Recommendations
for media governance

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Europe's media policy in the 21st century has been largely reactive. Directives and regulations have been used to respond to the decline in the freedom of expression of journalists, whistle-blowers, and rights defenders from abusive litigation to the increasing security risks posed by the information war and to the increasing perils of journalists' work. This reactive media policy has been inevitable, as changes and crises (pandemics and wars) as well as the polarisation of societies and the spread of populism have created risks for democracy that need to be responded to as quickly and efficiently as possible.

However, building on the results of the Mediadelcom research, we propose that proactive media governance would frame the reactive media policies that inevitably accompany the crisis. A proactive media governance requires the establishment of a media monitoring system in the Member States to detect emerging risks and to continuously analyse the resilience of society's communication culture.

The Mediadelcom approach for media governance recommendations is based on five pillars.

1. The concept of deliberative communication could serve as the normative basis for media governance. In simple terms, the purpose of deliberative communication is to enable citizens to make informed decisions based on reliable and reasoned information. The strength of the concept is that it supports evidence-based argumentation, dialogue and equal debate between the many stakeholders in society. In the context of social acceleration, it is important to reduce the pace of decision-making through slower and more inclusive communication.

2. Evidence-based media policy should be further developed into wisdom-based media governance, which relies on the systematic collection, analysis and application of knowledge to withstand the risks for any mediascape, and to create favourable conditions for the development of deliberative democracy. Wisdom is the result of the cooperation of many agents (journalists, media organisations, academics, NGOs, research and media policy makers). This will require either the creation of institutions to coordinate media monitoring or adding to existing institutions an obligation to coordinate the consistent and periodical collection, evaluation and use of relevant knowledge.

3. The EU media policy regulations are based on common values, but to efficiently implement them it is vital to pay more **attention to the specific realities of each member state.** It should be made explicit: (i) Which groups of agents are key players concerning certain risks (e.g. increasing power of media moguls diminish public service function of news media); (ii) where the cooperation between the agents supports deliberation; (iii) where this cooperation needs to be motivated and how. While the EU has made efforts to fund various comparative media monitoring projects (Media Pluralism Monitor; EuroMO etc.) that help to understand national differences, Member States should also be motivated to contribute to the capability of monitoring mediascapes.

4. In the context of information overload and the widespread dissemination of propaganda and disinformation, media literacy competences of both the creators of news media content (journalists) and the users of the media have become the key issues. Citizens' awareness about the importance of independent and reliable media is also critical. While the issue of media literacy for both journalists and citizens has been recognised at the EU directives' level, the initiatives at

the Member States level are rather fragmented and need a profound and properly funded re-form of the whole education system.

5. The role of **public service media** has become increasingly important in the creation of inde-pendent, accountable, high quality, diverse and reliable news content.

A description of the problems addressed

The following problems are presented to varying degrees in the drafted risk profiles of Medi-adelcom countries. It is important to underline that the frequency of occurrence and the sources of the problems vary from country to country. The differences are described in the third part of this document.

1. In the 21st century, press freedom and freedom of expression appear to be under increasing pressure. In recent years, the EU directives and various recommendations from the European Commission have proposed various solutions. However, Mediadelcom's country reports show that very little research has been done on the day-to-day implementation of regulations and its impact in the most problematic countries.

2. The judiciary has not adapted to handling SLAPP cases, and abusive lawsuits have become a serious constraint on the freedom of expression, increasing the risks of self-censorship by jour-nalists. The Recommendation in April 2022 to protect journalists and rights defenders from abusive litigation (SLAPP) foresees several measures to fight against SLAPP: early identification of SLAPP cases; further education of lawyers and journalists; as well as the collection of infor-mation on SLAPP cases. However, Mediadelcom's reports show that there does not yet exist a good practice for collecting and analysing SLAPP cases.

3. Access to public information is not sufficiently guaranteed, at the level of implementation, which reduces transparency in society and makes the work of investigative journalists more difficult (except for Sweden, Austria, and Germany among the 14 Mediadelcom consortium countries).

4. The independence of legacy media has declined in those European countries where local media magnates control editorial offices (e.g., Hungary, Poland, Czechia, Bulgaria, Romania, Italy), and therefore public trust in legacy media is also declining.

5. Ownership and editorial selection mechanisms are not sufficiently transparent to allow the public to trust media outlets (the review of the actual situation is available on the website of the EuroMo project).

6. Financing of outlets, including either or both state and public money advertising, is opaque and does not allow the public to see the mechanisms of economic influence on editorial policy and staff (e.g., Bulgaria, Hungary, Romania).

7. The individual autonomy and job security of journalists is under increasing pressure, despite the adoption of the document "Commission Recommendation ensuring the protection, safety and empowerment of journalists and other media professionals in the European Union" (16.9.2021) by the European Commission. The problem is that in many EU member states, no systematic data on the working conditions of journalists and on their job security have been collected, which means that the actual implementation of the recommended measures may not be effective or not happening.

8. Accountability instruments for journalists and media organisations either do not exist or are of limited effectiveness in most consortium countries; no international media accountability instruments exist.

9. The increasing information overload, information warfare and polarisation of societies demand higher standards from professional journalists and media workers. However, in most European countries with some exceptions (e.g., Sweden, Austria, Germany, Estonia, Latvia) there are insufficient incentive mechanisms to ensure that journalists with high qualifications and ethical standards are in the majority among those hired in the media sector.

10. The independence of the public service media lacks adequate legal and economic guarantees.

11. Despite media literacy promotion actions, in many countries (except e.g., Sweden, Estonia) people's media competence (digital media literacy, digital literacy, critical media use) is uneven or low and are not a matter of permanent and consistent monitoring.

12. The collection and ownership of media usage data is concentrated in most countries in the private sector (media organisations and private companies conduct media usage surveys). The public has no access to media usage data. Comparative studies carried out at EU level mitigate this gap, but do not cover all the EU Member States.

13. At the nation-states level, longitudinal and large-scale media studies that would allow researchers to make evidence-based conclusions about: changes in the sustainability of news journalism; audience media consumption; awareness of journalism and communication ethics; editorial independence and ownership; journalists' autonomy and working conditions; journalists' qualifications and pay conditions, and job security, are very scarce, especially in smaller countries. There is also a lack of long-term, large-scale studies on the media competences of different socio-economic groups (except children and young people).

14. The number of media studies has steadily increased in the 21st century, but the results are fragmented and poorly correlated. The proportion of longitudinal studies has declined because of project-based research funding. Short-term and project-based studies predominate, which do not allow for an assessment of trends and risks related to news media and news media use. The smaller the Member State, the more important the knowledge on the state of the media in the country is gathered through EU research projects. Comparative studies of high methodological quality are of great benefit to both the national and EU level. However, participation in EU projects demand well-qualified research staff. Concurrently the national research governance loses its role in setting the research agenda.

15. In the context of social acceleration, the discussion and use of the high number of research results has become problematic. Encouraging researchers to disseminate research findings is insufficient, as policy-makers and media organisations lack sufficient motivation to use and synthesise data-driven knowledge for policy-making.

Statements on why the current policy needs to be changed and recommendations for action

One of the starting points of the Mediadelcom's policy recommendations is that more attention needs to be paid to the conditions under which different regulations are implemented. This in turn means asking how the regulations in each country need to be changed to motivate key players to act differently from now. Which agents have had too much or too little influence so far?

For some problems, it is specifically demonstrated that there is not enough reliable knowledge to solve a problem, so policy design must start with a more detailed examination of the problems.

1. The Mediadelcom project recommends adopting a deliberative communication approach as a long-term and proactive measure against risks concerning deliberative communication. This will make it possible to define more precisely both the objectives of communication education, the content of media literacy and the balance between the rights and freedoms in media regulation.

2. Freedom of the press and freedom of expression have always been valued and protected in the EU public policy through the European corpus of legal norms, national states' Constitutions and ECtHR case law. However, legal protection has not been sufficient for all EU Member States. In the countries where freedom of expression is most at risk, empirical research on the implementation of the laws is missing or insufficient. It is important to make a distinction between editorial independence and journalists' autonomy and freedom in policy-making. Freedom of the press is primarily protected through editorial independence. This means that the editor-in-chief and the editorial board have a high degree of legitimacy to set the editorial line. Editorial freedom would support deliberative communication and pluralism if the appointments of editors-in-chief were transparent and their independence from the business or political elites of the owners would be guaranteed. In several countries (e.g., Poland, Czechia, Bulgaria, Hungary, Italy, Romania), the dependence of the editorial staff on the owners and politicians has increased, which indicates that journalists' job security should be better protected.

3. Recommendation (EU) 2022/758 on protecting journalists and human rights defenders from unfounded or abusive court proceedings was adopted in 2022 and the impact is not yet clear. The Mediadelcom reports show the lack of adaptation of courts and judges to this new type of problem. In addition to the need to improve the training of judges and lawyers outlined in the EU recommendations, we add the suggestion that the Member States should set up independent commissions in the courts of the first instance to give a preliminary assessment of the actions based on someone's critical speech in the public media. The preliminary assessment would not be binding for the court and should be available to the public. This would allow both judges and the public to better balance the protection of individual rights and freedom of expression, as well as to raise awareness concerning SLAPP cases and better to collect cases of SLAPP.

4. Freedom Of Information regulations have not been updated at the EU level. Since the adoption of the GDPR, the balance between access to information and the protection of confidential information at the level of implementation has been biased towards the protection of confidentiality in several countries (e.g., Estonia, Latvia, Bulgaria, Romania, Italy, Croatia, Hungary). Organisations and officials have a higher incentive to declare information confidential than to make it available. The problem is complicated by the obligation to publicise information varies from sector to sector. A free and easy way for journalists to challenge the confidentiality of information should be installed.

5. The Media Freedom Act is supposed to reduce the influence of owners, but in a liberal market economy, the commercial and political interests of owners and managers of media organisations are firmly protected. This protection is reinforced by polarised and fragmented audiences in terms of media consumption. The independence of the public service media and the quality of their content should be safeguarded as a counterweight to market pressures.

6. The EU's ownership transparency policy has been consistent, in particular as regards presenting the situation (the EuroMo project, covering all 27 Member States). The results of the project give an indication that current legislation varies across the EU Member States. Increased transparency of both the ownership and the appointment of managers of media outlets is likely to occur at the expense of market liberalism.

7. To regulate transparency in national advertising, it is necessary to examine existing practices in depth and to ensure that both advertisers and media organisations follow transparency in practice.

8. The European Commission's 2021 Recommendations contain a wide range of safeguards for journalists. In contrast to ownership transparency studies, policy making in this area should start with the creation of a systematic and reliable methodological database. The policy recommendation is to oblige the Member States to first analyse working conditions and professional autonomy guarantees for journalists using a high quality and reliable methodology. The recommendation of Mediadelcom is to set up a comparative monitoring project such as EuroMO. Based on this data, it will be possible to assess whether and to what extent the Member States have implemented the assistance requirements laid down in the 2021 Recommendations, and what proportion of the journalist population needs which kinds of protection.

9. Accountability promotions carried out over the 20th century have only yielded results in the countries where the quality of democracy and the culture of news journalism are high (e.g. Sweden, Germany, Austria, Estonia). A practical solution to accountability issues could be wisdom-based media governance in the EU Member States. It is important that media educators, journalists, representatives of media organisations and NGOs cooperate. In addition to a system of accountability for journalism, public awareness of general communication ethics needs to be raised.

10. The journalistic profession has traditionally been an 'open profession'. However, the Mediadelcom country reports point to low or very uneven competence of journalists (e.g., Italy, Bulgaria, Romania, Czechia, Slovakia) as a major risk factor, while in other countries good education and competences are a risk-reducing factor (e.g. Sweden, Austria, Germany, Estonia, Latvia). The problem of insufficient competence could be solved by developing a system of professional standards and assessment of portfolio for journalists working in public service media and offering protected employment contracts for a certain period for the best journalists. Working conditions of journalists in the public media could be comparable to the academic freedom and assessment of portfolios in public universities. Professional standards for journalists working in public service media organisations could be developed in cooperation with international organisations (e.g., EJTA, IFJ etc.). The policy recommendation is to encourage the relevant organisations to address the issue of motivation of upgrading the competence of journalists.

11. The independence of the public service media should be guaranteed legally, fiancially and at the level of governance and transparent recruitment practices (see p. 9). In this respect, the political will of the EU Member States, especially in countries at risk, is low. Therefore, a policy recommendation should intervene at the level of an EU directive. As a counterbalance to guaranteed independence, public service media should be open to constructive criticism from a range of societal groups.

12. The development of digital competences is strongly emphasised in EU policies (e.g., European Commission, the European Parliament, the European Economic and Social Committee; Communication on a European Skills Agenda for sustainable competitiveness, social fairness and resilience). The policy recommendation is to continue with the current activities in the direction of media literacy promotion, but to pay more attention to media use and the risks it entails, not only for children and young people, but also for citizens of older age groups. To improve media literacy in a more comprehensive way, it is necessary to introduce modern didactics of critical media use in teacher education and to motivate various NGOs, universities and media organisations to cooperate continuously in this direction. In addition to the fact that many stakeholders are involved in promoting media education, it is also split across academic disciplines. The

result is uncoordinated action, the effectiveness of which cannot be monitored. To coordinate such cooperation, it is necessary to establish a centre for this specific purpose.

13. Organise and fund longitudinal studies mapping people's media repertoires; this involves all 27 Member States in the Reuters Institute of digital news report study; motivate the private sector to release media usage data to the public.

14. There is a need to ensure that longitudinal research in areas relevant to the media is sustainable. Funding models based on short-term projects do not guarantee this. Our policy recommendation is to agree on the agenda, methodology and reports of long-term baseline media research between researchers, journalists, NGOs and policy makers at the national level. These agreements should avoid the duplication of research at the EU level. Reducing the research agenda that is driven by the individual interests of researchers would enforce the research that society needs.

15. Change the incentive system for media researchers and research teams so that they are motivated to publish less original research but to critically reflect more on existing findings.

16. For the development of wisdom-based media policy, we recommend bi-annual risks and opportunities reports, published in national languages as well as in English. The experience and tradition of such reports exists at the EU level. The primary aim of the reports is to analyse the potential and realised risks hindering deliberative communication. The production of the report should be led by an independent organisation providing public media service (following the good practice in Austria), which should also aim to coordinate the activities of the stakeholders for the benefit of the report. The second aim is to raise public awareness and the critical capacity for analysing the information environment. The third aim is to reduce the marginalisation of media research in comparison with other disciplines.

In sum, the mediascapes and the technologies that animate them have a hugh dynamic of changes. Responses to their shortcoming or adverse effects on human rights have been always reactive and delayed, especially in the context of legal solutions. MEDIADELCOM recommends the stimulation of a forward thinking approach and the use of foresight strategy (identification of possible future development scenarios based on the risk and opportunities analysis and the possible actions for the desired future(s)). National and EU level groups of experts representing all the stakeholders should be involved in this exercise.

Specific context of countries

One of the findings of the Mediadelcom comparison of 14 countries is that although the risks are universal in nature, the reasons of their emergence, the extent to which they occur and the ways in which they can be mitigated vary. In other words, each country has its own specific risk causality chain and its own specific opportunities.

Thus, policy recommendations need to consider, in particular, the combination of risks and opportunities in a given country. Therefore, we next present the 14 Mediadelcom participant country's RO configurations and policy recommendations.

Austria	**8**
Bulgaria	**11**
Croatia	**18**
Czechia	**24**
Estonia	**28**
Germany	**33**
Greece	**37**
Hungary	**40**
Italy	**46**
Latvia	**62**
Poland	**69**
Romania	**72**
Slovakia	**77**
Sweden	**82**

AUSTRIA

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Austria among other countries: fsQCA calibrated values of the outcome and conditions in the study

Austria belongs to a set of European countries that display basic characteristics of deliberative communication, although the indicators in Mediadelcom's fuzzy-set qualitative comparative analysis are much lower than in most democratic-corporatist media systems (such as Germany and Sweden). In that regard, Austria rather resembles other small states in the Mediadelcom sample (e.g., Greece and Estonia).

According to the results of the fsQCA, several context factors support deliberative communication in Austria. These include: higher developed post-materialist values, a higher quality of democracy, a higher state of human development as well as economic development. Considering these contextual conditions, Austria bears similar traits as Germany and Sweden. On the other hand, unlike other countries in North-Western Europe, the Austrian case also shows that higher political and social polarisation are not necessarily a risk for deliberative communication in the context of high quality of democracy. The fsQCA also points to favorable conditions in the Austrian journalism sector to support deliberative communication (such as a large share of skilled journalists, a strong monitorial role of journalists, less attacks on journalists, autonomy of public service media, etc.).

At the same time, the Austrian country case studies highlight various factors that must be considered as a potential threat to deliberative communication. In the context of legal and ethical regulation, our research points out several shortcomings of the existing regulatory safeguards and deplores a lack of incentives for more media self-regulation. In the field of journalism, we note a recently increased political influence on the media, mainly through the arbitrary allocation of press funding, but also long-term trends of market concentration, leading to the insight that media plurality in Austria is under threat. Regarding media audiences, the country studies discuss the comparably late deregulation of the broadcasting sector and the impact of foreign media products as typical Austrian challenges. Like other countries, Austria is also confronted with the ongoing transformation from traditional mass media to social media and the resulting challenges in the area of media-related competencies.

Recognising ROs: CMM (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. Particularly in the domains of journalism and media usage, a large variety of empirical sources is available and research initiatives have reached a high degree of specialisation. In recent years, the complexity of different data collection procedures seems to be growing and

there is a discernible trend towards internationally comparative research settings, first and foremost in the field of journalism research. Unfortunately, data quality in the area of media usage is still marred by the interests of commercial research institutions and their continuing struggle to synchronise the established "currencies" for measuring audience reach in different media sectors. In the domain of legal regulation, the basis of available data also appears to be well advanced, although empirical research is underrepresented. By contrast, research on media ethics and media literacy is less differentiated – presumably a result of either weak institutionalisation or the typically interdisciplinary character of these (sub-)domains which makes it difficult to identify a clearly defined canon of literature.

Wisdom-based media governance: risks and opportunities

The Austrian country studies highlight a couple of good practices that can be described as examples of wisdom-based media governance. These include the continuous monitoring initiatives coordinated by the Public Value Competence Centre of the Austrian public service broadcaster ORF, the practice-oriented research and consulting activities by Medienhaus Wien, the public debates and research activities accompanying the re-establishment of the Austrian Press Council, and others. All of these examples include a variety of different agents (media practitioners, policy-makers, self-regulators, researchers, in some cases also members of the broad public) that intentionally cooperate to reach a joint aim.

However, our research also specifies several factors that regularly inhibit wisdom-based media governance. A general problem can be found in the increasing information fragmentation as a result of progressing specialisation in media research – for some research field we can even detect an over-production of research results. More specifically, our studies highlight the challenge that not all relevant research is available to the public (e.g., when it is owned by private companies or hidden behind the paywalls of commercial publishers). Despite the successful monitoring activities of specialised institutions and individual researchers, there is a lack of continuously collected and reliable official media statistics. Although internationalisation of research entails many opportunities, it can also create a problematic trend when it leads to the marginalisation of expert knowledge about the Austrian media system. A lack of comparable long-term studies in most of the relevant research fields makes it difficult to identify problematic change processes and turning points relevant for deliberative communication.

Agent oriented analysis

Despite the shortcomings of the Austrian CMM noted above, recent research and monitoring activities make it possible to indicate a number of potential risks for deliberative communication in all relevant domains: In the field of legal regulation, for example, we note a 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. In the context of media accountability, our analysis reveals a lack of incentives for more media self-regulation (i.e., co-regulation). In the journalism sector, notable threats relate to ongoing trends of increasing media market concentration and rising political influence on media and journalism. For media usage and media-related compe-

tencies, the 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

In reaction to the highlighted deficiencies of the Austrian CMM, several measures can help to foster problem-oriented research and monitoring initiatives, thereby increasing the potential to create public awareness for the issues at stake. These include:

- more public funding for national research activities in the field of media and communication, alongside international cooperative projects, e.g. by allocating a more substantial share of the state budget for supporting media to media research;
- in particular, increased public support for long-term monitoring projects to enable an observation of change processes in the national media landscape;
- a provision of reliable official media statistics, particularly in the field of media ownership data, and other key figures relevant for describing the Austrian news media infrastructures;
- a broader debate about scientific publication strategies and open access/open data concepts, with the aim of increasing the public visibility and accessibility of relevant knowledge.

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

- a realignment of public press funding in Austria, including the system of distributing public advertising to news media, with the aim of promoting 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;
- specific legislative actions to restrict concentration of the media market;
- promotion of digital literacy in the sense of deliberative communication by measures in the context of life-long learning, particularly for empowering media users to identify disinformation and other manipulative media contents.

BULGARIA

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Media research exists in Bulgaria prior to the introduction of academic education in journalism in 1952 at the St. Kliment Ochridski Sofia University.

Aiming to explain the comparative cross-country analysis of the four domains (legal environment, media accountability, journalism, and media usage) that have been posited in the MEDIADELCOM project to impact deliberative communication, the report of fsQCA focuses on the comparative analysis of the configurations of RO's factors. According to the calibration it was "found that weaker implementation of transparency of media ownership policies (as in Bulgaria, Czechia, Hungary, Poland and Slovakia), combination of weaker technological development and weaker media market (as in Bulgaria, Croatia, Hungary, Italy, Latvia, Poland, Romania and Slovakia), as well as weaker technological development and lower use of legacy media (as in Bulgaria, Hungary, Latvia, Poland, Romania and Slovakia) are sufficient conditions for a weaker deliberative communication".[1]

Explanation

In Bulgaria **critical junctures** in the media landscape during the research period (2000-2020) with regard to the four studied domains: legal and regulatory; journalism, media usage; and media related competences follow three strands: political, economic, and technological.

