

Comparative Analysis Of Global Legal Aid Systems: International Experience, Human Rights Frameworks, And The Evolution Of State-Funded Legal Assistance In Uzbekistan

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Abstract: This study conducts a comparative legal analysis of global legal aid systems in France, Germany, the United Kingdom, the United States, Russia, and Uzbekistan. It explores how institutional independence, early access to legal counselling, and sustainable financing contribute to equal access to justice in line with international standards, including UN Sustainable Development Goal 16 and the UN Basic Principles on the Role of Lawyers (1990). The findings indicate that Uzbekistan's Law No. O'RQ-848 (2023) and Law No. O'RQ-915 (2024) represent significant progress toward a rights-based model of legal aid. However, further reforms remain necessary to establish an independent Legal Aid Authority, expand pre-trial advisory services, and enhance participation in pro bono legal assistance.

Keywords: Legal aid, access to justice, institutional independence, human rights, pro bono, UN SDG 16, comparative law, Uzbekistan.

Introduction: Access to justice is one of the foundational principles of modern rule-of-law states. Ensuring that every individual, regardless of social or financial status, can obtain qualified legal assistance is essential for the protection of human rights and the preservation of judicial fairness. The historical development of legal aid across jurisdictions demonstrates that the institutionalization of this right has followed diverse political, economic, and cultural trajectories.

The origins of state-funded legal assistance are commonly traced to England's Tudor period, when the Crown introduced **pro bono** representation for the poor through appointed advocates and simplified litigation procedures (Burrows, 2019). The 1531 statute allowing paupers to file claims without court fees laid the foundation for the *in forma pauperis* principle, which subsequently evolved into the modern concept of state-sponsored legal aid (O'Shea, 2024). Over time, this charitable practice transformed into a codified component of national justice policy.

By the seventeenth and eighteenth centuries,

Enlightenment thinkers such as Jeremy Bentham argued that concentrating access to justice in the hands of the wealthy perpetuated moral and political inequality (Griffiths, 2014). Bentham's utilitarian critique, that denying counsel to the poor was tantamount to denying them justice itself, helped legitimise legal reforms extending the right to counsel in England (Bentham, as cited in Burrows, 2019). The **Prisoners' Counsel Act of 1836** granted defendants in criminal cases the right to professional defence, marking the first institutional recognition of defence rights for indigent citizens (Griffiths, 2014).

During the nineteenth century, European countries began incorporating legal aid into their broader social reform agendas. In France, following the Revolution of 1789 and the Declaration of the Rights of Man and of the Citizen, the state sought to eliminate class barriers in access to justice. Although the guild system of *avocats* was temporarily dissolved during the Revolution, it was re-established under Napoleon, introducing a publicly financed defence mechanism for the poor. The **1851 Law on Judicial Assistance**

formalised free legal representation for indigent litigants, later expanded under the 1972 reform that placed its financing under the Ministry of Justice (Global Access to Justice Project, 2014). The **1991 Law No. 91-647** modernised this model through the aide juridictionnelle scheme, integrating both aide juridique (representation in proceedings) and aide à l'accès au droit (early legal advice and education) (Ochan et al., 2022).

Germany adopted a dual structure comprising Beratungshilfe (consultative aid prior to litigation) and Prozesskostenhilfe (court-cost aid), codified in its Civil Procedure Code and the **Federal Legal Aid Act of 1877**, later refined during the Weimar Republic in 1919 (Dübereck & Gottschalk, 2020). This system guarantees not only access to courts but also preventive legal counselling, financed wholly or partly by the state according to applicants' income. Scholars note that such bifurcation enhances efficiency by resolving disputes before they escalate into formal adjudication (European e-Justice Portal, 2022).

Across the Atlantic, the United States constitutionalised the right to counsel in criminal matters through **Gideon v. Wainwright (1963)**, which held that "lawyers in criminal courts are necessities, not luxuries" (U.S. Supreme Court, 1963). For civil matters, the **Legal Services Corporation (LSC)** was established in 1974 to allocate federal grants to non-profit legal aid organisations, creating a hybrid model combining public funding and private pro bono participation (Williams, 2012; U.S. Department of Justice, 2023).

