

IURI G. BARABASH

yu.g.barabash@nlu.edu.ua

Department of Constitutional Law of Ukraine

Yaroslav Mudryi National Law University

61024, 77 Pushkinska Str., Kharkiv, Ukraine

NATALYA M. VAPNYARCHUK

Department of Legal Research Coordination

National Academy of Legal Sciences of Ukraine

61024, 70 Pushkinska Str., Kharkiv, Ukraine

HALYNA V. TATARENKO

Department of Constitutional Law

Volodymyr Dahl East Ukrainian National University

93400, 59-a Tsentralnyi Ave., Severodonetsk, Ukraine

IVAN I. OMELKO

Department of State Building

Yaroslav Mudryi National Law University

61024, 77 Pushkinska Str., Kharkiv, Ukraine

MALVINA V. DANYLOVA

Research Institute for Social Security, Politics, Law, Finance and Business

01231, 40B Hlybochytska Str., Kyiv, Ukraine

COMPARATIVE ANALYSIS OF SOCIAL PROTECTION MODELS OF THE EUROPEAN UNION AND UKRAINE

ABSTRACT

Modern socio-political practice of developed democracies of the world shows that the most successful are those where the whole system of public administration puts people first. The social security system plays an extremely important role in this matter. Without it, it is difficult to imagine the successful construction of a welfare state. From this point of view, it is interesting to study the experience of developed democracies in social security and the application of this experience in Ukrainian political realities. The methodological basis of scientific work is a set of general and special methods and techniques of scientific knowledge, the practical application of which allowed to obtain scientific

cally sound conclusions. The purpose of this work is to characterize the main models of social policy, comparative analysis of models of social protection in European Union member states and Ukraine, identify the main positive and negative aspects of each, as well as justifications and proposals for adapting European best practices in Ukraine.

Keywords: social policy model; the social protection; social insurance; socially oriented economy; social standards.

Summary: 1. Introduction – 2. Materials and methods – 3. Results – 4. Discussion – 5. Conclusion

1. Introduction

One of the most important constitutional characteristics of the Ukrainian state is its characterization as a social state. The term “welfare state” has been used in Western Europe since the late 1940s. The most important feature of this type of state is the high level of social security and social protection of its citizens. Achieving this level is possible through effective social policy. State social policy is the actions of the state in the social sphere, pursuing certain goals, correlated with specific historical circumstances, supported by the necessary organizational and advocacy efforts, financial resources and designed for certain milestones of social results. Despite the fact that the main subject of social policy is the state, along with it, other, non-state actors, in particular, trade unions and political parties, play an active role in social policy.

The main indicators of the effectiveness of social policy are the level of well-being, education, public health, social stability, constructive relations of social groups, etc. An important place in achieving this goal is the strategy of social policy, which is a kind of plan for solving social problems of the country at each stage. In a democratic society, the pluralism of ideologies and the presence of different actors give rise to a variety of goals and a variety of social policy strategies. Each of the strategies is an integral part of one or another ideology and program of social development.

Given the multi-vector nature of social policy in the process of its implementation, it is important to take into account all its directions, not admitting some and not ignoring others. The effectiveness of social policy at any level depends largely on the state of the economy, the availability of the necessary funding for social programs from the state, local governments, enterprises, sponsors, etc. In the process of Ukraine's movement towards the welfare state, improvement of social policy and social strategy, it is important to skillfully and appropriately use international experience in this field, taking into account the mentality of Ukrainian society.

Ukraine, striving to become an equal member of the European community, must also be clearly aware of the need to change social policy priorities. Choosing possible alternatives is too difficult a task, but the leading idea of social policy must remain the desire for greater justice in society and sustainable development. Today, Ukraine is in a very difficult situation (military events in the East, deteriorating economic situation, significant social tensions), which significantly complicate the implementation of social policy and create a field of uncertainty. In this regard, research aimed at creating a scientific basis for the development and implementation of effective policies for social protection and support in the European Union (EU) and Ukraine is particularly relevant.

Social policy in Ukraine today is characterized by inconsistency, inconsistency, and most importantly - a lack of focus on maintaining high living standards. At the same time, Ukraine is considered a welfare state, as a third of GDP is redistributed through the budget. Ukrainians are the first to retire and receive it, even if they have not paid taxes all their lives. The state keeps not only pensioners. Financial support accompanies Ukrainians from birth to death: birth assistance, payments to large families, orphans, the disabled, students, unemployment benefits, payment for housing and communal services, payment for housing for migrants. The social budget in Ukraine can be compared in size with the military. However, Ukrainians live poorer than their

neighbors (Borysova et al., 2019). Therefore, we consider it necessary to analyze the existing classical models of social policy and propose the use of positive experience of developed countries in the field of social policy for use in Ukraine.

The issue of the model of social policy, building an effective social policy in Ukraine and the EU has been addressed in the works of many domestic and foreign scholars such as V.V. Gretska-Myrhorodska (2018), A.O. Simakhova (2018), Yu. V. Tyuleneva (2019), O.V. Bilozir (2018), T.B. Tokarsky (2018). At the same time, the issues of adaptation to the Ukrainian realities of the experience of developed democracies are insufficiently studied, so there is a need to conduct this study¹.

1 Below are the references of this article. Berezina, S.B. (2018), Social insurance as a tool of social risk management. *Economy and State*, 7, 22–29.

