

Legal boundaries of restrictions on the right to strike in Uzbekistan: The institution of minimum necessary works (services) in the context of international labour standards

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Abstract: *This article analyses, through the prism of international labour standards, the institution of strike action introduced into the labour legislation of the Republic of Uzbekistan by Law No. ZRU-1150 of 11 June 2026, with particular emphasis on restrictions on the right to strike and the mechanism for ensuring minimum necessary work (services). The central issue is to determine the legal boundary between an absolute prohibition and a minimum-service regime sufficient to protect the life, health and personal safety of the population. The study demonstrates that the Uzbek model contains mechanisms of a general prohibition in emergency circumstances, absolute prohibitions applicable to certain categories and sectors, minimum necessary services, and temporary judicial restrictions. It argues that, instead of imposing an identical prohibition on all workers in the healthcare, energy, water-supply and communications sectors, restrictions should be linked to the particular function performed by the worker and to the real risk arising from the interruption of that function. The article develops a seven-stage system of criteria for assessing restrictions on the right to strike and proposes that the scope of minimum service be determined by agreement between the parties, with disagreements to be resolved promptly through impartial labour arbitration.*

Keywords: *right to strike; collective labour dispute; minimum necessary works (services); essential services; proportionality; freedom of association; International Labour Organization; Convention No. 87; labour arbitration*

INTRODUCTION. The right to strike is a legal instrument that helps to balance workers' position in collective bargaining and serves to protect their common occupational and socio-economic interests. At the same time, the suspension of work in certain sectors may seriously affect the life, health and safety of the population or the uninterrupted functioning of the State. Accordingly, the central issue in modern labour law is not merely whether strike action should be permitted or prohibited, but rather how to determine the lawful boundaries of restrictions, their necessity, and the availability of less restrictive alternatives.

In Uzbekistan, this issue entered a new stage in 2026. Law No. ZRU-1150 of 11 June 2026 introduced into the Labour Code special provisions governing the concept of a strike, the procedure for declaring and conducting a strike, guarantees for participants, the postponement or suspension of a strike, restrictions, unlawful strikes, and liability [2]. These provisions will enter into force on 12 September 2026. Uzbekistan ratified ILO Convention No. 87 in 2016 [4]. In its Advisory Opinion of 21 May 2026, the International Court of Justice recognised that the right to strike is protected within the framework of that Convention [5]. It is therefore particularly important to assess domestic restrictions in harmony with international labour standards.

The ILO Committee on Freedom of Association links the possibility of restricting or prohibiting strikes primarily to public servants exercising authority in the name of the State and to essential services in the strict sense, that is, services whose interruption would endanger the life, personal safety or health of the whole or part of the population [6]. In other socially important services, a minimum-service mechanism may be used instead of a complete prohibition of strike action. Workers deprived of the right to strike should be afforded effective compensatory guarantees, such as impartial and expeditious conciliation and arbitration procedures [7].

Uzbek legal scholarship had addressed certain aspects of collective labour dispute resolution, mediation and unlawful strikes even before the 2026 reform. M.A.Raximov analysed collective labour disputes and the procedures for their resolution [8]. L.Rakhimkulova examined legal issues relating to mediation [9] and, in a 2025 article, proposed clarifying the procedure for lawful strikes, establishing special rules for essential services, and using agreements on minimum service [10]. In B. Hamroqulov's study "Resolution of Collective Labour Disputes: National and Foreign Experience", the national system for resolving collective labour disputes was compared with the experience of the United States, Germany, the United Kingdom and France. The study argued for creating a clear legal basis for the right to strike, regulating the conditions and restrictions governing its exercise at the statutory level, strengthening the institutional independence of labour arbitration, enhancing the role of trade unions, and developing open statistical data on collective disputes [19]. It also specifically noted that, as a last resort in collective labour dispute resolution, strike action had not yet acquired a fully developed legal form in domestic legislation [19]. These studies constituted the domestic doctrinal foundation preceding the 2026 reform.

