

# MEDIA AND DIGITAL RIGHTS REGULATION IN UKRAINE

**Digest #28 – October 2025**

DSLU monthly digest on media and digital rights regulation in Ukraine provides an overview of the proposed and adopted legislation in the spheres of freedom of expression, media regulation, privacy and data protection, Internet regulation in general, and the activities of the National Council on Television and Radio Broadcasting of Ukraine (hereinafter – NBC) in the area of Media Law implementation.

## EVENTS AND HIGHLIGHTS

On 30 October, the **President of Ukraine signed a new [Order on the Martial Law Extension](#)**. The Order **extends the martial law period until 3 February 2026**. It will also extend the applicability of specific additional restrictions, such as the aggression-related exceptions under the Law on Media. This is the 12th such order since the beginning of the full-scale Russian invasion on 24 February 2022.

On 21 October, the **Verkhovna Rada of Ukraine officially [appointed Tetiana Berezna as Vice Prime Minister for Humanitarian Policy and Minister of Culture of Ukraine](#)**. Moreover, the government intends to **[remove the focus on strategic communications from the Ministry of Culture](#)** and place it under the mandate of another body instead. This decision may indicate a shift in policy within the realm of strategic communications.

On 22 October, **Draft Law [#14000 on the State Budget of Ukraine for 2026 was voted on by the MPs in the Parliament and \[adopted in the first reading\]\(#\)](#)**. The defence and security sectors remained a priority in the budget allocation. The Verkhovna Rada of Ukraine has also adopted proposals from the MPs before finalising the document, in particular, regarding the local budget and teachers' remuneration. The funding allocated for the media sector **[remained the same](#)**: 239.88 million UAH has been designated for the NBC,

2.47 billion UAH for the National Public Broadcasting Company of Ukraine, and approximately 80.8 million UAH for the parliamentary TV channel “Rada”. The MPs can submit amendments to the budget for the second reading until 5 November.

On 16 October, the European Court of Human Rights issued a judgment in [\*M.S.L., TOV v Ukraine\*](#), the first case concerning the application of sanctions in Ukraine. The case concerns the freezing of assets imposed on the applicant company under the Ukrainian [Law on Sanctions](#), which has been found to be incompatible with Article 1, Protocol 1 to the European Convention on Human Rights, guaranteeing the protection of property. The ECtHR has emphasised the need for an individualised assessment of the impugned measures to justify the application of sanctions. Such an assessment cannot be limited solely to compliance with the formal requirements of the Law on Sanctions, without addressing the substance of the allegations. It had also addressed a number of legality issues, such as the lack of indication of reasons for sanctions’ imposition in the respective orders by the President of Ukraine. This case is an essential precedent for future advocacy on amending the sanctions legislation, including the long-standing issue of its provisions’ use to implement website blocking, which will have a positive impact on further Ukrainian legislative reforms.

## FREEDOM OF EXPRESSION AND MEDIA REGULATION

There were **no legislative initiatives regarding freedom of expression registered in the Parliament**, as well as progress on other drafts described in the [previous digests](#), including Draft Law [#7033-d](#) on the prevention of disclosure of certain information in the texts of court decisions, Draft Law [#12111](#) on Amendments to Certain Laws of Ukraine on Media Activities, Draft Law [#12191](#), decriminalising the dissemination of pornography, Draft Law [#12253](#), which improves the legal provisions of the [Law on Advertising](#), Draft Law [#13457](#) which introduces criminal liability for facilitating fraud through the dissemination of information, Draft Law [#13597](#) on combating discrimination, two draft laws on accelerated consideration of EU integration-related drafts ([#13653](#) and [#13653-1](#)), and two draft laws criminalising the insult of military personnel ([#13384](#) and [#13384-1](#)).

Draft Law [#11321](#) on improving journalists' access to official events, Draft Law [#5870-d](#) on conditional access to media services, and Draft Law [#12320](#) on Safeguarding the Barristers' Activities are still awaiting the President's signature.

## PRIVACY AND DATA PROTECTION

On 13 October, **Draft Law [#14118](#)** was registered in the Parliament. The draft introduces a provision to the [Law of Ukraine "On Public Electronic Registers"](#) according to which **a person should be notified of the use of their information contained in the registers within five days from the date such information was accessed**. This is an essential guarantee for the data subject to be informed about any operations conducted with their personal data. The Parliamentary Committee on Digital Transformation processes the draft.

On 22 October, **Draft Law [#14056](#) on Amending Book I of [the Civil Code of Ukraine](#)**, analysed in detail in [the September digest](#), was **voted on by MPs in the Parliament** with an [extended deadline](#) for the second reading preparation. The draft laws [aim](#) to modernise private law and adapt civil legislation to the digital environment. MPs have the opportunity to submit amendments until 5 November.