Bilozir, O.V. (2019), Organization of social dialogue and partnership in the context of European integration. *Public Administration and Customs Administration*, 4(23), 13-20.

Borysova, V.I., Ivanova, K.Y., Iurevych, I.V., & Ovcharenko, O.M. (2019), Judicial protection of civil rights in Ukraine: National experience through the prism of European standards. *Journal of Advanced Research in Law and Economics*, 10(1), 66-84.

Chochia, A., Troitiño, D. R., Kerikmäe, T., & Shumilo, O. (2018). Enlargement to the UK, the referendum of 1975 and position of Margaret Thatcher. Brexit: History, reasoning and perspectives (pp. 115-139) doi:10.1007/978-3-319-73414-9_7

Drymalovska, K.V., & Bala, R.D. (2021), State social policy: Essence, models, directions. *Problems of Economics*, 1, 178-184.

Gretska-Myrhorodska, V.V. (2018), Peculiarities of choosing a model of socially oriented economy in the conditions of market transformation. *Scientific notes of Tavriya National University named after V I Vernadsky*, 29(68), 6-11.

Irtysheva, I.O., Gurina, O.V., & Rabotin, Yu.A. (2018), Opportunities for implementation of the experience of social development of EU countries in domestic practice. *Scientific Bulletin of Uzhhorod National University*, 20(2), 6-11.

Jayet, C. (2020), The meaning of the European Union and public support for European integration. *JCMS: Journal of Common Market Studies*, 58(5), 1144-1164.

Kniazieva, T.V., Shevchenko, A.V., Shevchenko, A.V., Yaroshenko, O.M., Inshyn, M.I., & Yakovlyev, O.A. (2021), Current trends in the formation and development of insurance marketing in Ukraine. *Risk Management and Insurance Review*, 24(3), 279-292.

Kochkova, G.V., & Dei, M.O. (2020), The impact of international legal standards in the field of protection of labor rights of judges and European. Radio for Ukraine to reform the national legislation on labor relations with judges. *Magazine KUP*, 1, 352-356.

Lavryk, O. (2021), Social insurance in Ukraine: Current status and prospects. *Economic Analysis*, 31(2), 107-113.

Leonenko, T.M. (2020), *Medical insurance as an element of the system of social protection of the population of Ukraine*. Sumy: Sumy State University.

Lepyokhin, O.V., & Ivashchenko, O.V. (2019), The impact of the model of socio-economic development of the country on tax security of the state. *Scientific Bulletin of Kherson State University*, 34, 125-128.

2. Materials and methods

The methodological basis of scientific work is a set of general and special methods and techniques of scientific knowledge, the practical application of which allowed to obtain scientifically sound conclusions. The basic methodological basis of the article is the dialectical method, which allowed to reveal the subject of research systematically, fully, in dynamics, the relationship of its structural components. With the help of formal-logical methods (analysis, synthesis, generalization, etc.) the main definitions were formulated, which were used in the study. The logical method of research determined the sequence of the stated judgments and inferences. Its application made it possible to formu-

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- Lutsenko, O. (2019), Anticorruption compliance: International experience in legal regulation and innovation for Ukraine. *Humanities and Social Sciences Reviews*, 7(5), 765–770.
- Makhortov, Yu.O., & Telichko, N.A. (2018), Innovative approaches to improving the management system of social protection. *Problems of Innovation and Investment Development*, 17, 4-14.
- Pashkov, V. M., Golovanova, I. A., & Olefir, A. A. (2016). The impact of the legal regime of intellectual property protection in the pharmaceutical market. *Wiadomosci Lekarskie* (Warsaw, Poland: 1960), 69(3), 582-586.
- Reznik, O., Getmanets, O., Kovalchuk, A., Nastyuk, V., & Andriichenko, N. (2020), Financial security of the state. *Journal of Security and Sustainability Issues*, 9(3), 843-852.
- Romanovska, Yu.A., & Snitko, I.V. (2021), Social role of personal insurance in social protection of the population of Ukraine. *Eastern Europe: Economics, Business and Governance*, 1(28), 83-90.
- Shevchenko, A., Kydin, S., Kamarali, S., & Dei, M. (2020), Issues with interpreting the social and legal value of a person in the context of the integrative type of legal-awareness. *Fundamental and Applied Researches in Practice of Leading Scientific Schools*, 38(2), 54-61.
- Simakhova, A.O. (2018), Indicators for assessing the effectiveness of the social economy model at the global level. *Bulletin of the Dnieper University*, 26(10), 95-100.
- Smirnova, I.I., Lykhoshva, O.Y., Rak, N.V., & Gorieva, L.A. (2021), Social protection of the population at the present stage: The state and problems in Ukraine. *Economic Bulletin of Donbass*, 2(64), 201-208.
- Sydorenko, V., Shorobura, I., Ponomarenko, A., Dei, M., & Dzhus, O. (2020), Application of technologies of formal and non-formal education for continuous professional development of the modern specialist. *Revista Tempos E Espacos Em Educacao*, 13(32), 1-24.
- Tokarsky, T.B. (2018), The main aspects of social policy of the European Union. *World Science*, 5(2/30), 132-136.
- Tyuleneva, Yu.V. (2019), Features of state social policy in Ukraine. *Modern Problems of Economics and Entrepreneurship*, 24, 40-46.
- Verkhovna Rada of Ukraine. (2000), Law of Ukraine On State Social Standards and State Social Guarantees. Retrieved from <https://zakon.rada.gov.ua/laws/show/2017-14#Text>
- Yaroshenko, O.M., & Tomashevski, K.L. (2021), The impact of COVID-19 on labour and social security relations: Rule-making experience of Belarus and Ukraine. *Journal of the National Academy of Legal Sciences of Ukraine*, 28(2), 211-221.
- Zelenko, N., & Zelenko, V. (2019), Features of the functioning of European models of social protection: Experience for Ukraine. *Bulletin of Lviv University. Economic Series*, 20(2), 57-67.

