



## CS1. Studies on national media research capability as a contextual domain of the sources of ROs

The aim of the **first case study** is to describe and analyse the **countries' monitoring capability**: the ability and possibilities of various agents to observe the developments of the media and the changes in society emanating from the media transformations, as well as related risks and opportunities for deliberative communication, and applying the obtained knowledge in making media political decisions.

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## GREECE

# Risks and Opportunities Related to Media and Journalism Studies (2000–2020). Case Study on the National Research and Monitoring Capabilities

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## Executive summary

Research and data sources for the analysis of risks affecting, and opportunities for, deliberative communication in Greece reveal significant differences across the four Mediadelcom domains under study. Academic research is well advanced in the domain of law, but not particularly developed in the sphere of media ethics. Academic research in the domain of journalism is well-established and expanding, but data and statistics on journalism are scarce. In the domain of media usage, academic research is insufficiently institutionalized, while data collection is dispersed across commercial research bodies. The domain of media-related competences is the least developed of all in terms of the research and data available. The heterogeneity of the research and data sources available in the four domains reviewed undermines the potential for monitoring and assessing risks and opportunities for deliberative communication.

## 1. Introduction

Greece represents a small media market and a media system whose development has been thoroughly shaped by strong state intervention marked by politicized procedures and the instrumentalization of commercial media (Hallin and Papathanassopoulos, 2002). Falling under Hallin and Mancini's 'Mediterranean or Polarized Pluralist' model (2004), it has experienced fundamental changes in recent years as a result of technological advancements and the profound financial crisis the country underwent. These developments entail new risks and opportunities for the media's ability to support deliberative communication.

Greece was a latecomer as regards the institutionalization of media and communication studies. It was only in the 1990s, with the advent of commercial broadcasting, that university departments specifically focused on media, communication and journalism were established. That these were often staffed by scholars who had studied abroad meant the field manifested an international orientation from early on. Greek media and communication scholars are embedded within international networks, publish in international journals, and in many cases conduct research within the framework of international and European projects. The latter have been particularly important in a domestic context characterized by inadequate opportunities for funding. Up until 2016, when the Greek Research and Innovation Institute (ELIDEK) was established, there was no regular research grant scheme for the social sciences. Nowadays, funding for research in media and communications studies mostly stems from the European institutions, on a project basis, in response to specific calls. At the national level, there is no public funding mechanism specifically addressing media and communications studies while private research

grants, mostly from civil society organizations, are not provided on a regular basis. As a result, much of the academic research conducted is small-scale, though efforts to establish academic journals addressing media-related issues have proved successful (e.g. *Law of Technology and Communication*). The National Documentation Centre offers online access to research produced by the Greek academic community in the field. It also hosts journals of interest.

Next to academic research, public bodies and independent authorities collect media-related data on aspects coming under their remit. Professional associations and market research bodies also engage in data collection activities. Aspects of the state of the media are regularly reviewed by international non-profit organisations (e.g. Freedom House, Reporters without Borders, etc.), and European and international surveys also cover Greece (e.g. Eurobarometer, Pisa).

The aim of this report is to review Greece's research, data and monitoring capabilities vis-à-vis risks to, and opportunities for, deliberative communication across the four domains covered by the Mediadelcom project over the period 2000-2020: law and ethics, journalism, media usage, and media-related competences. Relevant publications and data sources have been identified through university libraries, databases maintained by public bodies, media regulatory authorities and commercial media research agencies, as well as online journal searches using a list of keywords which relate to key aspects of the four domains. The opinion of influential media scholars on relevant publications and data sources has also been sought. On this basis, 136 relevant scholarly publications and research reports have been selected and compiled into a bibliographical database. This database is by no means exhaustive but it nonetheless provides an organized collection of available research and data sources for the analysis of risks affecting, and opportunities for, deliberative communication in Greece.

## 2. Publications, data sources and main monitoring actors of the legal and ethical domain

The sources in the legal and ethical domain related to the media field pertain to both primary and secondary sources. Legal texts are available through domestic databases and the official gazette whilst preparatory documents and consultations preceding regulation are also accessible to the public. Regulatory authorities with a remit in the media also inform on their activities and their decisions can be found online. Over the past years, the EU institutions and especially the European Commission have developed a key interest in issues concerning freedom of expression and information, funding monitoring of media policy and regulation in the Member States. Greece has been covered by the Media Pluralism Monitor (MPM) since 2014, when the project started on a pilot basis. It is also reviewed in the context of the rule of law mechanism of the EU, with the relevant MPM country reports feeding the assessment.

