



Routledge Studies in Media, Communication, and Politics

EUROPEAN MEDIA SYSTEMS FOR DELIBERATIVE COMMUNICATION

RISKS AND OPPORTUNITIES

Edited by Zrinjka Peruško with Epp Lauk
and Halliki Harro-Loit



European Media Systems for Deliberative Communication

European Media Systems for Deliberative Communication explores how four dimensions of national media systems – the legal framework for freedom of expression and information, media accountability, journalism and audience media usage and competencies – contribute to or are detrimental to the success of deliberative communication.

Drawing on a study of 14 European countries and their media systems, the volume provides comparative and individual perspectives to examine the social consequences of various types of media systems. By using fsQCA (fuzzy set qualitative comparative analysis), the authors relate deliberative communication to the legal framework for freedom of expression and freedom of information, media accountability, journalism and media usage and media competencies. The book shows how different combinations of conditions and contexts figure as risks or opportunities that are detrimental to, or supportive of, deliberative communication, measured with an original index on a European level.

This book will interest scholars and students in communication studies, political communication, media and society, media sociology, global media studies, European Studies and journalism.

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European Media Systems for Deliberative Communication

Risks and Opportunities

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and Halliki Harro-Loit

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1 Introduction

*Zrinjka Peruško, Halliki Harro-Loit,
and Epp Lauk*

European democracies have faced many changes and challenges related to media and public communication in the 21st century. People's opportunities to participate in public communication broadened with the spread of social media; however, the possibility of rapid and unlimited dissemination of false information and propaganda also increased. The monopoly of professional journalism as a news distributor has ended, and the legacy business model of journalism has also collapsed as global platforms have begun to receive increasingly more advertising money. Freedom of expression, one of the central values of democracy, is undermined by disinformation and increased intimidation of journalists. These changes have affected all spheres of social life, including democracy as a model for government. However, these changes and challenges do not affect all countries of the European Union (EU) to the same extent and in the same way. This often-overlooked fact guided the research presented in this book.

This book focuses on the influence of changes in media and communication on democracy in Europe. In particular, we focus on deliberative democracy with a strong emphasis on communication. Although any type of democracy is necessarily based on citizens' information on government-related topics, and the topic of media and democracy has been one of the 'most intensively ploughed areas in media studies' (Curran, 2011, p. 1), deliberative democracy has not been empirically investigated in relation to the media system. Democracy is a changing institution, and we are witnesses to both the decline and renewal of democracy in Europe and elsewhere. Normative expectations of democracy are also changing. Deliberative democracy, sometimes criticized for its unrealistic expectations, is perhaps more feasible now when the spread of the voice (if not rationality) of people is much easier with new media platforms and social media. The following paragraphs present our analytical rationale and research approach which links media structures and practices to the potential for deliberative democracy.

This book analyses the relationship between the media system – understood in a broad sense to refer to media-related structures and agents that operate within a society, with deliberative democracy as the most advanced idea (or ideal) of a democratic government (Bächtiger et al., 2018b; Habermas, 2022;

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Held, 2006) – and a normative goal for the media (Blumler & Gurevitch, 1995). As Christians et al. (2009) note, different types of democratic models expect different media roles. Deliberative democracy requires the media to enable citizens to make argument-based decisions through various strategies and roles.

The scope of normative conceptualizations of deliberative democracy becomes more intricate when considered in relation to communication and media ecology, which have expanded in diverse directions since the concept of rational deliberation supported by the media was described as a democratic ideal. The process of deliberation has been defined as ‘mutual communication that involves weighing and reflecting on preferences, values, and interests regarding matters of common concern’ (Bächtiger et al., 2018a, p. 2, in Nord et al. this volume). Moreover, deliberative democracy is related to the concept of the public sphere developed by Habermas (1962, 2006, p. 415), who imagined the public sphere as a ‘communication system’ existing in formal and informal deliberations on different levels of the political system, from everyday talk among citizens to discussions in civil society up until deliberations by elite political actors. Deliberation has been researched and found in parliaments, civil society, the media, everyday talk, and other spaces where people interact (Bächtiger et al., 2018b).