- **Politically**, the country had to face two challenges, which impacted directly the media and regulatory policies. Firstly, it had to deal with the transition from totalitarian (with limited sovereignty) to democratic type of political system (1989-2006). Secondly, since it has accessed the EU in 2007, it had to cope with the empowerment of a supranational union to directly exercise some of the powers and functions otherwise reserved to member states (i.e. again, with limited state sovereignty). Although the political systems of the former Eastern Bloc and the European Union are ideologically different, they approach the characteristics of their territorial conditioning in a similar way. Both formations are very close in their perception of the regional approach to development that will eventually happen in the future: in the first case - the utopia of the unrealized communist society, which collapsed, in the second - the motto of unity in diversity, which is experiencing already some signs of some cracking[2]. After all, both organizations have been constructed by nation-states, which are identified with the interpretation of their past. Generally, the Bulgarians were not asked in a referendum whether to join the Eastern Bloc, nor whether to access NATO and the European Union. Geopolitics dictated both these affiliations and their consequences – positive and negative.

- **Economically**, the country had to face also two challenges. Firstly, it had to deal with the transition from centralized, planned, predominantly with state ownership economy of the Eastern Bloc (with limited sovereignty) to market-place type of the economic system of the Europe-

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[1] Deliverable 3.1. Identifying Similar and Different Configurations of RO's Factors and Grouping the Countries Accordingly, p. 60.

[2] Raychev Andrey (2020). Midwifery of Socialism and the Reasons for Its Collapse. https://glasove.com/na-fokus/akusherstvoto-na-socializma-i-prichinite-za-negovoto-ruhvane

an Union (again, with limited state sovereignty). Secondly, prior to the accession to the European Union in 2007, in the process of democratization, Bulgaria looked with great expectations to the practices of the more advanced countries. But along with the positive vibes came a 'rude awakening'[3] with a number of unfamiliar challenges. For example, the newly formed media market in the country rejected the monopolization of the state and gained encouraging developments as a result of technological and economic globalization. The foreign experience was positive in several directions, such as the enhancement of pluralism, increased attention to applying professional standards, introducing new business models, diversification of the media milieu, etc. At the same time, however, the first licences were issued to foreign radio stations. The free movement of capital from western multinational investors (mainly dominated by the USA, Canada, France, Great Britain, Germany, Ireland, Greece, the Scandinavian countries, etc.) brought about the media commercialization and enhanced the concentration trends in the vulnerable deregulated at that time Bulgarian media and advertisement market with emerging media and competition legal framework, which subsequently resulted in the opacity of media ownership.

- **Technologically**, the transition from analogue to digital media services after the quick progress of mobile communications, following the policy moves of the European Commission (media have been transposed from DG *Education, Culture, Youth, Media and Sport* to DG *Information Society and Media* (2004), challenged the status quo of the media industry. The fast pace of ICT developments outstripped the timely catching up of the legal and regulatory framework, the modernization of business models, the realignment of professional activities, the psychological and technological adjustment of the audiences for perception and creation of content in the variety of sources and outlets. It is notable that due to these shortcomings after Bulgaria's accession to the European Union in 2007, the country has experienced a steep downslide in the *Reporters without Borders* rankings safeguarding the right to freedom of information (from (35th in 2006 and 112th place in 2020)[4].

In the complicated geopolitical situation of a country with limited sovereignty within the framework of the EU and NATO and internal political instability (1 regular and 4 early Parliamentary elections have been held 2021/2023), the capability of monitoring of media environment is essential in order to outline the risks in its developments and envisage opportunities for their overcoming.

Capability of monitoring mediascapes

The country possesses sufficient and well-educated research potential as well as production of valuable scientific and specialized publications. Apart from those initiated by academia, there are studies of the mediascape undertaken by the media themselves, as well as by sociological and advertising agencies, NGOs, independent researchers. In recent years, the country participates in regularly updated international databases in the field of media.

In 2022 the Faculty of Journalism and Mass communication published a bibliography of 6480 titles on media and communication (1990-2020)[5], covering the research period of MEDIADELCOM of twenty years (2000-2010). The greater part of these studies are national publications, which, although open access, are difficult to compare internationally because of

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[3] Jakubowicz Karol (2006). Rude Awakening: Social and Media Change in Central and Eastern Europe. London: Hampton Press.

[4] Reporters without Borders. https://rsf.org/en/bulgaria

[5] Tzvetkova Milena (2022). Media and Communications. Scientific Bibliography (1990–2022). In: Annual of the St. Kliment Ochridsky Sofia University. Vol. 30 https://fjmc.uni-sofia.bg/sites/default/files/inline-files/Bibliografia_FJMC_v.5_Interactive.pdf

the language barrier and the Cyrillic script. Only about ten percent of them appear in Latin script.

Although most of the publications, monitoring the Bulgarian mediascape are extensive and comparatively easily accessible, their content display insufficient continuity and systematic approach in terms of longitudinal outlining of trends. Albeit the abundance of texts analyzing a number of reliable data sources, it is challenging to conduct comprehensive studies and to summarize effectively the outcomes. Thus, the four analysed domains in the case study[6] on the capabilities of media monitoring (legal and ethical regulation, journalism, media usage and media competencies) are sparsely presented and somehow incoherent. Multi-aspect studies that trace and compare the causal relationships in the developments of media phenomena in order to outline interconnected trends in their dynamics are scarce. As a consequence of the conclusions of the Bulgarian team in MEDIADELCOM, the Faculty of Journalism and Mass Communication at Sofia University founded a Center for Media Studies for consistent and sustainable monitoring on the media environment.

Wisdom-based governance of monitoring of mediascape: risks and opportunities

In Bulgaria, studies that can be linked to wisdom-based governance of monitoring of the mediascape are sporadic.

Among the risks that can be challenging to the effective management in parallel of the studies on the processes in the mediascape may be pointed out:

- the insufficient consistency in tracking of the performances in each of the four examined domains separately and in relation to each other;

- the overabundance of media monitoring data in some domains compared to the fragmented research in others;

- the uncoordinated liaison between data collection and research conducted by the state authorities, the academia, the media industry, the media-related entities, the non-governmental organizations etc.;

- the limited publicity of data (on ratings, advertisement revenues and other essential market factors) operated by commercial providers.

The opportunities for more effective monitoring of the mediascape are mostly related to overcoming these and other risks. Nowadays Bulgarian media legal and regulatory framework is harmonized with the binding to all Member States of the European Union body of common rights and obligations Acquis communautaire and of the Council of Europe media policies. This is an essential basis and commitment within the framework of the European Union and the Council of Europe for all agents involved in the monitoring and research of the media environment to step up and coordinate their efforts in presenting a clear, consistent, and predictable picture of the media system in the country.

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[6] Raycheva, L., Zankova, B., Miteva, N., Velinova, N., Metanova, L. (2022). BULGARIA. *Risks and Opportunities Related to Media and Journalism Studies (2000–2020).* Case Study on the National Research and Monitoring Capabilities. In: Studies on national media research capability as a contextual domain of the sources of ROs. Approaching deliberative communication: Studies on monitoring capability and on critical junctures of media development in 14 EU countries. CS1, D-2.1, pp. 34–64.
Mediadelcom.https://www.mediadelcom.eu/publications/d21-case-study-1/blg/

Agent oriented analysis

The achievements and the shortcomings in monitoring of the mediascape in the country is somehow interconnected with the achievements and the shortcomings of the developments of media system, which faced serious challenges according to the findings for all of the four studied domains.

- Freedom of speech, freedom of press and freedom of information

The Bulgarian Constitution guarantees the basic fundamental rights and freedoms. According to Art. 40 "The press and the other mass information media shall be free and shall be not subjected to censorship". Art. 41 stipulates that "Everyone shall be entitled to seek, receive and disseminate information"[7].

Nevertheless, the exercise of these rights have been hampered by the ongoing process of mediatization of politics and politicization and commercialization of the media[8]. This tendency has a counterproductive effect on the independence of the media system and the sustenance of the professional standards. Weaker implementation of transparency of media ownership policies and market concentration, as well as inadequately allocation of state advertising and insufficient funding of public service media might be risky for the deliberative communication.

The opportunity to oppose these precarious for the democratic development of media risks can be maintained by the timely and strict implementation of the European Media Information Act, which proposes new rules to protect media pluralism and independence, proposing support for free media.

- Accountability

In this domain the sources reveal mainly the engagement of academic institutions, NGOs, some ministries and regulatory bodies. There are not special national configurations or multi-stakeholders' synergies specifically set up for the purpose of research. Research projects gravitate around universities and non-governmental organizations.

The acts of the audio-visual media regulator - the Council for Electronic Media such as decisions, standpoints, declarations, public consultations, etc. can be reached at its website. The annual reports of the public service broadcasting media BNT and BNR are also publicly available.

Bulgaria has not yet introduced an ombudsman relevant to the overall media sector. However, both public service broadcasters – the Bulgarian National Radio (BNR) and the Bulgarian National television (BNT) have appointed institutional ombudsperson with the aim to pursue active dialogue and profound feedback from the public. These offices also provide valuable feedback on self-regulation[9]

Art. 4b of the RTA stipulates the obligation to promote self-regulation and co-regulation through codes of conduct and standards, where appropriate[10]. Also listed are some of the existing codes such as the *Code of Ethics of the Bulgarian Media*[11], developed by the National Council for Journalistic Ethics Foundation; the *Unified Standard for the Regulation of Sound Levels in Advertising*, adopted by the industry, and the *National Ethical Rules for Advertising and Commercial Commu-*

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[7] National Assembly of the Republic of Bulgaria (1991). *Constitution.* https://www.parliament.bg/en/const

[8] Raycheva, L. (2013). *The Television Phenomenon. Transformations and Challenges*. Sofia: Tip Top Press.

[9] Bulgarian National Radio. https://bnt.bg/ombudsman

[10] Radio and Television Act (2020). https://lex.bg/laws/ldoc/2134447616

[11] Union of Bulgarian Journalists (2004). *Ethical Code of Bulgarian Media*. https://www.sbj-bg.eu/index.php?t=58

nication, developed by the Association "National Council for Self-Regulation"[12]. Their decisions are also publicly available. However, these bodies should work in greater cooperation with each other in order summarized data to be available for the needs of research and policy activities.

Peculiar is that the regulatory framework which is in force in Bulgaria in most of the cases does not take into account the specific features of the Internet. Publications point out that self-regulation should be strengthened through more consistency and transparency.

Following from all these media accountability is most often one-sidedly studied from a journalistic point of view without taking stock of its regulatory aspects including procedural ones and the opportunities for trying and exploring novel accountability practices online. Media accountability cannot be understood outside the social and political structures or media ownership as well as regulatory framework defined at the national level (including self- and co-regulation). Lack of clear and stable ethical regulations can result in a complex relationship between the media and politicians and in the emergence of media groups with unclear origins and financial opacity.

The opportunity to maintain these shortcomings is connected with the timely and strict implementation of the European Media Information Act, which proposes no interference in editorial decisions of media and more protection for media against unjustified online content removal. The activation of the journalist's guild might support these moves by enhancing more satisfactory cooperation between regulation, self-regulation and co-regulation. Thus professional standards might be improved and self-censorship reduced.

- Journalism

In the last twenty years the academic and professional community in Bulgaria has created a large corpus of studies on media and journalism developments. The sources can be divided into several groups: academic research; research of professional and branch organizations; research of non-governmental organizations; and information from regulatory bodies and state institutions. The sources from the first three groups are predominant. Since 2015, the National Statistical Institute publishes annual data on the state of the media, which can be considered reliable and trustworthy. They are of a general nature and are limited to several indicators - annual production of radio and television programs, annual circulation of newspapers and magazines, internet access of households, etc.

As of 2020, academic programs in journalism (BA, MA, and PhD programmes, some of them - in English) are offered at ten universities - seven of them are public and four are private. The number of students enrolled in Journalism and Mass Communication in the academic year 2021/2022 were 2226 (BA-1933, MA-293)[13]. Besides, JMC is part of the curricula in a number BA and MA programs in social sciences and humanities. Supplementary training programs for journalists also include NGOs with external funding. The PSB – the Bulgarian National Radio (BNR) and the Bulgarian National Television (BNT) as well as most of the mainstream media organize regular courses for journalism training.

Topicality is most inherent in the data published by primary sources about journalism - these are the reports of professional and branch organizations, whose participants voluntarily provide information about their own activities However, this information is rather sporadic and lacks continuity. The same can be said for sociological research on media issues. They are na-

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[12] Foundation National Council for Journalistic Ethics. https://mediaethics-bg.org/%d0%b5%d1%82%d0%b8%d1%87%d0%b5%d0%bd-%d0%ba%d0%be%d0%b4%d0%b5%d0%ba%d1%81-2/

[13] National Statistical Institute (2022). *Enrolled Students by Educational Degree and Fields of Education*. https://www.nsi.bg/bg/content/3392/

tionally representative and are usually held on the eve of elections. Conducting of such a survey is expensive, and the results are provided to the sponsor (most often a political party or NGO), at whose will, a selected part of the results is presented to the general public.

The information provided by the professional associations of media and journalists, by the National Statistical Institute, as well as the sociological surveys of nationally representative nature deserve the trust of the researchers in Bulgaria. The lowest level of trust is connected with the sample data for the audiences, the rating and the market shares of the media. There is a tendency for people metric companies to provide distorted data by "inflating" the data about their customers at the expense of the media that are in the portfolio of a competing company. This tendency is clearly evident in the drastic discrepancies between the results of the same media in the bulletins of the two main people metric agencies in Bulgaria. In addition to confusing audiences and researchers, the distortion of information makes it very difficult for advertisers to choose the right medium and thus distorts the advertising market.

An opportunity to maintain the insufficiencies in the research on journalism issues is the activation of journalists themselves in their branch organizations to react against the tendencies of limiting external pluralism (access to various sources of information) and internal pluralism (freedom of expression, incl. overcoming self-censorship) in the process of creating and distributing media content for diverse audiences.

- Media usage

In the studied period of 2000-2020 rhythmic research on media usage patterns in Bulgaria is comparatively extensive, although with not regular cyclicality. Most of the research examines issues related to access to media content, media diversity, functionality and quality of the media, public trust in the media, new media, frequency of media consumption by different age and social groups.

The fast pace of technological progress implies some risks on the media developments, such as reducing access to online content and lowering the use of legacy media in the vulnerable media market in comparison with social media usage.

An essential opportunity to overcome these shortcomings is the Action plan of the Strategy "Digital Transformation of Bulgaria for the period 2020-2030"[14], which among other tasks envisages to: deploy a secure digital infrastructure; ensure access to adequate technical knowledge and digital skills; strengthening research and innovation capacity; unlock the potential of data. This is in tune with European Digital Strategy - a comprehensive, ambitious and long-term plan to protect nature and reverse the degradation of ecosystems.

- Media related competences

A number of studies are consumption-oriented and are related to the so-called people's media diet - what sources of information they use, how many of them watch TV, listen to radio, read newspapers and magazines, access online media milieu. Many systematic studies focus on trust in the media.

A less researched area is the degree of media literacy among audiences, how people assess the authenticity of information and by what criteria, whether they have critical thinking about it and understand the context, how they distinguish between misinformation and fake news, etc.

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[14] *Digital Transformation of Bulgaria for the Period 2020-2030* (2020) https://dig.watch/resource/digital-transformation-of-bulgaria-for-the-period-2020-2030#:~:text=Strategies%20and%20Action%20Plans&text=Deploy%20a%20secure%20digital%20infrastructure,a%20circular%20low%20carbon%20economy

Insufficiently analyzed is also the question to what extent people's trust in the media is determined by their technological and communication competences and whether there are other factors than the rational ones that make people lose trust in the legacy media.

It is noteworthy that the attention of researchers is less often attracted by the characteristics of the media audiences and by the deficit of comprehensive and systematic research for media users to cover demographic, educational, social characteristics, as well as their preferences.

These deficits might be overcome through implementation of such digital tools as The 2022 Code of Practice on Disinformation (by cutting financial incentives for purveyors of disinformation; maintaining of transparency of political advertising; ensuring the integrity of services; empowering users, researchers and fact-checking community) for strengthening of monitoring framework[15]

Country-specific policy recommendations

In order to improve capabilities of comprehensive monitoring of mediascape it is necessary to set up a special national configuration coordinating multi-stakeholders' synergies in collecting timely, specifically set up for research purposes measurable and comparable longitudinal open access data on a national scale. This would support policies for achieving better and more effective:

• opposing the trends of increasing media market concentration and of rising political influence on media and journalism by amending the legal framework and strengthening of the Commission on Protection of Competition regulatory mechanisms;

• transparency of media ownership, people metric measurements, and allocation of state advertising by improving the legal framework and strengthening the regulatory mechanisms;

• coordination between regulation, self-regulation and co-regulation by joint activities of the media regulatory media, media industry and citizen's participation;

• sustenance of external and internal pluralism by strengthening of the regulatory framework and raising of media professional standards;

• conditions for independence of journalism by amending the legal framework and strengthening of the activities of the regulatory body and the media professional guild;

• enhancing media usage approach through improving easy and effective access to media channels of interest by platform and mobile operators;

• pushing wide development of digital, information and media (including AI) competences by Ministry of education and science, media industry and non-governmental organizations.

These measures are in tune with the challenges facing the contemporary mediascapes as an essential part of democratic processes nationally and internationally.

[15] European Commission (2022). The 2022 Code of Practice on Disinformation
https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation

Zrinjka Peruško

Croatia amongst other countries: fsQCA calibrated values of the outcome and conditions in the study by Vozab, Trbojević and Peruško (forthcoming)

Croatia is in the group of countries in the lowest third with low deliberative communication; with a calibrated value of 0,3 it measures at the same level as Bulgaria, better than Slovakia, Poland, Romania and Hungary (Nord et al., 2024). As the presence of either economic development or quality of democracy are found to be necessary conditions for higher deliberative communication, lower values of both of these necessary contextual conditions is a contributing factor to Croatia's low deliberative communication. Lower economic development and lower democratic development are contributing factors.

The fact that Croatia has a higher measure of post-materialist values (which can be viewed as an opportunity) does not contribute to higher deliberative communication. This would indicate that among the contextual factors, the structural factors play a more important role.

With a low value of deliberative communication, Croatia shares solution paths with some other countries in similar position in regard to the analysed media system areas.

In the domain of the legal framework for freedom of expression and information Croatia shares the path with Hungary and Romania: lower measures in the implementation of data protection regulation in support of freedom of expression, as well the less successful implementation of the freedom of expression regulation, contribute to Croatia's lower deliberative communication. Here it seems that the lack of, or the negative, agency aspect is more important that the structural.

In the media accountability domain, Croatia shares the path to low deliberative communication with a number of countries (HU, IT, LV, PL, RO, SK) who do not have a media ombudsperson. Croatia and Bulgaria together form another path which additionally highlights the lack of highly developed organizational codes of ethics and public discourse on media criticism. The highly developed professional discourse of media criticism (which is an opportunity) does not help either country to reach high deliberative communication.

In the journalism structures and competencies, Croatia shares a path with countries (PL, IT, RO, BG) with not developed media markets, low autonomy of PSM, lower journalistic skills, and higher market concentration. As this last condition is also found in the countries with higher deliberative communication (but alongside with highly developed media market and autonomy of PSM), this might be seen as an potential opportunity.

Regarding media usage and competencies, Croatia belongs to a group of countries (BG, HR, HU, IT, PL,RO, SK) with high trust in social media and low trust in legacy media, as well as a lower use of legacy media. All of these are contributing factors to lower deliberative communication.

Recognising ROs: CMM (capability of monitoring mediascapes) based on the study by Peruško and Vozab (2023)

While many industry produced data on media and their performance are or should be collected based on legal requirements, in reality there are not real sanctions if the media do not provide them. This provides a risk.

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. Results of international comparative research exist in a growing number of areas (social values, journalism values and practices, media literacy, media use in various aspects).

Although with a long tradition of communication and media social science research dating from the 1960s, and presently 6 academic journals for media and communication studies, the availability of data varies by RO domain. Several research groups exists, the largest being the one at the Centre for Media and Communication Research, Faculty of Political Science, University of Zagreb.

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, and this is also a risk in the long term.

Law and Ethics

The legal domain includes an adequate number on sources regarding the freedom of expression area predominantly focusing on defamation, also including hate speech and to a lesser (or more recent) extent, disinformation. Protection of personal data is not that well covered by research, and copyright protection is almost nonexistent topic in relation to media. Research on the protection of journalistic sources is also insufficient, with only one research article, and no research is available on whistleblowing and the media and trade secrets. Issues of media ownership and transparency are well covered and presented in the journalism domain.

Research coverage of the area of accountability is also not sufficient, with only a few articles dealing with ethical issues, and several more investigate the accountability of regulatory bodies. General normative perspectives of the media and journalism are more numerous, especially in various articles or books dealing with media policy issues.

The problem with legal research is that legal scholars have no knowledge of the media and the Croatian media system.

Journalism

Most fields of interest in the journalism domain are adequately covered and allow further analysis in Case study 2. The journalism domain includes a number of articles and raw data regarding shape of the media market and the level of its pluralism and diversity. Production conditions for journalism are mainly investigated in relation to digitalization changes, while other aspects (economic) are not as numerous. Although PSB as a topic has permeated the media-policy related debate since the 1990s, we would expect more academic studies on this issue. Working and organizational conditions for journalists were also a topics of research studies, and the area of professional culture and journalistic competences is well covered. There is also a host of articles that in some way touch upon journalism, often in relation to the quality of its content or in relation to representation of various social groups, that can be used as supporting evidence for other domains (e.g. legal).

Media Usage

Media usage research is rather scarce before 2010, but later studies are adequate to answer many of the questions posed by our study. Sources exists for evaluating access to media, relevance of news media, trust in the media.

Media related Competences

The media literacy area/media competencies domain is well covered in relation to children and young people, but the data is not available for older audiences. The research only started after 2010 so the first period of our study is not covered.