late such basic concepts as “social protection”, “social security”. The comparative legal method allowed to study the norms of domestic law, which are expressed in the system of legal acts of different legal force and regulate the issue of public administration in the field of social protection, and compare them to formulate proposals for borrowing positive experience of the European Union. also highlight the determinant characteristics of public administration in the field of social protection in Ukraine.

The application of the structural-system method allowed the classification of European models in the field of social protection. Statistical and sociological methods were used to analyze and summarize empirical information related to the research topic. The study also used a modeling method to develop and formulate areas for improvement and practical principles of improving the efficiency of public administration in the field of social protection in Ukraine and proposing a new model of social protection in Ukraine. The integrated application of these methods ensured the completeness and objectivity of the provisions presented in the study.

A number of articles related to the research topic were also analysed, such as “State social policy: essence, models, directions” (Drymalovska & Bala, 2021), “Peculiarities of choosing a model of socially oriented economy in the conditions of market transformation” (Gretska-Myrhorodska, 2018), “Indicators for assessing the effectiveness of the social economy model at the global level” (Simakhova, 2018), “Features of state social policy in Ukraine” (Tyuleneva, 2019), “The impact of the model of socio-economic development of the country on tax security of the state” (Lepyokhin & Ivashchenko, 2019), “Innovative approaches to improving the management system of social protection” (Makhortov & Telichko, 2018), “Social insurance as a tool of social risk management” (Berezina, 2018), “Opportunities for implementation of the experience of social development of EU countries in domestic practice” (Irtysheva et al., 2018), “Features of the functioning of European models of social pro-

tection: experience for Ukraine” (Zelenko & Zelenko, 2019), “The main aspects of social policy of the European Union” (Tokarsky, 2018), “Organization of social dialogue and partnership in the context of European integration” (Bilozir, 2019), “The Meaning of the European Union and Public Support for European Integration” (Jayet, 2020), “Social protection of the population at the present stage: the state and problems in Ukraine” (Smirnova et al., 2021), “Medical insurance as an element of the system of social protection of the population of Ukraine” (Leonenko, 2020), “Social role of personal insurance in social protection of the population of Ukraine” (Romanovska & Snitko, 2021), “Social insurance in Ukraine: current status and prospects” (Lavryk, 2021).

3. Results

The current stage of development of society has radically changed the idea of driving forces and the relationship of various factors of development, the role and place of man in civilizational progress. The experience of the economically developed countries of the European Union (EU) shows that human capital, the quality of the workforce and the motivation for efficient work are crucial. The new concept of the XXI century is focused on human development and is gradually displacing the previous one, the driving force of which was the accumulation of material wealth. It is human and social capital that currently provide the highest rates of economic growth, and it is those countries whose policies are primarily focused on human development (the EU is a prime example) that achieve the highest level of prosperity for their nation.

According to the standards of the Council of Europe and the European Union, social security is classified as a system that includes other forms of social protection in addition to social security (through social insurance), including state social assistance, and special and special (additional) social protection for certain categories. people. This understanding is important for national legislation, as there is still no general law on social protection in Ukraine. In the social protection systems of the vast majority of EU countries, social insuran-

ce plays a key role and is their most important element. Therefore, a comparative analysis of Western European models of social protection and / or social insurance, due to historical and political circumstances, allows us to draw appropriate conclusions and recommendations for further reforms in Ukraine.

Social policy is the defining direction of domestic policy. It is a component of general policy, embodied in social programs and various activities aimed at meeting the needs and interests of people and society. Social policy - the activities of the state aimed at creating and regulating the socio-economic living conditions of society in order to improve the welfare of members of society, eliminate the negative effects of market processes, ensure social justice and socio-political stability in the country; socio-economic measures of the state, enterprises, local authorities, which are aimed at protecting the population from unemployment, inflation, devaluation of labor savings. The basic concept of social policy is based on the satisfaction of equal basic human needs - health, income, education, work, housing, personal security (Drymalovska & Bala, 2021; Lutsenko, 2019).

Social policy in the narrow sense means the activities of its subjects in the formation of social security of the individual and society. In a broad sense, social policy is a system of managerial, regulatory, self-regulatory ways and forms of activity of subjects, a set of principles, decisions, actions embodied in social programs and social practice to meet social needs, balance social interests, social groups, achievement of social goals, solving social problems, formation of social values. At the same time, in a broad sense, social policy is a system of not only institutional but also supra-institutional (those within the competence of other social institutions), state and public, public and personal, individual ways and forms of activity aimed at social development, creating conditions for comprehensive self-realization of human social potential, its essential forces.