The literature on freedom of expression and information is well developed. Our bibliographical database features sixty-nine (69) publications dealing with these issues published over the period of reference. These are authored by both academics and legal practitioners and appear mostly in Greek language books and specialized legal journals. For the most part, these publications provide a systematic, long-term analysis of the domestic legal framework and the scope of protection granted to freedom of expression and information. Legal developments and cases of interest covering higher and lower courts are also discussed. Naturally, in terms of the specific topics covered, the literature follows legal developments and the evolution of the jurisprudence, which means that certain topics might gain attention at specific points in time whilst others are more recurrent. For instance, the interaction of free speech with the right to freely develop one's personality or with the right to respect for private life are discussed in the literature throughout the period covered while issues related to the dissemination of 'false news' attract scholarly attention in 2019 in response to steps taken at the EU level to reach a better under-

standing of and curb disinformation,<sup>31</sup> alongside changes brought to the Greek criminal code modifying relevant provisions. Research on media accountability has been less developed. Relevant sources are limited to just six (6) scholarly publications. At the same time, the bodies involved in media accountability do not all report on their action.

## 2.1. Freedom of expression

Literature on freedom of expression and the right to information reveals a steady interest in the relevant constitutional provisions, mainly Article 14(1) of the Hellenic Constitution (Const.) on the right to free speech and freedom of the press and Article 5A Const. on the right to information and the right to participate in the information society (see, indicatively, Chrysogonos and Vlachopoulos, 2017; Contiades, 2001; Dagtoglou, 2012; Karakostas 2010; Kiki, 2013; Papanchristou *et al.*, 2006; Vlachopoulos, 2017). Scholars have discussed the nature and scope of the protection deriving from relevant provisions, giving increased consideration to new technologies and digitalization (see, for instance, Igglezakis, 2011; Karakostas, 2009; Mantzoufas, 2010; Tassis, 2006). They have also worked towards a better understanding of Article 15 Const.: this declares that ‘radio and television shall be under the direct control of the State’, aiming *inter alia* at the ‘objective and on equal terms transmission of information and news reports’ and ‘at ensuring the quality level of programs’.<sup>32</sup> Scholars have noted that direct control of this sort is inextricably linked to the activities of the National Council for Radio and Television (NCRT), which enjoys constitutional protection as an independent administrative authority (Contiades, 2016; Dimitropoulos, 2017; Tsevas, 2009). However, the NCRT has been criticized down the years for its inability to effectively discharge its duties (Contiades, 2016; Kamtsidou, 2005; Mavroumoustakou, 2006; Oikonomou, 2004, 2017; Psychogiopoulou, Casarosa and Kandyla, 2014; Tsevas, 2009).

Regarding the balancing of freedom of expression with other rights and freedoms, the literature has mostly focused on the interaction of free speech with the right to freely develop one’s personality, the right to private life, and the right to the protection of personal data. Concerning the right to free development of one’s personality, legal experts have examined the civil law provisions upon which claims for injuries to one’s honour and reputation can be based, and the criminal law concerning insult, defamation and slanderous defamation. Studies on domestic case law have revealed deficiencies in judicial reasoning (Akrivopoulou, 2015; Mitsiou, 2012; Tsakyrakis, 2011), some of which have led to seminal rulings of the European Court of Human Rights (Anagnostopoulos, 2009; Psychogiopoulou and Kandyla, 2020). Regarding the standards guiding the balancing of freedom of expression and the right to respect for private life, scholars have explored issues including the protection of the private life of public figures (Alivizatos, 2010; 2018; Vrettou, 2013) and the publication of information obtained via illegal means (Alivizatos, 2010; 2018; Tsevas, 2013). Turning to the protection of personal data, the relevant legal framework, both before and after the adoption of the General Data Protection Regulation (GDPR),<sup>33</sup> has been a centrepiece in the literature (Vlachopoulos, 2018c). Studies engaging with data protection legislation prior to the GDPR have, overall, shown balanced decision-making by the Data Protection Authority (Lytras, 2013) in line with ECtHR standards - and this despite the fact that national legislation afforded outright precedence to data protection vis-à-vis freedom of the press (Akrivopoulou, 2017; Panagopoulou-Koutnatzi, 2016; Tsevas, 2013; Vrettou, 2020). In the

<sup>31</sup> See in particular the report of the independent High-Level Group on fake news and online disinformation, ‘A multi-dimensional approach to disinformation’ (2018), <https://digital-strategy.ec.europa.eu/en/library/final-report-high-level-expert-group-fake-news-and-online-disinformation>.

<sup>32</sup> See Art. 15(2) Const.

<sup>33</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) [2016] OJ L 119/1.

wake of the GDPR, attention has shifted to steps taken by the Greek legislator to restore the balance between the protection of personal data and freedom of expression and information (Panagopoulou-Koutnatzi, 2019; Skondra, 2020; Vrettou, 2020). Abusive court proceedings against journalists, known as SLAPPs (*strategic lawsuits against public participation*), have also started to gather attention (Media Freedom Rapid Response, 2021).