Wisdom-based media governance: risks and opportunities

If we understand as wisdom based media governance the use of data and information produced by the industry and research, and knowledge created by its processing by academic research, for policy making, Croatia mainly displays risks. Unfortunately, policy making rarely uses knowledge produced by academic research, and is more often based on interest of specific industry groups and the political interests of the government.

The opportunity to change this was created by the Croatian Mediadelcom team from the Centre for Media and Communication Research of the University of Zagreb, during the workshop held in 2023 to present the two Croatian case studies to a diverse audience of academics, journalists, and policy makers. A Media Policy Forum was proposed by the team, as a permanent network of academics, journalism, media industry, and policy makers, with a view to discuss the current issues in the Croatian media sphere. All the participants have supported this idea, and the first workshop of the MPF will be convened in the first quarter of 2024.

Agency oriented analysis

We find in the Croatian example the importance of both agency and structural variables/conditions as contributing to lower deliberative communication.

Agency is visible in the legal framework (lack of implementation of freedom of expression regulation and protection of data for freedom of expression), in the accountability domain (lack of public discourse and developed professional discourse), in the journalism domain (lower journalistic skills), and in the media usage domain (low trust in legacy media, low use of legacy media, high trust in social media).

Structural conditions that play a role in Croatia are low economic (gdp) and technological development (i.e. proliferation of broadband internet), lack of media ombudsperson, lack of highly developed organizational codes of ethics, and low development of the media market and low autonomy of PSM.

Country-specific policy recommendations: Croatia

Action to improve both the agency and structural conditions would benefit the media system and increase the possibility of higher deliberative communication.

Legal framework:

- improve implementation of freedom of expression regulation by further educating the judges in the standards of the European Court of Human Rights, in order to reduce the number of overturned judgments;

- improve implementation of the protection of freedom of information by strengthening the punitive possibilities of the Information commissioner in cases of non-compliance of institutions.

Accountability domain:

- the media could create permanent structures for public discourse to interact with already developed professional discourse in media criticism, by developing radio or TV programs, or podcasts on the subject of public media critique. The Agency for Electronic Media could include this aim with the preferred topics to receive funding from the Pluralism and diversity fund.

Journalism domain:

- increase journalistic skills with lifelong learning - universities can develop short courses on specific digital skills for journalists, and media organizations can do the same for their employees.
- The Croatian Journalists Association could organize seminars on professional ethics skills.

Media usage domain:

- increase independence and quality of news in legacy media and PSM, by implementation of professional journalistic standards, avoiding bias in favour of the government and its policies in news reporting, and opening up the airways to those with opposition and critical views on policy issues
- make legacy news and information more salient to different audience groups by including in the current affairs programming topics of interest to different social groups; young audiences in particular should be analysed in relation to their information needs, which need not focus only on political news but should be much wider to include topics and areas of interest and concern to these audiences (like youth oriented education, health, amateur sport and culture, political participation, etc.).

Structural aspects:

- More determined implementation of data provisions to official bodies, and their capacity to process the data and make them easily available to the public, is a necessary step to ensure improvement of media system governance. The institutions in charge of data collection should be more active and use their prerogatives to ens
- Increase in economic development (in terms of higher gdp) is probably one of the most important structural characteristics that will positively impact deliberative communication.
- increase in economic development will also contribute to the development of the media market
- development of the media market with incentives from the state (competitions and prizes, funding for specific investigative journalism topics, etc.).
- Broadband internet access should be increased especially in non-metropolitan areas – government policy could promote this in cooperation with commercial providers
- a media ombudsperson institution should be created at the national level to cooperate with specific media, develop and implement organizational codes of ethics in individual media organizations.
- Autonomy of PSM should be ensured. At present, PSM which can be to easily influenced by any governing party though the way of appointing the CEO by a simple majority in the parliament. If the majority was 2/3 this would ensure a need for political consensus and would contribute to the autonomy of the person at the helm and the institution.
- government advertising in national and local media is not transparent, in spite of the existence of laws that require the public and government institutions to report their ad-

vertising activity. This advertising can be/ or is used as a means to influence editorial content.

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- government advertising in national and local media is not transparent, in spite of the existence of laws that require the public and government institutions to report their advertising activity. This advertising can be/ or is used as a means to influence editorial content.

The position of the PSM organization Croatian Radio and Television (HRT) and the non-transparency of state advertising are very worrying conditions which show no political inclination by the governing parties to being solved, and can only be solved if there is political will. Perhaps the EU Media Freedom Act can promote it.

CZECHIA

Lenka Waschková Císařová, Iveta Jansová and Jan Motal

Czechia among other countries: fsQCA calibrated values of the outcome and conditions in the study

Czechia, together with e.g. Slovakia, Italy and Poland is out of the set of countries with high deliberative communication. Czechia indicates sufficient *contextual conditions* for the absence of deliberative communication, it is alone "on the path of higher technological development and lower polarization, and lower economic development and quality of democracy".[16] Regarding *legal domain,* the Czechia is again in the group of countries, with the conditions for the absence of deliberative communication, where opportunities are successful defamation and data protection implementation, but risks are "unsatisfactory freedom of information and transparency of media ownership implementation".[17] Similarly, for *accountability conditions*, there is a risk of "lack of organizational codes of ethics, meta discourse, public discourse and international accountability".[18] As for the *market conditions*, "weaker media market contributes to the lack of deliberative communication".[19]

To sum up, the fuzzy set analysis of the Czech context stressed various opportunities – higher technological development, lower polarization, successful defamation and data protection implementation; but it also brought out many more risks for deliberative communication – lower economic development, lower quality of democracy, unsatisfactory freedom of information, unsatisfactory transparency of media ownership implementation, lack of organizational codes of ethics, lack of meta discourse and public discourse about accountability, lack of international accountability, and weaker media market.

Explanation

Based on our analysis of critical junctures in the Czech media transformation, which was focused on a secondary analysis of available data and research information on Czech media,[20] largely similar opportunities and risks were indicated, but seen more deeply and in the national context.

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[16] Deliverable 3.1. Identifying Similar and Different Configurations of RO's Factors and Grouping the Countries Accordingly, p. 49.

[17] Deliverable 3.1. Identifying Similar and Different Configurations of RO's Factors and Grouping the Countries Accordingly, p. 50.

[18] Deliverable 3.1. Identifying Similar and Different Configurations of RO's Factors and Grouping the Countries Accordingly, p. 51.

[19] Deliverable 3.1. Identifying Similar and Different Configurations of RO's Factors and Grouping the Countries Accordingly, p. 53.

[20] Waschková Císařová, L., Jansová, I., Motal. M. (2022). Czechia. Critical junctures in the media transformation process. In: Country case studies on national media research capability as a contextual domain of the sources of ROs. *Approaching deliberative communication: Studies on monitoring capability and on critical junctures of media development in 14 EU countries,* CS2, D-2.1, pp. 202–244. Mediadelcom. https://www.mediadelcom.eu/publications/d21-case-study-2/cze/

As the most significant risk – combining the risks from the legal framework, accountability, market conditions, and the conditions of journalistic work (e.g. journalists' autonomy) – we identified oligarchization of media ownership and concentration of media ownership in the hands of domestic businessmen. Nevertheless, this development also led to the emergence of new independent media and started a significant transformation of the Czech media system, which can be understood as an opportunity.

Recognising ROs: CMM (capability of monitoring mediascapes)

The monitoring capability of Czechia is highly dependent on NGOs and academia, as the state institutions provide no consistent media policy and the related research, as well as the industry usually does hardly make their data public (public service media being the exception). The critical juncture which heavily influenced the evolution of CMM was the change of media studies research after 2010 in favour of more empirical data, combined with the "big sell" of Czech media to oligarchs and the consequent development of the independent journalism and related NGOs focusing on critical monitoring of media landscape (especially fact-checking, ownership, professional standards). This presents the great opportunity; however, it is connected to the following risks:

a) The monitoring capacity and relevance of the professional organizations is very weak.
b) Politics, industry, academia, and professional organizations are not sharing the data and they hardly cooperate in the evaluation of the available data.
c) 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.

As there is no professional organization/institution (such as press councils are) or state institution being widely respected, the evaluation of the data provided by the monitoring capacities has only limited effect on the industry. On the contrary, as we can see in the policy and activities of the Publisher's Union, the industry has a great collective power to face the outcomes of monitoring and refuse it.

Wisdom-based media governance: risks and opportunities

In the legal and accountability domain, we identify these biggest risks: the intuitive nature of the discussion on media ethics in the Czechia; its close intertwining with media law; the absence of a broader conceptual debate based on international comparisons; and the inactivity of the largest trade union organisation, the Syndicate of Journalists of the Czech Republic, which is unable to enter the professional or public debate in a significant way. A major risk is the long-term indifference of media professionals and the professional public to long-term and systematic solutions. Nevertheless, there is an opportunity now to start discussing and solving fundamental problems of media ethics and law, because of the public criticism of the oligarchized media.

The risk from the point of view of journalism domain is a lack of cooperation and lack of mutual participation among individual actors in the field. The media market is rather a highly competitive environment. One of the risks is also the long-term dysfunctionality of the professional journalistic union, the Syndicate of Journalists of the Czech Republic.

Media usage research is one of the most systematically covered topics in the reflection of the Czech media, which can be understood as an opportunity, however, this data is collected by private companies or associations, which usually keep it out of the public domain and different actors do not cooperate with each other, both can be considered a risk.

An obvious risk that can be identified regarding media-related competencies is the void without activity, created by responsible actors such as the state, which must be filled by NGOs.

Agent oriented analysis

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

The Freedom of Information is guaranteed by the Charter of Fundamental Rights and Freedoms. Under the Information Act, citizens and journalists have access to information from public institutions and government. People have a legal right to information from public institutions and the government, but there is a lack of consistent digitisation of the public administration, much information has to be requested by law and is not publicly available, many authorities have been reluctant to provide it in the past, and people have had to seek it through the courts.

The courts can be considered as actors in cases of protection of journalistic sources (even with past cases of police trying to break this right unsuccessfully). Moreover, people have a legal right to information from public institutions and the government. The reality of that is hindered by the lack of digitalized content, making it available to requests by law pub not for public.

Politicians and businessmen (and coincidently also owners) are also a growing risk as there is no regulation of ownership in the Czechia, just a regulation of politicians owning media, and oligarchization became an unavoidable problem in the Czech media system.

> *How to turn risks into opportunities /or maintain opportunities?*

- Make it legally transparent and forbid all politicians to buy and own media (now the law is applicable only on national level of politicians).
- Restrict the amount of media ownership by one subject.

Accountability

Czechia does not have any independent press council. The media have their own codes of ethics, and there is also a code of ethics for the Syndicate of Journalists; However, the effectiveness and enforceability of these codes is generally low, as there is a lack of independent bodies to enable such enforcement, and the journalists' union does not have sufficient authority. Organizational codes of ethics/conduct exist but are widely regarded as pro-forma declarations. There are also no ombudsmen for all media, only in public service media, and one private media have an ombudsman.

> *How to turn risks into opportunities /or maintain opportunities?*

- Develop a discussion in the journalistic field on the functionality of self-regulation.
- Introduce the position of media ombudsman.

Journalism

For the 10 million country, there are three University Departments specialized in Journalism training and some private universities too. Each bachelor study program is opened for a large number of students (e.g. 180 students per year). However, in the case of the Czechia the number of journalists with university degree in journalism is quite small in comparison to the possibilities for them to obtain the degree.

There is a lack of cooperation and solidarity among journalists, leading to lack of self-regulation (lack of strong professional organization).

> *How to turn risks into opportunities /or maintain opportunities?*

- Promote the importance of lifelong learning for journalists.

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- There is an opportunity to 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

There is enough data on media usage in the Czech media system framework, however, only some actors have access to them, but they do not analyse or process them sufficiently. The picture of Czech media usage is therefore rather fragmented and does not provide important information for the relevant development of the field.

How to turn risks into opportunities /or maintain opportunities?

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

Media related competencies

Our country has media literacy programs inserted in the overall plans in formal education, but the application is up to each school and is not controlled in any way. This results in incomparable quality of the media literacy education at each school in the country. Some schools (i.e. students) thus have great media literacy education thanks to their schools' initiatives, on the other hand there are completely opposite cases.

How to turn risks into opportunities /or maintain opportunities?

- Create a functional and sustainable media literacy program.
- Strengthen the role of the state in building this program.

Country-specific policy recommendations:

1. 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 (see the forthcoming EU Media Freedom Act), transparent media management (e.g. who are the big advertisers, how much money comes from advertising and how much from elsewhere, etc.)

2. 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

Critical junctures in the media transformation process

Halliki Harro-Loit, Epp Lauk

Estonia among other countries: fsQCA calibrated values of the outcome and conditions in the study

The *contextual and diachronic conditions* for Estonia mostly contribute positively to deliberative communication (0,56). Estonia here belongs to the same group with Austria (0,55) and Greece (0,56). Only Sweden (0,85) and Germany (0,75) have higher calibrated values. The same applies to the *legal domain and accountability*. Here, the description of actual risks needs further qualitative analysis (which is explained in the next subchapter).

Estonia's *market structure* (0,12) and concentration (0,42) create a risk, which is about the same as Latvia's—hence, a very small market is a natural risk. Therefore the oligopolic market itself is not a risk, but declining editorial independence or journalistic independence might quickly become a very high risk.

Explanation

Estonia's situation differs from that of other European countries in terms of the ROs for deliberative communication: on the one hand, Estonia does not belong to the same group as the old democratic countries of Western Europe (Sweden, Germany, Austria) – too small and too poor; on the other hand, Estonia is not similar to the countries of Central and Eastern Europe – it has a high quality of democracy, well educated people, highly digitalised society; well protected freedom and independence of the news media.

A few of Estonia's opportunities emerged because during the critical juncture (collapse of the Soviet Union), the country's leaders made good decisions about the future. Estonia's political leaders supported the development of digital literacy among the population from 1996 onwards ("Tiger Leap" programme, which provided schools with computers and started to emphasise digital skills, followed by a net-neutrality policy - Internet accessible to all and everywhere; the third component was the development of public digital services). The critical juncture that defined digital development was made by the Estonian political leadership at the beginning of the overall digital turnaround in 1996/97. In other words, people's ability to access a wide range of information depends on their digital skills. In addition, historically, Estonia has a strong cultural belief in education (this is supported by the good results of the PISA tests for Estonian children); a long tradition of reading newspapers, a relatively long tradition (since 1954) of education in academic journalism. These aspects may explain why Estonia has a high quality of democracy.

At the same time, the Estonian news media market is small and vulnerable as is journalists' job market. During the first decade of the 21st century, Estonian news media remained trapped for too long in the production of free online news. Advertising-based news media only started to recover from the effects of the economic crisis and the poor business model in 2018-2019.

Qualitatively, it is important to analyse the sustainability of Estonian news journalism and human capital (working conditions and competencies of journalists) as both are a risk and opportunity.

Recognising ROs: CMM (capability of monitoring mediascapes)

Estonia has excellent journalism education (according to international accreditation results) and a long tradition of uninterrupted journalism education. However, the risk is related to too few resources for monitoring. Estonia's research and education policies, which in the 1990s laid the foundations for a robust and internationally competitive research community, have since 2014 tended to increase the risks to Estonia's CMM. The main reasons are the lack of state interest in media-related issues (absence of a media policy) and the almost totally project-based funding of research. Project-based research makes the career models of researchers unclear and insecure, but also creates a situation where short-term projects die out. In turn, this does not allow an assessment of the dynamics of the Estonian media landscape.

In several important areas (freedom of expression, working conditions for journalists, media economy dynamics, etc.) knowledge acquisition depends on the interest and initiative of solitary researchers to obtain individual grants. The research financing system is not transparent.

At the same time, Estonia is very well represented in various international research networks, EU-funded projects are important for Estonian media monitoring.

In Estonia there is an urgent need for inclusive research governance, especially because the research should be as efficient as possible. The career models of researchers should be more secured, otherwise there will be not be enough young and competitive researchers to qualify for EU projects.

Wisdom-based media governance: risks and opportunities

In the second decade of the 21st century, the risk for Estonian journalism was posed by the wrong decisions of media organisations' managers to inefficiently increase the flow of online news.

To some extent, wisdom-based media governance opportunities might have been possible if the managers of journalism organisations had cooperated with analysts to get a more accurate picture of how the media consumption repertoires of various socio-economic groups changed in the 21st century.

Agent oriented analysis
Legal regulation

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

Opportunities

- creating better working conditions for the existing teams of qualified investigative journalists
- journalists can resist pressure from politicians and media owners
- Data Protection Inspectorate and journalists are sensitive towards the attempts to diminish transparency of the decisions and activities concerning public information and 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
- the quality of journalistic content will improve if journalists develop their ability to critically analyse their own work and the ability to learn efficiently. Being well informed about relevant academic research is also contributing to the improvement of journalistic performance.

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
- media researchers have methodological competence to determine which data is necessary to collect and process to produce knowledge about the media repertoires of the populace

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

How to turn risks into opportunities /or maintain opportunities?

It is most important to protect journalists' autonomy.

Accountability

There is a risk of the dominance of press organisations and the leaders of media organisations, not journalists themselves. Journalists will not present their own explanations to ethics committees. Accountability instruments tend to target the media industry, communication with the public is scarce. The Code is old, its updating is of no interest to journalists or media organizations. Only the Estonian Journalists' Union has shown interest in 2022, but it has failed to generate a wider discussion.

However, the journalistic ethics debate has begun to develop in the context of media scandals, where individual journalists and editors have become increasingly professional in justifying to the public the moral considerations that have been made in one or another complex case.

Journalism

Estonian journalism was in crisis in the 2010s, until around 2018, when the owners of the newspaper Postimees tried to interfere in the editorial process, forcing the departure of several journalists; the mass production of online news burned out young journalists. After the online news was put under paywall, Estonian readers got used to paying for news, with a sufficient number of readers willing to pay for analytical and investigative journalism.

How to turn risks into opportunities

For future scenarios, the most important aspect is that journalists with high qualification and ethical standards are valuable also for employers. More co-operation between academia and media organizations as well as journalists would finally help to maintain the prestige of journalistic content for Estonian citizens.

Media usage

Data on media usage is produced by commercial research organizations, even the Public Broadcasting does not publish audience data. Concurrently both Tartu and Tallinn universities have the methodological competence to process data and develop methodology concerning the media repertoires of the population. In Estonia, governments have so far lacked the political will to value knowledge about what information Estonian people use, trust and which groups are beyond the influence of the news.

How to turn risks into opportunities

The first step is that Estonia should participate in the Reuters Institute digital news survey.

Media related competencies

There are many initiatives, but they lack a system. Many agents are involved in short-term projects whose impact we do not know. The project-based approach does not allow for a wider impact. A project should last more than 10 years and should be methodically designed to have a successful impact.

How to turn risks into opportunities:

Estonian needs a wisdom-based media literacy governance of improvement: a small centre to bring together the stakeholders, pool existing research and knowledge, convene stakeholder discussions to plan the way forward.

Country-specific policy recommendations

- governments should be more proactive in communication with the public and should use the model of deliberative communication (listening, evidence-based argumentation, truthul information, equal participation in debate)

- there is an urgent need for an institution responsible for the "transparency of public communication" – a civic ombudsman or office that would assist people in the issues of accessibility of public information. This institution could also deal with the assessment of SLAPP cases.

- 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 recommendations concerning SLAPP cases

- a strategic coordinating centre for media literacy governance is necessary

- qualification requirements for journalistic jobs of key importance and for the leading positions in public service media should be established, and their independence protected

- Estonia should join the Reuters Digital News Report project

- wisdom-based media literacy governance is necessary.

GERMANY

Marcus Kreutler, Susanne Fengler

The Federal Republic's political system as well media policy in particular have been shaped heavily by the experience of national socialist dictatorship: The new system was designed to avoid too much concentration of political as well as journalistic power. Politically, this can be seen in the division of power between federal level and federal states or the electoral system that enforces cooperation between different actors (all federal governments so far have been coalitions of at least two parties). Again after the experience of previous dictatorship and its reliance on state-controlled propaganda, the media system is shaped to avoid monopolies of opinion: A strong role of public broadcasting has been protected by several decisions of the constitutional court, and regional diversification again plays a role in the larger part of this system. In private media, there are specific regulations on mergers between companies that try to avoid too much concentration. In broadcasting, these regulations rely on a specific Commission of the (regionally organized) broadcasting authorities that measures concentration (the KEF) based on different institutional, private, and academic sources – a good example for cooperation between different agents.

Recognising ROs: CMM (capability of monitoring mediascapes)

Germany profits from a long history of academic activity in the field of news media and journalism, nonwithstanding theoretical and methodological shifts as well as organizational re-orientations over time. The research system benefits from the size of the country and its decentralised nature: There are many universities throughout the country that have developed different focusses, including in media-related subjects. This guarantees the availability of experts and research for diverse topics. As for education and training of journalists, a classical approach of teaching journalistic skills "on the job" to alumni of other subjects (or young journalists that have no tertiary education) has only partly been replaced by university-based programs. While there is no formal requirement to work as a journalist – a constitutional provision that is also a reflection of the pre-1945 period and its methods to exclude oppositional journalists from the media –, the widely accepted practical qualification is a "volontariat". This is another example of cooperation between different stakeholders, as training content and work conditions during this 2-year-training programme are agreed upon in collective agreements of publishers and journalists' unions and include training sessions outside the media houses.

To sum up historical background and monitoring capacities, the German system benefits from a specific chain of opportunities (even if it originates from the country's darkest period): A general consensus for the need of checks and balances and wide distribution of power provided for general scepticism of media concentration or state influence in the media. In turn, mechanisms of public representation and concentration control have been established, often built on the idea of cooperation between different stakeholders.

Wisdom-based media governance: risks and opportunities

Good practices include the above-mentioned cooperative efforts of different stakeholders, for example in monitoring concentration using resources, data, and methods from different academic, institutional, private and public actors. Unfortunately, privatisation of Eastern-German media after re-unification is usually evaluated as mostly negative, because public authorities acted against this readily-available wisdom when they based their decisions exclusively on economic criteria.