At the same time, **Draft Law [#14057](#) on Amending Book II of the Civil Code of Ukraine** is still being processed by the Parliamentary Committee on Legal Policy. In October, **Ruslan Stefanchuk**, the Speaker of the Parliament and the draft's leading author, **[held a meeting with representatives of NGOs](#)** in the fields of media and digital rights **to discuss proposals for the draft law**. Among the key topics of discussion were compensations for moral damages, the right to reply, the right to information, and digital privacy, the provisions of which were criticised by media experts. It was agreed to [take the proposed amendments into consideration](#).

No progress was made on other [previously analysed documents](#), such as the Draft Law [#13181](#) on the Ukrainian Parliament Commissioner for Human Rights and Draft Law [#8153](#) on Personal Data Protection.

## INTERNET REGULATION

The lone **Draft Law [#14150](#) on Public-Private Interaction in the Field of Cybersecurity** was registered in October. The draft **formalises cooperation in the cybersecurity sector**, establishes main tasks for public-private interactions, and empowers respective public and private bodies with competences regarding information exchange, reactive measures to cyber leaks and cyber accidents, and preventive measures for cybersecurity. The current draft law does not contain provisions that harm digital rights. The **Parliamentary Committee on National Security, Defence and Intelligence** processes the draft.

On 9 October, **Draft Law [#12349](#) on the Cyber Forces of the Armed Forces of Ukraine (AFU)**, analysed in detail in [the December 2024 digest](#), was **voted on by the MPs in the Parliament**. The draft aims to establish a military and technical unit within the AFU to handle cyber defence under NATO standards. It is currently **awaiting second reading by the Parliamentary Committee on National Security, Defence, and Intelligence**.

On 21 October, **the Parliamentary Committee on Digital Transformation**, in its meeting, [recommended](#) that the Parliament adopt the **Draft Law [#13505](#) on the Prohibition of Use and Distribution of Hostile Software Products and Hostile Information Technology in the first reading**. The draft, analysed in [the July digest](#), [aims](#) to establish a regulatory framework for these digital tools in response to their widespread use and exploitation by the aggressor state in Ukraine's information space. The **Draft's terminology can be interpreted as restrictive towards the provision of access to apps and websites of certain platforms**, whose ultimate beneficiaries are the citizens of the aggressor-state (such as Telegram), in Ukraine, from 1 January 2030, with the potential for imposing fines on the Internet service providers providing such access.

No legislative steps were taken regarding earlier submitted initiatives, namely [Draft Law \[#11115\]\(#\) on Regulation of Information-Sharing Platforms That Disseminate Mass Information](#) (analysed in the [March 2024 digest](#)), [Draft Law \[#13311\]\(#\) imposing liability for adopting unlawful decisions while applying sanctions](#), and two sanctions-related drafts ([#11492-1](#) and [#12406](#)).

# NATIONAL COUNCIL ON TELEVISION AND RADIO BROADCASTING OF UKRAINE

On 1 October, the NBC [expanded](#) the [List of Persons Threatening National Security](#) by including **Valeriy Nikolaev, the Russian actor**, who systematically made anti-Ukrainian statements aimed at supporting Russia's military aggression against Ukraine.

The **Council** [has also imposed](#) **finances totalling 640,000 UAH** (approximately 13,055 EUR) on LLC "Sportbet system" and LLC "Modern audio streaming" for operating their radio channels without registering with the regulator as subjects in the sphere of media. On 14 October, the NBC [proceeded](#) with its policy in the area, **imposing fines on seven additional legal persons** for broadcasting radio channels without registration, which **collectively totalled 1.44 million UAH** (approximately 30,000 EUR).

On 23 October, the NBC [scheduled](#) an inspection of the LLC "Platforma TV" for the **distribution of the film featuring a Russian actor who was included in the List of Persons Threatening National Security**. The Council has also [rejected the application](#) of the online media outlet "Forbes" regarding the review of the regulator's decision to issue a prescription, outlined in the [previous digest](#).

The NBC continued to advance its co-regulatory efforts. On 23 October, the **co-regulatory body in the sphere of audiovisual media services** [announced](#) **a call for experts to join working groups**. The experts will develop codes of practice (rules) governing the distribution of European products to national and regional TV channels with a small audience, as well as the criteria for classifying linear media as thematic and the volume of national content for such media. Applications are accepted until 10 November 2025.

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**Digital Security Lab Ukraine** is a non-governmental organisation aiming to create a human-rights-centered digital environment in Ukraine. We work towards achieving this goal by providing digital security support to high-risk Ukrainian human rights and media organisations, and contributing to policy development in the field of human rights on the Internet through conducting legal monitoring, research, analysis, advocacy, and awareness-raising campaigns.

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