Social policy means in a broad sense the activities of national authorities to organize and maintain the welfare of the state for the benefit of its citizens. To implement social policy, the state by regulating intervenes in the redistribution of public goods, reduces the negative effects of the labor market. The redistribution of public goods by the state is the main task of social policy. This is done in order to ensure collective social needs (health care, labor protection, education, vocational training, etc.) and social security of the part of the population in need of state assistance (pensioners, the disabled, the unemployed, large families). That is, social policy is seen as a national phenomenon. However, within the European Union, it has become a pan-European phenomenon (Gretska-Myrhorodska, 2018). In foreign social practice, three models of the welfare state and, accordingly, of social policy have become universally recognized: liberal (or Anglo-Saxon), continental European (conservative), and Scandinavian (or social democratic). This classification is based on the principles of accessibility, coverage and redistribution of income in social security systems. It was also important to clarify the role and extent of the influence of political forces (parties, movements, state authorities) on these processes.

The liberal model of social policy is based on the presence in the public consciousness of faith in the regulatory capabilities of the market and a developed system of private charity. Its formation took place in conditions of dominance of private property, market relations and under the influence of liberal labor ethics. This model has been widely developed in Australia, the United States, Canada, the United Kingdom and Japan. The main conditions for the functioning of the liberal model were minimal state intervention in market relations and limited application of state regulatory measures (Kniazieva et al., 2021). The public sector has only a small share in the gross domestic product. That is why the dominant role in the social sphere is played not by state bodies, but by private charitable organizations created on various grounds - ethnic, religious or other. This model provides for government social protection responsi-

bilities only for the most vulnerable. Other citizens must provide for themselves. That is, in social issues, in particular, to ensure their well-being, preference is given not to the state, but to the personal efforts of each individual citizen. Under this model, social support for citizens is provided through developed insurance systems and with minimal government intervention, and problems that arise between employers and employees regarding social protection are solved mainly through trade unions (Simakhova, 2018; Reznik et al., 2020).

The liberal model is characterized by the provision of targeted social assistance to the poorest groups while strengthening the insurance principle of financing social programs, as well as the growing role of personal funds in the payment of social services. The state finances from the budget only the services included in the list of minimum guarantees. Financial assistance is targeted and is provided only if necessary and verified. For the implementation and successful functioning of this model in the field of industrial relations, the maximum conditions for the development of entrepreneurial activity must be created. Business owners are not limited in making independent decisions on the development and restructuring of production, including dismissals.

In addition, one of the varieties of this model of social policy, which has long been applied and justified in the developed world, is the neoliberal model. It is based on the basic principles of British social policy, developed and implemented during the reign of British conservatives, including Prime Minister Margaret Thatcher and her successor, Labor Tony Blair. The essence of Margaret Thatcher's social policy was to maximize its transfer to a commercial basis with a significant reduction in public spending on the social sphere (health, education, housing, social security). To this end, the government carried out the privatization and creation of the market for social services, attracting non-governmental organizations on a contractual basis to provide them. However, the unitarity of Great Britain did not allow the state to completely lose its in-

fluence in the social sphere. Moreover, the basic principles of public policy were ultimately determined by the state (Tyuleneva, 2019).

Tony Blair's Labor government, which replaced the Conservatives, announced a new political course - the "third way", which excluded adherence to both right-wing and left-wing ideology. The liberal model is fully in line with its main purpose in conditions of economic stability or recovery. However, it is not effective in times of crisis, recession or forced reduction of production, which is accompanied by the inevitable reduction of social programs, which leads to a significant deterioration of many social groups, especially women, youth, the elderly. Thus, the essence of liberal policy is to reduce the role of the state in solving social problems of citizens, giving them as much freedom as possible to solve them independently. Characteristically, such social policy is possible in the complete absence or weakness of left-wing political forces or their representatives in government, as their main slogans are social protection of the population from possible social upheavals and increasing the role of the state on this issue.

The continental European (conservative) model is based on combining efforts to solve social problems, when the responsibility of the individual entrepreneur is replaced by a system of their mandatory collective responsibility under state control. The model assumes the existence of a corporate social protection system within enterprises. The government uses social partnership as a mechanism for reconciling the interests of employees and employers, a tool for regulating the class struggle in order to increase the level of social protection of the employed population (Lepyokhin & Ivashchenko, 2019). This model is a prerequisite for a highly and well-organized society and is the result of a society's political commitment to welfare. The corporate type combines different features: pronounced stratification both in terms of income (especially in France) and social status. The state's position here is much stronger; budget contributions for social activities are approximately equal to the insur-

ance contributions of employees and employers; the main channels of redistribution are either in the hands of the state or under its control.

At the same time, the state seeks to give preference to the insurance protection system. Due to this, the amount of social assistance is proportional to the income and the amount of contributions to insurance payments. For example, Germany spends a lot of money on social programs. If in 1960 the share of expenditures for these purposes was 20.4 percent of GDP, in 1981 it reached 29.2 percent. However, in times of economic turmoil, spending on social programs is significantly reduced. A distinctive feature of the continental European model is the “self-government” of insurance companies, which are jointly managed by business owners and influential unions representing the interests of employees. The amount of guaranteed unemployment benefits depends on length of service, and the timing - on the duration of insurance premiums, their size and age of the employee. In many countries, the period for unemployment benefits has been extended to people over 50 (Makhortov & Telichko, 2018).