Persistent cooperation of different actors is clearly an opportunity, while a decline of such practices (e.g., due to cost-cutting measures or a shift of interests) poses a risk.

Agent oriented analysis

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

The legal system in the media sector is generally well-established and balances different interests well. Some norms on public slander of specific personalities (the president, until 2018 also foreign dignitaries) mostly have little significance, but there is a remaining risk of abuse. While SLAPPs are considered a comparably minor problem, and higher courts have demonstrated rather media-friendly rulings, there is a risk of publishers not taking the financial risks of appealing to higher courts in specific cases, which may over time lead to stricter case law. The situation of right of information laws differs between different federal states and the federal level, which can be a risk for journalistic research in some areas. A general risk discussed with regards to the constitutional court, one of the pillars of legal protection of the media and backing of PSB in Germany, is that an extremist government could potentially re-shape the court to rule in their interest.

> *How to turn risks into opportunities /or maintain opportunities?*

The system works comparably well, but could be hardened against the abusive practices mentioned above.

Accountability

Despite criticism of "toothlessness" against the press council as the most visible instrument of media accountability, the system is comparably well-developed and built on cooperation of media companies/publishers and journalists. Some media companies also seem to increase their activities (internal codes of conduct, ombudspersons) as a means to strengthen public trust through accountability. A risk is a decline of media journalism in general-interest media due to financial shortages.

> *How to turn risks into opportunities /or maintain opportunities?*

Stronger involvement of the public / media users in media accountability activities could be an avenue to further improve accountability and its impact with the users. This could be done informally (e.g., through media-critical online formats) or formally (e.g. some kind of representation in the press council).

Journalism

In an international comparison, the German media system is still built on an economically sound foundation – nevertheless, over time, this foundation appears to be crumbling, especially with regards to local coverage. "News deserts" are still not real, but a more realistic scenario in some regions – counties or towns without local/regional media would be a big risk, especially given

the reliance of Germany's political system on these regional political entities. There have been political debates about how such media could receive public funding without risking state interference, but so far without a clear result.

Inside the journalistic profession, a persistent lack of diversity can be interpreted as a risk: The journalistic workforce and especially managing positions might be unaware of topics that are relevant to different social minorities. Some market actors (both private and PSB) try to actively tackle this problem in their human resources activities.

Monitoring of the field is advanced, but several long-term research activities both into media market structures and media content have been terminated or face an unclear future.

How to turn risks into opportunities:

Both politics and publishers should increase activities that strengthen the economic viability especially of local/regional journalism. This includes transition from print to online formats and their monetarization before print revenues collapse totally, but also possibilities for subsidies.

In terms of monitoring, long-term projects that allow for longitudinal analysis should only be terminated after careful evaluation of their usefulness and possible follow-up projects that serve a similar purpose.

Media usage

Data production on media usage is sufficient and available to the public and research community to a huge degree – a relevant opportunity in international comparison. Risks include rather recent shifts in news usage (vs. news avoidance), a persisting hesitation to pay for online news, and eroding trust in the media (media scepticism).

How to turn risks into opportunities

 Make sure positive situation in usage data is not watered down by limiting data production or availability. Intensify media activities to safeguard trust and explain relevance of news media for democratic discourse.

Media related competencies

The media-related competencies discourse about such competencies in school children show that the actors involved acknowledge the relevance of the topic, although different federal states tend to frame it slightly differently and have their own strategies of including media-related competencies in school curricula. These activities are based on a common, federal framework and supported by other actors such as Federal Agency for Civic Education and its database of additional offers. For adults, programs to improve media-related competencies do exist, but there is concern about their efficacy when studies show that "lying press" (Lügenpresse) accusations can build on a distorted understanding of news media procedures in relevant parts of the adult population.

How to turn risks into opportunities

Activities to improve media-related competencies in school education are probably key to achieve long-term improvements, but should be amended by offers for adults. Journalists and researchers could be integrated in such processes to guarantee more direct access to how news media work, and school students could be central for multiplication also with the adult population.

Country-specific policy recommendations

From a comparative perspective, Germany is still in a rather privileged situation in many regards, particularly the media market, the legal and accountability situation, and the monitoring potential. The biggest risk in such a situation is to water down the efforts in these areas (for whatever motivation: cost-cutting, attempting to control political discourse, or just ignoring imminent risks). Germany has developed a complex and relatively decentralised media system that is efficient in providing information and discourse for public deliberation, and it has the economic capacity to uphold this system as well as required monitoring activities – it needs determination to keep up this situation and develop the system further to cope with future challenges.

Policymakers on federal and federal state level can help to achieve this on two levels: 1.) Future-proofing the legal basis for journalistic work, especially in the framework of public service broadcasting, for a new generation of media users in a digital environment, as well as against possible political threats by populist political actors. 2.) Strengthening educational activities on media literacy and critical media usage, especially in schools. Offers for adults are a valuable addition, but given their voluntary nature they run the risk of "preaching to the choir". These activities ideally include cooperations with actors from within the media, e.g. through journalists' associations, to improve mutual understanding.

Policymakers need a good knowledge base for future decisions, especially in the complex and traditionally wisdom-driven German context. Thus, policy recommendations also focus on monitoring activities: While the *Medienvielfaltsmonitor* (media plurality monitor) of the media authorities is a useful addition to their monitoring offers, the long-term monitoring of media content has seen decline in the past few years with the end of the media authorities' program monitoring and ARD/ZDF-financed news/info monitor. Since both activities had been paid for by institutions that benefit from the broadcasting fee (media authorities, ARD/ZDF research commission), a cooperative approach of these actors to secure some kind of content monitoring especially of journalistic content – even in a more cost-effective manner than in the above-mentioned, former series, but ideally including online content – would be important. A similar decline is occurring in press concentration monitoring, an area that has seen official press statistics in the past: If academic or industry actors are unable to provide this work in the future, the re-establishment of official press/publisher statistics could be an option.

GREECE

Evangelia Psychogiopoulou, Anna Kandyla

Recognising ROs: CMM (capability of monitoring mediascapes)

Greece features a prolific scholarly community in the field of media law, journalism and communication that is well embedded within international networks and often participates in collaborative research projects funded by European institutions. These have been particularly important for knowledge production in media and communications since domestic funding opportunities are extremely limited and there are no schemes funding research in the field on a regular basis. As a result, much of the academic research conducted is small-scale and clustered around topics that reflect the research interests of individual researchers. Indeed, the research carried out in the framework of the MEDIADELCOM project identified differences in the breadth of academic research production *across* but also *within* the domains under review. The gaps between the topics covered by the extant research and those that are relevant for monitoring media-related risks and opportunities for deliberative communication is, therefore, flagged as an important risk in the case of Greece.

Another risk is connected to knowledge gaps caused by the lack of systematic data collection that would enable an analysis of relevant developments in the *longue durée*. The dearth of such data is particularly pronounced when it comes to the competences of media users and levels of media literacy, media usage patterns as well as the profile, skills and competences of professional journalists. Further, important data related to the media market (such as, for instance, audience and advertising figures) is not collected by public bodies but by private market research companies and, as such, it is not freely available.

Wisdom-based media governance: risks and opportunities

Overall, in designing and implementing laws and regulations for the media, the balancing that takes place between freedom of expression, freedom of information, and other rights and interests seeks to reconcile competing positions without curtailing freedom of expression and the right to information. Moreover, the literature on freedom of expression and freedom of information is well developed and it is able to provide a systematic, long-term analysis of the domestic legal framework and the scope of protection granted to freedom of expression and freedom of information. At the same time, the presence of experts in media law is strong and has been increasing in recent years. These are factors that create an opportunity for knowledge-based policy-making in the field.

In the domain of ethics, risks can be discerned in the limited effectiveness of the system of professional accountability. The system rests with the journalists' unions on the basis of codes of ethics and does not involve the media organizations. As such, it cannot guarantee that ethical standards are being applied and respected in reporting. Moreover, accountability instruments are also lacking at the organizational level. Greek media have refrained from creating own codes of ethics.

In the domain of journalism, the impact of the economic recession (2008-2018) and digitalization has been strongly felt on media market structures and working conditions. Economic hard-

ship has threatened the fragile sustainability of the media market and put journalists' employment conditions under strain. At the same time, a number of new alternative media outlets were set-up by networks of journalists and other media professionals who had been laid off collectively during the crisis. These media outlets aim to provide independent news and cover socially-relevant topics often neglected by mainstream media outlets. As for the digital transformation, this is often cherished by Greek journalists as an opportunity for its potential to help them perform better and more efficiently. However, it is also associated with risks in so far as it has created new burdens on the practice of the profession, where journalists are now required to master ICT tools and skills and adapt their reporting practices accordingly. However, the effects of such developments have yet to crystallize and more research is needed to understand their dynamics.

In the domain of media usage, digitalization and the diffusion of the internet appear as opportunities in so far as they brought increased diversity in terms of the media on offer. Media supply has expanded with the addition of online media outlets and alternative news sources. Certainly, the main risk in this domain is the absence of comprehensive data collection structures, which prevents the regular assessment of the entire media sector in terms of users' media access. The data compiled is fragmented, which undermines efforts to gain knowledge on the risks and opportunities affecting the field.

In the domain of media-related competences one risk relates to the lack of a thorough media literacy policy strategy. Yet, several public and private actors (mainly civil society organizations) are active in the field and they often cooperate in the organization of actions and initiatives. This creates a dynamic that could be further bolstered by streamlining and coordination, so as to maximize impact. Another risk concerns individual-level data on user competences. Existing data covers a limited set of aspects and does not allow the risks and opportunities relating to media-related competences and user autonomy in the changing media environment to be identified.

Agent oriented analysis

The role of the state in driving risks and opportunities for media-related deliberative communication in Greece cannot go unremarked on. State actors play an important role in defining the legal context in which free speech and freedom of information can be exercised. EU-level rules and international human rights also contribute to the design of the legal framework. State influence is also clearly discernible in the domain of journalism. Media policy-making has been highly centralized, reflecting efforts to keep a close eye on the operation of the media. This has impacted journalistic professionalism and fed into the marginalization of the public service broadcaster. For their part, commercial news media have in general refrained from investing in quality journalism. It is to be noted that the Greek media have not set up media accountability instruments, and that they do not participate in the existing system of professional self-regulation. The latter involves only the journalists' unions and their members. The analysis also shows that several other actors engage in data collection and research into aspects of journalism, media usage and media-related competences, while civil society is much involved in media literacy initiatives. This does not, however, suggest that these actors play an important role in driving risks and opportunities for the Greek media.

Country-specific policy recommendations for Greece

CMM: Provide stable funding for research and data collection in the field of media and communication to ensure regularity and continuity in research and diversity in terms of the topics

covered; strengthen and systematize data collection in areas related to the media market, jour-nalism, media usage and media-user competences; ensure that data is freely available.

Ethics/accountability: Public authorities should create incentives for media outlets to set up media accountability instruments; the media and journalists' associations should support the creation of a press/media council which brings together media owners, editors and journalists to ensure that ethical standards are respected and enforced.

Journalism: Support independent, journalist-driven media organizations; support the continu-ous development of digital and data journalism competences for professional journalists through skills-development programmes.

Media-related competences: Public authorities should develop a thorough media literacy policy strategy, they should support synergies between public and private actors engaging in media literacy initiatives and ensure coordination.

HUNGARY

Ágnes Urbán, Gábor Polyák and Petra Szávai

Hungary among other countries: fsQCA calibrated values of the outcome and conditions in the study

The contextual and diachronic conditions to deliberative communication in Hungary are far from favourable. The country scores very low on both the micro (0,33) and meso/macro (0,04) level deliberative components, thus does not only have the lowest deliberative communication score (0.14) among the 14 countries of Mediadelcom, but also among all EU Member States. With this value, Hungary belongs to the group of those countries that do not have highly developed deliberative communication. Hungary is among the poor performers in terms of contextual variables, such as economic, human and technological development, the quality of democracy, post-materialist values as well as political and societal polarization.

The state of the Hungarian media landscape is particularly complex. Looking at the variables defined in the theoretical background of the Mediadelcom project, which aim to capture the guarantees that ensure the conditions for deliberative communication, we can see that in Hungary there are only a few aspects where significant risks cannot be identified. It is interesting to note that Hungary is rarely the most underperforming country regarding the individual variables, yet the various components of the system, the problematic areas and risks and, in particular, the structural conditions, combine to make Hungary the country most distant from the ideals of deliberative communication.

Explanation

The history of the development of the Hungarian media system cannot be separated from the political transitions of the past. Since the regime change, governments have tried to expropriate public media and influence the private media market, helping their business circles to expand their media ownership interests. This has led to an underdeveloped media market and a lack of autonomy for journalists, which has hampered the professionalisation of the journalistic profession. The economic crisis of 2008, as a critical juncture in media development, has affected the country severely and has contributed to the acceleration of these tendencies. Due to the economic downturn, foreign investors have started to sell their media portfolios, and businessmen close to Viktor Orbán have acquired media companies. Along with the economic juncture, a political turnaround also occurred in Hungary: the 2010 elections brought a two-thirds constitutional majority for the Fidesz-KDNP government. A new constitution, a new electoral law and new media acts were adopted, besides which a new media authority was also formed. Ever since, the constantly changing legislative environment regularly affects the **legal context** in which the media and journalists can operate. This media policy has resulted in the biased and opaque operation of public service media, politically influenced decision-making in the media authority, and a complete transformation of the **media market** structure and ownership networks. Following the changes to the core curriculum in the framework of the education reforms, **media literacy** is increasingly being pushed out of the curriculum as a subject and is being seen as a cross-curricular competence, which in this form is at risk of getting "lost". Changes in the

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media market and **media consumption** patterns becoming more polarised, **journalists' roles** are also changing. Biased, partisan media outlets and journalists are gaining importance.

Recognising ROs: CMM (capability of monitoring mediascapes)

The media policy of the 2010s has drawn attention to media regulation and market issues, so there are many resources available for examining the conditions for deliberative communication in Hungary. However, there is little systematic, strategy-based media monitoring. In terms of centrally organized public research, the work of the Institute of Media Studies under the Media Authority should be highlighted, but in the academic field, only sporadic research conducted by individual researchers in pursuit of their own research interests can be found. Non-governmental organisations are very important agents in monitoring the media in Hungary, for example the Hungarian partner of Mediadelcom, Mertek Media Monitor, which has been collecting data systematically in legal, journalism and media usage domains. International research also pays great attention to Hungary, with European Union bodies, transnational NGOs and academic research projects regularly looking at the situation of the Hungarian media. However, this does not mean that Hungary's media monitoring potential can be considered ideal.

Government education and R&D policy is shifting towards greater support for the natural sciences, with less and less support for education and research activities in the humanities and social sciences, including communication and media studies.

For media research, the main risks lie mainly in the structural changes affecting the academic sector: institutions are currently vulnerable, especially in the area of financial autonomy, but it is still uncertain what impact the changes will have on their professional autonomy.

So far, international research projects and surveys have been seen as an opportunity, as well as the work of domestic organisations, mainly NGOs, which have been involved in monitoring the media landscape in Hungary. These NGOs can carry out project-based research on media issues with the help of foreign funding. There is currently a major risk posed by the new sovereignty protection law passed in 2023. How these foreign-funded media research projects will be affected by the new law and the soon-to-be-established new authority is still in doubt.

How to turn risk into opportunities:

Participation in international projects is extremely important for NGOs and the remaining independent research institutions, not only for research funding, but also because of the attacks on academic freedom. It is important that independent researchers remain members of professional networks. In addition, Hungarian researchers are able to produce in-depth analyses of the functioning of the illiberal media system, the destructive power of propaganda and the impact of disinformation. Unfortunately, the illiberal media model is toxic, so knowledge about it could be useful in other countries.

In the case of political change, it may become realistic to develop a comprehensive, systematic monitoring system capable of researching elements of deliberative communication. There would be a need to develop research methodologies and conduct systematic research in all areas of media research, building largely on best practices in other European countries.

Wisdom-based media governance: risks and opportunities

Since 2010, Hungarian media policy has been characterised by a shift away from democratic and EU values. There have been significant changes in all domains of the media system, which have reinforced each other to create the orchestrated government communication machinery that today defines the public sphere and the various forums of public life. The (media) legisla-

tive changes, the transformation of public service media into a propaganda instrument, the distortions of the media market, the obstruction of journalists' work, and the adverse decisions concerning media education have all contributed to create the current media system in Hungary.

Government's (and public bodies' such as the media authority's) approach and attitude towards the democratic role of the media can be considered as the cornerstone of government media policy. Not only the deliberative function of the media, but even its basic democratic functions are being questioned by the country's ruling elites, who claim that there is no such thing as independent media. The head of the media authority, András Koltay, said so in an interview: "Even in the West, there are brave authors who write that media independence is a self-made myth. After all, it always works in the interests of the owner and other interest groups, and journalists are necessarily biased."[21] This philosophy, alongside the restructuring of the media market (by supporting pro-government media owners), resulted in the state's considerable efforts to promote right-wing, conservative, pro-government research institutes and think tanks, which demonstrate the justification for such a model of media governance.

How to turn risk into opportunities:

In the current political situation, wisdom-based media governance is hardly feasible. However, it is already possible to develop scenarios on how to transform an illiberal media system into a democratic media system. For this purpose, it could be particularly useful to draw on the experience of other countries that are ahead of Hungary in this respect (especially Poland, but Slovenia could also be a good example).

In the case of political change, wisdom-based media governance can be created by using the scenarios developed and the knowledge accumulated internationally.

Agent oriented analysis

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

In the legal domain, the most important risks date back to the introduction of the media laws in 2010, by setting up a new media authority, whose independence is not guaranteed by institutional safeguards and which takes decisions on a clearly political basis, can be overruled or simply does not act on certain issues. There are also serious deficiencies in the autonomy of other areas of the judiciary, which also affect judicial matters involving the press. The regulation of public service media is extremely problematic since it can operate in an almost completely opaque way.

Since 2023, **defamation** is decriminalised in Hungary, but at the time when the country reports were written, defamation was still punishable even by imprisonment, which normally poses a risk to freedom of expression. One would expect that the decriminalisation of defamation might be a positive development for freedom of expression, but in Hungary's special case it can be counter-productive. After all, this decision has brought a positive outcome more for pro-government journalists from media outlets notorious for their propagandistic smear campaigns, who tend to have the highest number of lost press-rectification cases.

There are no specific provisions on exceptions for journalists and the press in the **GDPR** legislation. In terms of implementation, Hungary, along with Romania, has experienced a negative impact of the data protection regulation on press freedom.

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[21] Source: https://24.hu/belfold/2022/02/21/koltay-andras-nmhh-elnok-mediatanacs-interju/

Although **freedom of information** is guaranteed by law in Hungary, in fact, journalists' access to data of public interest is restricted in many cases.

In terms of **transparency of media ownership**, Hungary is one of the countries where general ownership registration is required by law, but media owners are able to hide behind complex ownership structures.

> *How to turn risks into opportunities:*

In the current situation, problems in media law can be identified and their consequences explored (e.g. lack of media concentration rules, problems with public service media regulation, shortcomings of the FOIA). It is important to monitor the impact of the forthcoming European Media Freedom Act on the Hungarian media landscape. In addition, proposals should be developed on what legal changes will be needed in the longer term.

In the case of political change, it is necessary to rethink the entire Hungarian media regulatory framework, to reform the institutional system and to reduce the possibility of political influence.

Accountability

The powers of the Hungarian media authority are strong, and the law does not allow independent **self-regulatory bodies** to decide on certain issues themselves. Only **co-regulatory bodies** can act with very limited powers, based on a contract with the Media Council. The strict, extensive legal framework does not leave room for self-regulation by the industry, and the co-regulatory system set up by the media authority only enforces the requirements already laid down in the law. Therefore, journalists' associations are weak in Hungary.

In Hungary, efforts to self-regulation in the past were not able to bring a normative system acceptable to the journalistic community as a whole. This is also reflected in the existence of multiple **codes of ethics**.

> *How to turn risks into opportunities:*

Increasing cooperation between media organisations and the remaining independent research institutions is needed. A well-functioning, active self-regulatory body should be established.

Independent media companies are likely to face many government attacks and will have to provide a lot of data in the future because of the new Sovereignty Protection Act. Media organisations can use this to their advantage by proactively sharing information about themselves (e.g. financial background), thus increasing transparency. In the long term, this can increase trust in the media.

Journalism

In the 2010s, the **media market** in Hungary became extremely distorted. Foreign professional investors, who left after the 2008 crisis, were replaced by pro-government media owners. Old, big media brands were closed down or put into the service of government propaganda. Together, public service media and the Central European Press and Media Foundation, which brings together hundreds of pro-government media brands, have become a powerful communication apparatus for the government.

The government distorts the media market further through the **unequal distribution of state advertising revenues**: favoured media can survive almost exclusively with the help of these resources, while cutting off the opportunities for independent media is a way of putting pressure on them. The majority of independent media are experiencing continuous financial uncertainty. With the exception of a few large media outlets, smaller outlets, which mostly rely on community funding, are struggling to survive from month to month.

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Without systematic statistical data and institutionalised **journalism** research, there is little and sporadic information available on Hungarian journalists, but a few surveys and interviews provide some insight into their situation. The constant changes in the media landscape make them extremely vulnerable. Hungarian journalists say that the **prestige of the profession** has become extremely low, they complain of underpayment and overwork.

How to turn risks into opportunities:

The forthcoming European Media Freedom Act can help to improve the transparency of state advertising spending. The EMFA can also help protect journalists by banning illegal surveillance.

Journalists need more cooperation and should develop a common communication on the importance of quality journalism. It is also important to recognise each other's journalistic achievements, even if newsrooms are competitors.

At present, the ruling party has a distinctly hostile attitude towards journalists. In the case of political change, a new political culture will be necessary, and those in power must respect the journalists who do their job and ensure access to information.

