchenko, who considers it a multi-component formation and suggests evaluating it according to three interrelated criteria: motivational-personal, cognitive-knowledge-based, and activity-resultative [1, p. 182]. Within the motivational-personal dimension, this involves the presence of a stable internal motivation to acquire knowledge in the field of management and leadership, a formed leadership potential, responsibility, determination, initiative, openness to innovation, and the capacity for reflection and self-development. The cognitive-knowledge-based criterion encompasses an understanding of the mission and value orientations of law enforcement agencies, knowledge of the theoretical foundations

of leadership and management, awareness of the specifics of implementing leadership influence in professional activity, as well as familiarity with the requirements of ethical standards of official conduct. The activity-resultative component reflects the practical ability of a head to solve complex professional tasks, organise effective teamwork, regulate conflicts, substantiate and defend managerial decisions, and ensure his or her own professional growth.

The results of research on the organisational and managerial competence of heads of law enforcement agencies demonstrate the existence of a demand for the systematic modernisation of the training of managerial personnel. In particular, this concerns the need to implement educational programs oriented toward the development of strategic thinking, ethical leadership, and communicative competence. In this context, the expediency is substantiated of: 1) improving the content of social and humanitarian disciplines with an emphasis on forming an understanding of leadership behavior; 2) actively using situational teaching methods to develop skills in making managerial decisions; 3) applying interactive technologies for the purpose of developing communicative skills; 4) involving cadets in research activities as a means of revealing their leadership potential [1, p. 178].

A significant factor in the transformation of leadership content in the law enforcement sphere has been the full-scale armed aggression against Ukraine. Under these conditions, leadership extends beyond the traditional managerial dimension and assumes strategic and value-based significance. It serves as a mechanism for maintaining the psychological resilience of personnel, ensuring effective coordination of actions in high-risk regions, and establishing interaction with the population. Contemporary scientific publications emphasise the need to develop crisis and adaptive leadership as an integral component of the professional competence of heads of law enforcement agencies [4].

Therefore, the modern model of leadership in Ukraine's law enforcement agencies is characterised by a combination of a formalised hierarchical management structure with the gradual establishment of a competence-based approach to training heads, and the strengthening of the importance of ethical standards of official activity. The identified characteristics, in particular the orientation toward personnel development, a structured understanding of leadership competence, the institutionalisation of educational mechanisms for its formation, and the actualisation of the crisis dimension of leadership, may be used as conceptual parameters for further comparative analysis with the approaches applied in the law enforcement systems of other states.

In the United States, leadership within the law enforcement system is regarded as a crucial prerequisite for both internal organisational effectiveness and public trust in police institutions. The American model of law enforcement is characterised by pronounced decentralisation: federal, state, and local agencies operate under autonomous legal mandates and administrative structures, creating a multi-level, institutionally complex environment for implementing managerial decisions and developing leadership personnel.

Contemporary American scholarly discourse supports moving away from rigid "command-and-control" hierarchical models toward more flexible leadership concepts oriented toward adaptability, partnership-based interaction, and evidence-based approaches in public safety. In particular, E. Flynn and V. Herrington emphasise that effective police leadership must foster organisational capacity for learning, innovation, and rapid response to evolving security challenges. At the same time, the authors underline that leadership cannot be reduced solely to the individual characteristics of a manager but must encompass the broader context of organisational culture and managerial processes within which policing activities are carried out [10, pp. 13–14].

Current research in the USA also focuses on competency-based models for the preparation of law enforcement executives. S. Morreale and P. Ortmeier identify a set of key competencies necessary for effective management within the public safety system. These include the ability to initiate and implement change, lead personnel, achieve measurable results, demonstrate managerial and organisational awareness, and build interagency and community partnerships. Within this framework, strategic thinking, effective human resource management, and active engagement with the community emerge as fundamental components of contemporary police leadership [11].

Recognising persistent gaps in leadership preparation, U.S. institutions have introduced a range of innovative educational initiatives. One notable example is the Policing Leadership Academy, established at the University of Chicago Crime Lab. The Academy seeks to strengthen the strategic and managerial capabilities of mid-level and senior law enforcement leaders. Its curriculum integrates strategic leadership training, community trust-building, data-informed decision-making, and the development of advanced management skills. A distinctive feature of the program is its reliance on empirical methods to assess training effectiveness, including controlled research designs, thereby promoting a closer alignment between academic research and practical leadership development.

Among the institutions that provide systematic executive training, the FBI National Academy occupies a particularly prominent position. Designed for mid-level officers nominated by their respective

agencies, the program consists of an intensive course lasting approximately ten weeks. The curriculum combines academic instruction in leadership, communication, forensic science, behavioural sciences, counterterrorism, and organised crime with rigorous physical training requirements that reinforce professional resilience. Participants engage in case study analysis, independent research projects, and interagency knowledge exchange, thereby contributing to the formation of national professional networks and the enhancement of strategic management perspectives [12].

Further contributions to the advancement of contemporary leadership approaches are made by organisations such as the Police Executive Research Forum and the Senior Management Institute for Police. These institutions provide analytical support for reform initiatives, develop policy guidance and methodological recommendations, and offer advanced professional development opportunities for senior law enforcement personnel.

In recent years, scholarship on leadership in U.S. law enforcement has increasingly examined the subject through the lenses of organisational culture and institutional resilience. A. Winter, for example, argues that leadership style and executive behaviour, particularly at the strategic level, play a decisive role in shaping internal norms, structuring interactions between management and frontline officers, and determining an organisation's ability to respond effectively to crises. Within this framework, resilient leadership is understood as the capacity of leaders to support personnel under heightened professional stress associated with critical incidents while maintaining the organisation's strategic coherence and operational stability [13, p. 13].