However, as the media is the ‘throughput’ of communication in the public sphere (Habermas, 2022), we focus on media as the key institution for the success of deliberative democracy. In journalism, communication, and political science literature, the relationship between the media and democracy has often been normatively described. Certain characteristics of media systems are related to democratic political contexts, others to undemocratic (Siebert et al., 1956); and different types of (normative) media roles have been linked to various types of democracies (Held, 2006; Strömbäck, 2005), and different types of relationships between the roles of news media and the political realm (Christians et al., 2009). Although democracy is often advanced as a normative goal in studies of the political information environment (Aalberg et al., 2010), the relationship is rarely analysed empirically.

The return to normative concerns in the study of media, motivated by the rapidly changing media environment with unclear consequences, can be observed in the increase in attention to media and democracy in disciplinary discussions and publications over the past decade (Aalberg et al., 2010; Curran, 2011; Cushion, 2017; *Normative Theory in Communication Research*, 2017). Comparative studies of media systems in the past two decades, following Hallin and Mancini’s (2004) seminal book, primarily included empirical research which was not concerned with normative aims but sought to demonstrate similarities and differences of key media system dimensions in a comparative quantitative fashion (Brüggemann et al., 2014; Castro-Herrero et al., 2017; Peruško et al., 2013). This phase followed the predominant normative approach of the previous decades, particularly in research on Central and Eastern European media after 1990 (Jakubowicz & Sükösd, 2014).

An increase in the internationalization of research at the intersection of media and politics and the importance of media for democracy have been documented for the past two decades (Bucy & Evans, 2021). This study aims to contribute to this trend.

The contribution of the media to deliberative communication is posed as an achievable goal in actual democratic life. We propose a conceptual model for deliberative communication as a normative goal for a media system designed to be empirically tested. Usually, the success of the attainment of normative aims related to democracy and deliberation is not empirically analysed. No previous studies have attempted to relate the empirical media system situation with an empirically operationalized deliberative democracy (see Maia et al., 2023). We argue that it is possible to move this question into the empirical realm in order to advance our understanding of the connections between news media-related transformations and deliberative processes in European societies.

This book makes some innovative strides in understanding deliberative communication and operationalizing it to measure it comparatively on the same scale on a European level. We operationalize deliberative communication as a multi-scale concept, occurring at different levels of society: the macro level, the micro level of everyday talk between citizens, and the meso level of citizens engagement in institutions of civil society (Polletta & Gardner, 2018, in Nord et al. this volume). The concept of deliberative communication is used here in preference to deliberative democracy, which refers primarily to the macro level of the political system.

Although our research approach differs in important aspects, we follow the tradition of comparative cross-country media systems research inaugurated by the standard-setting works of Hallin and Mancini (2004) and Aalberg and Curran (2011) and believe that it is important to study communication and related phenomena in a comparative cross-national fashion (Esser & Pfetsch, 2004). We now briefly outline our model of the media system for deliberative democracy and explain our research approach and process.

Media system model for deliberative communication

Following Hallin and Mancini's (2004) groupings, our sample of studied countries includes countries from the Northern European democratic-corporatist model (Sweden, Germany, and Austria) and from the Southern European polarized-pluralist model (Italy and Greece). According to Castro-Herrero et al.'s (2017) grouping of post-socialist European countries, our sample also includes countries of the Northern model (Estonia, Latvia, and Slovakia), Central model (Czechia, Poland, and Croatia), and the Eastern model (Bulgaria, Romania, and Hungary). In this book, we follow the approach of Peruško et al. (2013), in which Eastern and Western European countries are analysed together and grouped together based on their similarities. In this study, countries from Western and Eastern Europe group

into common solution paths in their success or failure to attain deliberative communication.

Our media system domain model was designed to address the risks and opportunities for deliberative communication presented by the media environment. The book empirically demonstrates how selected media system domains contribute to or are detrimental to the success of deliberative communication. These key media domains comprise the legal framework for freedom of expression and information, media accountability, journalism structures and practices, media usage, and media competencies. A number of variables are used for the quantitative and fuzzy set qualitative comparative analysis (fsQCA) in each of the domains; some variables describe media system structures, whereas others relate to agents and their practices. The media system domain conceptualizations and the comparative findings for the 14 sample countries are included in [Chapters 3–7](#) of this volume and are briefly outlined below.