Regarding disinformation, scholars have mostly debated whether untrue information falls within the scope of the constitutional protection granted to freedom of expression and information (Contiades, 2020; Vlachopoulos, 2018b). The constitutionality of domestic provisions penalizing the spreading of false news has also been explored (Spiropoulos, 2019); while the Greek judiciary has not as yet had the opportunity to pronounce on this, judges have widely referred to the media's 'duty of truth' (Karakostas, 2010; Karakostas and Vrettou, 2011) alongside the duties of 'good faith' and 'due diligence' (Sotiropoulos, 2009) which require journalists to check the accuracy of information prior to publication. Scholars have also examined the conditions under which a journalistic work can be protected under intellectual property legislation (Deliyanni, 2009; Kallinikou, 2002; Synodinou, 2007), probing the ways in which copyright legislation has sought to adjust to the specificities of journalism through the introduction of certain exceptions from copyright protection (Stamatoudi, 2005; Synodinou, 2007).

Over the last years, research has also focused on the broader array of factors - legal and non-legal - that affect free speech and press freedom in Greece (Maniou, 2022; Papadopoulou and Maniou, 2021; Psychogiopoulou and Kandyla, 2021; Serafeim, 2012).<sup>34</sup>

## 2.2. Freedom of information

Scholars have also delved into the implications of data protection legislation for access to information. Here, the focus has been on the legal framework governing access to documents held by public authorities (Andrikaki, 2010; Detsaridis, 2006; Lazarakos, 2006) and its combined reading with data protection rules (Grivokostopoulos, 2021; Igglezakis, 2020; Veneris, 2017; Vlachopoulos 2018a). Studies on the confidentiality of journalistic sources have noted that the protection of journalistic sources stems more from case law than legislation (Kargopoulos, 2008). Studies on whistleblowing have pointed to the absence of a targeted whistleblower law (OECD, 2018a; Psychogiopoulou and Kandyla, 2021; Transparency International, 2013). No studies appear to have explicitly explored trade secrets legislation and its effects on freedom of information.

According to studies on media ownership transparency, domestic legislation does not include clear and comprehensive provisions on the disclosure of news media ownership structures (Psychogiopoulou and Kandyla, 2021). Whilst older studies have pointed to the difficulties encountered by the NCRT when it seeks to ensure compliance with domestic rules (see, indicatively, Kamtsidou, 2005; Mavromoustakou, 2006), more recent research suggests that news media ownership is not disclosed directly to the public in a systematic way (European Commission, 2021a).

## 2.3. Accountability system

Turning to ethics, media self-regulation's potential for protecting free journalistic speech in line with the ethical responsibilities inherent in it has received relatively little scholarly attention. Some efforts have been made to map the existence and reach of certain accountability instruments: scholars have, for instance, reviewed the principles of the Ethics Code, which constitutes

<sup>34</sup> We would like to thank Lambrini Papadopoulou, Assistant Professor, Department of Communication and Media Studies, National and Kapodistrian University of Athens, for bringing some of these sources to our attention.

the main instrument of self-regulation at the professional level (Kiki, 2003). They have also examined the principles contained in the Code of Conduct for News and Other Political Programmes, which was drafted by the NCRT and later adopted as a statute applicable to broadcast media. More recent studies report the lack of both traditional accountability tools (such as press councils, ombudspersons, etc.) and formalized public accountability practices, such as media-critical initiatives (Psychogiopoulou and Kandyla, 2017).

Studies evaluating the effectiveness of existing media accountability instruments are also few in number and paint a bleak picture of the status quo. Research suggests that the NCRT has not succeeded in ensuring respect for the ethical standards enshrined in the Code of Conduct for broadcast media (Rigou, 2017). Scholars have also highlighted the limited effectiveness of the Ethics Code as a defining element of the practice of journalism (Deliyanni, 2004; Psychogiopoulou, Kandyla, and Anagnostou, 2014; Komninou, 2017).

### 3. Publications, data sources and main monitoring actors of journalism

Research in the journalistic domain is well developed, stemming mostly from the academia. Our database features forty-seven (48) publications addressing aspects that are relevant for assessing risks affecting, and opportunities for, deliberative communication in Greece. Notably, the majority of works has been published in international publishing houses and journals. Issues related to the economic sustainability of Greek journalism have consistently attracted scholarly attention over the past 20 years. Yet, the volume of relevant publications has increased since 2008 when the economic crisis put the economic sustainability of the Greek media under strain. Research on aspects concerning the social sustainability of journalism, i.e., the socio-cultural conditions that enable journalists to produce content that is accordance with normative journalistic values, on the other hand, is relatively less developed and more recent. Data collection carried out by some public bodies covers the most important aspects of the media market and its evolution. However, there is no general comprehensive survey on the status and exercise of the journalistic profession.