Foreign scholarship has focused not only on the substance of restrictions but also on how they are determined and on the safeguards accompanying them. I. Katsaroumpas identified problems arising from the unilateral determination of minimum service levels in the United Kingdom, insufficient participation by the social partners, and the need to preserve the practical effectiveness of strike action [11]. Drawing on South African experience, S. Tavuyanago showed that employment in an essential sector does not automatically mean that every worker performs an essential function [12]. C. Pérez-Muñoz emphasises the severity, likelihood and immediacy of the harm that may result from a strike when assessing a restriction [13]. S. Pérez Agulla argues that minimum service should not restore ordinary full-scale operations and that a reasonable proportionality between competing interests must be maintained [14]. M. Petrović treats the determination of the scope of minimum service through negotiations between the social partners as an important safeguard [15]. In their comparative analysis, P. Herzfeld Olsson and S. McCrystal emphasise the balance between the public interest and the legal status of the right to strike [16]. Contemporary doctrinal approaches to ILO standards on labour restrictions have also been systematised in Russian-language scholarship [17].

Four issues occupy a central place in contemporary doctrine: (1) which services are genuinely essential; (2) the distinction between a sector-wide general prohibition and a restriction based on a specific function; (3) whether minimum service can constitute a less restrictive alternative to an absolute prohibition; and (4) who should determine its scope

and under what safeguards. The model introduced in Uzbekistan in 2026 raises these questions in a new form for domestic law. In this sense, the 2026 reform substantially addressed the principal legal gap identified in B. Hamroqulov's research-the need to regulate clearly, at the statutory level, the procedure, conditions and restrictions governing the organisation of strikes [19]. However, recognition of the right has generated a new scholarly problem: how should the boundaries between absolute prohibition, functional restriction and minimum necessary services be drawn? The research gap lies in the fact that these boundaries under the new legislation have not yet been comprehensively assessed through the standards of the ILO, the 2026 interpretation of the International Court of Justice, and the principle of proportionality.

The purpose of this study is to assess Uzbekistan's new model of restrictions on the right to strike in light of international labour standards, to identify the legal boundary between absolute prohibition and minimum necessary service, and to develop well-founded proposals for legislation and law-enforcement practice. The hypothesis is that the proportionality of the national model will be enhanced if restrictions are linked not merely to the name of a sector or the status of an organisation, but to the real risk to life, health or personal safety arising from the interruption of a specific labour function; if preference is given to a less restrictive measure where the risk can be managed through minimum service; and if the social partners are ensured meaningful participation in determining the scope of that minimum service.

MATERIALS AND METHODS. The normative basis of the study consists of the Constitution of the Republic of Uzbekistan [1], Law No. ZRU-1150 of 2026 and the new provisions of the Labour Code governing strike action [2-3], ILO Convention No. 87 [4], the Advisory Opinion of the International Court of Justice of 21 May 2026 [5], and the principles developed by the ILO Committee on Freedom of Association concerning essential and minimum services as well as compensatory guarantees [6-7]. The doctrinal basis includes studies published in Uzbekistan and abroad in recent years [8-19].

Using the formal-legal method, Articles 570 and 581-589 of the Labour Code were interpreted in their interrelationship. The international-law analysis differentiated the legal significance of Convention No. 87, the Advisory Opinion of the International Court of Justice, and the principles developed by the ILO supervisory bodies. The comparative-law method focused on the determination of minimum service and its institutional consequences in the United Kingdom [11, 18], restrictions in the healthcare sector in Zimbabwe and South Africa [12], proportionality in Spain [14], and participation of the social partners in Serbia [15]. These jurisdictions were selected not as ready-made models but as comparative reference points for assessing specific elements of the Uzbek model.

