



**MEDIA**delcom

Risk and opportunities configurations  
and policy recommendations



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## Austria: RO configurations and policy recommendations

### Capability of monitoring mediascapes

from a comparative perspective, the capability of monitoring mediascapes seems well developed in Austria – at least in some of the relevant research domains,

- in journalism and media usage: large variety of empirical sources and high degree of specialisation, along with trend towards internationalisation,
- in legal and ethical regulation as well as media literacy: basis of available data is less differentiated and empirical research is underrepresented.

### Wisdom-based media governance: risks and opportunities

#### Several good practices as examples of wisdom-based media governance, e.g.:

- monitoring initiatives coordinated by the Public Value Competence Centre of ORF,
- practice-oriented research and consulting activities by Medienhaus Wien,
- public debates and research activities accompanying the re-establishment of the Austrian Press Council.

#### Risks that inhibit wisdom-based media governance:

- increasing information fragmentation as a result of progressing specialisation in media research,
- not all relevant research is available to the public,
- lack of continuously collected and reliable official media statistics,
- trend towards internationalisation leads to marginalisation of expert knowledge about the Austrian media system,
- lack of comparable long-term studies in most of the relevant research fields.

### Agent oriented analysis

#### Recent research and monitoring activities make it possible to indicate a number of potential risks for deliberative communication in all relevant domains:

- legal regulation:** e.g., failure to introduce and implement effective measures to counter current problems such as disinformation as well as a lack of legislation to support the right to information,
- media accountability:** e.g., lack of incentives for more media self-regulation (i.e., co-regulation),
- journalism:** e.g., ongoing trends of increasing media market concentration and rising political influence on media and journalism,
- media usage and media-related competencies:** digital transformation of the past decades continues to be a key challenge.

**Although all of these risks are well known and broadly debated among media practitioners, policy-makers, and researchers, practical solutions are still not properly implemented.**

## **Country-specific policy recommendations**

**Several measures can help to foster problem-oriented research and monitoring initiatives, thereby increasing the potential to create public awareness of the issues at stake. These include:**

- a provision of reliable official media statistics, particularly in the field of media ownership data, continued public funding for national research initiatives in the field of media and communication, alongside international cooperative projects,
- increased support for long-term monitoring projects,
- a broader debate about scientific publication strategies and open access/open data concepts.

**Other targeted media policy recommendations can help to foster deliberative communication directly. Possible initiatives for Austria include:**

- specific legislative measures to restrict concentration of the media market, a realignment of public press funding to promote media pluralism and quality journalism, independent of political influences,
- effective incentives for media companies to support media accountability (e.g., by making acceptance of the Austrian Press Council a requirement to receive public funding),
- promotion of digital literacy in the sense of deliberative communication.





## Bulgaria - RO configurations and policy recommendations

### Capability of monitoring mediascapes

the country possesses sufficient and well-educated research potential as well as the production of valuable scientific and specialized publications,  
although most of the publications monitoring the Bulgarian mediascape are extensive, user-reliable sources and are comparatively easily accessible, their content displays insufficient continuity, complexity and a lack of a systematic approach in terms of longitudinal outlining of trends,  
uneven and sporadic input of some of the participating agents hampers comprehensive and consistent multi-aspect studies on the developments of the mediascape.

### Wisdom-based media governance: risks and opportunities

studies and good practices that can be linked to wisdom-based governance of monitoring the mediascape are scarce,  
cooperation between media-related agents (policy makers, regulatory bodies, academics, journalists, professional organizations, media industry, NGOs, independent researchers) for evidence-based systematic collection, evaluation analysis and application of knowledge to withstand the risks involved in the development of deliberative communication is insufficiently coordinated,  
long-term and proactive measures against risks concerning deliberative communication need combined efforts between media-related agents and stakeholders in order to provide the public with timely, reliable, and plural information on various kinds of legacy media and online platforms.

### Agent oriented analysis

#### Legal regulation

insufficient fully-fledged and efficient transposition of European *acquis communautaire* related to media and communication,  
shortcomings in regulation of media concentrations; cross-ownership; press and online platforms,  
incompletely transparent public registries for the regulation of media ownership,  
insufficient regulation of media funding,  
sparse, unclear and unstable ethical regulations in supporting the independence of media and journalists.

#### Opportunities

- modernization of media regulation through the Media Freedom Act (EMFA), Digital Service Act (DSA), Digital Markets Act (DMA), and others common for EU member-states,
- coordination and cooperation between stakeholders for effective implementation of complex media and communication policies and regulation,
- stronger guarantees for the independence of the media regulatory authorities and their professional performance.

## Accountability

insufficient internationally acknowledged media accountability instruments,  
non-binding and voluntary self-regulation standards and co-regulation procedures related to media ethics,  
scarce accountability practices of commercial media to audiences.

### Opportunities

- publicly available accountability of the entire media sector, not only of the acts of the broadcasting regulators - the Council for Electronic Media (CEM) and the Communication Regulation Commission (CRC), as well as of the annual reports of the public service broadcasters BNT and BNR,
- introduction of special national configurations of multistakeholders' synergies specifically set up for media research,
- creation of an ombudsman's office relevant to the overall media sector, not only to the public service broadcasters BNT and BNR

## Journalism

political and corporate dependence of media,  
high level of legacy media concentration and commercialization, while local journalism is on the edge of survival,  
deterioration of the working conditions and prestige of the journalistic profession,  
neglect of professional journalistic standards and growing self-censorship of media content creators,  
disunity of journalistic guild.