#### 3.1. Market conditions

The economic sustainability of journalism in Greece and its ability to keep pace with technological innovation (Giomelakis and Veglis, 2016; Spyridou *et al.*, 2013) and socio-economic challenges (Papathanassopoulos, 2001; Touri, Kostarella and Theodosiadou, 2017) has been one of the central themes in the literature over the past 20 years.<sup>35</sup> Much of the extant research adopts a media-systems approach, situating relevant issues within the context of the clientelistic relations that exist between the political system, the state and the media. For instance, studies have discussed the state of the market for journalism at the turn of the 20th century with reference to the haphazard advent of private broadcasting, when publishers and a handful of business owners who had entered publishing in the mid-1980s took advantage of a domestic politico-economic crisis to ‘occupy the airwaves’ (Papathanassopoulos, 2011; Psychogiopoulou, Kandyla and Anagnostou, 2012; Skamnakis, 2006). Successive governments revealed inertia in concluding the licensing process, which they generally delayed in order to keep the media hostage to political influence (Katsirea, 2017) in the hope of positive coverage. The end result was an overcrowded commercial audiovisual media market, in which several media outlets were preserved so their owners could exert pressure on the political arena, often for the benefit of other business interests.

<sup>35</sup> We would like to thank Prof. Stylianos Papathanassopoulos, Department of Communication and Media Studies, National and Kapodistrian University of Athens for bringing these sources to our attention.

This over-crowded market persisted until 2010 when the financial crisis hit the sector. Over the period 2010-2017, there was a vast decline in advertising revenues across traditional media types as the budgets of both the private and public sectors shrank in Greece. Many newspaper titles, radio and TV channels ceased to operate as a result, while some ‘historic’ media groups went bankrupt (Karadimitriou, 2020; Papathanassopoulos, 2020). However, online advertising revenues seem to have increased over this same period (Papathanassopoulos, 2020), with several new digital native news media appearing in the market (Skamnakis, 2018).

Media concentration and media ownership structures are also quite well researched, at least as far as traditional media is concerned. Studies emphasize that the clientelistic relations that characterize the Greek media system have prevented the establishment of an effective framework for regulating media ownership, leading to a high degree of concentration in the national newspaper and television markets (Leandros, 2000; Leandros, 2010; Veneti and Karadimitriou, 2013). The economic crisis is shown to have affected media ownership structures, as some leading media outlets ceased operation or changed hands and some new, mainly digital, media entered the market (Papathanassopoulos, 2020). However, the extent to which the crisis has affected media concentration patterns has not been explicitly addressed in the literature.

### 3.2. Public service media

Research on public service media has focused mainly on independence-related questions. Here again, relevant studies tend to adopt a longer-term perspective and a media-systems approach, acknowledging that the transition to the dual broadcasting system was not accompanied by changes that could have enabled the Greek public service broadcaster, ERT, to function independently (Papathanassopoulos, 2010; Psychogiopoulou and Kandyla, 2013). It is noted that, despite successive efforts to restructure ERT, governments have been unwilling to release it from their control: the responsibility for appointing ERT’s managing board has always rested with the government, while changes of government, even with the same political party in power, have always been accompanied by changes in the composition of the board (Iosifidis and Papathanassopoulos, 2019; Papathanassopoulos, 2014; Psychogiopoulou and Kandyla, 2021). The government’s abrupt decision to shut down ERT in June 2013 has also been addressed in the literature (Fouskas, 2013; Fraszczyk, 2015; Iosifidis and Katsirea, 2014; Papadopoulou and Gazi 2021).<sup>36</sup>

### 3.3. Production conditions

Production conditions have gained attention in scholarly research over the last decade. For instance, scholars have examined multiplatform journalism and the impact of digital resources. Studies on the use and impact of algorithms and audience metrics find that online news media outlets have embraced the use of search engine optimization techniques and that journalists often resort to web analytics to gain insights into the online visibility of their stories (Giomelakis and Veglis, 2020; Giomelakis *et al.*, 2019). At the same time, however, data-traffic-driven news decisions are perceived as an emerging problem in so far as they change the way editors select and create news content (Giomelakis *et al.*, 2019). The potential of investigative journalism has also gained salience in recent years in connection with the emergence of ‘alternative’ media outlets set up by networks of journalists and other media professionals during the crisis (Boucas and Iosifidis, 2020; Papadopoulou, 2020; Siapera and Papadopoulou, 2016; Siapera, Papadopoulou and Archontakis, 2015; Touri *et al.*, 2016). These media - most of which are digital-native - vow to abide by the principle that journalism should be critical and practiced inde-

<sup>36</sup> Both Prof. Papathanassopoulos and Assistant Prof. Papadopoulou noted that the closure of ERT is a research area that should be further explored.

pendent of ownership. They prioritize giving voice to the marginalized and offering an alternative to mainstream media narratives (Aslan-Ogzul and Veneti, 2021).