The principal analytical instrument of the study is a seven-stage set of assessment criteria: (1) legal basis; (2) essentiality; (3) the connection between the worker's function and the real risk; (4) suitability of the restriction for achieving its purpose; (5) availability of a less restrictive alternative; (6) participation of the parties in determining minimum service; and (7) final proportionality. These criteria are not rules of positive law; rather, they are used as a scholarly model that systematises, for purposes of legal application, the general requirements derived from domestic legislation, ILO principles and comparative doctrine.

RESULTS. Law No. ZRU-1150 recognises strike action as a lawful means of resolving a collective labour dispute. Article 570 of the Labour Code defines a strike as the temporary, voluntary and concerted complete or partial cessation by workers of the performance of their labour duties for the purpose of protecting their labour-related, socio-economic and occupational interests [2]. Articles 581-582 link recourse to strike action to the failure of conciliation procedures, the adoption of the workers' decision in the prescribed manner, and a one-month advance period. Article 585 prohibits disciplinary sanctions solely for lawful participation in a strike and guarantees the preservation of the worker's job and position [2]. Thus, the need identified in scholarship before 2025 to establish the legal foundations of the right to strike and to regulate its procedure, conditions and restrictions at the statutory level was largely given normative expression by the 2026 reform [19]. The focus of analysis therefore shifts from the existence of the right itself to the lawful and proportionate boundaries of its restriction.

The new model contains several forms of restriction. First, Article 589(1) establishes a general prohibition during a state of emergency, emergency situation, state of war or general mobilisation. Second, paragraph 2 prohibits strikes by healthcare workers, holders of certain civil-service positions, military personnel, judges and certain employees of law-enforcement bodies, as well as employees in the energy and water-supply sectors and the communications system. Third, Article 586 and Article 589(3) require the maintenance of minimum necessary works (services) in certain socially important services. Fourth, Article 587 allows a court, where a real risk exists, to postpone the commencement of a strike or suspend its continuation for up to thirty calendar days [2]. Accordingly, the national model combines a general and sectoral prohibition, minimum service, and temporary judicial restriction within a single regulatory system.

Under the ILO approach, an "essential service" is determined not by the label attached to the service but by the consequences of its interruption: the interruption must create a real danger to the life, personal safety or health of the population [6]. Thus, healthcare, energy, water or communications may be essential in a general sense, but this does not mean that every position and every function within those sectors must be subject to the same restriction. The South African model analysed by S. Tavuyanago demonstrates that a minimum-service agreement can distinguish, within an essential service, between workers who must continue working and those who may retain the right to strike [12]. C. Perez-Munoz's harm-based approach likewise emphasises that the seriousness, probability and immediacy of the harm must be substantiated in order to justify a restriction [13]. S. Perez Agulla, in turn, evaluates the essential nature of a service in each case by reference to the interests protected, the scale of the strike and its duration [14].

From this perspective, it would be incorrect to regard the sectoral prohibitions in Article 589 of the Labour Code as automatically inconsistent with international standards, since the ILO accepts restrictions or prohibitions in essential services in the strict sense [6]. However, the scope of the restriction must be precise and functionally justified. For example, resuscitation, emergency medical care, emergency management of the electricity grid or functions ensuring the safety of drinking water do not carry the same social risk as administrative, archival, accounting or other support functions. The core issue, therefore,

is not the mere existence of a prohibition, but the workers and functions to which it applies.

The institution of minimum necessary work may constitute a less restrictive means of addressing this problem. Article 586 of the Labour Code requires, during a strike, the maintenance of public order, the protection of property, and the operation of equipment whose stoppage would directly endanger human life or health. Article 589(3) provides for minimum service in services that are not essential in the strict sense but are important for everyday life, or where the scale and duration of a strike threaten normal living conditions [2]. In ILO standards and comparative doctrine, the function of minimum service is not to neutralise a strike, but to prevent consequences for the public that cannot be tolerated; ordinary full-scale service should not be restored, and the strike must retain its substantive character as an instrument of collective pressure [6, 11, 14].