In the post-Soviet region, Russia and other CIS states gradually incorporated legal aid into state-guaranteed social protection frameworks. The Russian Federation's **Federal Law No. 324-FZ "On Free Legal Aid" (2011)** institutionalised dual channels—state and non-state—ensuring assistance through advocates, notaries, and accredited NGOs (Bondar & Mikhaylenko, 2021). Russian legal scholars conceptualise yuridicheskaya pomoshch' (legal aid) as a constitutionally guaranteed form of social support rather than a commercial service (Muzyukin, 2021).

Following global trends, **Uzbekistan** has also undertaken substantial reforms to institutionalise free legal assistance. Article 29 of the Constitution guarantees the right to qualified legal aid. Building on this foundation, the **Law of 16 June 2023 No. O'RQ-848 "On Legal Aid Provided at the Expense of the State"** established procedural, organisational, and financial frameworks for legal aid delivery, defining eligible beneficiaries and mechanisms for state-appointed counsel. The **2024 amendments (No. O'RQ-915)**

further expanded eligibility to socially vulnerable groups and refined funding mechanisms (Lex.uz, 2023; 2024). Despite these advances, challenges remain—particularly in ensuring early legal advice, maintaining quality standards, and integrating pro bono initiatives and university legal clinics into the national framework.

Comparative research shows that sustainable legal aid systems require a **hybrid architecture**: clear eligibility criteria, independent administration, and stable multi-channel financing (Global Access to Justice Project, 2014; Breig, 2019). Accordingly, this study analyses how Uzbekistan's emerging legal aid model aligns with global best practices, identifying its institutional strengths, systemic gaps, and prospects for further policy adaptation.

2. METHODOLOGY

2.1. Research Design and Approach

This study employs a qualitative comparative-legal methodology to examine the institutional, procedural, and normative frameworks governing legal aid systems in selected jurisdictions, namely Uzbekistan, France, Germany, the United Kingdom (England and Wales), the United States, and the Russian Federation. The comparative perspective enables the identification of both convergent and divergent features across national models of state-funded and pro bono legal assistance, as well as the assessment of their relevance for the consolidation of Uzbekistan's recently reformed legal aid system (Lex.uz, 2023; Global Access to Justice Project, 2014).

The research design is descriptive, analytical, and evaluative, combining doctrinal legal analysis with policy and institutional review. The doctrinal dimension focuses on legislative frameworks, case law, and administrative regulations, while the evaluative component assesses the practical effectiveness, accessibility, and financing mechanisms of legal aid delivery in comparative perspective.

2.2. Sources of Data

The analysis relies on three principal categories of sources:

1. Primary legal instruments, including:

- Law of the Republic of Uzbekistan No. O'RQ-848 (2023) "On Legal Aid Provided at the Expense of the State";
- Law No. O'RQ-915 (2024) on amendments and additions to the previous act;
- Loi n° 91-647 du 10 juillet 1991 relative à l'aide juridique (France);
- Legal Aid, Sentencing and Punishment of Offenders Act 2012 (LASPO, England & Wales);

- Beratungshilfe- und Prozesskostenhilfe provisions under the German Zivilprozessordnung (Dübereck & Gottschalk, 2020);
- Gideon v. Wainwright (372 U.S. 335 (1963)) and the Legal Services Corporation Act (1974, U.S.);
- Federal Law No. 324-FZ “On Free Legal Aid in the Russian Federation” (Russia).

2. **Secondary sources**, such as academic monographs, peer-reviewed journals, and global reports:

- Global Access to Justice Project (2014);
- Burrows (2019), Griffiths (2014), Williams (2012);
- Bondar & Mikhaylenko (2021), Muzyukin (2021);
- Breig (2019), Ochan et al. (2022);
- European e-Justice Portal (2022).