### 3.4. Working conditions

#### 3.4.1. Employment conditions

Employment conditions have attracted quite some attention because of the financial crisis. Related studies rely on available statistics, interviews with journalists or both. They point at the mass redundancies that took place during this period, sending the unemployment rate for journalists rocketing to 50% in 2017 (Skamnakis, 2018: 12). At the same time, those journalists that managed to keep their jobs had to accept pay cuts and irregular payments (Skamnakis, 2018: 12; Papathanassopoulos, 2020: 133-134). Short-term contracts and the use of freelancers have become much of a norm (Papathanassopoulos *et al.*, 2021: 219). The crisis is also credited for increasing job insecurity and making journalists more vulnerable to ownership interventions, thereby limiting journalistic autonomy (Iordanidou *et al.*, 2020).

#### 3.4.2. Intra-organizational diversity

Research on intra-organizational diversity is very much lacking. There are, nonetheless, a couple of studies addressing gender-related aspects. Studying the professional situation of women journalists, Kyriazi *et al.* (2008), for instance, note the existence of a “glass ceiling” in Greek journalism. More recently, the Media for Democracy Monitor report for Greece finds that inequalities in salary and promotion do exist, but they tend not to be acknowledged as such by management (Papathanassopoulos *et al.*, 2021: 188, 195). This then translates to the absence of measures to support gender diversity in the newsroom and ensure pay equality and equal access to senior positions. Some data on gender diversity in PSM and leading news media is also collected by the MPM (see, for instance, Psychogiopoulou and Kandyla, 2021).

#### 3.4.3. Journalists’ competences, education and training

Issues related to journalists’ competences, education and training have been explored to some extent. As regards journalism education, for instance, there are studies which narrate the development of journalism education in universities in the early 1990s (Siomos, 2009; Skamnakis, 2012). Digital literacy and the ability of professional journalists and journalism students to use information and communication technologies (ICT) are also examined (Spyridou *et al.*, 2013; Veglis, 2013; Veglis and Pomportsis, 2014). Still, data sources for assessing journalists’ competences are quite limited. With the exception of the Worlds of Journalism Study (Dimitrakopoulou, 2017), data on the competences of professional journalists in Greece has not been systematically collected.

#### 3.4.4. Professional culture and role perceptions

Research into aspects of professional culture and role perceptions has developed over the last twenty years. Relevant studies tend to tap the issue from either a systemic- or individual-level perspective. Systemic-level approaches generally adopt a more historical approach, discussing how the instrumentalization that characterizes the Greek media system has impacted on the development of a culture of journalistic professionalism (Hallin and Papathanassopoulos, 2002; Skamnakis, 2006; Papathanassopoulos, 2011; 2001). Studies focusing on the individual level qualitatively investigate journalists’ role perceptions and how these are changing in response to the networked, new media environment and in the context of the austerity that accompanied the financial crisis (Karadimitriou, 2020; Siapera, Papadopoulou and Archontakis, 2015; Touri *et al.*, 2016). Their findings suggest that Greek journalism is experiencing some sort of an ‘identity crisis’, with journalists recognizing that a change of paradigm is needed.

## 4. Publications, data sources and main monitoring actors of media usage patterns

Sources identifying the domain of media usage in Greece are mainly sources based on quantitative data. Commercial research entities mostly collect survey data on different aspects concerning media usage on a regular basis. Relevant data is disclosed to the media which occasionally highlight and report on key trends. Data is also collected by public authorities, the statistical bodies and the media regulator. Academic research on media usage has been lately expanding. We identified nine (9) research publications dealing with aspects of media usage in Greece, most of which were published in the late 2010s. An important part of relevant research stems from foreign research institutes with Greek scholars affiliated to them.

### 4.1. Access to media and diversity of viewpoints in the media system

Concerning access to media, Greece lacks a comprehensive media usage study that is conducted regularly and covers all the different media segments. Audience and readership data is mostly compiled by market research bodies. With regard to digital media metrics, no single agency covers the entire field. The *Reuters Institute Digital News Report (DNR)* offers data on issues such as news media consumption, the reach of top brand offline/online news content, and Internet penetration. Digital economy statistics are also provided by Eurostat, the Hellenic Statistical Authority, and the National Centre for Social Research (NCSR) - the latter for the purposes of the *World Internet Project*. NCSR data also provides information on the key characteristics of Greek Internet users and avoiders (Tsekeris *et al.*, 2020).