Scandinavian (or social democratic) model. The leading role in the social protection of the population is assigned to the state and provides basic support to all citizens of the country from the state and local budgets generated by taxes. Unlike the liberal model, where everyone cares about their own well-being and security, this model of social policy is based on the concept of “solidarity”, in which social protection is seen as a matter of society as a whole, not individuals. That is why it is often called solidarity. This model has found practical application in the countries of northern Europe - Sweden, Norway, Finland, Denmark, as well as in the Netherlands and Switzerland. The social-democratic model is based on the following principles of social protection: all people have the same value, regardless of age and productivity, society can not abandon the “weak” elements and must create conditions for them and provide opportunities to meet their needs; social services are provided on a volunta-

ry basis (Berezina, 2018). In case of lack of voluntariness, the state may use coercive methods; social protection must be continuous, comprehensive and cover all spheres of human life; social protection must be flexible, accessible and able to equalize social conditions for all groups of the population. This approach helps to bridge the gap in the social capabilities of both “weak” groups and society as a whole. In particular, everyone should have an equal opportunity to receive education, qualifications and paid work, ie to become normal self-sufficient members of society.

The priority tasks of the state social policy are considered to be general employment and equalization of incomes of the population and mitigation of stratification of society by income level. The developed public sector of the economy is the basis for financing the social sphere, which is strengthened by a high level of taxation. The share of government spending in GDP is 66 percent in Sweden, 61 percent in Denmark and 56 percent in Finland. The main part of these costs goes to meet the social needs of the population. Transfer payments, due to which the national product is redistributed in favor of the poorest sections of the population, also make up a significant part. The main feature of this model is the universalization of social protection as a guaranteed right of all citizens provided by the state. The model has a high role of the state in the socialization of income and national social governance mechanisms. The state ensures a high level of quality and universal access to social services (including free medical care, education, etc.). The Scandinavian type of welfare state is characterized by universalism and redistribution of income through a progressive system of taxation. This model is based on a social insurance system with certain contributions from employees and employers. The fight against poverty is combined with the maintenance of high living standards for all citizens (Berezina, 2018).

The economic basis of this model is efficient production, full employment, strong associations of employers and trade unions, contractual relations

between them, which are controlled by the state, a high level of redistribution of social product. Social policy is financed by the state from the budget (through the tax system). The state ensures the implementation of guaranteed rights and actions of social protection and is responsible for the active functioning of various non-state social services. This is possible with strong and decentralized management (Irtysheva et al., 2018). In countries where this model of social policy is applied, taxes are usually quite high, indirect and related to the retail sale of goods and services to the public. Income is taxed on a progressive scale. At the same time, the profitable progression is quite significant, so Swedish entrepreneurs often resort to registering their companies in Europe to avoid tax influence. The Swedish doctrine of the welfare state was the most popular. It reduces the care of the state for its citizens to the rank of a national cult, promising to provide them with security, reliability and protection in threatening situations. Citizens are independent of relatives or charity, and even more so of the market. The state takes care of a person throughout his life.

The Swedish model is characterized by: regulation of labor relations at the national level (establishment of tariff rates, collective agreements); conducting social policy that provides the least differentiation of the population in terms of income; orientation of employment policy to minimize unemployment, primarily through retraining of workers; development of industrial democracy, etc. Activities in each of these areas have yielded quite impressive results (Irtysheva et al., 2018). By implementing the basic idea of the Swedish model of national solidarity, the government not only ensures equal protection of the interests of all members of society, but also seeks to ensure the well-being of certain groups. Active redistributive policies in the Scandinavian countries have solved the problem of poverty, but failed to completely solve the problems of socially vulnerable groups (disabled, children, the elderly, the unemployed). As a result of the introduction of the principle of proper

protection of social rights of citizens, the level of spending on social protection is quite high, which allows to achieve its effectiveness and support a large number of supporters of the social democratic model. Other distinctive features of this model are a developed system of industrial democracy, regulation of labor relations at the national level, rather than at the level of individual enterprises or industries, the use of available funds to minimize unemployment.

In order to achieve the set goals, in 1977 Sweden reorganized the social department and formulated the tasks of the social service quite broad, but specific and understandable to the population. Among them there are four general areas: income guarantees; measures to protect the environment and service; care (including health) and protection of the working environment. A specific public institution is responsible for each of the areas. The development and implementation of such a model of social policy is possible in a political system where the government is heavily influenced by the working class and social democratic parties. Such a model significantly reduces the level of political confrontation in society, and creates a basis for peace and tranquility in the state. These three models are not found anywhere in the world in their pure form, representing the “ideal types” of the welfare state, each of which has its advantages and disadvantages. In practice, one can observe a combination of elements of liberal, corporate and social-democratic models with a clear predominance of the features of one of them (Zelenko & Zelenko, 2019).

Note that according to the scientist (Zelenko & Zelenko, 2019), politician, former German Chancellor Ludwig Erhard, social policy is a policy not for millionaires, but a policy for millions. The social orientation of the market is the strengthening of state regulation of all spheres of society and, above all, its economic basis. It was under Erhard that the term “welfare state” came into widespread scientific use as opposed to the monetarist state. Unlike monetarism, the welfare state regulates social processes, including and the market, pursues social policy in the interests of the majority of the people. Thus, this

model strengthens the influence of the state on the mechanism of the market through a diverse and interconnected socio-economic, monetary, financial, scientific and technical, investment and environmental policies, which provides the necessary development of production and social problems. For such a model, preference is given to the so-called indicative planning, which involves the establishment instead of policy indicators of certain indicative indicators and parameters.