3. **Tertiary and digital databases**, including the Legifrance repository for French legislation, the Lex.uz portal for Uzbek laws, the U.S. Department of Justice and Legal Services Corporation websites for American data, and the European e-Justice Portal for comparative EU resources.

2.3. Analytical Framework

The comparative analysis follows a **three-dimensional framework** developed for assessing legal aid systems (adapted from OECD & UNDP guidelines):

1. **Institutional dimension** — examines administrative models, independence, and governance structures of legal aid authorities (e.g., the French centralized model versus Germany’s court-based system).
2. **Procedural dimension** — analyzes the stages of assistance (pre-trial consultation, representation, and post-judgment support), the scope of eligibility, and rights awareness mechanisms.
3. **Financial dimension** — evaluates funding models: direct state financing, mixed grant-based systems, and voluntary or pro bono contributions (Global Access to Justice Project, 2014).

Data from each jurisdiction were coded thematically under these dimensions to reveal recurring patterns and unique national adaptations.

2.4. Comparative and Doctrinal Methods

The research employs the **doctrinal method** to interpret statutory texts and judicial decisions, identifying principles that underpin the right to legal aid (e.g., equality before the law, access to justice, and effective remedy). In addition, a **comparative legal method** is applied to contrast different traditions:

- **Civil-law systems** (France, Germany, Uzbekistan, Russia) with their codified welfare orientation;
- **Common-law systems** (England & Wales, U.S.) emphasizing adversarial defense and pro bono culture.

These comparisons enable cross-fertilization of policy ideas and highlight which institutional choices yield higher accessibility and sustainability.

2.5. Limitations

The study is **conceptual and normative**, relying on textual and documentary analysis rather than empirical field data.

Key limitations include:

- Limited access to up-to-date administrative statistics on case volume and budget execution in Uzbekistan;
- Differences in legal terminology and institutional contexts across jurisdictions, requiring careful translation and conceptual alignment (Muzyukin, 2021);
- Absence of user-experience surveys, which could quantify satisfaction or awareness levels among aid recipients.

Despite these constraints, triangulation of legislation, policy evaluations, and international benchmarks ensures a **reliable qualitative foundation** for subsequent interpretation and discussion.

2.6. Ethical Considerations

All sources were publicly accessible or open-licensed legal materials. No personal or confidential data were collected. Analytical neutrality was maintained by cross-referencing multiple jurisdictions to avoid normative bias toward any particular model.

3. RESULTS

The comparative analysis indicates that legal aid has, across jurisdictions, evolved from philanthropic and religious charity into a constitutionally recognised function of the modern welfare state. In all systems examined, the right to qualified legal assistance is now treated as an essential component of access to justice, albeit with considerable variation in the degree of institutionalisation, administrative independence, and financial sustainability (Global Access to Justice Project, 2014). The earliest precedent for publicly supported legal assistance emerged in England, where the *in forma pauperis* principle enabled impoverished litigants to access the courts without fees (Burrows, 2019). Over time this concept expanded into a formal system of state-supported defence for indigent persons, culminating most recently in the Legal Aid Agency’s role under the Legal Aid, Sentencing and

Punishment of Offenders Act 2012 (LASPO). LASPO consolidated criminal and civil legal aid administration under government supervision and introduced market-based contracting with private firms and non-profit organisations. While competitive tendering enhanced cost control and accountability, it also significantly narrowed eligibility in civil matters, constraining early legal advice and social-welfare case coverage (Robbins, 2009; Burrows, 2019).

France represents a contrasting institutional paradigm: a centralised, fully state-financed model grounded in social solidarity. Since the Loi n° 91-647 du 10 juillet 1991 relative à l'aide juridique, France has operated a dual scheme—aide juridictionnelle (representation during judicial proceedings) and aide à l'accès au droit (early legal advice, mediation, and legal education). Financing is provided by the Ministry of Justice through national and regional budgets, while local Conseils départementaux de l'accès au droit coordinate territorial delivery (Ochan et al., 2022). This architecture supports nationwide coverage and equal treatment, though recurring critiques concern bureaucratic rigidity and low remuneration rates that may dampen advocates' participation (Global Access to Justice Project, 2014).