Drawing on data from its registry, the NCRT sheds light on media diversity by providing data on the number of operational TV (national and regional) and radio undertakings, pay-TV providers, broadband content operators, etc. through its annual activity reports. Data on newspapers is gathered by the Registry of the Regional and Local Press, which is maintained by the General Secretariat of Information and Communication along with a Registry of Online News Media. ERT supports structural plurality by offering services on different media platforms (TV, radio, online), and its digital presence has grown significantly in the past years (Reuters Institute, 2021). Media diversity data is also collected by the MPM. Social inclusiveness data - in particular with reference to media access for women, people with disabilities and others - attests to the difficulties encountered in addressing stereotypes and implementing equality policies in the Greek news media (Psychogiopoulou and Kandyla, 2021). The NCRT also gathers statistical information regarding the time allocated to political parties and candidates in news reports and other news programmes during elections by national broadcasters.

### 4.2. Relevance of news media

Regarding the relevance of news media, a broad range of data is provided by Eurobarometer. Studies on how Greeks navigate the news testify to high rates of alternative digital news consumption (Karogeropoulos, Rori, Dimitrakopoulou, 2021). Online news users appear to embrace digital-born outlets and social media for news at significantly higher rates than online news users in other Western democracies. Scholars have also shown a keen interest in young people's media use (Demertzis and Armenakis, 2000; Spyridou and Veglis, 2008). The evidence here suggests that the Internet is the medium which attracts young people to news most successfully. As for studies relating to active news avoidance, these show that both individual (demographics, political attitudes and news genre preferences) and contextual factors (press freedom and political freedom and stability) matter (Toff and Kalogeropoulos, 2020).

### 4.3. Trust in the media

Concerning trust in news media, the DNR data depicts high levels of media distrust (Reuters Institute, 2021). Eurobarometer data (2021), Pew Research Center data (2018) and EBU data (EBU, 2020) confirm the trend. Research findings show that alternative news consumption is associated with lower levels of trust in news (Kalogeropoulos *et al.*, 2019; Kalogeropoulos, Rori and Dimitrakopoulou, 2021).

## 5. Publications, data sources and main monitoring actors of media related competences

Relevant sources for the domain of media related competences mainly address aspects of media literacy. The most important primary sources include policy documents produced by EU institutions as these have a profound influence in shaping the domestic media literacy policy discourse and developments. The main domestic actors in the field are the General Secretariat of Communication and Information, with the National Centre of Audiovisual Media and Communication (EKOME) under its auspices, as well as the Ministry of Digital Governance. Responsibility for media literacy education in formal schooling and teacher training is assigned to the Ministry of Education. Data and research on media literacy and the competences of media users at the national level is limited. Our bibliographical database includes fourteen (14) publications, most of which are research reports conducted within the framework of EU-funded projects.

### 5.1. Normative sources

The importance of users' competences in today's networked digital media environment is increasingly being recognized in both the communication and education studies literature. The extant research is mainly focused on media literacy and media education. A number of studies have reviewed the state of media/digital literacy and media education policies, most of them conducted within the framework of EU-funded projects and European research and policy networks (Andriopoulou, Papadimitriou and Kourti, 2014; European Audiovisual Observatory, 2016; Papadimitriou, 2015; Voros, 2015). The analyses note that media literacy was added to the policy agenda in the early 2000s, partly in response to EU-level policy developments in the field. Yet, it is noted, Greece still lacks a concrete public policy on media literacy. As regards media literacy in formal education, studies point out that it has developed as a cross-curricular, interdisciplinary subject that is not fully integrated into the compulsory education curriculum.

### 5.2. Assessment of media related competences among citizens

Apart from the above, research on users' competences is highly fragmented, comprising some studies of students' and school teachers' attitudes towards media education (Diamantaki *et al.*, 2001; Marantos, 2001) and evaluations of the implementation of specific media literacy initiatives and training activities (Nika and Davou, 2008; Papadimitriou, 2015a, 2015b; Papadimitriou and Sofos, 2019). As such, the research basis for an analysis of risks affecting and opportunities for deliberative communication with respect to the competences of media users is quite limited. Further, data that taps into relevant aspects is not regularly collected at the national level; indeed, it is international and European sources that collect most of the data on users' competences in Greece (e.g. Eurobarometer, Eurostat and PISA surveys).

## 6. Analysis of Research and Monitoring Capabilities and Quality

Research and data sources for the analysis of risks affecting, and opportunities for, deliberative in Greece display significant differences across the four domains under study. The following sections discuss the degree of attention given to distinct research areas, the implications of research gaps for knowledge imbalances and the capacity in each domain examined to monitor risks affecting and opportunities for deliberative communication in Greece.