### Opportunities

- ensuring independent and sufficient budgets for public service media,
- ensuring transparent procedures for allocating public (national and EU) funds to strengthen media, freedom of speech and local journalism,
- building a strong journalistic community and associations to promote the protection of journalistic work against the tendencies of limiting external pluralism (access to various sources of information) and internal pluralism (freedom of expression, incl. overcoming self-censorship).

## Media usage

distrust in legacy media due to the decline in content quality,  
distortion of data on ratings provided by people metric companies,  
difficult recognition and control of fake news,  
decline in freedom of speech due to lower access to information,  
preferences for easily digestible information and interactive communication on social media.

## Opportunities

- ensuring high levels of digital inclusion and connectivity,
- safe-guarding access to information and data sharing,
- providing specific tools for vulnerable audiences: children, the elderly, disabled.

## Media-related competences

- non-consistent comprehensive programs in media literacy for different societal groups,
- insufficient participation by all stakeholders in promoting the necessity of media literacy,
- lack of critical thinking about information, leading to the risk of misrecognition and the spread of fake news and misinformation,
- media literacy is enshrined in the curriculum of secondary education in Bulgaria, but the number of classes is still few.

## Opportunities

- enhancing digital, information and media competences and skills of media content providers,
- coordination of the synergies of all stakeholders to ensure media literacy education for all media users,
- developing positive practices in raising the achievements of digital and media literacy programs at schools.

## Country-specific policy recommendations:

- adoption of effective legal and regulatory measures opposing trends in the politicization and commercialization of media, and the mediatization and internetisation of politics,
- adoption of effective legal and regulatory measures for transparency of media ownership, people metric measurements, and allocation of state ad vertising,
- enhancing coordination between regulation, self-regulation and co-regulation
- outlining professional methods? for the sustenance of external and internal pluralism for the independence of journalism,
- further developing reliable media usage patterns,
- enhancement of effective incentives for media stakeholders to support media accountability,
- further development of digital, information and media (including AI) competences,
- creation of provisions for reliable longitudinal and consistent official media statistics and media monitoring
- ensuring the transparency of media monitoring and research funding in order to prevent conflicts of interests.



# Croatia: RO configurations and policy recommendations

## Capability of monitoring mediascapes

while many industry produced data on media and their performance are or should be collected based on legal requirements, in reality there are no real sanctions if the media do not provide them,  
 academic and NGO research also produces data that can contribute to the monitoring of the mediascape in Croatia, but the quality is not equal in all the areas,  
 a broader research policy and funding for regular monitoring of the most important elements of the media system are lacking at the national or university level.

## Wisdom-based media governance: risks and opportunities

-- often based on interest of specific industry groups and the political interests of the government,  
 lack of cooperation between the state, the media, and other actors,  
 Media Policy Forum was proposed by the Croatian Mediadecom team as a new opportunity,  
 where academics, journalists, media industry professionals, and policymakers could share their views and discuss the current issues in the Croatian media sphere.

## Agent oriented analysis

### Legal regulation

insufficient research on protection of personal data, copyright protection, protection of journalistic sources, whistleblowing, and the media and trade secrets,  
 conflicts of interest arising from media involvement in politics,  
 legal scholars have insufficient knowledge of the media and the Croatian media system,  
 lack of implementation of freedom of expression regulation and protection of data for freedom of expression.

### Opportunities

- o well covered issues of media ownership and transparency,
- o adopting the laws to strengthen the protection of journalists and media independence.

### Accountability

research coverage of the area of accountability is not sufficient, with only a few articles dealing with ethical issues, and several more investigate the accountability of regulatory bodies,  
 lack of media ombudpersons  
 lack of highly developed organizational codes of ethics,  
 lack of public discourse on media criticism.

### Opportunities

highly developed professional discourse of media criticism.

## Journalism

- attitude of the political elite towards journalists is polarised,
- modest development of the media market,
- low autonomy of the PSM,
- low journalistic skills,
- higher market concentration.

### Opportunities

- most fields of interest are adequately covered and allow further analysis,
- improving the level of communication between political elites and journalists.

## Media usage

- audiences are reluctant to pay for digital news, favouring free content,
- low use and trust in legacy media,
- high trust in social media.

### Opportunities

- sources exists for evaluating access to media, relevance of news media, and trust in the media,
- strengthening of trust between legacy media and audiences.

## Media literacy

- low levels of media literacy,
- media literacy activities are mostly led by NGOs and less by public institutions.

### Opportunities

- emphasizing media literacy (with a focus on other social groups besides children),
- teacher training in didactics of critical media use.

## Country-specific policy recommendations:

- create the Media Policy Forum as a permanent venue for sharing knowledge and wisdom about the media system,
- overall increase in economic (in terms of higher GDP) and technological (the broadband Internet access) development,
- improving the implementation of freedom of expression regulation, as well as the implementation of data protection for freedom of expression,
- more serious implementation of data provisions to official bodies, and their capacity to process the data and make them easily available to the public,
- creating the permanent structures for public discourse to interact with professional discourse in media criticism (e.g., TV / radio program or a podcast),
- increasing journalistic skills with lifelong learning,
- increasing the autonomy, independence, salience, and quality of news in legacy media and public service media (PSM).



## Czechia: RO configurations and policy recommendations

### Capability of monitoring mediascapes

weak monitoring capacity and low relevance of journalistic organizations, politics, industry, academia, and professional organizations are not sharing the data and the cooperation in the evaluation of the available data is very weak, the academic research is still strictly project-oriented and there is a lack of the state support for continuous independent scientific research into the media landscape.