The “German miracle” was achieved, first of all, due to the correct selection of the socio-economic model of society, the compliance of certain costs (one third) of the total budget for social security. Health insurance is provided. All unemployed and retired workers are undoubtedly subject to sickness insurance. For the purpose of early detection of certain diseases, preventive care is provided for various groups of insured: children under 4 years of age, women aged 30 years and men aged 45 years. Pensions are usually granted after the age of 65. It is possible to receive a pension at the age of 63. The prerequisite for this is insurance experience of at least 35 years. The total insurance period also includes time spent in the army and at the front, unemployment, as well as the period of study in secondary and higher educational institutions and the time of incapacity due to illness. Women are entitled to a pension after reaching the age of 60. This rule also applies to the unemployed. Disabled people who are fully or partially incapacitated also have the opportunity to receive a pension before reaching retirement age (Chochia et al., 2018).

In Germany, more than 11 million retirees receive social security pensions. They, along with active workers, benefit from economic growth and higher incomes. Due to the principle of the dynamics of pensions, they are set again from year to year: pensions increase in line with the overall increase in wages. Recently, pensions have increased more than 19 times compared to the 1950s. The average pension is more than 950 euros. In each case, within a certain amount - the pension depends on the amount of contributions paid in the

past: who for a long time paid insurance premiums at high rates (from earnings above the general level), he is entitled to a higher pension (Irtysheva et al., 2018).

Persons with physical or mental disabilities due to war injuries, general illness or injury are involved in working and social life. There are more than 4 million disabled people in Germany who are unable to cope with the consequences of disability without the help and care of society. All persons with disabilities have the right to appropriate social, psychological, medical and vocational rehabilitation. Activities aimed at their employment and living arrangements begin at the hospital bed and are extended until the time of a certain inclusion of the disabled person in the labor process and life of society. The means of subsistence for the disabled and their families are provided throughout the rehabilitation period by providing assistance, the amount of which is determined as a percentage of previous earnings. They are paid at the rate of 80% of the total amount of earnings and increase as well as the pension provision depending on the pace of economic development (Shevchenko et al., 2020).

The state also provides assistance to those who have and raise children. Families with many children usually have less money than single or childless families. Monthly benefits are paid to families to make it easier to support and raise their children. The state pays 50 euros for one child, 70 euros for the second, and 120 euros for the third and each subsequent child. All parents are entitled to assistance, regardless of their level of income, until their children reach the age of 18, ie coming of age. If children's education takes a long time, the benefit is paid even when they reach the age of 27. Child benefit is not taxable. Unemployed persons will receive from the Labor and Employment Bureau during the year unemployment benefits in the amount of 68% of the last received salary, which should not exceed a certain maximum amount. Unemployed children with child support are also provided with child benefits. Unem-

ployed people who have not had a job for more than 1 year are paid a benefit of 58% of their last earnings. Part-time benefits are paid in the event of short-term downtime. It is calculated depending on the period of downtime and is an average of 68% of earnings that should have received the worker, provided that the downtime did not occur (Tokarsky, 2018).

The German version of social protection, called the social market economy, is of particular interest because it combines high economic efficiency with a developed social protection system based on certain principles. The main ones are the provision of economic freedom, which serves as an incentive for high productivity. The principle itself consists of the following elements:

- freedom of consumption, according to which consumers can choose any goods or services at their discretion;
- freedom of production and trade (enterprises can produce those goods and services that consumers need);
- freedom of choice of workplace, possession and disposal of private property.

Decentralized economic planning of production enterprises is based on the principle of economic freedom. Coordination of decentralized economic planning in a market economy is performed through a market mechanism of interaction between supply and demand. This is the basic idea of a market economy, and economic freedom is the destructive force of this economic system. Ensuring real competition has become one of the important tasks of the state. If the results of the market mechanism become unacceptable from a social point of view, it is important to ensure control by the state. Under these conditions, the principle of economic freedom is complemented by other principles characteristic of the welfare state (Bilozir, 2019).

In Germany, there are various elements of a social market economy that allow the state to adjust the results of market mechanisms and collective bar-

gaining. Profits are distributed through taxes. Low-income citizens are exempt from income tax. What is valuable in the German model is that it provides for labor protection measures, in particular: protection against illegal dismissals; - labor protection of women (prohibition of women's labor in the mining and construction industries, labor protection of mothers and pregnant women); labor protection of youth (prohibition of labor under 15 years, differentiation of working hours and vacation time depending on the benefits of vocational education); protection of workers from industrial and occupational hazards (injuries, excessive noise, poisoning, etc.); regulation of working hours, ban on work on weekends and holidays. The German model is based on a mixed public-private solution to social problems, where the responsibility of the individual entrepreneur is replaced by a system of “compulsory” collective responsibility under state control (Kochkova & Day, 2020).

4. Discussion

One of the most important constitutional characteristics of the Ukrainian state is its characterization as a social state. The term “welfare state” has been used in Western Europe since the late 1940s. The most important feature of this type of state is the high level of social security and social protection of its citizens. Achieving this level is possible through effective social policy. Unfortunately, social policy in Ukraine today is imperfect and contradictory. Due to the lack of a clearly defined concept, strategy and priorities, the necessary economic base, the excessive politicization of Ukrainian society, many social programs are populist, declarative in nature. The development of the concept of the welfare state, taking into account the world experience, on the basis of which it is possible to develop a system of social protection and improve social policy should bring Ukraine closer to European standards of sustainable social development.