Germany combines judicial oversight with preventive outreach through two distinct mechanisms: Beratungshilfe, providing free or low-cost pre-trial legal counselling, and Prozesskostenhilfe, covering litigation costs and lawyers' fees where claims have reasonable prospects of success. Local courts adjudicate eligibility, and public budgets fund the schemes, with partial repayment obligations in some cases (Dübereck & Gottschalk, 2020). This bifurcated design encourages early dispute resolution, reduces pressure on courts, and screens out weak claims; however, inter-Länder procedural variation and processing delays can undermine uniformity of access (European e-Justice Portal, 2022).

The United States operates a hybrid system anchored in constitutional jurisprudence. In *Gideon v. Wainwright* (372 U.S. 335, 1963) the Supreme Court recognised the right to counsel as fundamental in criminal proceedings, obliging states to provide publicly funded defence for indigent defendants (U.S. Supreme Court, 1963). In the civil sphere, the Legal Services Corporation (LSC)—created in 1974—channels federal grants to non-profit legal aid organisations working in housing, employment, family law, and related areas (Williams, 2012; U.S. Department of Justice, 2023). This model blends public funding with philanthropic and pro bono contributions, yet remains vulnerable to budgetary constraints and political contestation.

The Russian Federation's system, formalised by Federal Law No. 324-FZ (2011) "On Free Legal Aid in the Russian Federation", integrates state and non-state providers within a welfare-oriented legal philosophy. Representation for low-income citizens, veterans, and other vulnerable groups is delivered through state legal bureaux, regional authorities, and licensed advocates (Bondar & Mikhaylenko, 2021). Russian scholarship conceptualises *yuridicheskaya pomoshch'* (legal aid) as a constitutionally guaranteed social service rather than a market commodity (Muzyukin, 2021). Empirical assessments, however, report regional disparities in implementation due to uneven fiscal capacity and limited public awareness.

Uzbekistan has more recently embarked on institutionalising legal aid as part of broader judicial reforms. Law No. O'RQ-848 "On Legal Aid Provided at the Expense of the State" (16 June 2023) established a nationwide framework for free legal assistance spanning criminal, civil, and administrative matters (Lex.uz, 2023). It defined eligibility categories—indigent persons, minors, persons with disabilities, and women in vulnerable circumstances—and introduced a national registry of state-appointed advocates. Law No. O'RQ-915 (27 February 2024) expanded beneficiary coverage and specified mechanisms for quality assurance and funding (Lex.uz, 2024). Implementation is overseen by the Ministry of Justice, which coordinates regional legal aid centres and digital hotlines to improve access. While this emergent model aligns closely with European social-state approaches, its ultimate effectiveness will depend on adequate, predictable financing, systematic professional training, and the structured integration of pro bono initiatives and university legal clinics.

Comparative evidence thus suggests that effective legal aid systems share several universal features: clear and transparent eligibility criteria, institutional independence (or at minimum insulated administration), robust early-advice mechanisms, and stable multi-channel funding. France and Germany demonstrate the advantages of centralised governance linked to preventive outreach; Anglo-American systems rely more heavily on competitive provision and hybrid financing; and Russia and Uzbekistan embody a civil-law conception of legal aid as a public social guarantee, while still confronting challenges of regional inequality and professional capacity. Overall, Uzbekistan's recent reforms mark a decisive step towards harmonising national legislation with global standards, helping bridge the long-standing gap between declaratory rights and their practical realisation through accessible, accountable, and sustainable legal assistance (Global Access to Justice Project, 2014; Bondar & Mikhaylenko,

2021; Ochan et al., 2022).