### Wisdom-based media governance: risks and opportunities

lack of a broader conceptual debate on media ethics, absence of an active and recognised journalistic organisation, lack of systematic and long-term strategies for media, lack of cooperation and mutual participation among individual actors in the field.

#### Opportunities

start discussing and solving fundamental problems of media ethics and law, because of the public criticism of the oligarchized media.

### Agent oriented analysis

#### Legal regulation

lack of consistent digitisation of the public administration, much information has to be requested by law and is not publicly available, or has to be requested through the courts, no regulation of ownership concentration and ownership in the Czech Republic, only a partial regulation of politicians owning media.

#### Opportunities

- make it legally transparent and forbid politicians to buy and own all types of media,
- restrict the amount of media ownership by one subject.

#### Accountability

there is no independent press council, codes of ethics exist but the effectiveness and enforceability of these codes is generally low, as there is a lack of independent bodies to enable such enforcement, there is no ombudsman for all media.

## Opportunities

- develop a discussion in the journalistic field on the functionality of self-regulation,
- introduce the position of media ombudsman.

## Journalism

number of journalists with university degree in journalism is quite small in comparison to the possibilities for them to obtain the degree,

lack of cooperation and solidarity among journalists, leading to lack of self-regulation.

## Opportunities

- promote the importance of lifelong learning for journalists,
- take advantage of the emergence of independent media, new generation of journalists and international environment and promote the cooperation and solidarity among journalists.

## Media usage

media usage data is mostly controlled by private companies, limited public access,

only some actors have access to media usage data, but they do not analyse or process them sufficiently.

## Opportunities

promote data sharing, collaboration on data analysis and interpretation, and the public availability and public discussion of the results of such analyses.

## Media literacy

low level of media literacy,

media literacy activities mostly led by NGOs.

## Opportunities

- create a functional and sustainable media literacy program,
- strengthen the role of the state in building this program.

## Country-specific policy recommendations:

fight against media oligarchization, and more generally, against concentration of media ownership,

support for independent media, laws for transparent ownership, strengthening the separation of business and editorial processes, transparent media management,

fight for better cooperation of agents:

support the creation of press council/strong self-regulatory organization, support lifelong learning of journalists (professional integrity) and development of media ethics, coordinated cooperation on legislation, on the discussion of what is a public service, on law reforms, creation of a platform, a kind of "tripartite" (journalists, media owners, NGOs, academia, state), which would meet regularly, discuss, share information and data.





## Estonia: RO configurations and policy recommendations

### Capability of monitoring mediascapes

lack of State interest in media-related knowledge, absence of a clear-cut media policy, project-based media research funding makes the career models of researchers insecure, the national research funding system is insufficiently transparent, Estonia is well represented in international research networks and projects, including EU-funded ones.

### Wisdom-based media governance: risks and opportunities

neither politicians nor the media industry representatives are interested in cooperating with media analysts and scholars, policymakers ignore the research-based knowledge available in academic studies.

### Agent oriented analysis

#### Legal regulation

the lower courts have not been successful in handling SLAPP cases.

#### Opportunities

- presence of a team of qualified investigative journalists,
- journalists can resist pressure from politicians and media owners,
- Data Protection Inspectorate and journalists are contributing to maintaining a high level of freedom of information.

#### Accountability

the accountability bodies (two Press Councils and an Ombudsman) address media organisations rather than journalists, communication of the accountability bodies with the public occurs only through their websites, the Code of Ethics has not been updated for decades.

#### Opportunities

- journalistic ethics debate has begun to develop in the context of media scandals,
- journalists are paying more attention to ethical issues than ever before.



## Journalism

small and vulnerable job market,  
the journalists' organisation (EAL) has no prestige among younger generations of journalists,  
high stress level among journalists.

### Opportunities

- enough readers exist who are willing to pay for analytical and investigative journalism,
- improving cooperation between academia and media industry to raise the prestige of the content quality of journalistic products among the public.

## Media usage

audience data is gathered only for commercial purposes and is not freely available for academic research,  
the authorities undervalue the information about what kinds of media content people use and trust  
and what groups remain beyond the impact of news.

### Opportunities

- people are accustomed to pay for online content,
- researchers have limited access to commercially gathered data on the populace's media usage (media repertoires).

## Media literacy

there are many short-term initiatives on media literacy, the outcome of which is unknown (not reported),  
the project-based approach does not allow for a wider impact.

### Opportunities

- a wide variety of media literacy initiatives,
- the projects should be better coordinated and last at least 10+ years to have long-term impact.

## Country-specific policy recommendations:

governments should improve their communication with the public,  
there is an urgent need for an institution responsible for the “transparency of public communication”,  
Estonia needs a ‘platform’ (a body, a forum) for getting media industry professionals, journalists,  
policymakers and academics into constructive discussion,  
an independent unit for regular monitoring of media changes should be founded by the  
government,  
job security and clearer career options for journalism, media and communication  
researchers should be established to secure sustainability of research,  
research funding system should be transparent and more flexible,  
Estonia should follow the EU’s recommendations concerning SLAPP cases,  
a strategic coordinating centre for media literacy governance is  
necessary,  
qualification requirements for journalistic jobs in public  
service media should be established,  
Estonia should join the Reuters Digital News  
Report project,  
wisdom-based media literacy  
governance is necessary.