In our opinion, social security should be considered in the context of public policy. As you know, the policy-making process consists of five interre-

lated stages, which can be significantly separated from each other over time, namely:

- 1) The stage of problem identification that cannot be resolved under the existing conditions);
- 2) Stage of intentions (different ideas for solving the problem are clarified, alternative proposals are identified);
- 3) Stage of decision (selection and approval of one of the proposed proposals by the authorized body);
- 4) Planning and implementation stage (the mechanism of implementation of the adopted option is determined);
- 5) Stage of evaluation of policy implementation (control over the actual course of action, current evaluation of results, impact, determination of necessary changes).

From this we can conclude that social policy is the direction of action on social phenomena in order to manage social relations and the distribution of social resources. Furthermore, it is a system of special programs or measures to ensure the well-being, improve the quality and quality of life of the entire population; activities for the development of the social sphere, for the satisfaction and harmonization of social needs. Social policy can be also defined as a certain orientation and system of actions to optimize the social development of society, relations between social and other groups, the creation of certain conditions to meet the needs of life. It manifests principles and types of social activity that guide and regulate relations between individuals, groups, communities, social institutions. Areas of social policy are of great importance to people: social security, employment, health care, housing, education. Values in social policy play a crucial role in shaping social policy. The very consideration or acceptance of certain values is based on: views on the nature of human behavior; approaches to the acceptance and understanding of values.

Analyzing the Ukrainian model of social protection, it can be noted that according to the principle of its construction, it best corresponds to the continental European model. The system of social protection in Ukraine includes: the system of social insurance of employees, which is carried out by special-purpose insurance funds and allocations from the budgets of different levels (providing subsidies and various benefits under the relevant programs) (Yaroshenko & Tomashevski, 2021). Ukrainian legislation provides for the following main types of social protection: in connection with temporary disability and burial losses; medical - in case of illness; from accidents at work and occupational diseases that have caused disability; in case of unemployment and other types of insurance provided by the laws of Ukraine. In the system of social protection of Ukraine, the negative examples can be considered the following:

- significant “shadowing” of the labor market (about 40%);
- constant crises in the economy, as well as low wages (compared to the EU, the share of capital in output is higher, and labor - less);
- aging of the population after the occupation of part of the territory the number of contributors equaled the number of recipients of pension benefits and is projected to worsen this trend;
- increased labor migration of the most productive labor abroad (especially to the European Union);
- the Pension Fund, which is forced to be covered from the state budget;
- the lack of real social dialogue in the management of social insurance funds;
- the slow pace and inconsistency of reforms throughout the socio-economic system (Jayet, 2020).

Practically all reforms in the social sphere that have taken place in Ukraine, following the example of the European Union, are designed to help increase the implementation of social guarantees of citizens, organization and

effective development of the domestic labor market as a basic condition for the formation of an effective system of social protection in general. Analyzing the experience of the EU, we can note the gradual convergence of national social protection systems and the formation of a mixed model of social protection. The basis for this is the successful implementation of both common social and other common community policies that have contributed to the formation of a common market, employment policy, entrepreneurship and more. Therefore, similar basic conditions are created for the implementation of national social protection policies in the Member States, such as equalization of economic development, formation of the European labor market, harmonization of relevant legislation, etc. These processes do not bypass Ukraine, which has embarked on the path of European integration (Smirnova et al., 2021).

Given the realities of today and the world experience of forming social states, it becomes obvious that in Ukraine, in our opinion, there are no existing signs of social and legal statehood and its inherent democratic rule of law, comprehensive human rights, freedoms and security. An important factor in social security is human social security, which includes the level and quality of life, which are characterized by a number of indicators. On the other hand, the social security of man, society and the state depends on the socio-economic development of the country, the availability of human, material and natural resources. Legislatively established minimum social standards and guarantees play a significant role in ensuring the income of the population, on the level of which the social security of citizens largely depends. The legal basis for their formation and application is enshrined in the Law of Ukraine "On State Social Standards and State Social Guarantees" (Verkhovna Rada of Ukraine, 2000).

The state must guarantee social protection at the minimum level for human subsistence. If the state does not establish and provide a guaranteed minimum social assistance, there will be threats to human life and health. The social guarantees of the state are its obligation to maintain the livelihood of a person

at the appropriate level necessary for survival. The limit of these guarantees does not allow to reach the level of normal functioning and human development, but allows to prevent the possibility of physical death. In addition to the minimum social guarantees, the state social protection system uses social guarantees of contractual regulation of labor relations. Their level is higher compared to state social guarantees, tends to increase depending on the level of acceptance - the state, industry, region, enterprise (Sydorenko et al., 2020; Pashkov et al., 2016).

Ukraine needs a new social model, which involves abandoning the old paternalistic system of control and gaining greater economic freedom. This social model should strengthen social justice and cohesion in society and not stand in the way of economic success. This is a difficult political task that hides great risks and even greater chances. The greatest risk would be political inaction and stagnant reforms (Leonenko, 2020). Today, in order for Ukraine to occupy a worthy place on the world stage and the quality of life of citizens to meet European standards, ineffective and unprofitable social policies need to be replaced by policies focused on the needs not only of a particular social group but also of each individual. Today, Ukraine needs to clearly define the model according to which its social policy will be built. At the same time, this social model must be sustainable, in the country's leadership must develop and implement it regardless of the interests of political forces that are in power or will come to power after the next election. To do this, the main characteristics of the new model of social policy of Ukraine should be as follows:

- poverty reduction and strengthening the position and role of the middle class;
- strengthening the competitiveness of the national economy on the basis of an innovative model of development and implementation of an effective state anti-corruption policy;

- outpacing growth of citizens' incomes compared to inflation; reduction of financially unsecured benefits;
- increasing the level of employment and preventing the loss of qualified personnel;
- improving social mobility; spread of the volunteer movement.