Media usage

The distortions in the media market are also reflected in consumption: voices independent of government are increasingly being pushed out of the traditional media channels onto digital platforms. Consumers need to be more conscious to **access** reliable, credible information or to be exposed to narratives other than the government 's one. Hungarians' **trust** in established institutions is declining significantly, there are only a few countries where trust in the media is as low as in Hungary. Partisanship divides citizens' perceptions of reality - the truth for one is a lie for another.

The fact that **market measurement companies** publish very little or no data carries the risk that 1) market players only publish data that is favourable to them, and 2) the predominance of market interests makes it impossible to conduct scientific analyses of this data that could help to gain a deeper understanding of media consumption patterns and habits of the Hungarian population.

How to turn risks into opportunities:

The biggest challenge now is for the remaining independent research centres to find resources for research on media usage. The results need to be communicated in a clear way and disseminated as widely as possible to provide a deeper understanding of the Hungarian media landscape.

In the case of political change, public funding for this research should also be made available. The research should be repeated regularly so that changes can be monitored. The database of publicly funded research should be made available so that researchers can use the data for their own projects.

Ensuring the publicity of some market-based research data is also important. Of course, this does not apply to commercially sensitive data (e.g. media usage of certain target groups), but some basic data on society as a whole should be made public.

Media related competencies

Digitalisation and content abundance open the door to disinformation and fake news, which requires a high level of **awareness** from citizens to be properly informed. The current public **education** system neglects media literacy at all levels of education. The centralised school

system, slow technological development, inadequate financial and professional recognition of teachers make it difficult to prepare children adequately for the challenges of the digital world.

In formal education, the teaching of media literacy is linked to multiple educational areas, it is not a subject in its own right, and is therefore usually taught by teachers without a specific qualification. Qualified teachers with the right skills, appropriate textbooks and the necessary development methodologies are lacking. The **lack of a coherent policy** is mainly due to the fragmented role of the state, the lack of definition of the roles of the stakeholders and the lack of coordination between them. Some progress has been made in recent years, especially among civil society and business actors. National and international NGOs play a significant role in developing good practices in media literacy, and the media industry is also increasingly involved with initiatives that provide a common platform for different stakeholders.

How to turn risks into opportunities:

Currently, NGOs have a crucial role to develop media literacy materials. On the one hand, this requires resources, and on the other hand, it is very important to participate in the European network and to learn from best practices.

It is also important to raise awareness of the dangers of disinformation and to help recognize disinformation. This is the responsibility not only of NGOs, but also of mainstream media companies.

In the case of political change, the education system needs to be reformed and media literacy needs to be integrated into the curriculum.

Country-specific policy recommendations

In the case of Hungary the following recommendations are absolutely important:

- 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

Critical junctures in the media transformation process

Sergio Splendore, Javier J. Amores, Martín Oller Alonso

Italy among other countries: fsQCA calibrated values of the outcome and conditions in the study

Italy, in comparison to other European countries, is placed within a context where legal and accountability domains are qualitatively calibrated, alongside journalism and media usage competencies. The calibrated fsQCA values suggest that Italy, like other countries such as Poland or Slovakia, may exhibit high levels of journalistic autonomy and a polarized pluralist media system. This implies a media environment with a certain degree of freedom yet influenced by political polarization and less developed media literacy. The data also highlight the nuanced and complex media landscape in Italy compared to other European counterparts, and how varying levels of deliberative communication are influenced by different media system contexts. Italy's calibrated values indicate its unique position in the media system typology within the EU, reflecting on its specific challenges and opportunities for deliberative communication , since it has some aspects of highly developed deliberative democracies, as well as, increasingly aspects of countries in which deliberative communication is very poor and faces too many risks and challenges.

This specific situation of Italy is explained especially by its media market concentration and limited diversity, the lower share of skilled and educated journalists compared to other EU countries, the risks to journalists' safety and freedom in this country, the lack of effective defamation laws and media ombudspersons, the lack of media and digital literacy in citizens, and the little innovation, and the slow and clumsy digitalization and adaptation to new technologies in journalism and the media. All these aspects will be explained in more detail below.

As a way of indicator, Italy, along with countries like Greece, Latvia, Croatia, Hungary, Poland, Romania, and Slovakia, displays a significant absence of media ombudspersons. This absence is a sufficient condition for the lack of a healthy deliberative communication. Media ombudspersons typically serve as an accountability mechanism in journalism, responding to public complaints and promoting ethical standards. In addition, the analysis identified four paths that contribute to the absence of deliberative communication, with Italy being part of the fourth. This path is characterized by a lower share of skilled and educated journalists, a lower role of journalists in monitoring power, a higher share of journalists in precarious positions, more attacks on journalists, and a weaker public service media, but a larger media market. These conditions suggest a challenging environment for journalists in Italy, where there may be a significant concentration in the television market, potentially limiting the diversity of viewpoints and information. On a positive note, it is convenient to highlight that having a higher share of skilled journalists can compensate for the lack of full-time journalists or a lower share of journalists with higher education. It seems that highly skilled journalists are an essential additional condition for successful deliberative communication, as observed in countries like Germany, Sweden, and Austria. This also indicates that despite structural challenges, the skill level of journalists can play a crucial role in fostering a deliberative media environment.

So, comparatively, Italy shares some challenges with countries from the polarized pluralist model and post-socialist countries, such as the absence of media ombudspersons and difficulties in journalism practices. However, there is also a possibility for Italy to enhance deliberative communication by focusing on the development and support of skilled journalists, which has been a successful condition in other European countries with democratic corporatist media systems.

Explanation

In Italy, critical junctures in the media landscape have simultaneously presented risks and challenges. First, it is convenient to point at the rise of private television networks, during the 1980s and 1990s, notably Silvio Berlusconi's Mediaset, which led to a concentrated media market, reducing diversity but also catalyzing calls for media reform and independent journalism. The shift towards digital media in the 2000s also posed challenges in adapting traditional media structures, yet it opened doors for digital innovation and new journalistic practices. Ongoing changes in journalistic professionalism and education highlight the risk of diminishing journalistic quality but also offer opportunities for enhanced journalism education and professional development. Legal and regulatory shifts, including changes in defamation laws and the implementation of EU directives, have at times constrained journalistic freedom, while also providing chances to fortify legal protections and ethical standards. More recently, the rise of misinformation, particularly on social media, underscores the risk of an ill-informed public, but also emphasizes the critical need for comprehensive media literacy programs. Each of these periods reflects the dynamic and dual nature of Italy's evolving media environment, where changes have often brought both significant challenges and the potential for progressive transformation.

So Italy is currently at a critical turning point in its media transformation, marked by these junctures and a legal environment that poses significant challenges for deliberative communication, due to inadequate regulation and implementation of defamation laws, despite having certain protections for whistleblowers, since the laws (aligned with the broader standards set by the European Union) does protect whistleblowers from retaliation such as dismissal, demotion, or discrimination in the workplace, and ensure confidentiality and anonymity for them, providing secure channels for reporting misconduct. But the legal aspect is crucial for the country, as it directly affects freedom of expression and the safety of journalists, thus impacting the quality of public debate and deliberative communication. Undoubtedly, this situation creates a complex environment for journalists, where freedom of the press can be compromised and thus affect the quality of deliberative communication.

On the other hand, the absence of well-developed professional ethical codes, identified as a necessary condition for deliberative communication, underlines the need to strengthen professional standards, accountability and self-regulation in Italian journalism. In this regard, it should be noted that the country's media system, historically influenced by political affiliations and regional biases, has prevented the development of adequate ethical codes. In addition, the concentration of media ownership is closely aligned with political and commercial interests, often leading to conflicts of interest and preventing the establishment of objective journalistic standards. The lack of strong and independent self-regulatory bodies further complicates the enforcement of ethical codes. Moreover, the rapid digital transformation of the media landscape has outpaced the development of ethical guidelines, especially with the emergence of new forms of media. In sum, while legal frameworks exist to regulate media practices, they often do not translate clearly into professional ethics, and are based more on legal compliance than ethical journalism. These intertwined factors collectively contribute to the current state of professional ethics in the Italian media sector.

Moreover, Italy shares characteristics with Hungary on a path marked by fewer qualified and educated journalists, an increase in attacks on journalists and weaker public service media, albeit with a larger media market. This situation can be explained because the Italian media sector is facing economic difficulties that mean budget cuts and fewer resources to recruit and train journalists. This economic pressure often translates into precariousness, lower salaries, more internships and less job security, making journalism a less attractive career or professional choice. In addition, rapid changes in the media landscape, particularly the shift to digital media, require new skills that current training programmes may not adequately provide. Moreover, the historical context of Italian journalism, characterised by political affiliations and concentration of media ownership, may not emphasise the importance of a diverse and comprehensive journalism education. As for the increase in attacks on journalists in Italy, this is explained by the polarised political climate and the rise of social media, which have made journalists more visible and vulnerable to public scrutiny. The types of attacks range from verbal abuse and online harassment to physical assaults. These attacks are often perpetrated by individuals or groups hostile to the role of the media in democratic society, including political extremists, organised crime groups and sometimes even public officials. The climate of political tension and social division contributes to this worrying trend, with journalists reporting on sensitive or controversial issues particularly at risk.

Without a doubt, this situation reflects wider challenges related to press freedom and the safety of journalists in Italy, and suggests that Italy's media system is at a critical point, where strengthening journalists' skills and protection against attacks could significantly influence the transformation towards a more open and deliberative media environment. Moreover, there is a need to improve media literacy, media understanding and skills among the Italian population in order to foster a more deliberative communicative outcome.

These critical junctures highlight the importance of a legal and ethical reform, but also and improvement effort in terms of media related competencies and media use, to facilitate a media environment more conducive to deliberative communication and democracy in Italy. So far, the agents leading legal and ethical reform in Italy are mainly government agencies, the judiciary and various media-related organisations. The Italian government plays the main role in enacting legal reforms, often in response to EU directives or domestic policy initiatives. The judiciary, through court decisions, shapes the interpretation and application of these laws, which impacts on media practices. However, media organisations, journalists' associations and advocacy groups, which play a critical role in pushing for ethical reforms and self-regulatory mechanisms in the industry, should be given a more important role in these reforms. These agents should work together to create a more accountable and transparent media environment, balancing the need for press freedom with ethical journalistic practices.

Recognising ROs: CMM (capability of monitoring mediascapes)

The Capability of Monitoring Mediascapes in Italy is not led by a single entity but involves a collaborative effort among various stakeholders, including transnational organizations, research projects, media industry units, scholars, and government organizations. The main agents would be the governmental regulatory bodies responsible for overseeing media practices, but also independent media watchdog organizations, academic institutions conducting media research, and journalist associations advocating for press freedom and ethical standards. These groups and entities play various roles in shaping the understanding of risks and opportunities in media ecology and research, and collectively contribute to the monitoring and analysis of media practices, trends, and challenges in Italy, playing distinct yet complementary roles in shaping the media landscape and ensuring its adherence to professional and ethical standards.

Nevertheless, the CMM in Italy is marked by a low level of collaboration among those actors, limited recognition of non-governmental actors' work, and minimal impact on public order. This lack of collaboration can be attributed to factors such as the fragmented media landscape, the competition between media outlets, divergent political interests, and the absence of a unified regulatory framework. Media entities often operate in a highly competitive environment, leading to individual efforts rather than cooperative approaches. Political polarization can also create divisions that hinder joint initiatives. Additionally, without a strong tradition of industry-wide self-regulation or a centralized body to coordinate efforts, collaboration can be challenging.

These factors hinder the development of cohesive strategies for monitoring and improving media practices across the country and to maximize opportunities and minimize risks in media ecology. The recognition for scholarly work is often confined to academic publishing, lacking broader visibility, and the insights generated rarely influence public policies directly. This scenario underscores the need for more integrated efforts and greater public engagement in monitoring deliberative communication.

In specific, the risks and threats associated with the Capability of Monitoring Mediascapes in Italy are multifaceted. One of the primary concerns is the potential for media monitoring to be influenced or manipulated by political or economic interests, which can skew the understanding of the media landscape and affect the objectivity of media reporting. This is particularly relevant in the context of Italy's historical challenges with media pluralism and the influence of political forces on media outlets. Furthermore, the reliance on external funding for media research can lead to biases in the focus and outcomes of studies, potentially prioritizing the interests of funders over local needs. In this country, the main external funders for media research often include European Union funding programs, such as Horizon Europe, and various international organizations that have an interest in media development and democracy. However, the research funding system in Italy also comprises national bodies like the Italian Ministry of Education, University and Research (MIUR), which provides grants and funding opportunities for academic research, including media studies. Additionally, private foundations and institutions may offer funding for specific projects or collaborations, but this part of funding is not so important.

Another significant risk is the indicated lack of cooperation and data sharing among diverse stakeholders, including academia, media organizations, and independent entities. Without a doubt in Italy there is a lack of tradition of collective action within the media sectors and academics and researchers in the field of journalism and communication, because of the factors previously mentioned. Perhaps this collaboration and joint efforts should be facilitated and motivated through education and greater incentives from institutions. But until this occurs, this lack of collaboration can result in a disjointed and incomplete picture of the media landscape, reducing the effectiveness of CMM in addressing critical issues such as misinformation, media freedom, and the impact of new technologies on journalism. Additionally, the limitations in data quality and availability impede the ability to conduct thorough and reliable media analysis, further complicating the task of monitoring and understanding the complex Italian mediascape. These limitations are due to structural challenges, such as a lack of comprehensive data collection systems and standardized reporting protocols, that can hinder the gathering of reliable data. But also the bureaucratic inefficiencies and a lack of digitization in public administration can contribute to the problem, leading to delays in data release and difficulties in data access. Additionally, privacy concerns and the stringent application of data protection laws like GDPR may restrict the availability of certain types of data. These factors, combined with potentially limited resources allocated to data management and research, result in challenges to accessing high-quality data.

Nevertheless, associated with all these risks and threats, a number of opportunities can be identified in terms of media monitoring capacity in Italy, such as the following:

- Enhanced interdisciplinary collaboration: The fragmented field of media and communication studies could encourage greater collaboration among universities, research institutions, and media organizations. For this, a central coordination mechanism could be introduced, in order to facilitate communication between various stakeholders. Policy reforms that incentivize joint ventures, along with the development of shared resources, could also encourage collaborative efforts. Education programs that focus on cross-sectoral knowledge exchange and networking events could also foster interdisciplinary relationships. Moreover, a recognition system for collaborative successes could further motivate diverse entities to work together. These steps would collectively create a more integrated and innovative approach to addressing media monitoring in Italy.

- Innovative methodology development: Challenges in data quality and availability offer an opportunity for developing new methodologies and technologies, like AI and big data analysis, to gain deeper insights into media trends and consumer behaviour. These challenges should be addressed mainly by academic institutions and research centers, which are at the forefront of methodological innovation, as well as tech companies specializing in data management and analytics. But also governmental agencies, particularly those in charge of statistics and public records, must drive improvements in data collection and sharing. Furthermore, collaborations with international organizations that have expertise in data governance could bring in external insights and practices. These agents, by working together, leveraging their respective strengths, and fostering a culture of openness and innovation, could significantly improve the landscape of data quality and availability in Italy.

- Promotion of independent research: Dependence on external funding raises bias issues, but also opens possibilities for exploring alternative funding models, ensuring greater research independence and objectivity.

- Strengthening press freedom and media pluralism: Addressing political and economic influences in media can enhance press freedom and media diversity through public policies, regulation, and public awareness. This would require a concerted effort from multiple agents. Key among these would be independent media watchdogs, which could advocate for stronger regulations against media concentration and conflicts of interest. The Italian government could enact and enforce legislation that ensures more media ownership transparency and fair competition. Journalist associations and unions could champion the cause of press freedom, pushing for protections against political interference. Additionally, the European Union, as a supranational entity, should provide a more solid framework and support for ensuring that its member states, including Italy, uphold the principles of media pluralism and freedom.

- Media education and training: The main challenges in this regard would be adapting curricula to keep pace with rapid technological changes and the evolving media landscape. This includes integrating digital media skills, data journalism, and social media proficiency. There is also a need to address the disparity in access to media education, especially between urban and rural areas, and to ensure that continuous professional development opportunities are available for working journalists. Furthermore, securing adequate funding for media education programs and fostering partnerships between educational institutions and media organizations present ongoing challenges. These issues are compounded by the need to cultivate a strong ethical foundation amidst a media environment often influenced by political and economic pressures. Addressing these challenges, incorporating courses on media ethics, research technics, data analysis, and new technologies, is crucial to prepare effectively current and future media professionals for the current complexities of this industry in Italy.

- Proactive response to misinformation: To identify and mitigate misinformation is crucial for improving public discourse and trust in media. And to get this, a multi-stakeholder approach is essential. Leading agents in this effort should include the Italian government, which can implement and enforce regulations to combat fake news, and media organizations that can invest in fact-checking services and promote transparency in news reporting. However, as it seems very difficult today for these agents to currently get involved in this work, academic institutions and tech companies should lead this task and collaborate on developing AI-driven tools and strategies to detect and flag misinformation. Civil society organizations and journalist associations could also engage in public education campaigns to raise awareness about misinformation and enhance media literacy among the populace. Additionally, international bodies such as the European Union could support these efforts by sharing best practices and providing a regulatory framework. Together, these agents can create a more informed public and a resilient media ecosystem capable of countering the spread of misinformation.

Wisdom-based media governance: risks and opportunities

In Italy, implementing wisdom-based media governance could mean more effective self-regulation among media outlets, enhanced journalistic standards, and policies that promote media literacy among the public. However, the risks associated with this approach include potential resistance from media entities accustomed to less regulated environments and the challenge of defining and implementing ethical standards that are universally accepted. There is also the risk that such governance could be misinterpreted or misused for political or commercial gains, thereby undermining the very principles it aims to uphold. In addition, Italy's path is characterized by a lack of international accountability and the absence of media ombudspersons, which is a risk but also suggests that there is a significant opportunity to enhance the wisdom-based governance of its media landscape. Such governance emphasizes the importance of reflective and inclusive practices that can support democratic discourse and the public's critical engagement with media. The absence of robust public discourse and developed organizational codes of ethics also points to a risk, but also indicating a potential area for growth in reinforcing ethical standards and fostering a more active media critique from outside the journalism profession. So, Italy's main opportunity lies in developing these aspects of media governance to create a more transparent, accountable, and thus, wise media environment that can effectively support deliberative communication. And without a doubt, wisdom-based media governance in Italy could lead to a more informed and engaged citizenry, reduced polarization, and a more trustworthy media environment. It could also encourage media outlets to adopt practices that prioritize truthfulness, fairness, and diversity of perspectives. Moreover, this approach could foster greater collaboration between media entities, academia, and the government, leading to a more resilient and dynamic media ecosystem that is better equipped to face the challenges of the digital age.

Agent oriented analysis

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

The main risks in this legal framework in Italy arise from potential overreach in regulations that could inadvertently stifle journalistic freedom or public discourse. For instance, defamation laws, though designed to protect individuals' reputations, can be used to suppress critical journalism, by creating a chilling effect where journalists, fearing legal repercussions, may avoid reporting on sensitive issues. This threat of litigation, especially from powerful individuals or entities, can lead to self-censorship and financial burdens due to legal costs. Consequently, journalists might refrain from investigative reporting on matters of public interest. Such practices undermine freedom of the press and restrict public debate, as the threat of defamation suits can be employed to intimidate and silence media voices, particularly in environments where legal systems are influenced by political or economic powers.

Similarly, while privacy laws are essential, they can conflict with the public's right to information, especially in investigative journalism. These challenges highlight the delicate balance Italy must maintain between protecting individual rights and preserving robust, free journalistic and public expression. In addition, while there is a legal framework in place that acknowledges the protection of journalistic sources and the existence of whistleblowing regulations in Italy, the actual implementation of these laws is inconsistent. This is due to bureaucratic inefficiencies, varying interpretations of the laws across different judicial jurisdictions, and a lack of clear guidelines for enforcement. Additionally, the political and media landscape in Italy, often characterized by its complexity and regional differences, can influence the application and effectiveness of these laws. There is also a potential conflict between maintaining journalistic confidentiality and addressing legal and ethical concerns, which can lead to inconsistent enforcement. Moreover, the rapid evolution of the media environment, especially in the digital age, as mentioned, poses challenges to keeping these protections relevant and enforceable.

Freedom of Information laws exist, intending to allow access to official documents and information held by public entities; however, the effectiveness of these laws is limited, since a substantial proportion of requests in Italy did not receive timely responses, and many requests are deemed illegal. This could be addressed by strengthening the administrative processes and legal framework. This includes providing adequate resources and training for public officials to handle FOI requests efficiently and within legally mandated timeframes. Streamlining the request process through digital platforms can also facilitate easier access and faster response times. Additionally, clear guidelines and criteria should be established to determine the legality of requests, reducing the number of requests deemed illegal. Regular monitoring and evaluation of the FOI process, along with transparency in reporting response rates and reasons for denial, can help identify bottlenecks and areas for improvement, ensuring that the public's right to information is effectively upheld.

Additionally, the right of journalists not to disclose their sources is recognized as vital for freedom of information, but again, the enforcement of this right is not always guaranteed. The whistleblowing protections are in place as per the EU directive, yet the lack of information on their enforcement raises concerns about the actual level of protection afforded to whistleblowers. Moreover, there appears to be limited or no specific monitoring data publicly available on the implementation of whistleblowing protections in Italy so far. This lack of comprehensive data contributes to the concerns regarding the actual level of protection afforded to whistleblowers. Effective monitoring and transparent reporting are essential for evaluating the enforcement of these protections and ensuring they serve their intended purpose. Without such data, it is challenging to assess the effectiveness of the whistleblowing regulations and to identify areas needing improvement. On the other hand, while there are legal safeguards for media ownership

transparency, Italy is identified as following a path with unsatisfactory regulation and implementation of defamation laws. This environment suggests that the main risks to freedom of speech and information in Italy are not rooted in the absence of laws but rather in their inconsistent application and the inadequacy of enforcement mechanisms.

How to turn risks into opportunities /or maintain opportunities?