# Germany: RO configurations and policy recommendations

## Capability of monitoring mediascapes

- long history and favorable establishment of the field,
- established cooperation of different stakeholders (monitoring, regulation, professional, economic),
- good access and availability of data and analysis, but sometimes complex due to federal system.

## Wisdom-based media governance: risks and opportunities

- wisdom-based media regulation as established practices,
- good practices: media concentration regulation, financing decisions for public-service media,
- historical bad practice example: Privatization of Eastern-German media landscape after reunification.

## Agent oriented analysis

### Legal regulation

- generally good balancing of different legal interests,
- strong guarantees for media freedom in constitution and constitutional court decisions,
- several avenues for abusive practices can be discussed, but practical significance is considered limited,
- defamation is punishable as a criminal offence, but application in media-related cases is rare,
- discussion on SLAPPs is relatively minor,
- higher courts considered rather media-friendly, but there is a risk from media companies not appealing to these higher courts.

**Opportunities**

Harden the system against abusive practices.

### Accountability

- well-established system of professional accountability practices despite criticism of “toothlessness” of the press council,
- system built on cooperation of journalists and media companies,
- increase of accountability activities by publishing houses (ombudspersons, organizational codes) to improve trust, albeit still on a limited level,
- some risk from decline of meta-journalism in general interest media.

**Opportunities**

Stronger involvement of media users in accountability activities could strengthen accountability.

## Journalism

strong professionalization in journalism and overall sound economic foundation,  
main economic risks for regional and local journalism, especially in a political system that is built heavily on participation on these levels – some debate on public funding options,  
the journalistic profession arguably lacks diversity, especially in management positions –  
problem is increasingly acknowledged and tackled by some media houses.

### Opportunities

- Strengthening of economic viability of journalism, especially on local and regional levels.
- This may include public subsidies or at least assistance in further transition to online news distribution and its monetarization.

## Media usage

sufficient data production and availability,  
risks in recent shifts: news avoidance, media scepticism, hesitation to pay for quality news.

### Opportunities

- Intensification of debate and activities on trust in media and relevance of news media for public discourse.
- These activities can built on tradition of cooperation between public, private, and social stakeholders.

## Media-related competencies

for school children, significance of media-related competencies is acknowledged, although implementation differs between federal states,  
for adult population, there is significant concern about lack of knowledge about how news media work.

### Opportunities

Focusing on media-related competencies in the education system ensures outreach to all social groups, at least in the younger generation.

## Country-specific policy recommendations:

effort to maintain the comparatively positive evaluation in areas such as the media market, journalistic professionalism, legal and accountability system,  
specific effort to uphold and intensify monitoring activities, particularly with regard to longitudinal data (where some long-term programs have been terminated),  
key challenges: Finding sustainable solutions for funding regional and local journalism and improving media-related competencies as well as trust in news media.



## Greece: RO configurations and policy recommendations

### Capability of monitoring mediascapes

there is a prolific scientific community in the fields of media law, journalism and communication, embedded in international networks and research projects,  
academic research is clustered around themes that reflect the interests of individual researchers,  
there is a lack of systematic data collection in most of the fields relevant for assessing risks and opportunities for deliberative communication through the media,  
data on important aspects of the media market such as audience and advertising figures is collected by private companies and is, thus, not freely available.

### Wisdom-based media governance: risks and opportunities

regulation seeks to reconcile freedom of expression and information with other rights and interests,  
the Greek media have not established accountability tools and they do not form part of the existing system of professional self-regulation,  
professional journalism has yet to fully recover from the economic recession (2008-2018) which threatened the sustainability of the media market and put journalists' employment conditions under strain,  
several alternative media outlets provide independent news and cover socially-relevant topics often neglected by mainstream media,  
the absence of comprehensive data collection structures undermines the potential to assess trends in media usage and the media-related competences of individual users  
media-literacy policy is underdeveloped.

### Agent oriented analysis

#### Regulation

state actors play an important role in defining the legal context in which freedom of expression and freedom of information can be exercised,  
state actors keep a close eye on the operation of the media through centralized policy-making practices.

#### Accountability

the reach of the system of media accountability is limited since it is enforced by journalists' unions and only applies to those journalists who are members.

## Journalism

public service media are marginalized,  
commercial news media do not invest in quality journalism sufficiently,  
journalists confront a number of challenges related to digitalization and new technologies in the digital age.

## Media usage

relevant data is mainly collected by private companies, limiting public availability.

## Media-related competences

low level of media literacy  
media literacy activities are mostly led by NGOs, academic institutions, less by public institutions,  
there is no pedagogical faculty with an accredited teacher training programme focusing on media education.

## Country-specific policy recommendations:

### CMM

Provide adequately-funded structures for research in the field of media and communications; strengthen and systematize data collection; ensure that data is freely available.

### Ethics/accountability

Create incentives for media outlets to set up media accountability instruments; support the creation of a press/media council which brings together media owners, editors and journalists.

### Journalism

Support independent media and journalism; support the continuous development of digital and data journalism competences for professional journalists through skills-development programmes.

### Media-related competences

Develop a thorough media literacy policy strategy; support synergies between public and private actors engaging in media literacy initiatives and ensure coordination.



## Hungary: RO configurations and policy recommendations

### Capability of monitoring mediascapes

- resources available for examining the conditions for deliberative communication, insufficient support for education and research activities in the humanities and social sciences, including communication and media studies,
- structural changes in the academic sector risk financial and professional autonomy.