For the effective development of the Ukrainian system of social protection and social insurance in particular, it is necessary to achieve coordinated functioning of all its components, as it is largely a connecting component of the labor market and financial market, affects the distribution and redistribution of national products. After Ukraine's signing of the Association Agreement with the EU, the processes of research and adaptation of best practices of member states on the formation and reform of national European models of social protection and the creation of universal recommendations for Ukraine in the EU's common social policy (Romanovska & Snitko, 2021).

The Ukrainian model of socially-oriented economy envisages, first of all, the need to ensure a socially guaranteed minimum of needs, which is “the division between social and economic needs.” Targeted social policy and active employment policy can become a tool for implementing such a model. This model should absorb all the best that works effectively in market economies: the active preventive nature of social policy; creation of social and legal conditions for the implementation of economic initiative of citizens; optimal amount of redistribution of GDP (50%) through the budget at each stage of development; active participation of private and public organizations in providing social services to vulnerable categories of citizens; implementation of the ideas of social solidarity and sub-solidarity; priority of socially vulnerable categories of citizens. What is valuable in this model of socially oriented economy is that it provides not only social protection, but also the creation of such a state organizational and economic mechanism that would help reduce the number of people in need of social assistance (Lavryk, 2021).

The introduction of such a model should involve the implementation of the following strategic objectives of social policy, which should be addressed at the state and regional level: ensuring the implementation of approved state programs; implementation, monitoring of social programs at the regional level; monitoring structural changes in the economy, ensuring livelihoods and maintaining an adequate standard of living; creation of a regulatory framework for the formation of local budgets; creation in the regions of the necessary conditions to ensure equal starting opportunities for life in view of the minimum social guarantees of the state and the budgetary security of one inhabitant; conducting constant social examination of the state and development of the region, development of social forecasts and balanced use of them in making management decisions at the national and regional levels; comprehensive support for entrepreneurship, especially small and medium-sized businesses; streamlining of communal property relations; development of housing and communal services; gradual reform of social infrastructure facilities; providing effective targeted assistance to the most socially vulnerable segments of the population; active youth policy, family support, motherhood and childhood, and targeted social assistance.

5. Conclusion

Social protection of the population as a social institution is a set of economic, social and legal measures of the state that provide all citizens of the country with equal opportunities to maintain a certain standard of living. The concept of social protection can be used in a broad and narrow sense. Social protection in the narrow sense is understood as a set of actions aimed at providing assistance during life crises. Social protection in the broadest sense is a type of collective security that aims to support the well-being of people and includes, in addition to directly helping in difficult life situations, the introduction of mechanisms aimed at preventing such situations. For example, the protection of workers is due to state regulation of the minimum wage. Ideally, the

state should build social protection in such a way that, in addition to solving the individual problems of each person, to ensure the interests of society as a whole. Social protection in the broadest sense includes social assistance, social insurance and social guarantees. The system of social guarantees and social protection is a factor in maintaining not only economic balance in society, but also their dynamic balance in the process of economic change.

Modern models of social policy differ in the degree of state intervention in the socio-economic sphere of society and the degree of social protection of citizens, ensuring freedom of social choice of various segments of the population and the impact of social processes on economic development. The implementation of state social policy in Ukraine requires the study of world experience and its adaptation to Ukrainian realities. Therefore, today we should pay attention to a thorough analysis of European models of social policy and determine which of the current models of social policy will meet the modern requirements of Ukrainian society. It should be noted that the development of a progressive and effective model of social policy is one of the main indicators of the well-being of civil society and the country's position in the international arena.

The Constitution proclaimed Ukraine a welfare state, which means the priority role of the state in ensuring the social and economic rights of citizens. However, the economic situation and the imbalance and underdevelopment of the current system of social protection and social security do not allow to make this declaration a reality. Transformation processes in Ukraine are associated with political and economic transformations that significantly affect social relations in society and social protection of the population. Therefore, one of the most pressing issues today is to improve the social protection system, which should be based on improving the funding of specific measures provided by relevant government programs, which, in turn, should promote economic development and improve living standards. An integral part of the process

of advancing Ukraine on the path to the EU and building a socially oriented economy is the introduction of scientifically sound social policy, creating an effective system of social protection.

The problem of reforming the social insurance system in Ukraine, as well as social protection in general, has been studied since Ukraine's independence. However, after the signing of the Association Agreement between Ukraine and the EU, the reform of the national social protection system was updated in accordance with the plan of implementation of this agreement and using the best practices of European countries, which led to a new vector of research. A comparative analysis of social protection systems in the EU showed that further and more thorough research in Ukraine requires such problems as de-shadowing the labor market, restoring the insurance principle in the formation of trust funds, restoring the principle of social justice, transparency in social protection, real social dialogue in the management of insurance trust funds, implementation of new forms of social security.