A certain asymmetry exists in the national legislation: minimum service is expressly provided for services falling under Article 589(3), whereas an absolute prohibition is chosen for healthcare, energy, water and communications under paragraph 2. Yet, where essential functions can in certain cases be maintained by a limited group of workers, minimum service may be a more proportionate measure than depriving all remaining workers of the right to strike. Minimum service should therefore be regarded not merely as a technical regime specific to certain sectors, but also as a less restrictive alternative for testing the necessity of an absolute prohibition.

Article 589(4) of the Labour Code provides that the Cabinet of Ministers, in agreement with the Republican Tripartite Commission on Social and Labour Issues, shall determine the list of minimum necessary works (services) and the organisations, services and sectors in which they apply [2]. However, a national list answers the question “which services?”, while the questions “how much service, which tasks, which shifts and how many workers?” in a specific strike require a separate determination. M. Petrovic regards the determination of the scope of minimum service through negotiations between the social partners as a safeguard against excessive state intervention [15]. I. Katsaroumpas likewise considers the participation of the parties and the prompt resolution of disagreements by a trusted independent body to be important [11]. L. Rakhimkulova has also proposed for Uzbekistan a mechanism based on agreements between the parties concerning minimum service [10]. On this basis, a two-tier model appears preferable: the State, together with the social partners, determines the general sectors and functional framework, while in a specific strike the volume of service and the composition of the workforce are determined by a written agreement between the employer and the trade union; where no agreement is reached, the matter is resolved through impartial labour arbitration.

Where a strike is prohibited under Article 589(1) or (2) of the Labour Code, consideration of the collective labour dispute by labour arbitration is mandatory, and the resulting decision is binding on the parties [2-3]. This may correspond to the ILO’s “restriction plus compensatory guarantee” approach [7]. However, the mere formal existence of arbitration is insufficient. Its effectiveness depends on equality of the parties in selecting arbitrators, expeditious consideration of the dispute, reasoned decisions, and their prompt and full enforcement. B. Hamroqulov’s research likewise argued for ensuring the organisational and financial independence of permanent labour arbitration bodies,

securing balanced participation of representatives of the State, trade unions and employers, and strengthening the enforcement of arbitral decisions [19]. Thus, although the 2026 model enhances the legal significance of labour arbitration, the practical guarantees of its impartiality and institutional independence remain a pressing issue.

DISCUSSION. Two extremes should be avoided when assessing the Uzbek model. It is equally unfounded to treat the right to strike as an absolute right that admits no restrictions, or to assume that a general reference to the “public interest” or an “essential sector” is sufficient to justify any prohibition. Following the Advisory Opinion of the International Court of Justice, the starting point of interpretation is no longer whether the right to strike exists, but which restrictions on that right are lawful, necessary and proportionate [5].

Uzbek legislation recognises strike action while simultaneously establishing several restrictive mechanisms, including a one-month advance decision period, conciliation procedures, temporary judicial restrictions, sectoral prohibitions, minimum service, and liability for unlawful strikes. These mechanisms should therefore be assessed not only individually but also in terms of their combined effect. In their comparative study, P. Herzfeld Olsson and S. McCrystal demonstrate that, alongside the protection of public safety and health, the function of strike action within collective bargaining must also be taken into account [16]. Continuity of essential services and preservation of workers’ collective leverage should therefore be understood as compatible rather than mutually exclusive objectives.

A functional approach is particularly important in healthcare, energy, water supply and communications. For example, the interruption of emergency medical care, resuscitation services or emergency electricity-grid management may create a real risk. At the same time, that risk cannot automatically be attributed to every administrative or support function within a large organisation. In the communications sector, the social risk associated with emergency-service communications is also not the same as that associated with ordinary commercial telecommunications. It is therefore appropriate to link the absolute prohibition in Article 589(2) to “workers performing functions whose interruption creates a direct and real risk to life, health or personal safety”, while allowing other workers, where necessary, to exercise the right to strike subject to a minimum-service regime.