### Wisdom-based media governance: risks and opportunities

- Hungary is drifting away from democratic and EU values, with tangible effects on the media as well,
- polarisation of the media along political lines is driven by the ruling elite,
- in the current political situation, wisdom-based media governance is hardly feasible.

### Agent oriented analysis

#### Legal regulation

- the media authority, created in 2010, is not independent and makes politically driven decisions – serious deficiencies in the autonomy of other areas of the judiciary,
- regulation of public service media is extremely problematic,
- lack of media concentration rules,
- no exceptions for journalists and the press in the GDPR legislation, negative impact of the data protection regulation on press freedom,
- FOI laws do not sufficiently guarantee journalists' access to data of public interest.

#### Opportunities

- o need to rethink the entire Hungarian media regulatory framework,
- o reform the institutional system and reduce the possibility of political interference.

#### Accountability

- powers of the media authority are strong, self-regulatory bodies are not allowed to decide on certain issues themselves,
- co-regulatory bodies can only act with very limited powers,
- there is no generally accepted normative framework for the journalistic profession, multiple codes of ethics exist.

#### Opportunities

- o increasing cooperation between media organisations and the remaining independent research is needed,
- o increase the transparency of newsrooms, which can help build trust in the media.

## Journalism

extremely concentrated and distorted media market,  
unequal distribution of state advertising revenues,  
independent media are experiencing continuous financial uncertainty,  
prestige of the profession is extremely low.

### Opportunities

- European Media Freedom Act can help to improve the transparency of state advertising spending and to protect journalists by banning illegal surveillance,
- journalists need more cooperation, common communication on the importance of quality journalism

## Media usage

Hungarian consumers have to be very conscious to access reliable, credible information or to be exposed to narratives other than the government's one,  
partisanship divides citizens' perceptions of reality,  
market measurement companies publish very little or no data about media usage.

### Opportunities

public funding for longitudinal media usage research should be made available.

## Media literacy

current public education system neglects media literacy at all levels,  
lack of a coherent policy due to the fragmented role of the state and lack of coordination between stakeholders,  
NGOs have a crucial role to develop media literacy programs and materials.

### Opportunities

- media literacy needs to be integrated into the curriculum,
- need to increase cooperation between stakeholders,
- the state should take the lead in coordination provide a common platform for different stakeholders.

## Country-specific policy recommendations:

creation of a new media authority with guarantees of political independence,  
restructuring public service media,  
creating an autonomous and independent news agency,  
ensuring access to information for journalists,  
decreasing media ownership concentration and finishing the market distortion with state advertising,  
finishing the state-sponsored spreading of disinformation,  
media education to combat the dangers of digital media.





## Italy: RO configurations and policy recommendations

### Capability of monitoring mediascapes

- political and economic influence affecting media objectivity,
- fragmented media competition impeding cohesive monitoring strategies,
- data quality and availability challenges limiting thorough media analysis,
- lack of tradition of collective action, diminishing the effectiveness of media monitoring efforts.

### Wisdom-based media governance: risks and opportunities

- media resistance to regulatory changes,
- difficulties in establishing shared ethical standards,
- difficulty in balancing diverse media perspectives and interests,
- potential misuse of governance for non-journalistic purposes,
- wisdom-based governance could be leveraged for selective censorship.

#### Opportunities

- o promotion of self-regulation in media,
- o enhancement of journalistic standards and ethics,
- o improvement in public media literacy.

### Agent oriented analysis

#### Legal regulation

- defamation laws leading to journalistic self-censorship,
- privacy laws conflicting with public information rights,
- inconsistent protection for journalistic sources and whistleblowers,
- difficulty adapting laws to digital media changes,
- inefficiencies and barriers in enforcing Freedom of Information laws.

#### Opportunities

- o enhancing enforcement of Freedom of Information and source protection laws to boost transparency,
- o streamlining administrative processes for legal compliance and supporting investigative journalism,
- o increasing public awareness about rights and protections under these laws to ensure they effectively promote transparency

## Accountability

### Risk

- weak self-regulation and poor enforcement of ethical codes,
- lack of established media ombudspersons for handling public complaints,
- conflicts of interest due to overlapping media and political interests.

### Opportunities

- strengthening and establishing robust self-regulatory mechanisms, like effective press or media councils,
- improving the enforcement of professional and organizational codes of ethics to elevate journalism standards,
- establishing or enhancing media ombudsperson roles to mediate between media and the public, fostering transparency and trust.

## Journalism

- lower proportion of skilled journalists impacting quality,
- job precarity affecting journalistic stability,
- increased attacks on journalists leading to self-censorship,
- concentration of media ownership limiting diversity of viewpoints and information.

### Opportunities

- investment in journalist training and development for enhanced media quality,
- implementation of measures to protect journalists, fostering a safer reporting environment,
- encouraging media pluralism to ensure a diverse range of viewpoints and information.

## Media usage

- digital divide impacting access to online media, especially among older populations and in rural areas,
- high concentration of media consumption in a few major broadcasters, limiting content diversity,
- rise of social media as a news source, increasing the spread of misinformation and challenges in identifying credible sources.

### Opportunities

- addressing the digital divide to enhance internet access and digital literacy,
- supporting media diversity beyond major broadcasters,
- educating the public on media literacy to combat misinformation.

## Media literacy

- digital literacy education in schools is limited,
- media literacy education access varies regionally,
- media professionals face challenges adapting to digital changes.

## Opportunities

- o expanding digital literacy education across all educational levels,
- o addressing regional disparities in media literacy access,
- o adapting to digital trends in media education and professional development.