Some aspects of the media system are usually considered as risks to democracy, such as a lack of transparency about media ownership or the self-censorship of journalists, which decreases the diversity of information ([Media Pluralism Monitor 2023, 2023, <https://cmpf.eui.eu/media-pluralism-monitor/>](#)). However, in some cases, the transformation from potential problems to actual risks occurs only when several circumstances coincide. For example, we may expect that the oligopolistic media market in itself would not present a risk if the owners do not interfere in personnel policy and journalists' autonomy is guaranteed through employment contracts and strong professional identity. However, in a situation where the owners of media companies directly or indirectly interfere with journalists' work and the options to work as freelancers are missing, the risk to deliberative communication increases. These expectations stem from the present media policy understanding, but have not previously been empirically tested with a normatively described outcome, as in our study. In some circumstances, some expected risks are not detrimental to deliberative communication. Policy action would be more efficient if policymakers actually knew where the primary risks to their country's deliberative public sphere are situated. The understanding that media-related policy solutions that work in one country are not necessarily beneficial for other countries would also benefit EU policymakers. The results of the analysis of these dynamics in 14 European countries demonstrate that the desired normative outcome can be achieved by the presence of a combination of various conditions, whereas the presence of other conditions or the absence of certain conditions produces an undesirable outcome – in this case, lower deliberative communication. The key finding regarding risks and opportunities is that it is difficult, if not impossible, to pronounce that a certain variable/condition is a risk at the outset because in some circumstances it can actually play out as a risk, but not in others. Studying the specific contexts in which the conditions operate is of paramount importance.

Media structures and media-related practices occur not in a vacuum but in politically structured states and their societies. This context of the media system necessarily interacts with media institutions and agents and can be responsible for different shapes of media and media practices. In a comparative study such as this, where the media landscapes of 14 countries are analysed, their varied contextual conditions can be important in explaining the similarities or diversities in the outcome of the analysis, in which the four primary media conditions contribute or detract from deliberative communication. The contextual conditions are antecedent or prior conditions in the analysis. In this approach (which draws on historical institutionalist approaches), we study how the previous conditions/dimensions (variables) influence later developments, or how they participate in the configurations of conditions that ‘produce’ the analysed outcomes. The analysis reveals how the context figures in the risks and opportunities – we are able to show which contextual/antecedent conditions figure in desirable outcomes, from our normative position – high deliberative communication – and which figure in undesirable outcomes – low deliberative communication.

We anticipate that risks and opportunities for deliberative communication will appear in the dynamics between the structures/institutional levels and the agendas of various actors. Actors/agencies include the community of journalists, media owners, policymakers, and representatives of different professions whose activities influence the conditions (structure) of deliberative communication. The outcome of the interactions between agents can produce changes in the structural framework or in the reproduction of the structural framework (Archer, 1995; Giddens, 1984).

The causes for such changes emerge from many fields, including politics, economics, and communication. The causes of change can be internal or external and can include matters that act disruptively on societies worldwide, such as the recent COVID-19 pandemic, and others before it. Alternatively, the causes of change can be local or present in only one country, or a set of countries. The specific turning points that enable substantial changes by enlarging policy choices of political actors become ‘critical junctures’ if they activate transformations in the institutional, political, legal, and economic realms (Gallegos-Anda, 2020, p. 108) and produce new institutional configurations and interactions among the actors within these realms. The disrupted equilibrium of the status quo that occurs during critical junctures allows for a stronger influence of actors on the structural framework, thus enabling change to happen more easily (although this outcome depends on many other conditions) (Capoccia & Kelemen, 2007; Moore, 1966; Mahoney, 2001; in media research see Bannerman & Haggart, 2015; McChesney, 2007; Peruško et al., 2021). The specific turning points, critical and mini-junctures that shaped the change in the four critical media landscape areas in our 14 sample countries are identified in [Chapters 3–7](#).

The research approach and the book outline

The set-theoretical research approach (Ragin, 2008) is the primary research approach used in this book, with a fsQCA employed to empirically explain the relationship between the key media system conditions and deliberative democracy; fsQCA helps determine which conditions of the media system, conceptualized as risks or opportunities for deliberative communication, produce the outcome of deliberative communication. Both agency and structural variables/conditions were analysed using the same procedure, and their roles in the configuration paths were unearthed.