The restriction applicable to the civil service is formulated more narrowly. The law covers positions entered in the relevant register for the purpose of exercising the powers of a state body [2]. This is close to the ILO criterion concerning public servants exercising authority in the name of the State. In practice, however, not every position included in the register may involve the exercise of public authority to the same degree. Accordingly, classifications of posts and job descriptions should be reviewed periodically from the perspective of restrictions on the right to strike. Such an approach would preserve continuity of public administration while preventing excessive restrictions on technical and support staff.

The legality of minimum service depends not only on its quantitative scope but also on the procedure by which it is determined. Approval of a general list with the participation of the Republican Tripartite Commission is important for social partnership, but it cannot

substitute for the direct participation of workers and the employer in determining service levels at a particular enterprise. In the United Kingdom, unilateral determination of minimum service was subjected to serious criticism [11]. In Katsaroumpas's subsequent 2026 analysis, the repeal, without practical implementation, of the 2023 minimum service levels legislation is linked to the need for institutional legitimacy and firmer reliance on ILO standards [18]. The principal lesson for Uzbekistan is that the effectiveness of the mechanism depends not merely on its statutory introduction, but on participation by the parties, the impartiality of the dispute-resolution body, and preservation of the practical impact of strike action.

Law No. ZRU-1150 introduced into the Civil Procedure Code special proceedings concerning the postponement, suspension and declaration of strikes as unlawful [2]. Judicial review should not be confined to verifying compliance with formal requirements. Evaluative concepts in Article 587 of the Labour Code-such as real risk, public safety, public order and environmental stability-require courts to compare the facts, the probability of harm and the availability of less restrictive measures. For this purpose, the following seven-stage assessment criteria are proposed.

Criteria for Assessing Restrictions on the Right to Strike

Stage	Principal assessment question
1. Legal basis	Is the restriction based on a clear legal rule, and is it foreseeable in terms of subjects, time, scope and consequences?
2. Essentiality	Does interruption of the work create a real and serious risk to the life, health or personal safety of the population?
3. Functional nexus	Is the specific function performed by the worker subject to restriction necessary to prevent that risk?
4. Suitability	Does the prohibition or restriction objectively contribute to protecting the public interest pursued?
5. Less restrictive means	Can the risk be addressed through minimum service, on-call duty or another less restrictive measure?
6. Participatory safeguard	Did workers' and employers' representatives participate meaningfully in determining the scope of minimum service, and can disputes be resolved promptly by an independent body?
7. Final proportionality	Does the public benefit achieved justify the harm caused to the right to strike, and does minimum service avoid rendering the strike ineffective?

These criteria systematise a common set of legal questions for courts, labour authorities, the Cabinet of Ministers and the social partners. At their core lies the triad of "essentiality - necessity - proportionality". Essentiality identifies the subject matter of the restriction; necessity requires consideration of less restrictive measures before an absolute prohibition is imposed; and proportionality compares the public benefit achieved with the harm caused to the right of collective action. In this way, Article 589 may be interpreted not merely as a list of prohibitions but as a provision designed to maintain a balance between the right and the public interest.

The scientific novelty of the study does not lie merely in describing the new provisions. It proposes assessing them through the interrelationship “sectoral prohibition – functional restriction – minimum service – compensatory guarantee”. In doing so, the ILO principles concerning essential services, the harm-based approach [13], the distinction between an essential service and the particular function of an individual worker [12], participatory safeguards in determining minimum service [11, 15], and the proportionality requirement [14] are integrated into a unified set of practical criteria adapted to the Uzbek context.

CONCLUSIONS AND PROPOSALS. The findings demonstrate that the 2026 reform represents an important conceptual change in Uzbek labour law. Strike action has been recognised as an independent legal instrument for resolving collective labour disputes, guarantees for participants, judicial review, minimum service and mandatory labour arbitration in cases where strikes are prohibited have been established. This indicates that the principal part of the proposal advanced in B. Hamroqulov’s earlier research-to regulate at the statutory level the procedure, conditions and restrictions governing the organisation of strikes-has been implemented [19]. At the new stage, however, the central task is no longer recognition of the right to strike, but the application of restrictions on a functional, necessary and proportionate basis. The practical effectiveness of the institution will depend on how these criteria operate in law-enforcement practice.