## Country-specific policy recommendations:

- enhance media diversity, especially in television, and support independent outlets,
- improve journalism training, emphasizing digital and investigative skills,
- implement extensive media literacy education at all levels,
- foster collaborative media policy development,
- ensure journalist protection and promote ethical standards.



## Latvia: RO configurations and policy recommendations

### Capability of monitoring mediascapes

weak, lack of continuous, transparent and effective system of financing monitoring activities, main actors involved in monitoring are academic and NGOs, but only some of them provide data on regular bases and for longer periods of time, academic research is rather less developed, almost no longitudinal studies, monitoring activities are conducted with mainly project based funding.

### Wisdom-based media governance: risks and opportunities

the creation of more transparent, independent, equal and encouraging communication environment by establishing National Media Policy Guidelines (2016), Media Support Fund (MSF) (2017), as well as Latvian Journalists Association (LJA) (2010) and Latvian Media Ethics Council (LMEC) (2018), new corporate agents (Media Policy Department at the Ministry of Culture, MSF, LJA, LMEC, PSMs' Council) are important influencers of the structural change towards deliberative communication, risk is rising populist politics in Latvia, direct attacks on journalists, signs of political pressure, risks for deliberative communication is relatively low level of monitoring capacity and problems of media related competences.

### Agent oriented analysis

#### Legal regulation

the legal regulation of Latvian mediascape has created basic conditions for the development of freedom of speech, freedom of press and freedom of information in the country, Latvia has transposed the EU Whistleblowing Directive (Directive 2019/1937) and adopted new Whistleblowing Law (in 2022), lack of research and monitoring of the practice of laws, both in media every day and court practice, lack of data on court practices.

#### Opportunities

to encourage the research and critical public discussion of the media regulation both by universities and research centres, and NGOs.

## Accountability

the Latvian media and journalism self-regulation structure has been established recently in 2018, risk that new self-regulatory institutions can be used for their instrumentalization in political interests.

### Opportunities

- necessary to educate journalists and audiences about the role of news media in democratic society,
- several recently created institutions for support of self-regulatory media in Latvia must be defended against their instrumentalization in political interests.

## Journalism

Latvian journalists are relatively well educated and there is a relatively big amount of journalists working on a full time contract basis,  
concerns regarding prestige of the journalist profession,  
no consistent research on the wages as well as longitudinal and more qualitative research on journalists in change.

### Opportunities

- the more in-depth and longitudinal research on journalism cultures must be conducted,
- strengthening the role of Latvian Association of Journalists as an actor and partner in media related education of journalists, creation of self-reflection and public, discussion on the changes and problems in journalistic work and media practice, research and criticism of media work and deliberative communication.

## Media usage

most of the research on media usage in Latvia is conducted by commercial actors, so that only part of data collected are publicly accessible,  
little continuous and coherent qualitative research, especially, on motivations and perceptions of people in media usage,  
important risk is little representative and methodologically innovative academic research on media audiences,  
the Latvian audience can be characterised as TV viewers.

### Opportunities

- there is a need for effective reforms of PSM, and to find policy ways to establish strong and sustainable news media,
- the recognition of both the emergency of strengthening of PSM and a carefully elaborated strategy to support areas of content production that stand in public interest,
- special attention can be given to innovation and social cohesion.

## Media literacy

- media Literacy is part of new educational policy and content,
- knowledge on media related competencies is sporadic and fragmented,
- almost no research on media literacy,
- some competences needed for media consumer not covered in research and education at all,
- some groups reached by educators much less than others (school children and youth),
- lack of methodology for media literacy, especially, in regard to both linguistic groups of media users.

## Country-specific policy recommendations:

- sustainable research base for research on the development of press freedom and journalism,
- continue the development of the media regulation and self-regulation system,
- develop a new law intended for the entire media environment that corresponds to the situation of the modern media ecosystem,
- continue support for self-regulation of the media,
- create a media education and media literacy policy, focusing on the acquisition of broader media-related competencies,
- introduce the definition and regulation of "state advertising" into the advertising law,
- create a strategic plan lifelong education of judges on freedom of speech, freedom of the media, protection against digital mobbing, protection of journalists against online and offline attacks,
- create additions to the pre-election regulation, stipulating that parties must declare their techniques for political communication.

## Opportunities

support nationally representative research on all areas of MIL and MRC, development of proper methods for teaching of MRC all groups of society.



## Poland: RO configurations and policy recommendations

### Capability of monitoring mediascapes

- multiplication of media indexes and monitoring institutions,
- highly politicised and divided societal contexts for the media-democracy indexes and other forms of monitoring capabilities,
- the political-ideological (the so-called liberal vs conservative) divisions above deliberation (willingness to meet, speak, and other cultural factors for finding common grounds – deliberation),
- multiplication of voices over media and democracy.

### Wisdom-based media governance: risks and opportunities

- a wide range of agents involved in media governance, non-governmental and citizen-driven communities vs politics, scholarly knowledge focusing on the normative views on media and democracy, a call for more evidence-based and applied research,
- a call for more in-depth collaboration between policy-makers, media experts, professionals, activists and researchers on media democracy,
- the challenge: prototyping future deliberative media.

### Agent-oriented analysis: risks and opportunities

#### Media regulation

- the mismatch between the theory and implementation: multiple interpretations of acting in line with the media law and freedom of expression (and the media),
- defamation, access to public information and SLAPP as a part of political agendas,
- low level of media ownership transparency,
- old-fashioned public service media regulations.