The opportunities lie in strengthening the enforcement and implementation of existing laws. The presence of FOI laws, protections for journalistic sources, and whistleblowing regulations provide a foundational legal framework that could be leveraged to enhance transparency and accountability within the media and public sectors. The strengthening could be achieved by enhancing administrative capacity and legal clarity. For instance, to address the inefficacy in responding to FOI requests, Italy could improve administrative processes, perhaps through digital platforms, to ensure timely and legally compliant responses to FOI inquiries. Strengthening the implementation of source protection laws would bolster investigative journalism and the media's role in monitoring power. Regarding whistleblowing, solidifying the enforcement of protections would encourage disclosures in the public interest, thereby enhancing the fight against corruption and promoting public dialogue on such issues.

Moreover, improving the regulatory environment for media ownership transparency could foster a more competitive and diverse media landscape, which is crucial for a healthy democratic discourse. Addressing the unsatisfactory regulation and implementation of defamation laws would help protect against the misuse of such laws to stifle critical journalism and public debate.

The leading agents should include government bodies responsible for overseeing information access and whistleblower protection, judicial authorities ensuring the laws are correctly interpreted and enforced, and independent oversight organizations monitoring compliance. These entities can collaborate to streamline request procedures, provide comprehensive training for officials handling FOI requests, and ensure transparent and consistent application of whistleblowing protections. Additionally, raising public awareness about these rights and protections can help in holding these bodies accountable, ensuring that the laws are not only in place but are also effectively serving their intended purpose of promoting transparency and safeguarding public interest disclosures.

Overall, the opportunities involve turning existing legal provisions into effective practices that support a robust, free, and fair media environment, pivotal for deliberative democracy and the public's right to information.

Accountability

In Italy, accountability within the media sector faces several risks and challenges. The main risks include a lack of effective self-regulatory mechanisms, such as inadequately developed press or media councils and insufficient enforcement of professional and organizational codes of ethics. These deficiencies can lead to issues with journalistic standards and practices. The absence of well-established media ombudspersons further exacerbates the issue, limiting avenues for addressing public complaints and ethical concerns within the media. Moreover, Italy's path in the context of deliberative communication is characterized by the lack of international accountability, indicating a broader issue of insufficient oversight and transparency in media operations. Another of the main risks is the potential for conflicts of interest, particularly in cases where media ownership overlaps with political interests. This overlap can lead to biased reporting and a lack of impartiality in news coverage, thereby compromising the media's role as an unbiased and independent entity in a democratic society. Additionally, there is the challenge of enforcing accountability in a rapidly changing media landscape, where digital platforms and

new forms of media consumption continually redefine the boundaries and expectations for responsible communication. These risks and challenges highlight the need for robust regulatory mechanisms, stronger institutional structures and practices and vigilant oversight to uphold media accountability, ensuring responsible journalism and fostering public trust in the media, and thus maintain a healthy, balanced, and accountable media environment in Italy.

How to turn risks into opportunities /or maintain opportunities?

As mentioned, the main opportunities revolve around strengthening and establishing robust self-regulatory mechanisms. The development of effective press or media councils could be a significant step forward. These councils, ideally composed of diverse stakeholders including journalists, media owners, and public representatives, could serve as independent bodies overseeing media practices, addressing ethical breaches, and ensuring adherence to journalistic standards.

Improving the enforcement of professional and organizational codes of ethics presents another opportunity. Strengthening these codes and ensuring that they are ingrained in media culture can elevate the standards of journalism. This includes providing training and resources to journalists and media houses to foster a deeper understanding and commitment to ethical journalism.

The establishment or strengthening of media ombudsperson roles in Italy could also enhance accountability. These ombudspersons would serve as intermediaries between the media and the public, addressing complaints and promoting transparency. This role could help build public trust and provide a check against unethical media practices.

Furthermore, enhancing international accountability and transparency in media operations could improve the overall media landscape in Italy. This might involve adhering to international standards of media freedom and transparency, participating in global media accountability initiatives, and fostering a culture of open and responsible reporting.

Journalism

Italian universities offer diverse programs in journalism, ranging from undergraduate degrees to postgraduate courses and specialized master's programs. These programs often combine theoretical knowledge with practical skills, covering areas such as journalistic ethics, media law, digital journalism, and investigative reporting. Many Italian universities –more than 10, including the University of Catania, the University of Milan, the Polytechnic University of Milan, the Catholic University of the Sacred Heart in Milan, the University of Padua, the University of Pavia, the University of Siena, The American University of Rome, or the Mediterranean University of Reggio Calabria– have well-established departments or schools of communication and journalism, which are often linked with media research centres. These institutions not only provide academic training but also engage in research on media trends, journalism practices, and the evolving digital media landscape. Additionally, some universities offer joint degrees or collaborations with international institutions, providing students with a global perspective on journalism. However, as with journalism sectors worldwide, the academic field in Italy faces challenges such as adapting to rapidly changing media technologies, addressing the shift towards digital and multimedia journalism, and preparing students for a competitive job market. These universities and departments play a crucial role in shaping the future of journalism in Italy, equipping students with the necessary skills and ethical grounding to navigate the complexities of modern media. Of course, the rapid digitalization and technological evolution, including advances in artificial intelligence, pose significant challenges to journalism education and training in Italy. Traditional curricula may struggle to keep pace with these changes, potentially leaving graduates ill-equipped for the current demands of the media industry. The skillset required for jour-

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nalists is rapidly expanding to include data analytics, social media proficiency, and the ability to work with AI-driven tools. Without a responsive and adaptive education system that integrates these emerging technologies and digital skills, there is a risk that new professionals may enter the workforce at a disadvantage, leading to a skills gap in the Italian media landscape. This makes ongoing education and professional development critical for both current and aspiring journalists.

Moreover, and despite all these training offers and all the existing journalism and communication degrees in Italy, this country is characterized by a lower share of skilled and educated journalists, and a higher proportion of journalists in precarious positions, which may affect the quality of journalism and its role in democratic society. This can be attributed to financial challenges in the Italian media industry leading to budget cuts and a reduced capacity for hiring and training journalists. These economic strains often manifest as increased job precarity, lower wages, a greater reliance on internships, and reduced job stability, rendering journalism a less appealing professional choice.

On the other hand, attacks on journalists, both verbal and physical, also pose a significant threat to press freedom and the safety of media professionals, potentially leading to self-censorship and a chilling effect on investigative reporting. These attacks on journalists are carried out by various actors, including organized crime groups, particularly when journalists report on corruption and criminal activities. Political extremists and activists from various ideological backgrounds also perpetrate attacks, especially in response to journalists covering controversial issues. Additionally, there have been instances where public figures and politicians have been implicated in verbal assaults against journalists. The rise of digital platforms has also led to an increase in online harassment by individuals or groups who aim to intimidate journalists and discredit their work.

In addition, the high concentration in the television market, dominated by a few large companies, can limit the diversity of viewpoints and information available to the public. These risks underscore the need for measures to enhance media diversity, support the development and protection of journalists, and ensure a safe and enabling environment for free and independent journalism in Italy.

How to turn risks into opportunities /or maintain opportunities?

Considering the mentioned risks and challenges in this domain, the main opportunities would be enhancing media diversity, developing initiatives to reduce the concentration in the television market and promote a diverse media landscape; improving journalism education and training, strengthening journalism education and offering continuous professional development courses can help address the skills gap; fostering a safe environment for journalists, implementing stronger measures to protect journalists from attacks and harassment; promoting ethical journalism, strengthening professional codes of ethics and establishing effective self-regulatory bodies; leveraging digital transformation in the media sector, which offers opportunities for innovation in content delivery, audience engagement, and new storytelling formats; and encouraging investigative journalism through grants, fellowships, or collaborative projects, which can enhance the role of journalism in holding power to account and informing the public on critical issues.

Media usage

A significant concern in this sense is the digital divide, which impacts access to online media, particularly among older populations and in rural areas. This divide can lead to unequal access to information and a gap in media literacy. Another risk involves the high consumption of television, often dominated by a few major broadcasters, which can limit the diversity of content and

viewpoints available to the public. The rise of social media as a primary news source also presents risks, including the rapidly spread of misinformation and the challenge of discerning credible information sources, but also privacy breaches and echo chambers, where users may be exposed to biased or false information, reinforcing existing beliefs rather than offering a balanced view. These risks highlight the need for initiatives to improve digital access and literacy, ensure a diverse media landscape, and educate the public on media consumption and critical thinking skills.

How to turn risks into opportunities /or maintain opportunities?

The main opportunity would be bridging the digital divide, which can be achieved through expanded internet access and digital literacy programs, particularly targeting rural areas and older populations. This effort would not only democratize access to information but also empower citizens to engage more critically with media content. Another opportunity lies in promoting media plurality, encouraging the consumption of a diverse range of media sources beyond dominant television broadcasters. This could involve supporting independent and digital media initiatives, as well as public broadcasting services that offer varied and unbiased content. Regulators could enforce policies to prevent media concentration and ensure fair competition, while media organizations can commit to diverse programming and viewpoints. Educational institutions should emphasize the importance of media literacy, teaching individuals to seek information from a variety of sources. Civil society can play a role by advocating for a diverse media landscape and supporting alternative media platforms. While promotion alone may not guarantee efficiency, a multifaceted strategy that combines regulatory measures, industry commitment, educational efforts, and public advocacy is likely to foster a more pluralistic media environment.

Additionally, there is an opportunity to combat misinformation through educational campaigns and media literacy programs, equipping the public with the skills to critically evaluate news sources, especially on social media. These steps would contribute to a more informed, engaged, and critically thinking society, fostering a healthier public discourse and a more robust democratic process in Italy.

Media related competencies

In Italy, media literacy programs and educational initiatives are increasingly recognized as vital components of a well-rounded education, responding to the challenges of a digital and media-saturated environment. These programs aim to equip individuals, particularly students and young people, with the skills to critically analyze media content, understand the nature of media production, and become savvy consumers and producers of media. Educational initiatives often include teaching digital literacy, critical thinking, and ethical media usage, and are integrated into school curricula or offered as extracurricular activities. Additionally, there are efforts to provide training for educators and media professionals, ensuring they are well-equipped to guide and inform others in media literacy. Nevertheless, Italy faces several risks in this sense, such as the disparity in access to digital resources between urban and rural areas, and across different socioeconomic and age groups, which could lead to unequal opportunities for media literacy education. Additionally, there's a risk of insufficient integration of digital media literacy in educational curricula, which may leave younger generations ill-equipped to discern reliable information in an era of widespread misinformation. Moreover, media professionals themselves might face challenges in keeping up with rapid technological and digital changes and evolving media consumption patterns, underscoring the need for ongoing professional development.

How to turn risks into opportunities /or maintain opportunities?

Firstly, empowering citizens is a key opportunity, where these programs can develop individuals into critical thinkers and discerning media consumers, contributing to a more informed and engaged citizenry. Secondly, bridging gaps in media literacy is essential; targeted initiatives can help close the digital divide, ensuring equitable access to media literacy education across all demographics, including underserved rural areas and various age groups. Thirdly, there is a need to adapt to digital trends; educational initiatives can evolve to include contemporary digital trends, thus equipping learners with skills that are relevant and practical for the digital age. Fourthly, collaborative efforts can be pivotal; partnerships between educational institutions, media organizations, and technology companies can lead to innovative and effective approaches to media literacy education. Lastly, professional development is crucial; continuous learning opportunities for educators and media professionals are necessary to keep them updated with the latest media trends and technologies, thereby enhancing their capacity to effectively teach and guide others in an ever-evolving media landscape.

Country-specific policy recommendations:

1. Strengthen Media Diversity and Independence: Implement policies to reduce the concentration in the television market and support independent media outlets. Encourage a diverse media landscape that includes local, regional, and digital media voices.

To achieve this, the most important thing would be to implement regulatory frameworks that guarantee transparency and limit the concentration of media ownership, guaranteeing that no entity or individual can control a significant part of the country's media landscape. It would be beneficial to have laws similar to those in other European countries, which limit the percentage of media ownership to avoid monopolies, following the guidelines of the European Law on Freedom of the Media in terms of media regulation and protection of rights of journalists in Europe.

In this sense, first it is vital to enforce transparency in media ownership and funding sources to avoid hidden influences and conflicts of interest. Strengthening laws that require media companies to disclose their financial sponsors and advertising contracts can improve accountability.

Furthermore, following these same guidelines, and with the aim of supporting editorial independence and media plurality and diversity, it would be interesting for regional governments to provide greater financial aid, tax incentives or subsidies to small, independent and local media. This support can help these entities survive and thrive, contributing to a more diverse media landscape.

It would also be important to strengthen public broadcasting services to ensure that they have sufficient funding and independence. This could counter the influence of private media conglomerates and provide diverse and unbiased content.

These changes must be led by the government, through regulatory bodies, and through the enactment and application of national laws, which better align with EU standards and best practice recommendations. Civil society organizations and the journalism community can also play crucial roles in advocating for reforms, educating the public, and monitoring media practices.

2. Enhancing Journalism Education and Training: Invest in journalism education at universities and establish continuous professional development programs for media professionals.

There is a strong need to incorporate emerging technologies, digital journalism, data analytics and multimedia storytelling into curricula to prepare students for the demands of today's journalism, but also emphasize ethical journalism, critical thinking and research skills to maintain high journalistic standards. This requires continuous learning opportunities for today's journal-

ists to update their skills, especially in digital media, social media management and data journalism, to close the skills gap in the rapidly evolving media landscape.

It is also critical to strengthen investment in digital media initiatives and integrate comprehensive media literacy programs to empower not only journalism students, but also citizens with the skills to critically evaluate media content, interact with diverse sources of information and discern misinformation. These programs should focus especially on digital literacy, investigative and data journalism and fact-checking skills.

For this, both public and private investments are crucial. Public funding can support foundational education and training programs, especially in public universities and community colleges, ensuring accessibility and diversity. On the other hand, private investment can drive innovation, offer scholarships, and fund state-of-the-art facilities and equipment. Nevertheless, investment alone does not guarantee quality output. Quality assurance mechanisms, such as accreditation of journalism programs and periodic curriculum reviews by industry professionals, are essential to maintain education standards.

Programs that offer practical experience, such as internships with media houses, workshops with industry professionals, and opportunities for student journalism, are particularly attractive. These provide real-world skills and networking opportunities. But also it is recommended to develop specialized courses in investigative journalism, multimedia storytelling, AI, or data journalism, that can attract students interested in niche areas, offering them a competitive edge in the job market.

Without a doubt, this represents a great challenge for universities, educational centers and educators. Therefore, to motivate these changes, it is also interesting to strengthen partnerships with media organizations and professional journalists to develop guest lectures, internships and mentoring programs. This not only enriches the curriculum but also motivates educators by keeping them connected with industry trends. In addition, of course, it is important to encourage and fund research in journalism and media studies, allowing educators to explore innovative practices and pedagogies, which can be integrated into teaching. And it would be also crucial to offer more professional development opportunities and recognition for educators who innovate in teaching methods or contribute significantly to journalism education.

3. Collaborative Policy Development: Enhance a better cooperation of agents. For this it is important to engage a broad spectrum of stakeholders from diverse sectors in developing and implementing policies that address the multifaceted challenges of the media landscape. These stakeholders should include government and public bodies, transnational organizations, media industry structures, independent organizations, professional associations, scholars, and research groups. This diverse engagement would ensure a wide range of perspectives and expertise in policy development.

On the other hand, for this same purpose it would be also fundamental to improve the availability and reliability of data in open and digital formats. Ensuring data is accessible, processable, and provided in a structured format will facilitate better analysis and informed decision-making. It is also convenient to implement measures to increase the reliability of data and ensure contributions to democratic processes, since standardizing data formats across different actors can enhance comparability and usability.

Address funding avenues for media research and monitoring to ensure they are adequately supported is also recommended. This includes leveraging both national (e.g., Italian Ministry of Education, University, and Research; National Research Council) and international funding frameworks (e.g., European research frameworks like FP7 or Horizon2020). This would help promote collaborative research projects that bring together different actors to work on common objectives. This approach can lead to shared understandings and joint solutions to the challenges facing deliberative communication in Italy.

In addition, it is advisable to foster an environment of transparency where media policies are developed through open discussions involving all relevant stakeholders, for which the laws suggested in point 1 would be vital. This can help ensure that policies are both effective and reflective of diverse interests.

Also, and again, enhance the competencies of those involved in media, communication, and journalism through targeted education and training programs is fundamental, but also to leverage technology in order to facilitate collaborative policy development, such as digital platforms for stakeholder engagement, data sharing, and public consultation.

4. Protect Journalists and Promote Ethical Standards: Enforce existing laws to protect journalists from attacks and harassment, and establish or strengthen effective self-regulatory bodies like media councils and ombudsperson roles. Strengthen professional and organizational codes of ethics to uphold journalistic integrity and encourage adherence to professional codes of ethics in journalism.

This responsibility also falls upon a spectrum of stakeholders, including government bodies tasked with overseeing access to information and the protection of whistleblowers, judicial authorities responsible for the correct interpretation and application of laws, and independent organizations dedicated to monitoring adherence to these regulations. A more robust enforcement mechanism can be achieved through collaborative efforts among these entities, which should focus on streamlining procedures, offering comprehensive training to officials involved in handling Freedom of Information requests, and ensuring the transparent and consistent protection of journalists. Such measures are crucial for safeguarding freedom of expression and enriching public debate, creating a safer and more conducive environment for journalists to perform their essential role in society.

5. Encourage Investigative Journalism: Provide resources and support for investigative journalism, including grants, fellowships, and support for collaborative projects that enable journalists to freely investigate and report on matters of public interest.

For this once again a multifaceted approach is essential, involving government bodies, educational institutions, and private foundations. Creating and fostering an environment where journalists can work without fear of retribution and feel free to investigate and report on matters of public interest is crucial for enhancing the role of journalism in democratic accountability. Such initiatives not only support investigative journalism but also contribute to a more informed public and a robust democracy.

6. Regulatory Reforms for Transparency and Accountability: As mentioned before, reform laws and regulations to enhance transparency in media ownership and ensure fair competition is crucial, to strengthen media diversity and independence, to improve the oversight processes of those responsible for the media and demand accountability, to protect journalists, to encourage collaborative policy development, and more or less directly to improve the rest of the points indicated so far. Implement regulations that foster accountability and transparency in media operations, including clear guidelines for content and advertising. Address issues in the implementation of freedom of information laws and defamation legislation.

7. Adapt to Technological Changes: Support the digital transformation of media organizations through funding, training, and infrastructure development. Encourage innovation in content creation and delivery. Encourage innovation in media content delivery and audience engagement. Invest in research and development to keep pace with global media trends and digital transformation.

The responsibility for encouraging and supporting the digital transformation of media organizations and adaptation to new technologies in Italy also must fall to a coalition of government agencies, private sector entities, and academic institutions. These stakeholders can drive digital innovation by providing financial incentives, technological infrastructure, and educational

programs tailored to the evolving media landscape. Government bodies, such as the Ministry of Economic Development and the Italian Communications Authority (AGCOM), can offer regulatory support and funding for digital initiatives. Private companies can invest in cutting-edge technologies and partner with media organizations for technology transfer and innovation projects. Meanwhile, universities and research institutions play a crucial role in fostering a culture of continuous learning and adaptation by integrating digital media studies into their curricula and conducting research on digital transformation strategies. This collaborative approach ensures a comprehensive ecosystem that supports media organizations in navigating the challenges and opportunities presented by digital and AI transformation today.

8. Bridge the Digital Divide: Invest in digital infrastructure to ensure equitable access to the internet and digital resources, particularly in rural areas and for older populations. Promote digital literacy to bridge the gap between different demographics. For this pusporse, the government, through its regulatory bodies and public policies, plays a crucial role in expanding internet access and promoting digital literacy programs. These initiatives should be supported by educational institutions that integrate digital skills into their curricula, thus fostering media literacy. Civil society organizations should also advocate for a more inclusive digital landscape, supporting initiatives that aim for digital inclusion. Furthermore, media organizations and the private sector can contribute by offering diverse and accessible content that caters to the needs of all citizens. This comprehensive approach ensures that all Italians, regardless of their location or age, have the opportunity to participate fully in the digital society, enhancing democracy and societal engagement.

9. Promoting Civil Discourse: Politicians could take a leading role to achieve this goal by engaging in active dialogue directly with citizens, fostering feedback and open conversations through digital platforms, and encouraging constructive discussion on various public issues. This approach can help bridge the gap between government and the public, creating a more informed and engaged citizenry. Similarly, social media platforms have a significant role to play by creating and promoting environments that encourage civil discourse and dialogue among users with differing perspectives on their platforms. By implementing features and policies that facilitate respectful exchanges and counteract misinformation, social media can become a valuable tool for enhancing public debate and understanding. These efforts can contribute to a more vibrant and democratic public sphere.

10. Empowering Citizens as Competent Media Users: In order to promote the civil discourse is also important to empower citizens as competent digital and media users. And this is mainly because threat perceptions of selective news, and mal-, miss- and dis-information consumption are associated with algorithmically curated feeds on social media. Citizens should, thus, be made aware of the threats they face in social media and the role of algorithms in their political information environment, to empower them to critically evaluate the information they encounter.

For this, educational systems play a pivotal role through the integration of comprehensive media literacy programs into curricula at all levels, aiming to equip citizens with the critical thinking skills necessary for discerning misinformation. Government bodies can also support these initiatives by providing funding and policy frameworks that prioritize media education and digital literacy across the population. Additionally, civil society organizations can augment these efforts by launching awareness-raising campaigns and facilitating access to media literacy resources. This multifaceted approach ensures that citizens are not only consumers but also critical prosumers and evaluators of media content, contributing to a more informed and engaged citizenry.