First, when identifying an essential service, the principal criterion should not be the name of the sector but the real risk to the life, health or personal safety of the population arising from interruption of the service. Accordingly, the essential nature of healthcare, energy, water and communications does not automatically justify an identical absolute prohibition for every position within those sectors. Second, the institution of minimum necessary works (services) should also operate as a less restrictive alternative to absolute prohibition: where maintaining essential functions at a limited level can eliminate the risk, complete deprivation of the right for all other workers may not always be necessary. Third, the legality of minimum service also depends on the procedure for determining it; direct participation of the parties in a particular strike and prompt resolution of disagreements by an independent body should be guaranteed. Fourth, mandatory labour arbitration must function as an impartial and expeditious institution capable of issuing enforceable decisions if it is to serve as an effective compensatory mechanism for workers whose right to strike is restricted. Fifth, in light of the International Court of Justice’s 2026 interpretation, domestic restrictions should be applied on the logic of lawful, necessary and proportionate limitation of the right, rather than denial of the right’s existence [5].

To improve legislation and law-enforcement practice, the following proposals are advanced:

1. Article 589 of the Labour Code should define an “essential service (function)” as a service or function whose interruption creates a direct and real risk to the life, health or personal safety of the whole or part of the population.
2. The absolute prohibition applicable in healthcare, energy, water supply and communications should be functionally differentiated. The absolute restriction should apply to workers performing essential functions, while other workers should retain the right to strike under a minimum-service regime where the relevant risk can be managed in that manner.

3. Minimum necessary works (services) should be determined in two stages: (1) the Cabinet of Ministers, together with the Republican Tripartite Commission, should determine the relevant sectors and the general range of functions; (2) in a specific strike, the volume of service, shifts and composition of the workforce should be fixed in a written agreement between the employer and the trade union or other representative body leading the strike.

4. Where the parties cannot agree on the scope of minimum service, the matter should not be left to a unilateral decision of the employer; instead, it should be resolved within a short period by impartial labour arbitration constituted with equal participation of the parties, and the parties should have the right to challenge a minimum-service determination through an expedited judicial or arbitral procedure.

5. The Labour Code should expressly provide that minimum service must not restore the ordinary level of production or service in full, eliminate the economic and collective impact of the strike, or render the strike ineffective in practice.

6. Special provisions on mandatory labour arbitration should guarantee equality of the parties in the selection of arbitrators, an impartial chair, expeditious proceedings, reasoned decisions, and immediate enforcement.

7. In Supreme Court guidance, or in summaries of judicial practice concerning the application of Articles 587 and 589 in strike-related cases, the seven-stage assessment criteria proposed in this article should be used.

8. The list of minimum services approved by the Cabinet of Ministers should be reviewed periodically, with the participation of the Republican Tripartite Commission, in light of technological and socio-economic changes and developments in judicial and arbitral practice. Once the new institution enters into force, open statistical data-without personal data-should also be developed on strikes, minimum-service agreements, arbitration and court proceedings. This proposal continues, in the context of the new strike institution, the approach advanced in B. Hamroqulov's earlier research concerning the need for regular publication of open data on the number and causes of collective labour disputes and the methods used to resolve them [19].

The final conclusion is that the effectiveness of the new institution should be measured not by the number of prohibitions, but by the existence of a differentiated mechanism capable of protecting both the right and the public interest. If absolute prohibition functions as an exceptional measure, minimum service as a less restrictive balancing instrument, and labour arbitration as a genuine compensatory guarantee for workers whose right is restricted, the Uzbek model may develop consistently with the contemporary interpretation of Convention No. 87 and the principles of social partnership.

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