#### Opportunities

- provide a holistic discussion and joint cultural understanding of the rule of law, so everyone speaks the same language,
- support regulatory and practical solutions to online harassment, hate speech, and protection of whistleblowers,
- update the legal framework for the legacy media, as both the broadcasting and press law date back to the pre-internet mass media.

## Media accountability

the so-called conservative and liberal media tribes and the 'ethics' multiplication – the systemic challenge for deliberations with high political parallelisms in private media and public service media (from the winning elections onwards),  
multiplication of media accountability instruments, with a low level of authority and recognition by media and publics (citizens),  
the lack of digital-oriented media accountability practices, media watchdogs online and connections between the old and new media accountability platforms,  
research and data on media accountability focusing on journalists–media declarations, not the real daily work ethical dilemmas and deliberative literacies.

### Opportunities

- provide a holistic discussion and joint cultural understanding of media responsibilities and the truth so everyone speaks the same language,
- support self-regulatory solutions to use online digital platforms for media criticism, fact-checking and feedback loops on media performance,
- strengthen the authority of the ethical commissions and councils, with the possibility of introducing ombudsman-like institutions acting on behalf of citizens.

## Journalism

more research and understanding of media change and adaptation,  
the pros and cons of applying traditional media systems theories to the platform and metaverse-driven media realities,  
scholarly collaborative response to new technologies and an urgency for deliberative grounds (round tables, workshops),  
reinventing public service media journalism (including journalism studies: universities and other research centers).

### Opportunities

- more scholarly empirical research on people, values and processes in deliberative communications and organisational culture – diversity and inclusion,
- support studies to investigate current organisational and mental shifts in media-making, including new forms of knowledge sharing (media hubs and labs), skillsets, and human resources for the platform age,
- strengthen monitoring capabilities via more transparent ways to evaluate scholarly achievements (scientific projects, conference reports, publications).



## Media usage and literacy

a call for more research and understanding of media change and adaptation, data beyond the TV-viewing or radio-listening data (quantitative indexes),  
the pros and cons of applying traditional media systems theories to the platform and metaverse-driven media realities,  
understanding Gen Z and the Generation Alpha.

## Opportunities

- collaboration between media, schools, research centres and universities,
- regaining the authority of schoolteachers and study curricula, to reflect on high technologies, challenges for fact-checking and new skills (coding, data analysis, and so on),
- provide practical workshops for multistakeholder dialogues with respect and listening among the key values (beyond presentations and conferences).



# Romania: Risk and opportunities configurations and policy recommendations

## Capability of monitoring mediascapes

uneven across the board, with an impressive quantity of data in some and a severe scarcity in others, the data is only partially available or circulated outside the group that generated it and is seldom comparable,

difficulties in navigating it and the limited access to the full information created by private actors, the lack of comprehensive longitudinal research.

## Wisdom-based media governance: risks and opportunities

Romania has never had a comprehensive policy regarding the access to information (including via mass media) of its population, most of the relevant legislation is mirroring the EU directives, sometime interpreted in restrictive ways,

the market developed organically, driven by a combination of profit and self-interest, under the strong influence of politically motivated agents,

the media governance is based on data and information, seldom on knowledge and almost never reaches the level of wisdom.

## Agent oriented analysis

### Legal regulation: freedom of speech, freedom of press and freedom of information

the state is the main agent in the legal domain, regulating the media and the access to information and securing the transposition of the EU directives,

there were cases when European documents have been used to restrict access to information of the Romanian public and journalists (ex. GDPR),

the access to information via official channels somehow decreased over the last 20 years (lack of political will, lack of abilities of the public servants to manage and open public information),

digital tools for transparency are lacking.

### Opportunities

- consolidate the access to information of the public: enforce FOI legislation, train public servants, use digital tools to secure easy and affordable access to information for everybody,
- interpret and apply EU directives in the spirit of the largest freedom.

## Accountability

journalists dominate the accountability and self-regulatory domain, but their activity is weak and their practices even weaker,  
they are in a weak position of influence: overworked, often underpaid, with low job security and almost non-existent union protection.

## Opportunities

- consolidate the statute of journalists by providing better legal protection,
- consolidate the ethical standards, adjust them to the current challenges,
- seek public's support in defending media freedom.

## Journalism

academic actors produce national and international research, but on rather narrow topics and on small scale, the NGO sector provides cross-domain studies, some of them longitudinal, but are depending on international funding, with a risk to be discontinued, some aspects are not researched at all.  
there is no functional relationship between academia and industry or academia and society, new knowledge is either unused or unusable by the policymakers.

## Opportunities

- increase cooperation between interested stakeholders to expand monitoring capabilities and secure reliable, comparative, longitudinal data,
- support independent journalism projects, to regain trust in the value of journalism for the society.

## Media usage

the media usage patterns are mostly monitored and documented by commercial actors, as data thus collected is used for marketing purposes,  
the diachronic analysis of the domain is undertaken mostly by the NGOs, academia started to research the domain lately.

## Opportunities

- open media usage data to researchers and other interested parties,
- support comprehensive studies regarding the media usage patterns and use them to secure access to information to all citizens.

## Media related competencies

nationally generated data on media competences is almost completely missing,  
most data are coming from NGOss, international projects and organizations,  
the policy to fight disinformation is punitive rather than educational, reactive rather than forward thinking,  
there is a risk of “militarisation” of media literacy.

## Opportunities

- develop a comprehensive and overarching media policy based on education; allocate sufficient funding; engage all competent agents,
- develop proper evaluation tools for measuring the media-related competences of the public.