11. Fostering Individual Responsibility: On the same line as the previous point, citizens should also be encouraged to individually contribute to a healthy media diet. That is why is so important to foster individual responsibility in Italy, involving both personal initiative and support from a broader ecosystem. Citizens themselves can play a crucial role by actively seek-

ing out information from a variety of sources beyond their usual preferences, thus contributing to a more balanced mediascape. This personal effort is essential for cultivating a critical and informed public. However, the success of these individual endeavors also depends on the availability of diverse and reliable media sources, since citizens should be able to access information from outside their preferred political information environments. For this, educational institutions, media organizations, and policymakers must work together to provide the public with the tools and knowledge necessary to navigate the media landscape effectively, responsibly and critically. This collaborative effort ensures that citizens are not only encouraged but also empowered to take responsibility for their media consumption habits, leading to a more informed and engaged society.

12. Encouraging responsible news consumption: On the same line, individuals also play a crucial role in mitigating the spread and impact of false and fake information. Citizens should be urged to be more critical of the information they encounter, fact-check before sharing information, or correct false statements within their personal circles. That is why it is so important encouraging responsible and critical news consumption among citizens in Italy, something that also requires a collective effort from multiple stakeholders. For this purpose educational institutions are key, as they can embed media literacy into their curricula, equipping students with the skills to critically assess news sources. The government can also facilitate this by supporting policies and programs that foster media education across all age groups. Additionally, media organizations themselves have a responsibility to promote transparency, accuracy, and fairness in their reporting, thereby building trust with their audience. As mentioned before, civil society organizations can complement these efforts by launching public awareness above that highlight the importance of discerning media consumption. Together, these actions can cultivate a culture of critical engagement with news media, empowering citizens to make informed decisions in their media consumption practices and to counter mal-, miss- and dis-information spread on digital platforms.

These recommendations aim to address the identified risks and leverage opportunities to create a more balanced, robust, diverse and dynamic media environment in Italy, conducive to a healthy democracy and informed public discourse. As can be seen, all the points are absolutely interconnected, for this reason, the improvement and good implementation of one of them will indirectly lead to the improvement of the others, and vice versa. That is why it is vital to address all these challenges in a synergistic manner.

Critical junctures in the media transformation process

By Anda Rožukalne, Ilva Skulte, Alnis Stakle

Latvia among other countries: fsQCA calibrated values of the outcome and conditions in the study

The deliberative communication contextual and diachronic conditions indicators (0.32) can be considered relatively low and are significantly behind Sweden (0.95), Germany (0.92), Greece (0.71), Estonia (0.65) and Austrian (0.6) indicators. The contextual and diachronic conditions indicators show relatively higher quality of democracy (0,52), but lower economic development (0,17), human development (0,25), polarisation values (0,15) postmaterialist values (0,25) and with almost lowest rates among other countries in technological development (0,09).

Latvian journalistic opportunities are support of public service media (0.84) and share of full time employed journalists (0.85) as well as a relatively high level of journalists with higher education degree (0.54) and skilled journalists (0.65). However, risks are observed in the large share of women employed in media (0.93), which may indicate both the lower prestige of the journalism profession and lower pay. Also, it may indicate the stereotypical perception of the journalist profession and education in the culture.

Latvia has high indicators for digital media users (0.84) and audiences that frequently access news (0.9), which can be evaluated as an opportunity. However, it should be noted that risks are associated with relatively average media literacy (0.57) and audience with average level digital skills (0.42). The data clearly shows the number of lower legacy media users (0.21), and it can also be observed that the audience almost equally trusts social media (0.6) and legacy media (0.57), which may cause risks in the future for popularity and trust in public service media and professional journalism.

A high level of risks is observed in lower indicators of the accountability domain where (Non-statutory) press /media councils (0), professional Codes of Ethics (0.3) media ombudspersons of any kind (0.3), public discourse and media criticism (0) and international accountability (0.3) creates a complex set of predictable risks that can threaten the sustainability of independent and high-quality journalism, as well as generally affect freedom of expression and trust in journalistic independence.

The legal domain, which generally illustrates freedom of expression in Latvia, can be viewed more from the perspective of opportunities, which is indicated by the set of data, where defamation regulation (0.3), defamation implementation (0.7), data protection regulation (1), data protection implementation (1), freedom of information regulation (1), freedom of information implementation (0.7), protection of journalism sources regulation (1) protection of journalism sources implementation (1) protection of whistleblowing regulation (1) and transparency of media ownership regulation (1).

Explanation

The analysis of the available data allows to explain this situation as the gap between relatively well developed legal system and underdeveloped accountability system, it is also connected to other contextual factors influencing deliberative communication, like (materialist) value system, low understanding of media role in democracy, mediocre media related competences and lacking discussion on media in society in general and relatively low trust to news media and usage of them. Those factors proved to be part of the more in-depth change that happens slower, namely, cultural change (change of values, (ethical) norms, practices, routines etc.) and change of audience beliefs – both of them actually hardened by contemporary (geo)political situation and developing streams of populist communication in social media.

Other negative sources of influence are relatively low economic and technological development. Here, further factors to mention are the small market and low investments in research and development.

Recognising ROs: CMM (capability of monitoring mediascapes)

The monitoring capability of mediascapes in Latvia is rather weak due to the higher mentioned economic factors and especially there is a lack of continuous, transparent and effective system of financing monitoring activities. Main actors involved in monitoring and evaluation activities and providing data for public and professional discussion 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 due to the structural change in academia itself (journalism and media studies re-located from humanities to social sciences units in most of the universities) and relatively little number of academic actors. In spite of significant growth in academic output in the field of media studies, there is almost no longitudinal studies, no continuity and a lot of areas connected to deliberative communication remain intact, because of lack of sustainability - monitoring activities are conducted with mainly project based funding.

The last can also be said about the role of NGOs. However, the role of NGOs is very important especially in the domains of press freedom and media related competences.

The role of governmental actors in the monitoring process is also endangered by the lack of resources (financial, human), however, it is also important to ensure the independence of those bodies from political pressure that can result in the lack of objectivity and measures in damage of freedom of expression, in particular, press freedom.

Wisdom-based media governance: risks and opportunities

It must be mentioned that largely the problems and risks perceived in the first decade of the 21st century have already been mitigated during the second decade. The systemic and legal conditions for the deliberative communication in Latvia have been developed since the regaining of the independence in early 1990ies but stabilised at the end of 2010ies due to the legislative, policy making and professional journalistic initiatives. The contemporary situation can be interpreted as much more understandable in terms of policies, strategies and actors. National Media Policy Guidelines (2016), establishment of a Media Support Fund (MSF) (2017), as well as Latvian Journalists Association (LJA) (2010) and Latvian Media Ethics Council (LMEC) (2018), several new laws including Law of Public Electronic Media and Administration Thereof (2021) were aimed on the creation of more transparent, independent, equal and encouraging communication environment. These new corporate agents (Media Policy Department at the Ministry of Culture, MSF, LJA, LMEC, PSMs' Council) can be taken in account as the most important influencers of the structural change towards conditions that can be described as satis-

factory for deliberative communication. However, at the same time, there are **risks** that are especially serious in the context of rising populist politics in Latvia like in other countries direct attacks on journalists, signs of political pressure (including through influence on regulatory bodies) and insufficient practice of lower courts in the SLAPP cases show the fragility of the newly established system in some cases standing against traditional routines and practices based on biassed understanding of cultural values and norms and the national security and populist evocation of them. In this context particular risks for deliberative communication are connected to both 1)relatively low level of monitoring capacity (based on the lack of means, traditions and academic research and - as a result - a reflection based discussion of norms needed as a base for further legislative activity) and 2) problems of media related competences, especially, those competences and skills motivating fair production, delivery and usage of news, promoting inclusiveness, trust and active media use for participation in social life. There we can speak of a relative weakness of agents responsible for research and media education (universities, schools, libraries, NGOs, activist groups, media organisations itself) that could be involved in the activities of monitoring, developing and promoting deliberative norms and principles of communication in the country.

The **opportunities** to be used include the careful and balanced development of media policy goals and guidelines for next period of time to ensure continuation, coherence, but also strengthening knowledge and skills related to the understanding of role of media and journalism in contemporary society, especially, in the context of journalistic work and products , first of all, in all groups of primarily and corporate agents related to the field of deliberative communication, including judges and politicians and in the general society, as well as strengthening monitoring capacity - research, discussion and reflective evaluation.

Agent oriented analysis

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

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. FoE is clearly defined in Constitutional Law in Latvia, The Law on The Press and Other Mass Media from 1991 defines freedom of the press as the basis for the domain of media it defines the rights, and obligations of journalists, protecting sources of information of journalists. However, this law is outdated and doesn't reflect the complexity of contemporary media work and doesn't indicate instruments to protect editorial independence included in amendments of the law. Defamation is criminalised in Latvia (Article 157, Part 2 of the Criminal Law) whereby criminal liability for defamation refers to the author. Protection of journalistic sources is regulated by Article 22 of the Law on the Press and Other Mass Media but is not absolute and is subject to restrictions if a court instructs a media journalist or editor to indicate the source of the information published. Latvia is also one of the first countries that has transposed the EU Whistleblowing Directive (Directive 2019/1937) and adopted new Whistleblowing Law (in 2022).

However, practice of courts shows that the more in-depth change in understanding media work specifics and public discussion is needed, judges are still lacking broader context and proper knowledge of media work. They base their conclusions mainly on evidence and arguments provided by institutions, often governmental institutions.

How to turn risks into opportunities /or maintain opportunities?

The main risks in the domain are connected to the lacking research and monitoring of the practice of laws, both in media every day and court practice. Especially, lacking data on court practices is an obstacle to the development of knowledge based and wisdom-based court practice

and lawmaker practice. Thus, the opportunity would be 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 (the Latvian Media Ethics Council has been operating since 2018, the public media ombudsman - since 2022), it has not yet been integrated into Latvian media culture. For example, in a study by the Media Ethics Council (SKDS, 2023), news media editors and journalists admit that the code of ethics is mostly formal and that ethical decisions are made by following a "gut feeling". However, the new actors of self-regulation are active, their influence is gradually increasing, and support for their activity can change the ignorance towards the problems of professional ethics. At the same time, it is clearly observable that the new self-regulatory institutions can be used for their instrumentalization in political interests or to support SLAPP processes. Therefore, their task is to increase public trust and explain their activities in order to improve public understanding of media self-regulation.

> *How to turn risks into opportunities:*

It is important to educate journalists and audiences about the role of news media in democratic society and develop critical (self)reflection to increase trust in media and support transformation of value system and beliefs related to self-regulation and media ethics.

An important recent opportunity must not be let turn to a risk - 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 number of journalists working on a full-time contract basis. However, there are concerns expressed throughout the last two decades regarding prestige of the profession (a part of skilful journalists migrating to the field of PR) and the wages are low. It must be taken in account that there is no consistent research on the wages as well as longitudinal and more qualitative research on journalists in change.

The research (for example, SKDS, 2023) shows that the knowledge of specific profession related issues could be improved more precisely. Journalists' media related competences are also a subject of continuous improvement.

The inability to act in the interests of the journalistic community of Latvia by Journalist Union - a Soviet legacy NGO - was criticised by professionals establishing Latvian Association of Journalists (LAJ, 2011), a new organisation active in many cases in defence of journalists and often raising a public discussion on issues related to journalism.

> *How to turn risks into opportunities:*

The more in-depth and longitudinal research must be conducted in order to find the ways to build a more sustainable and stable journalistic community as well as strengthen the prestige of the profession in order to attract and include more young specialists.

The recognize and strengthen the role of LAJ as an actor and partner in 1) (media related) education of journalists, 2) creation of self-reflection and public discussion on the changes and problems in journalistic work and media practice including the changes needed in regulation, 3) research and criticism of media work and deliberative communication.

Media usage

Most of the research on the regular bases on media usage in Latvia is conducted by commercial actors (media research companies) in the interests of commercial actors (media companies), so that only part of data collected are publicly accessible. There is little continuous and coherent qualitative research, especially, on motivations and perceptions of people in media usage. There is not so much representative and methodologically innovative academic research on media audiences. This can be considered as an important risk, especially, given the relatively low figures of trust and media usage mainly directed by language used in families (that basically divides Latvian society in Latvian and Russian language media audiences).

The Latvian audience can be characterised as TV viewers, even if younger generations chose internet media (with tendency of Gen Z to use even products by traditional news media through social media posts), while there are no strong newspapers.

> *How to turn risks into opportunities:*

The lack of political will to go on effectively with the reform of PSM, and to find policy ways to establish strong and sustainable news media work conditions has created the situation where the risk is to lose audiences for important societal issues.

The recognition of both the emergency of strengthening (including financially and technologically) of PSM and a carefully elaborated strategy to support areas of content production that stand in public interest through Media Support Fund and other instruments. Special attention can be given to innovation and social cohesion. Here, the most important opportunity is the good continuation of the clear and thought-out media policy started in 2016 by the Ministry of Culture.

Media related competencies

The essential importance of media related competences, especially, in front of geopolitical challenges at the time of Russia's war in Ukraine, pushed both inclusion of the issue of media related competences in the agenda of both media policy makers and educational policy makers. It can be said that there is a discourse on MIL in Latvia and some practical steps are made (including fact-checking and debunking activities) by especially universities, public libraries, NGOs and some media. The network of actors in the scene was initiated by the Ministry of Culture. MIL discussed also as a part of new educational policy and content. However, the loud discourse did not allow to see fact that the previous knowledge on media related competencies is sporadic and fragmented and that 1)there is almost no research on MIL or MRC proper, 2)there are some competences needed for media consumer not covered at all, 3)there are some groups reached by educators much less than others (school children and youth), there is no methodology, especially, in regard to both linguistic groups of media users.

> *How to turn risks into opportunities:*

The opportunities respectively would include - to support nationally representative research on all areas of MIL and MRC, to ensure development of proper methods for teaching of MRC all groups of society, to continue to promote MIL in society in general, but also to specific target groups.

Country-specific policy recommendations

Since in Latvia, various ministries define the main research topics in the National Research Program and Fundamental and Applied Research Programs, we recommend **to develop a platform for interdisciplinary collaborative action and coordination work** aimed at the strengthening monitoring capability with a goal of developing deliberative communication. We also add specific recommendations to the ministries responsible for particular fields.

- **To the Ministry of Culture** - to continue the development of the media regulation and self-regulation system by developing a modern media regulation act, which would include definitions of media appropriate to the modern media environment, resolve the inconsistency of media terms and develop a new law intended for the entire media environment that corresponds to the situation of the modern media ecosystem (including development of hybrid media, pseudo-journalism, AI instruments in journalism etc.).
- **To the Ministry of Culture –** to continue support for self-regulation of the media and create a mechanism by which the stakeholders of the Latvian media environment can agree on an organisation that already represents media of all segments (e.g, the Latvian Media Ethics Council) to obtain representative status in connection with the needs of the Media Freedom Act.
- **To the Ministry of Culture** - to continue the development of the media regulation and self-regulation system by developing a modern media regulation act, which would include definitions of media appropriate to the modern media environment, resolve the inconsistency of media terms and develop a new law intended for the entire media environment that corresponds to the situation of the modern media ecosystem (including development of hybrid media, pseudo-journalism, AI instruments in journalism etc.).
- **To the Ministry of Culture –** to continue support for self-regulation of the media and create a mechanism by which the stakeholders of the Latvian media environment can agree on an organisation that already represents media of all segments (e.g, the Latvian Media Ethics Council) to obtain representative status in connection with the needs of the Media Freedom Act.
- **To the Ministry of Culture and the Ministry of Education and Science** - to create a sustainable research base by providing funding for research on the development of press freedom, journalism (journalists' working conditions, social protection, ethics, responsibility, education and necessary skills, understanding of professional roles, etc.), detailed analysis of available media usage and (no commercial) audience data;
- **To the Ministry of Culture and the Ministry of Education and Science** - to create a media education and media literacy policy, defining in it the goal of focusing on the acquisition of broader media-related competencies. Develop a sustainable plan for interdisciplinary studies of media literacy education effects.
- **To the Ministry of Culture -** In order to ensure complete information about the state's direct and indirect support to the media, introduce the definition and regulation of "state advertising" into the advertising law, create a regulation promoting a sustainable media environment and media diversity. Create a clear system, where information is regularly and transparently collected about the state's direct and indirect support to the media, paying special attention to the advertising investments of state institutions and state capital companies.
- **To the Ministry of Justice** - to create a strategic plan for improving the lifelong education of judges on freedom of speech, freedom of the media, protection against digital mobbing, protection of journalists against online and offline attacks and other problems related to the developments of the modern communication environment. Define

an institution that will provide analysis and monitoring of SLAPP cases, based on the analysis of SLAPP-like cases between 2004 and 2024.

● **To the Ministry of Justice -** In order to avoid election manipulation and make the process of political communication more transparent, create additions to the pre-election regulation, stipulating that parties receiving state funding must declare their techniques for political communication in the digital environment and provide information on political communication activities between elections.

Reference:

Gerli, M., Mazzoni, M., & Mincigrucci, R. (2018). Constraints and limitations of investigative journalism in Hungary, Italy, Latvia and Romania. *European Journal of Communication, 33*, 22 - 36.

SKDS. (2023.). Mediju ētikas kodeksu uztvere un piemērošana ikdienā [Perception and daily use of media ethics codes]. Tapis pētījums – ko par mediju ētiku domā žurnālisti un kā tā tiek piemēro-ta ikdienā - Jaunumi - Latvijas Mediju ētikas padome (lmepadome.lv)

Michał Głowacki, et al.

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

- 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 with active ngos, arts & culture and other forms of citizens aggregations

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

Policy recommendations

- 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 whistleblowers protection
- 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

Policy recommendations

- 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)

Policy recommendations

- 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 age of platforms and Generative AI
- Strengthen monitoring capabilities via more transparent ways to evaluate scholarly achievements – research excellence criteria (scientific projects, study reports, criteria for journals' evaluation, and so on)

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

Policy recommendations

- Collaboration between media, schools, research centres and universities via joint projects to monitor the quality of regulatory framework and the actual media performance
- Developing the result-oriented media literacies curricula for schools and teachers, highlighting risks and opportunities in connection with the online and legacy media
- 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 agile style workshops for multistakeholder dialogues with respect and listening among the key values (beyond presentations, conferences and public consultations)

A broader country-specific recommendations for wisdom-based governance

- New forms of deliberation, respect and experimentation
- Diversity and inclusion in policy-making and media literacy discussions
- Data sharing and going beyond the academic/scholarly bubble in researching monitoring capabilities
- Finding the middle ground between contesting voices and visions
- Citizens panels for media governance, policy-making and monitoring

ROMANIA

Ioana Avădani

According to the fuzzy set analysis, Romania presents several conditions that are conducive to the absence of deliberative communication. When it comes to contextual conditions, Romanian belongs to the path described by lower economic and technological development and higher polarization – together with countries such as Bulgaria, Croatia, Hungary, Poland and Slovakia[22]. In the legal domain, Romania has sufficient transparency of media ownership and has successfully decriminalised defamation, but the faulty implementation of the access to information and data protection is a risk[23]. The lack of various elements of a sound accountability system – such as weakness of ethical codes, the absence of a media council or a media ombudsman – also predisposes the country to the absence of deliberative communication[24]. The same goes for the combination of high usage of social media and low media literacy. The fuzzy set analysis revealed that Romania shares some features with countries from the region and with the same post-communist profile. The closest seems to be Hungary, both countries having in common low economic and technological development, weak media market, a decreasing usage of legacy media and a higher trust in social media. All these conditions describe risks that hamper the development of the deliberative communication, but also pinpoint areas where growth is possible with the right action.

Explanation

The same image has been described by the analysis of critical junctures in the development of the media in Romania. The main risks identified by this analysis was a fairly good but faulty implemented legislation, a weak journalistic community and a lacking accountability system, a market affected by politicization and unfair competition and driven mainly by profit, which affects the quality of the content. It also revealed that until recently there was a total lack of interest of policy makers for media education. A numerous and competent academic community, a technology-enthusiast (even if not very skilled) public and an expert civil society can be seen as opportunities if they manage to establish a polylogue with the decisions makers, be them from the political or business sectors, in the spirit of deliberative communication. This lack of shared data, information and knowledge seems to be a general feature of the Romanian society but luckily one that can be overcome with just good will and affordable resources.

Recognising ROs: CMM (capability of monitoring mediascapes)

Mass media has been one of the most dynamic economic sectors in the country over the last 30 years, still coherently documenting, planning and monitoring its evolution was not of particular priority for any corporate agent at play. As a result, the capability of mediascapes monitoring is rather uneven across the board. There is an impressive quantity of data in some domains – such as the legal and journalistic ones - and a severe scarcity in others, such as media-related competences of the general public. In between, the media usage patterns domain enjoys a variety of

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[22] Page 49
[23] Page 51
[24] Page 51

data, collected or produced by various actors, mostly commercial, with different methodologies and scopes. The academic literature is abundant, but often focuses on narrow topics and is clearly underfunded, as Romania ranks last in Europe when it comes to research funding[25]. Whatever the domain, the data is only partially available outside the group that generated it and is seldom comparable.

Risk: The abundance of documentation resources clearly provides an opportunity for researchers, but the difficulties in navigating it and the limited access to the full information created by private actors qualifies as a risk. The lack of comprehensive longitudinal research has been also marked as a risk.

How to turn risk into opportunities:

- Develop a coherent strategy for mediascapes monitoring to produce reliable, comparative longitudinal data able to serve as a basis for policy making.
- Engage academia and other competene agents in comprehensive, longitudinal studies to serve as benchmarks of the evolutions in deliberative communication.

Wisdom-based media governance: risks and opportunities

Romania does not and 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, with some twitching in their implementation in the sense of the restriction of the freedoms provided. The policies in the media-related competences domain just started to be developed, again under the pressure of EU legal requirements. The market developed organically, driven by a combination of profit and self-interest (sometimes protection from justice for the owners or final beneficiaries), under the strong influence of politically motivated agents, be them companies with strong political links or by state itself, via the preferential allocation of state advertising.

The journalists' associations are weak. Academic literature on the media ecosystem is virtually unknown outside academic circles and is rather narrow in scope and fragmented. The monitoring of NGOs is more comprehensive, but it is sporadic and depending on the availability of funding. Their combined influence on media governance is limited. The policy makers are not inclined to consult the main stakeholders and their expert opinion is seldom ground for policy making (not only in the media field).