4. DISCUSSION

The findings of this comparative study indicate that building an effective legal aid system is not a merely technical or administrative exercise but a core determinant of democratic legitimacy and social justice. Legal aid functions as the bridge between the abstract guarantee of equality before the law and its tangible realisation in citizens' daily lives (Griffiths, 2014). The institutional diversity observed in France, Germany, the United Kingdom, the United States, Russia, and Uzbekistan shows that there is no universal blueprint; rather, each state adapts its model to legal culture, fiscal capacity, and political philosophy. Yet beneath this diversity lies a shared normative foundation: the state bears ultimate responsibility for ensuring that justice is not contingent on wealth, education, or geography (Global Access to Justice Project, 2014).

Theoretically, the evolution of legal aid aligns closely with social-contract traditions and the welfare-state paradigm. Scholars from Bentham to Rawls have framed fair access to legal representation as a condition of moral legitimacy in political institutions (Burrows, 2019). Contemporary theories of legal empowerment and access to justice—advanced by the United Nations and the World Bank—further conceptualise legal aid as a driver of social inclusion that reduces inequality and prevents structural discrimination (UNDP, 2020). From this perspective, developments in Uzbekistan reflect a broader transformation of governance: from an administratively centred legality towards a participatory, citizen-centred rule of law.

Institutional independence emerges as decisive for system sustainability. In France, the *Conseils départementaux de l'accès au droit* operate under ministerial supervision yet retain operational autonomy, allowing budget management and quality assessment without political interference (Ochan et al., 2022). Germany's court-based administration similarly promotes procedural impartiality, with judges—rather than bureaucrats—approving or denying aid requests on objective criteria (Dübereck & Gottschalk, 2020). By contrast, systems in which legal aid offices are fully subordinated to ministries are more vulnerable to politicisation and funding volatility. For Uzbekistan, establishing a semi-autonomous Legal Aid Authority under the Ministry of Justice—tasked with budgeting, accreditation, and monitoring—would align with international good practice and strengthen public trust.

Timing and scope of assistance are equally pivotal. Comparative experience shows that early legal

advice—prior to litigation—is both economically and socially efficient. Germany's *Beratungshilfe* and France's *aide à l'accès au droit* help prevent dispute escalation and reduce court burdens (European e-Justice Portal, 2022). The United Kingdom's retrenchment under LASPO suggests the opposite dynamic: narrowing eligibility for early advice correlates with increased self-representation and procedural delay (Robbins, 2009). While Uzbek legislation permits pre-trial consultation, practice remains predominantly reactive, with aid often delivered only after proceedings begin. Expanding early-access channels—community legal centres, digital hotlines, and regional outreach—would therefore enhance preventive justice and overall efficiency.

Financial sustainability also proves fundamental. France's fully state-funded model offers stability but requires sustained fiscal commitment; the United States' hybrid approach—combining public funds with private and philanthropic sources—provides flexibility but risks uneven service coverage (Williams, 2012; United States Department of Justice, 2023). Uzbekistan currently relies exclusively on state financing, commendable for universalism but potentially straining the budget as coverage expands. Introducing mixed funding—competitive grants for non-governmental legal organisations, university law clinics, and structured pro bono partnerships—could distribute fiscal responsibility while incentivising innovation. The U.S. Legal Services Corporation model illustrates how transparent grant allocation and annual audits can preserve accountability under plural financing.

Quality assurance and professional standards require equal attention. Many European jurisdictions mandate continuing legal education and performance monitoring for advocates delivering state-funded aid. Germany and France employ standardised reporting on caseloads, time allocation, and client satisfaction (Global Access to Justice Project, 2014). Uzbekistan's 2024 reform (O'RQ-915) establishes a register of eligible advocates, yet monitoring mechanisms remain under-specified. Clear performance indicators—outcome-based evaluation, complaint procedures, and peer review—would strengthen professionalism and mitigate risks of misusing public funds.

The roles of pro bono initiatives and academic legal clinics are likewise significant. Comparative practice shows that voluntary legal assistance complements state provision and fosters civic participation. In the United States, clinical legal education supplies supervised services to marginalised communities (Williams, 2012); in Russia, accredited NGOs perform a similar function under the non-state legal aid channel

(Bondar & Mikhaylenko, 2021). With a growing network of law schools and youth programmes, Uzbekistan is well placed to develop a national pro bono and clinical alliance coordinated by the Ministry of Justice and the Bar Association—simultaneously expanding coverage and cultivating practice-ready skills among future lawyers.