The use of the set-theoretical research approach remains rare in media systems studies, but is recommended as a method particularly suitable for media systems research (Downey, 2020). Notable exceptions include Downey and Stanyer's (2010) study on personalization, Büchel et al.'s (2016) typologies of media systems, Humprecht and Büchel's (2013) analysis of changes in the journalistic profession, and Peruško et al.'s (2021) investigation of changes in media systems across time and space. As a common standard and approach for QCA does not exist in studies on communication, this study contributes to expanding the application and methodological diversity of the comparative communication field.

As Vozab et al. wrote in Chapter 8, the fsQCA differs from the usual linear causal inference of the functionalist approach (Downey & Stanyer, 2010). Fuzzy set theory enables the handling of vagueness in a systematic fashion and with theoretical fidelity as 'theories are often expressed in logical or set-wise terms' (Smithson & Verkuilen, 2006, p. 2). The fsQCA can explain some causal mechanisms or outliers which can't be explained by statistical analyses (Schneider & Wagemann, 2012). The usual 'variable' (dependent and independent) is replaced with (causal) conditions and outcomes. The same outcome (e.g. democracy, media freedom) can result from a combination of different conditions in different contexts (equifinality, Schneider, 2019). This is why we can theorize conditions that are risks or opportunities; however, only in their concrete contexts of states and media systems, will they actually demonstrate how they interact and where a certain condition contributes positively and whether it contributes negatively in some cases. In the fsQCA, the relationship between two conditions does not exclude other relationships (asymmetry). In addition, if positive values contribute to an outcome, it does not automatically follow that opposite values produce the opposite outcome (unlike the symmetric analyses of multiple regression and correlation analyses) (for an introduction to the method, see Schneider, 2019).

The context in which conditions come into play influences the outcome. Hence, the same causal conditions in different contexts create different outcomes. A suitable example is the regulatory changes in introducing public service broadcasting (PSB) in Central and Eastern Europe, when one model of public media governance (German) was introduced into contexts without

similar political conditions. What enabled the model to work in the original country, however, made it fail in different political and social contexts.

The study presented in this book evolved in several phases. The first step involved the development of a theoretical and operational framework for the conditions of the media landscape, which are considered key to the successful or unsuccessful development of deliberative communication. Five media system domains have been posited as the most important potential influencers on the quality and success of deliberative communication: the legal framework for freedom of expression and information, media accountability, journalism structures and practices, media usage, and media competencies. [Chapters 3–7](#) present the theoretical conceptualizations and operationalization of key media system conditions that are expected to hold risks or opportunities for deliberative communication and research. The comparative findings presented in these chapters are based on case studies from 14 countries. The case studies and media system condition chapters present the necessary theoretical and knowledge foundation for the analysis that follows in [Chapter 8](#) and the Conclusion.

Two sets of case studies were conducted for the 14 countries included in this study. The first case study surveyed the academic field to identify national and international research that could provide answers to questions posed at the country/media system level ([Mediadelcom, 2022a](#); [Oller Alonso et al., 2024](#)). Based on a review of the national and international literature from the first case study, the second case study surveyed the selected media system conditions in the same countries to identify risks and opportunities and critical junctures and changes during a 20-year period (2000–2020) ([Mediadelcom, 2022b](#)). The findings of this qualitative study are also included in [Chapters 3–7](#).

The last step identified the configurations of risk and opportunity in media systems in terms of high and low deliberative communication using fsQCA. The development of the ‘sets’ of media and contextual dimensions was a process parallel to the operationalizations of media system domains. Using case studies from 14 countries as the primary knowledge basis, this research phase focused on calibrating the conditions of the media system and contextual dimensions. Thereafter, the analysis was conducted using the fsQCA software 4.1 ([Ragin & Davey, 2023](#)). The results of this analysis are presented in [Chapter 8](#).

Deliberative democracy is analysed by Lars Nord, Mart Ots, and Dina Vozab in [Chapter 2](#) (this volume). The authors examine deliberative democracy in terms of theoretical normative conceptualizations in the extant literature and in terms of empirical operationalizations. Nord et al. argue for the use of the concept of deliberative communication instead of deliberative democracy because the key characteristics of this type of democracy are related to the communication process in and outside the media. The authors offer a new original operationalization of deliberative communication that enables the placement of European countries on the scale of a newly created index of

deliberative communication. Their operationalization of deliberative democracy includes the macro, meso, and micro levels. An index of deliberative communication is created that maps European countries according to their potential to attain deliberative communication. This index is used as an outcome variable in the empirical fsQCA of the relationship between various aspects of the media landscape and high or low deliberative communication.