Valuable research goes unnoticed and unapplied by the practitioners and policymakers, and new knowledge is wasted. The media governance is based on data and information, seldom on knowledge and almost never reaches the level of wisdom.

How to turn risk into opportunities

- Promotion (by law, practice and education) of the evidence-based policy making as a rule.
  - Increase the capacity of various actors to act together in research, policy making, development of practice and monitoring. The Government should engage in genuine and timely consultations with other actors and include their expertise in the policy-making process from its early stages.

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25 Eurostat data, availabe at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=R%26D_expenditure

Agent oriented analysis

There is a limited number of agents at play in the development of the deliberative communication is Romania.

The state has a major influence, in at least three directions. It creates the legal framework and monitors its genuine implementation. It creates the business environment that should induce a fair competition, decides on the allocation of resources, be it for research or directly for the media, via state advertising. The state also is one of the main providers of data regarding the media and communication, via its regular reporting mechanisms and the general access to information.

Journalists are more influential as individual agents, as they perceive themselves as personally responsible for preserving the ethical standards. Their influence as corporate agents is almost non-existant.

Media businesses are influential in the media content production and the working conditions of journalists. They are also responsible of maintaining the fair competition and media independence, a task that they fal at more often than not.

Academia is responsible for the education of journalists, but also of developing the media monitoring capability of the society.

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. Thus, EU itself becomes an actor in the media field, for better or for worse. 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, which is a major risk. This is caused both by a decrease in the political will to be accountable to the public, but also by a decrease of the abilities of the public servants to manage and open public information. Digital tools for transparency are lacking. Recent legal initiatives may lead to the abrogation of the specialised access to information legislation and include it in the Administrative Procedure Code, diminishing the importance of the access to information as a basic human right.

How to turn risk into opportunities

- The Government shall 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.
- The lawmakers and the judiciary shall iInterpret and apply EU directives in the spirit of the largest freedom. The judges shall be trained in how to interpret EU legislation.

Accountability

Journalists are, in theory, dominating the accountability and self-regulatory domain, but their activity is weak and their practices even weaker. Journalists are also in a weak position of influence: overworked, often underpaid, with low job security and almost non-existent union protection. This weakness, lack of professional solidarity and the capacity to react is one major risk for the deliberative communication.

How to turn risk into opportunities

- The Government shall consolidate the statute of journalists in front of the policy makers and business owners, by providing better legal protection for the practice of the profession, as well as in terms of labour rights.
- SLAPP shall be avoided; political parties shall sanction their members who resort to SLAPP against critical media. The law shall be amended to prevent the dissolution of civic organization acting in the public interest following onerous legal fees imposed by courts.
- The journalistic community shall consolidate the ethical standards, adjust them to the current challenges and imagine new ways of implementation. The journalists and newsrooms shall make the public aware of the standards and seek their support in defending media freedom.

Journalism

The study of journalism domain is dominated by academic actors and their national and international research. The abundant literature is focusing on rather narrow topics and research is small scale. The NGO sector is also active in this domain, providing cross-domain studies, some of them longitudinal. They are depending on international funding, therefor opportunistic, which puts them at risk to be discontinued.

There are gaps in monitoring certain sub-domains such as work conditions and public media. This lack of data and information is a risk per se.

Journalism content is abundant, but the quality is eroding and brings about the erosion of the trust of the public. Best pieces of journalism seem to be created outside corporate newsrooms, in joualrnism collectives or independent projects.

There is no functional relationship between academia and industry or academia and society, so that the new knowledge generated via research is either unused by the policymakers or unusable to them, given its narrow scope and distance from the real problems of the media.

How to turn risks into opportunities:

- All interested stakeholders shall cooperate to expand monitoring capabilities and secure reliable, comparative, longitudinal data fit for evidenced-base policy making.
- The public and the businesses shall support independent journalism projects and help rebuild trust in the value of journalism for the society.

Media usage

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

How to turn risks into opportunities:

- The owners of the media usage data shall open to researchers and other interested parties.
- The state shall use its convening capabilities/resources and facilitate a broad consultation among all interested agents regarding the most relevant parameters and data regarding the media usage. It shall further support and stimulate comprehensive studies regarding the media usage patterns thus identified and use them as a ground for policy to secure access to information to all citizens.

Media related competencies

Nationally generated data on media competences is almost completely missing, and the initiative in this domain belongs to NGOs. Most data are coming from international projects and organizations. The legislation is lagging behind in dealing with the effects of the new technologies (such as the spread of disinformation) and is still looking for appropriate, operational solutions to mitigate the risks of the technologies, but with little concern for preserving the freedom of expression. The approach is punitive rather than educational, reactive rather than forward thinking.

How to turn risks into opportunities:

- The Government shall develop a comprehensive and overarching media policy and allocate sufficient funding, engaging all competent agents.
- The Government shall initiate the development of proper evaluation tools for measuring the media-related competences of the public. All interested actors shall cooperate for the development, testing and the consistent and regular usage of the resulting evaluation tool.

Country-specific policy recommendations aimed at the Government

- 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.
- making information and mediascapes monitoring a current, permanent activity, considering the speed of the evolutions (especially in technology) that makes public policies a perishable good. Revisit and update policies based on the evidence produced by research and monitoring.

Slavomír Gálik, et al.

Slovakia among other countries: fsQCA calibrated values of the outcome and conditions in the study

The contextual and diachronic conditions for Slovakia mostly contribute negatively to the deliberative communication (0.27). Slovakia here belongs to the same groups as Czechia (0.27) and is located between Croatia (0.15) and Latvia (0.32) together with Greece (0.32). The quality of democracy in Slovakia is quite low (0.25) and is between Hungary (0.2), Italy (0.2) and the Czech Republic (0.3). Among the negative phenomena is the polarization of society in Slovakia, which reaches a value of 0.69. Croatia has the same polarization (0.69), Romania is lower (0.64) and Greece is higher (0.79). Technological development in Slovakia is lower compared to other countries with a value of 0.31. Lower development is only in Italy (0.27) and slightly higher in Hungary (0.45). Protection of freedom of journalistic expression, freedom of information, protection of journalistic sources, development of ethical codes of journalists, transparency of media owners reaches the highest value of 1. On the other hand, the media market is very low, reaching a value of only 0.16. Likewise, the full-time number of journalists in Slovakia represents a value of only 0.06, which is the lowest value among the studied countries. The value of trust in older media (press, radio, TV) is also very low - 0.3, and on the other hand, trust in social media is relatively high with a value of 0.42. Digital skills with a value of 0.3 and media literacy with a value of 0.46 are at low values, but in the middle of the surveyed countries.

The sum up, the fuzzy set analysis showed both opportunities and risks in the development of the media ecosystem in Slovakia. Opportunities include the implementation of laws and ethical regulations that are in line with European criteria. However, there are several risks, namely high polarization of society, low trust in traditional media, low digital and media literacy, but also a very weak media market and full-time work of journalists.

Explanation

Slovakia is a post-socialist country that, on the one hand, has implemented all legislative and ethical regulations in the field of media that are required by the EU, but on the other hand, they are not sufficiently applied in media and social practice. The low media market does not contribute to the improvement in this area either, which causes media workers to have other jobs as well. In recent years, politics has also entered the media sphere, which significantly polarized society, which was reflected in low trust in traditional media (in 2022, according to the Reuters agency, Slovakia worsened and fell to the level of 27%) and increased trust in social media. According to the PISA results, a long-term problem (since 2009) in Slovakia is the decline in reading and math literacy, which is also reflected in lower media literacy.

Recognising ROs: CMM (capability of monitoring mediascapes) (Norino)

The continuity of research and the relevance of the data obtained on the media environment in Slovakia are limited. Studies are often one-off, lack comprehensiveness, and tend to focus on assorted, partial topics and specific issues rather than on the media ecosystem as a whole.

Longitudinal research projects, which would monitor the development of the media ecosystem over time, are mainly absent. This lack represents a risk factor that negatively impacts the ability to monitor developmental tendencies and to evaluate ongoingly the Slovak media's capacity to adapt to the dynamic changes in the media market and an increasingly polarized society.

This situation poses challenges in comparing developments in the media environment or forecasting new trends due to insufficient relevant data. Most media studies are academic works produced by experts in media communication, marketing, and other social sciences. Non-governmental organizations are playing an increasingly active role in this area. Among public institutions, the Media Services Council primarily focuses on monitoring the media environment in Slovakia.

Research specifically targeting the risks and opportunities of deliberative communication is absent. However, some studies touch on aspects of deliberation, such as media-politics dynamics, issues in public media, etc.

Quantitative surveys are conducted on TV viewership, radio listening, periodical readership, and digital news and lifestyle media usage. These surveys are crucial for the development of media organizations' programming strategies and are valuable to the advertising and marketing sector. Unfortunately, much of this data remains exclusive to the research commissioners and is not widely available to professionals.

Research into the working conditions of journalists in Slovakia lacks a systematic approach, leading to fragmented data that does not cover critical aspects such as gender and income disparities. There is a notable deficiency in data regarding the demographic composition of the journalism profession in Slovakia, which hinders effective monitoring of progress in this field.

Finally, the absence of systematic research into the erosion of public trust in media is problematic. Combined with significant societal polarization and declining confidence in democratic institutions, this gap threatens deliberative communication and democracy.

Wisdom-based media governance: risks and opportunities

Despite the fact that new media laws began to be applied in Slovakia in 2022, affecting both print and electronic media, there has not been any change in media ownership. Socially open discussions about media owners and their connections to political elites are lacking, as highlighted by both domestic and international NGOs. This is because state or professional journalist organizations are unable to facilitate such discussions. The absence of a socially recognized and influential journalist organization poses a risk. Meanwhile, the Slovak Journalists Syndicate, grappling with long-standing staffing and financial issues, is failing to meet expectations.

The Slovak media market is highly concentrated and influenced by foreign capital and financial groups. As of July 2023, no fees are required, and the new government coalition has declared its intention to divide the public service media into two separate entities: Slovak Television and Slovak Radio. Additional risks include the diminishing objectivity and plurality of the public service media and their politicization. In Slovakia, cooperation between the state, the media, and other actors is non-existent.

Agent oriented analysis

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

The constitutional guarantee of freedom of expression and the right to information in the Slovak Republic has been a significant talking point, particularly after the murder of investigative journalist Ján Kuciak in 2018. The aftermath of this event triggered mass protests and catalyzed essential political shifts, underscoring the imperative to bolster investigative journalism.

Citizens frequently invoke the constitutional assurance of free speech to express their views, viewing any limitation on this right as an unlawful infringement and a form of censorship. This stance, however, also paves the way for the spread of disinformation and hate speech.

Following the 2023 parliamentary elections, there is a risk that the current government or other influential interests could manipulate media content or selectively disclose information to favored outlets. Numerous other media outlets, critical of the current coalition's actions, have been labeled as hostile by Robert Fico, the Prime Minister. This situation could result in state-imposed censorship or self-censorship among journalists who fear reprisals for critical reporting.

Many politicians very often use their own media to build their positive image at national, regional and local levels. Therefore, while current media legislation attempts to address the long-standing problems of unclear ownership links and non-transparent media financing, it still fails to address the conflicts of interest associated with the conflation of media business and one's own political ambitions.

Another risk is the concentration of the media market, reflected in audience and market shares, which threatens the diversity and heterogeneity of the media both in terms of content offered and ownership. In Slovakia, there is still a significant concentration of several media segments (print, audiovisual and radio communication) as well as a concentration of news media.

How to turn risks into opportunities /or maintain opportunities?

Protecting journalists from government or other external influences is crucial. This could be achieved through legislation that promotes media independence or through the establishment of independent bodies that monitor and report on attempts to influence media content.

To combat disinformation and hate speech, a strong emphasis should be placed on media literacy programmes. Educating the public on how to critically assess information sources can reduce the impact of misinformation. Working with educational institutions to integrate media literacy into the curriculum can be particularly effective.

Encourage the development of alternative media platforms, including community media, online news portals, and independent blogs. This diversification can help counter the concentration of traditional media segments.

Accountability

Slovak Syndicate of Journalists, which should be perceived as a respected organisation able to truly connect media professionals and content providers, does not possess a good reputation either in relation to the general public or within the journalistic community itself, even though, paradoxically, many news media outlets and publishing houses claim to respect the Code of Ethics for Journalists created by the Syndicate. In any case, established and relevant Slovak media (this does not include conspiracy media) follow their own ethical codes or codes formulated by other organisations, even though the extent to which they work with their own self-regulatory mechanisms is questionable and hard to assess. The problem which seems to be

impossible to solve is that any self-regulation standards related to ethics are non-binding and voluntary; thus, their full adoption requires a high level of integrity and a media organisation's willingness to represent a clearly defined set of values. It does not help that the field of ethical (self)regulation remains overlooked and marginalised even by Slovak academic circles (Zdroj: Media and Communication)

How to turn risks into opportunities /or maintain opportunities?

The Syndicate could focus on building credibility and trust within the journalistic community and with the general public. This can be achieved through improving reputation, transparent communication, showcasing success stories, and actively engaging with both media professionals and the public.

Raising awareness among the public and the journalistic community about the importance of ethical journalism can help to garner support for self-regulation. Educational campaigns, workshops and seminars can be effective tools in this regard.

Journalism

In Slovakia, four public universities and one private university provide education in journalism at bachelor's, master's, and doctoral levels. Although there is still relatively high interest in studying journalism, especially professionally older journalists do not have an education in journalism. The journalism profession in Slovakia has been marred by the murder of investigative journalist Ján Kuciak and his fiancée Martina Kušnírová in 2018, which led to numerous changes in high-level political positions. There is no strong professional organisation of journalists in Slovakia and the current political elite's attitude towards journalists is negative.

How to turn risks into opportunities?

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

Media usage

Currently, all media in Slovakia have their media content on the internet, but its accessibility to the public is often limited. More and more media organisations are applying a subscription model, which is related to the fact that traditional digital advertising revenues cannot fully replace the advertising revenue shortfalls of individual news outlets. Charging for the consumption of media content online is problematic, particularly because of the low willingness of audience members to pay for digital news content. A particular risk factor is that the subscription model is mainly applied by reputable media, which have the potential to contribute to improving the quality of public discourse in society. On the contrary, free access to their content is applied by most media outlets that spread misinformation and conspiracies and contribute to the polarisation of society. In this setting of the media ecosystem, it is therefore natural that a growing number of audience members distrust serious news media and seek an alternative in free and controversial media content.

How to turn risks into opportunities /or maintain opportunities?

Transforming the described risks in the Slovak media environment into opportunities requires designing and applying innovative strategies that balance revenue generation with audience involvement and building trust in the media. These are mainly approaches that would make it possible to diversify sources of income but also strengthen the relationship between the media and their audience, promote trust and reduce the appeal of disinformation sources. By adopting

these strategies, media organizations in Slovakia can not only address the challenges posed by the current media ecosystem but also play a pivotal role in enhancing democratic discourse and countering the spread of misinformation.

Media competences

One of the biggest risks for the media ecosystem in Slovakia is the low level of media literacy in the context of reading and math literacy (partially also in science). The latest PISA test results in 2022 showed a drop in reading literacy by 11 points compared to 2018. Compared to the beginning of the measurement in 2003, it is up to 23 points. The problem is that there is an increase the students (up to 35% this year) who do not meet the basic criteria set for reading literacy. In mathematical literacy, there is a drop of up to 22 points compared to 2018 and up to 34 points compared to 2003. This downward trend is alarming, because without sufficient reading and math literacy it is not possible to develop even media literacy, the basic pillar of which is critical thinking, which is subsequently reflected in deliberative communication and in politics. This problem affects mainly the young generation and various social areas of society such as media users, media producers, but also the policy makers and politicians in general.

Country-specific policy recommendations:

- Media Literacy Education: Implement nationwide media literacy programs in schools and communities. These programs should teach critical thinking, how to discern credible news sources, and the impact of disinformation on society.
- Legislation to Ensure Equal Access to Information: Enact laws that guarantee equal access to information for all media outlets. This could include regulations that require government officials and public institutions to provide equal opportunities for media coverage and information requests, regardless of a media outlet's editorial stance.
- Transparency in Media Ownership and Funding: Implement strict regulations requiring transparency in media ownership and funding sources. This would help in identifying potential conflicts of interest and reduce the influence of politically motivated financing.

SWEDEN

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Introduction

Media monitoring in Sweden is generally characterized by a great availability of data, often with acceptable quality, which enables deepened and full-fledged understanding of the Swedish media development. It enables different actors in the Swedish society to foresee the media development and to conduct deeper inquiries into certain aspects. In all analysed domains (legal and ethical regulation, journalism, media usage and media competencies) there is a variety of reliable data sources from different sectors of society (government, academia, research institutes, monitoring agencies).[26]

The overall impression of developments in all domains suggest that gradual transformations have been more prevalent than critical junctures. The distinctive role of different actors in changing processes are not so easy to detect as these processes have commonly been embedded in negotiations, bargaining and compromises between single actors that is typical for a democratic corporatist media system. The continuity factor may be as relevant to observe as possible changes and shifts of trends. However, continuity should not primarily be perceived as an absence of change, but rather as an adaption to new realities within the framework of durable principles. Resilience seems to be a stronger force than reshape in media policy processes.[27]

Against this background, it is difficult to point out more specific areas where media policy recommendations promoting deliberative communication are particularly urgent. The risks discussed here are therefore related to some possible problems that can be identified within relatively well functioning systems: Richness of data is potentially good, but overproduction and uncoordinated data collection may be a problem. Protection of public service media guaranteeing arm's lengths principles and sustainable financing models is important, but in danger if fundamental legislation in this area could be changed too easily. This policy recommendation defines these risks and discusses how they can be turned into opportunities and improve conditions for deliberative communication.

Finally, it is worth to note that media policy processes are dynamic and that new initiatives are regularly introduced in the national context with possible impact on news media and journalism conditions. An illustrative example is the implementation of a new law in Summer 2023 against terrorism activities that now makes some investigative journalism methods illegal.

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[26] Berglez, P.; Nord, L.; Ots, M. (2022). SWEDEN. Risks and Opportunities Related to Media and Journalism Studies (2000–2020). Case Study on the National Research and Monitoring Capabilities. In: Studies on national media research capability as a contextual domain of the sources of ROs. Approaching deliberative communication: Studies on monitoring capability and on critical junctures of media development in 14 EU countries, CS1, D-2.1, pp. 431–461. Mediadelcom.https://www.mediadelcom.eu/publications/d21-case-study-1/

[27] Berglez, P.; Nord, L.; Ots, M. (2022). SWEDEN. Critical junctures in the media transformation process. In: Country case studies on critical junctures in the media transformation process in Four Domains of Potential ROs (2000–2020). Approaching deliberative communication: Studies on monitoring capability and on critical junctures of media development in 14 EU countries, CS2, D-2.1, pp. 520–540. Mediadelcom. https://www.mediadelcom.eu/publications/d21-case-study-2/swe/

Recommendations

RISK: Over-production and lack of coordination of data

When it comes to availability of media monitoring data in Sweden there is no emergent lack of data. However, while the wide array of data producing- and collecting institutions in many respects is a source of advantage for the democratic resilience of the Swedish media system, the multifaceted motives, varying degrees of transparency, and lack of standardization among data sources create challenges that are currently left unaddressed.

It is a challenge to collect all available, and sometimes parallel, data and to evaluate their relevance. Monitoring and governance of media is conducted by several actors that are both government and non-government institutions but none of these institutions have the task to monitor the overall capacity development and performance of the media system as an enabler of deliberative democracy. Because of the current compartmentalization of media analysis, there is a risk of over-using and over-emphasizing variables that are easy to measure, whereas more complex analyses of the media situation in relation to democratic values remain under-investigated.

The recommendation would be to argue for a more systematic, and democracy-oriented collection of media monitoring data, enabling cross-data analyses, most likely managed by one single government institution such as for example MPRT, The Swedish Press and Broadcasting Authority. Whereas MPRT already collects statistics about media industry development (e.g. financial performance and audience figures), there is currently little room for systematization and meta-analyses of existing quantitative and qualitative research insights and their implications for democratic development. An annual report updating facts on media, communication and democracy should therefore be produced and presented at annual political summer conference in Almedalen.

RISK: Political changes of public service media conditions

The autonomy of public service media is an often-discussed political issue, where most political parties in Sweden historically have supported the arm's length principle with distance and 'fire walls' between media companies and political institutions. In recent years, however, criticism from the political right has been more influential as rightwing parties have gained more voter support. A new government can relatively easily change the conditions for public service media regarding autonomy and financing. A recent public inquiry on revision of the Freedom of Information Act concluded that there was no broad political majority behind the proposal to guarantee autonomy conditions of public service media in the Swedish constitution to avoid too dramatic changes of public service media conditions.

The recommendation would be to appoint an expert investigation addressing the topic of protection in the constitution for public service media and in particular highlighting the risks for deliberative communication if public service remit becomes too narrow or must depend on non-sustainable financing models. The objective is thereby to ensure the deliberative capacities of the media system by specifically ensuring resilient public service media. Hopefully, new, and better arguments could form a new political majority behind the protection proposal.

Reasoning

The reasons why these are the best solutions can be summarized as follows:

The more systematic data-collection on less commercial aspects of media developments can probably only be managed by a government institution with previous experiences and competencies related to media monitoring.

The protection of public service media in the constitution is no long-term guarantee as the constitution can be modified by two parliamentary decisions with an election in-between, but it makes changes more difficult and give citizens a chance to react in general elections.

The practical steps that need to be taken can be summarized as follows:

- 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 step is not complicated, only a matter of political willingness to promote public debates based on current media and democracy-related facts.
- To protect public service media in the constitution is more difficult as the political process is complicated and needs to be supported by a political majority in the parliament at two occasions with an election in-between. However, the issue of better 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 very good right now but could change in the future.