### 6.1. Comparative analytical overview of data processing capabilities

In the legal domain, academic research is well advanced and covers a broad array of relevant areas. In contrast, research on media ethics is not particularly well developed, which can be attributed inter alia to the lack of conventional accountability instruments in Greece. In the domain of journalism, academic research is well-established and expanding, but journalism-related data and statistics are scarce and often not accessible to the public when available. In the domain of media usage, academic research is insufficiently institutionalized and data collection is dispersed across commercial research bodies. The domain of media-related competences is the least developed in terms of the research and data available. Whilst issues concerning the competences of both professional journalists and media users have been receiving increasing scholarly attention, empirical data is still limited. On the positive side, at the European level especially, an increasing number of researchers are accessing collaborative research settings across all four domains examined.

The fact that the breadth of data collection and research is different across the four domains under review entails significant knowledge gaps in certain domains. Knowledge imbalances are combined with a broad range of actors engaging in fragmented data collection and the absence, overall, of a longitudinal approach: longer or shorter periods of time may be covered, depending on the interests of the researchers and bodies involved. Relevant factors, coupled with the fact that research and data collection is rarely framed as research and data collection specifically on risks affecting and opportunities for deliberative communication, make the processing of the data and information gathered challenging and ultimately, unequal across the four domains under study.

### 6.2. Monitoring capabilities and the quality of data and knowledge

In light of the considerable differences characterising research and data sources across the four domains under study, the following section assesses the capacity in each domain to monitor risks affecting and opportunities for deliberative communication in Greece by focusing on the following dimensions: a) the availability of data, b) the recency and continuity of data, c) the complexity of data-gathering, d) trustworthiness of the data, and e) the availability of experts and/or specific research structures.

#### *Law and Ethics*

The legal literature suggests that most of the areas germane to the identification of risks affecting and opportunities for deliberative communication receive thorough consideration. At the same time, databases held by various institutions and bodies (i.e. parliament, lawyers' associations, courts, private undertakings, etc.) offer a wealth of information on national laws and jurisprudence. As for information on the decision-making practices of independent authorities which are relevant to the field, this is provided by the Diavgeia portal and the authorities' websites. Access to amendments to existing laws can still be subject to a fee, whilst disclosure of the

text of court decisions (mostly the rulings of supreme courts and those rulings by lower courts which are of particular legal interest) tends to be offered on subscription.

Important interventions in the field of media law, in terms of legislation enacted, case law, and the decision-making practice of independent authorities, are regularly reviewed in specialized journals including *Law of Technology and Communication (Dikaio Technologias and Epikoinwnias, DITE*; formerly *Dikaio Meswn Enimerwsis kai Epikoinwnias, DiMEE*). The latter brings prominent scholars and experts together on its scientific and editorial board.<sup>37</sup> Indeed, the presence of experts in media law is strong and has been increasing in recent years. This is not only due to the impact of new technologies and digitalization, which has diversified scholarship and expertise; it is also due to increased participation in international and EU-funded research projects. Moreover, various university faculties, alongside the law faculties at the National and Kapodistrian University of Athens, the Aristotle University of Thessaloniki, and the Democritus University of Thrace, offer undergraduate and postgraduate courses in media law, information law, communication technologies, and human rights, thus helping to create well-qualified experts. It should be noted, nonetheless, that research in the field, though reliable and trustworthy, is not conducted through the lens of risks affecting and opportunities for deliberative communication. It mostly takes place within an analytical framework that is focused on fundamental rights, media regulation, and the values and objectives that underpin it.

Unlike legal regulation, research into the ethical regulation of the media is far less developed. While the scant scholarly attention certainly reflects the weak institutionalization and limited development of media self-regulation in Greece, existing studies do provide insights into the emergence, structure and performance of professional accountability instruments which can be used to evaluate risks in this domain. Still, the availability of data relevant for assessing and monitoring the field is quite heterogeneous. As journalists' unions are regionally organized, information on the ethics cases handled by each is scattered and not readily available. In fact, the Union of Journalists of the Athens Daily Newspapers is the only body that maintains, through its website, a section dedicated to those cases in which breaches of the Ethics Code are dealt with by its disciplinary councils. Broadcasters' breaches of the Code of Conduct for News and Other Political Programmes are examined by the NCRT, and comprehensive summaries of the cases are published on the authority's website and in its annual reports.

### *Journalism*

Overall, academic research in the sphere of journalism is well developed in Greece. Much of it is conducted in four university departments: the Department of Communication, Media and Culture at the Panteion University, the first of its kind in Greece; the School of Journalism and Mass Communication at the Aristotle University of Thessaloniki; the Department of Communication and Media Studies at the National and Kapodistrian University of Athens; and the newest, the Department of Communication and Digital Media at the University of Western Macedonia. The University of Athens hosted *Zitimata Epikoinwnias*, the only academic journal specifically focused on communication and journalism, though it ceased publication in 2015. A notable trend can be identified in the growing importance of international journals for the publication of relevant research; this attests to the high quality of the research in this field.