Finally, the cultural and informational dimensions of legal aid are critical. Comparative studies show that even where services exist, many citizens—especially in rural areas—remain unaware of their rights or of access pathways (Muzyukin, 2021; UNDP, 2020). Public legal education, media campaigns, and digital platforms are therefore essential to convert formal availability into actual empowerment. Uzbekistan's awareness initiatives and "Call Centre 1008" are important first steps, but systematic, nationwide information programmes—including multilingual outreach and sign-language provision—are needed to ensure inclusivity.

CONCLUSION

The comparative analysis of legal aid systems in France, Germany, the United Kingdom, the United States, Russia, and Uzbekistan demonstrates that free or state-subsidised legal assistance is among the most concrete expressions of equality before the law. The findings reaffirm that access to justice is not merely a procedural guarantee but also a socio-political instrument shaping the inclusiveness and moral legitimacy of governance. In effective models, legal aid is institutionalised as a public service rather than a voluntary charity, combining professional responsibility, state commitment, and civic participation. This evolution—from philanthropic assistance to a constitutional entitlement—marks a pivotal milestone in the development of democratic legal culture (Griffiths, 2014; Global Access to Justice Project, 2014).

Experience from advanced jurisdictions suggests that effective legal aid rests on three mutually reinforcing pillars: (i) institutional independence; (ii) early and comprehensive coverage; and (iii) stable, multi-channel funding. France's centralised system promotes universal access and administrative coherence; Germany's dual-tier design achieves efficiency through preventive consultation and judicial cost aid; the United Kingdom's targeted contracting model balances fiscal discipline with specialist service delivery; and the United States' hybrid framework combines constitutional defence rights with plural financing via the Legal Services Corporation and pro bono networks. Russia's welfare-oriented approach integrates state and non-state actors to enhance territorial equity of

representation (Burrows, 2019; Ochan et al., 2022; Bondar & Mikhaylenko, 2021).

For Uzbekistan, the adoption of Law No. O'RQ-848 "On Legal Aid Provided at the Expense of the State" (2023) and the amendment O'RQ-915 (2024) constitutes a decisive step towards aligning national legislation with global standards. These instruments lay the legal and institutional foundations for a modern, rights-based system spanning criminal, civil, and administrative proceedings. However, as this study indicates, the durability of these reforms will depend on translating normative guarantees into sustainable administrative and financial practice. The next strategic phase should prioritise three directions:

1. **Governance:** establish an independent or semi-autonomous Legal Aid Authority responsible for budgeting, accreditation, quality assurance, and complaints handling;
2. **Early access:** expand pre-trial advice and counselling, drawing on Germany's Beratungshilfe and France's aide à l'accès au droit;
3. **Financing:** diversify funding through competitive grants, university legal clinics, and structured pro bono partnerships, as seen in the United States and Russia (Lex.uz, 2023; 2024; U.S. Department of Justice, 2023).

Ensuring the professional competence and ethical accountability of advocates delivering state-funded aid is equally vital. Continuous training, standardised reporting, and transparent performance indicators are necessary to sustain public confidence and judicial efficiency. No less important is legal literacy: without awareness of their rights, citizens cannot exercise the entitlements the law affords. Accordingly, public information campaigns, community legal education, and accessible digital platforms should accompany institutional reforms to achieve genuinely inclusive access to justice.

In essence, Uzbekistan's trajectory signals a shift from a purely procedural understanding of justice towards a substantive, citizen-centred conception of legality. By embedding global best practice within a national framework grounded in social solidarity, transparency, and professional ethics, Uzbekistan can build one of Central Asia's most balanced and sustainable legal aid systems. Realising this vision would not only enhance judicial fairness but also strengthen civic trust in public institutions—transforming legal aid from a formal guarantee into a lived practice of equality, dignity, and human rights for all.

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