In the United Kingdom, leadership in law enforcement is understood as a comprehensive institutional capacity that integrates organisational culture, professional standards, and public legitimacy. Unlike the distinctly decentralised American model, the British system operates within a unified national architecture that brings together territorial police forces under common standards and ethical principles. In this context, leadership performs a dual function: it ensures internal organisational effectiveness while maintaining public trust, which constitutes the foundation of the concept of "policing by consent" [14, p. 44].

The institutional foundation for leadership development is a structured competency framework developed by the College of Policing – the national professional body responsible for training standards and professional practice in England and Wales. The framework comprises five sequential levels of leadership, ranging from entry-level positions to strategic management. For each level, expected behavioural standards, ethical requirements, and performance criteria are defined to foster an inclusive team culture, ensure accountability, support effective operational activity, and promote evidence-based decision-making [15].

Thus, leadership is understood not merely as a formal status but as a set of competencies that must be systematically developed at all levels of the organisation. These include an orientation towards the public interest, adherence to ethical codes, support for personnel's professional resilience, the application of evidence-based approaches to problem-solving, and the development of partnerships with the community.

Unlike more fragmented leadership training models typical of decentralised systems, the British approach aims to ensure national consistency of standards while allowing adaptation to local contexts. This normative institutionalisation of leadership competencies underscores the commitment to harmonising managerial practices across the entire system of territorial policing.

In addition to the competency framework, the United Kingdom is undertaking a systemic review of executive development approaches. The establishment of the Police Leadership Commission, supported by the College of Policing and the Home Office, aims to assess existing leadership capacities, identify structural challenges, and enhance training, performance evaluation, and career pathways. Particular attention is devoted to restoring public trust, fostering a healthy organisational culture, and responding to contemporary threats, including digital crime and violence against women. Compared with the American model, which emphasises academic and evidence-based leadership development programmes (for example, through specialised educational initiatives), reform in the United Kingdom has a more centralised and coordinated character, reflecting the specific features of institutional governance within the system.

Scholarly research on British police leadership emphasises the close interrelationship between leadership style and organisational culture. In particular, analyses of transformational leadership highlight both its potential and its limitations within established institutional norms and professional traditions [16]. This underscores the need to critically adapt theoretical models to the specificities of the policing environment. In a broader comparative context, these discussions reflect a common challenge across states: the search for a balance between ethical, normatively oriented leadership and the maintenance of organisational resilience under conditions of operational strain and heightened public scrutiny. While

American research emphasises the adaptability and evidentiary grounding of managerial decisions, the British approach places greater emphasis on the ethical embeddedness of leadership and the preservation of legitimacy within the paradigm of “policing by consent” [14, pp. 44, 46].

State Criteria	Ukraine	USA	United Kingdom
Organisational structure and level of centralisation	Strong hierarchical structure with centralised management, leadership is mostly associated with formal authority.	High degree of decentralisation, leadership is formed within individual departments with a high level of autonomy.	More unified approaches to leadership, with central authorities setting uniform standards.
Conceptual understanding of leadership	Traditionally, the administrative-command style dominates.	Leadership is seen as the ability to ensure organisational resilience, adaptability, and innovation.	Leadership is interpreted as a set of established competencies, standardised normatively, which pays great attention to the ethical component.
Leadership development in the process of training law enforcement officers	There are academic courses and training, but there is no clearly coordinated national program.	Developed training programs (FBI National Academy, Policing Leadership Academy). Practitioners often combine theoretical training with real-world cases.	The Police College forms unified standards for leadership. Clear structuring of competencies in the national training system.
Ethical and cultural dimensions of leadership	The formation of ethical norms is just beginning. Increased attention to professional integrity is needed.	Codes of ethics and accountability are important, but practical implementation is limited to individual agencies. Community policing plays a significant role.	Ethics and legitimacy are central categories (policing by consent). Consciously building public trust is one of the main tasks of a leader.
Leadership flexibility in times of crisis	Leadership becomes more important in the context of war and security challenges. Developing adaptive and crisis competencies is a strategic need.	Strong culture of adaptability. Leaders must respond quickly to changes in the criminal situation and counteract crises.	The system provides for preparation for unforeseen situations through standardised practices. A strong emphasis on planning and risk assessment.

Conclusions. Leadership in law enforcement agencies is a critically important component of ensuring the effectiveness of law enforcement activities, organisational stability and public legitimacy. However, approaches to its implementation differ significantly depending on historical tradition, the model of public administration, the legal system and the culture of police interaction with the community. To compare leadership models in Ukraine, the USA and the UK, we have identified several key criteria. First, the centralisation model significantly shapes how leadership develops. Thus, in Ukraine, gradual decentralisation with a strong centre is observed; in the USA it is flexible, adaptive but heterogeneous; and in the UK it is standardised and coordinated. Second, the conceptual understanding of leadership also differs across the countries. In Ukraine, a conceptual rethinking of leadership is underway; in the USA, the emphasis is on adaptability and demonstrability; in the UK, on standardisation and public legitimacy. Third, the USA and the UK have more formalised and developed systems for training leaders, while Ukraine is only at the stage of developing unified national standards. Fourth, the British model emphasises the ethical component of leadership. In the USA, the focus is on interaction with the community, while in Ukraine, it is necessary to strengthen ethical principles and accountability mechanisms. Fifth, in all models, leadership includes a crisis component, but approaches to training and response differ.

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