## Country-specific policy recommendations:

put freedom of information and freedom of the media at the core of the development agendas of all the interested agents, as the main stepping stone of any positive evolution toward deliberative communication,  
develop a solid wisdom-based media literacy policy and governance, with a strong accent of individual ethical responsibility,  
embrace a forward-thinking approach, aimed at formulating and acting for “desirable futures” rather than just correcting the effects of the organic evolutions,  
make information and mediascapes monitoring a permanent activity, revisit and update policies based on the evidence produced by research and monitoring.



## Slovakia: RO configurations and policy recommendations

### Capability of monitoring mediascapes

- weak research on the regulations of press freedom and freedom of expression,
- lack of best practice for collecting and analysing SLAPP,
- access to public information is not sufficiently guaranteed.

### Wisdom-based media governance: risks and opportunities

- absence of a socially recognised and influential journalism organisation,
- media market is highly concentrated and influenced by foreign capital and financial groups,
- diminishing objectivity and plurality of public service media,
- lack of cooperation between the state, the media, and other actors.

### Agent oriented analysis

#### Legal regulation

- media ownership and editorial processes are not sufficiently transparent,
- possible manipulation of media content by influential groups,
- fears of state-mandated or self-censorship of journalists,
- conflicts of interest arising from media involvement in politics,
- high concentration of the media market.

#### Opportunities

- adopt laws to strengthen the protection of journalists and media independence,
- establish new bodies to monitor media influence.

#### Accountability

- media accountability tools non-existent,
- no international media accountability instruments exist,
- any self-regulation standards related to ethics are non-binding and voluntary.

#### Opportunities

- promote ethical journalism,
- educational campaigns, workshops and seminars.

## Journalism

no strong professional organisation of journalists,  
attitude of the political elite towards journalists is polarised,  
inadequate incentives to ensure that highly qualified and ethical journalists dominate the media sector.

### Opportunities

- promote the development of professionally oriented curricula,
- improve the level of communication between political elites and journalists,
- support the emergence of a strong and respected journalistic professional organisation.

## Media usage

media usage data is controlled by private companies, limiting public availability,  
audiences are reluctant to pay for digital news, favouring free content,  
distrust in elite media, with a turn towards free, controversial content.

### Opportunities

- encouraging the private sector to share media usage data publicly,
- strengthening media-audience relationships to build trust.

## Media literacy

low level of media literacy,  
media literacy activities are mostly led by NGOs, academic institutions, less by public institutions,  
there is no pedagogical faculty with an accredited teacher training programme focusing on media education.

### Opportunities

- emphasise media literacy (also focusing on seniors),
- teacher training in didactics of critical media use,
- cooperation between stakeholders with measurable results.

## Country-specific policy recommendations:

media literacy education implement nationwide media literacy programmes in schools and communities.  
legislation to ensure equal access to information enact laws that guarantee equal access to information for all media outlets.  
transparency in media ownership and funding implement strict regulations requiring transparency in media ownership and funding sources.



## Sweden: RO configurations and policy recommendations

### Capability of monitoring mediascapes

- broad production and good availability of data, well-developed research with high international impact but with room for improvement in particular areas,
- presence of institutions with holistic media monitoring remits (Nordicom, MPRT) adds broad and cross-sectoral capabilities and sharing of insights,
- monitoring efforts are often conducted in media industry silos.

### Opportunities

broaden the role of holistic media monitoring institutions (Nordicom/MPRT) to monitor the democratic performance of the media.

### Wisdom-based media governance: risks and opportunities

- political changes of public service media conditions as a risk (of decreasing autonomy).

### Agent oriented analysis

#### Legal regulation

- generally very strong protection of press freedom and freedom of speech, arm's length principle with distance between (PSM) media companies and political institutions is being challenged,
- new anti-terrorism regulation could impact press freedom negatively.

#### Accountability

- long history of various institutions safe-guarding accountability regarding ethical and legal norms and regulations,
- some criticism of toothlessness of the Swedish media authority in enforcing accountability (e.g. with regard to public service value assessment).

#### Journalism

- due to price inflation, media companies are broadly under economic pressure,
- threats against journalists and other media workers is a working condition problem.

## PSM funding

There is presently political agreement in support of the current funding levels.

## Media usage

broader but fragmented data production, with many, sometimes competing actors and measurement standards, tendencies towards a more fragmented media ecology where some users consume media in filter bubbles.

## Media literacy

the threat of disinformation, misinformation, and exposure to criminal activities in digital media requires strengthened media literacy skills, well-developed and high public awareness and acceptance of the need for measures in this area, efforts to strengthen media literacy is being made in the educational system, but citizens outside the school system are more difficult to train.

## Country-specific policy recommendations:

the Government, or more specifically The Ministry for Cultural Affairs, needs to revise the tasks for the appropriate public authority so more coherent and relevant data can be produced on a regular level, the Government, or more specifically the Ministry for Cultural Affairs can also pave the way for giving an actor the task to collect and then find ways to collectively present existing data (deriving from academia, NGOs, public authorities, etc.), to protect public service media in the constitution is more difficult as the political process needs to be supported by a political majority in the parliament at two occasions with an election in-between. However, the issue of improved legal protection has been on the political agenda for some time and touched upon in previous public inquiries, prospects for a broad political agreement are not optimal at present but could change in the future, an expert investigation addressing the topic of protection in the constitution for public service media and in particular highlighting the risks for deliberative communication can look into the issue.







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Risk and opportunities configurations  
and policy recommendations





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