Whereas the extant research is not conducted from the perspective of risks affecting and opportunities for deliberative communication, it does cover several aspects that are important for this perspective. Research into the market conditions of journalism has been relatively extensive, with studies offering insights into the consequences of the interplay between media and politics, the financial crisis and digitalization. Public service media and their independence from the government of the day is also quite extensively covered. Studies regarding the production con-

<sup>37</sup> <http://www.nbonline.gr/journals/8>.

ditions for journalism are also available, focusing primarily on the impact of algorithms and audience metrics. There is quite some academic research on journalists' working conditions, although it is fragmented and does not cover all relevant issues. For instance, the issue of organizational diversity in terms of the socio-cultural diversity among the staff in journalistic organizations has not entered the academic discussion around journalism in Greece yet. Nevertheless, a growing number of media research conducted by doctoral candidates might be the future of research on organizational diversity in Greece.<sup>38</sup>

Despite the lively academic interest in journalism, the data available for assessing risks and opportunities in this field remains piecemeal. Official media market statistics are lacking. Most market data (such as, for instance, audience and advertising figures) is collected by private market research companies and thus comes with a fee; in addition, this data almost exclusively covers national media. The NCRT and the General Secretariat of Information and Communication collect and publish information on the ownership structures of broadcast and print media respectively. Data relating to digital-native media are collected by the General Secretariat, but are not made publicly available. Official figures on the number, profile and employment types/titles of journalists in Greece do not exist, and there is an absence of large-scale comprehensive surveys with journalists. The limited availability of data inevitably weakens the potential for monitoring developments in the field of journalism.

### *Media Usage*

Two distinct research components can be identified in this domain: applied audience research and academic media usage research. Applied audience research is mostly in the hands of market research companies and private undertakings. Both address distinct media markets, with traditional media markets generally well-covered; however, different methodologies are applied, which creates difficulties for cross-media analysis. More broadly, Greece lacks the sort of long-term, all-embracing database that would enable an analysis of the *longue durée* and sensible comparisons across media sectors. The absence of media usage-related tasks entrusted to bodies such as the NCRT or the public service broadcaster, ERT, compound this problem.

Academic media usage research cannot rectify the absence of a common dataset, as it is fragmented and scattered across domestic and foreign universities. Any monitoring potential in the domain of media usage in Greece can thus only be haphazard and disjointed. Individual university departments and research centres in the country may conduct research into aspects of media usage, but this mostly originates in personal interest and relies on data from other sources. Some international and EU-funded projects shed light on particular dimensions of media usage but, because of their thematic focus and chosen methodologies, they do not facilitate the identification of broader trends as regards the co-existence, reach and appeal of traditional and digital media. The upsurge in the latter has brought new research directions to the table, with scholars increasingly embracing digital-native outlets, social media and alternative news consumption in their work.

### *Media-related Competences*

Research and data-availability limitations are particularly pronounced when it comes to the competences of media users. Certainly, research into media literacy and education policies is considerable and includes a comparative perspective, and Greek experts from the field of communication and education are embedded in relevant European networks. At the same time European surveys (such as Eurobarometer and PISA) do collect some relevant data for Greece. Yet, the gradual institutionalization of media literacy has not been accompanied by any significant effort to map or assess the levels of media user competences in Greece.

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<sup>38</sup> We would like to thank Prof. Papathanassopoulos for this point.

## 7. Conclusion

The heterogeneity of the research and data sources available in the domains under review undermines the potential for monitoring and assessing with equal rigour the risks affecting, and opportunities for, deliberative communication across the four. Contextual factors pertaining to the conducting and funding of research play an important role here. Domestic channels for funding research are limited and therefore unable to address the exigencies of what has become an extremely rich media and communications research agenda. Empirical data sources, on the other hand, provide only a partial picture, because there is no comprehensive and cohesive approach to data collection across public and private bodies. Our study underscores the need both to work towards more institutionalized and adequately-supported research structures, and to strengthen and systematize data collection efforts in areas as diverse as the media market, media usage, journalism demographics, journalists' working conditions and their competences, and media ethics on the ground. Ensuring the sustainability of research and data collection processes can also support continuity in analysis, and thus a more robust assessment which could make a meaningful contribution to evidence-based domestic media policy-making.

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## List of expert interviews

Telephone interview with Dr. Sofia Papadimitriou, Head of Educational Radiotelevision and Digital Media, Ministry of Education and Religious Affairs; Tutor - Counselor, Hellenic Open University. 26 October 2022.

Skype Interview with Lambrini Papadopoulou, Assistant Professor, Department of Communication and Media Studies, National and Kapodistrian University of Athens. 27 October 2022.

Telephone Interview with Christina Akrivopoulou, Doctor in Constitutional Law (Aristotle University of Thessaloniki). 2 November 2022.