Chapter 3 conceptualizes the ways in which media-related regulation of freedom of expression and information provides the context within which deliberative communication through the media can (or cannot) materialize and how it is shaped in different European countries that are part of our research sample. In **Chapter 3**, Evangelia Psychogiopoulou, Anna Kandyla, and Zrinjka Peruško adopt a fundamental rights perspective. They argue that any sort of regulation addressing the media ecosystem should be congruent with freedom of expression and information. The opportunities and risks that regulatory approaches and responses to regulation may entail in deliberative communication rest on the definition, demarcation, and balancing of free speech and freedom of information. There are similarities and differences in how this is done among EU members. An important insight is that freedom of expression and information are critically influenced by legislative implementation.

Chapter 4 focuses on media accountability which has been analysed alongside legal regulation to demonstrate the differences in balancing self-regulation, co-regulation, and legal regulation. Marcus Kreutler, Tobias Eberwein, Susanne Fengler, Michał Głowacki, Jacek Mikucki, Anda Rožukalne, and Neli Velinova argue that established and reliable media accountability can help build trust in the media; however, its wide acceptance requires a level of trust. The same is true for professional journalistic autonomy, which can contribute to the establishment and acceptance of media accountability but also relies on media accountability activities as a means to confirm autonomy. They analyse media accountability in five key areas: professional, market, public, political, and international accountability. The examination of recent developments in media accountability in the studied European countries portrays a broad spectrum of different infrastructures – some with a long history and sound reputation within the profession, others nascent, with differences between new and old members of the EU. The authors discuss the consequences of deliberative communication and highlight possible opportunities and risks.

Chapter 5 focuses on journalism in terms of media and journalists' importance in building and supporting civic engagement in a democratic direction. Peter Berglez, Mart Ots, Epp Lauk, Ilva Skulte, Nadezhda Miteva, Lenka Waschková Císařová, Christina Krakovsky, and Anda Rožukalne analyse the production dimension of journalism, that is, the conditions, resources, and competencies that are required for media organizations to serve as generators and providers of dynamic deliberative communication in society. The authors examine a set of theory-based conditions for journalism that enable its supporting role in deliberative communication and democracy. These include

market conditions (ownership structures); the development of public service media companies; and production conditions, including the impact of digitalization, automatization/robotization, and resources for investigative and foreign reporting. Moreover, working and employment conditions, gender balance, journalistic competencies, values, education, training, and perceptions of professionalism are included. These conditions have been selected because of their relevance to understanding the sustainability of journalism in the EU context. Common patterns across the studied countries and unique trends in particular countries are identified and further analysed.

Chapter 6 examines audience media usage in relation to deliberative communication. Democracies and deliberative democracies, in particular, cannot function without people's communication engagement, and the media serves as a mediator between citizens and society (Coudry et al., 2010). Iveta Jansová, Ragne Kõuts-Klemm, Lilia Raycheva, Neli Velinova, Zora Hudíková, Ludmila Čábyová and Hana Pravdová evaluate risks and opportunities for deliberative communication regarding aspects of media usage. The authors argue that the most important indicators related to deliberative communication are access to media, relevance of news media, and trust in media. Although some media usage domain topics are easily comparable at the European level, others present a significant challenge as the analysed countries differ in data saturation, particularly from the longitudinal perspective of data collection and evaluation. The variability of data in the respective countries reflects (among other factors) the actors operating within the research on media usage in each country and the level of cooperation between them (NGOs, academics, industry).

Chapter 7 addresses related media usage competencies. Slavomír Gálik, Sabína Gáliková Tolnaiová, Norbert Vrabec, Alnis Stakle, Ilva Skulte, Ioana Avădani, Christian Oggolder, and Lora Metanova examine the importance of media user's competencies and the ability to interpret and create media content in the context of effective learning and deliberative communication. Media users' competencies are shaped by their habitual forms of media use and socialization. The conceptual variables related to risks and opportunities for deliberative communication are reflected in the context of the 'prosumer' phenomenon, which allows individuals to produce and disseminate their own messages in addition to consuming messages produced by others. The competencies of media users are examined in two key interrelated dimensions: the personal dimension pertains to characteristics that enable effective self-realization, whereas the social dimension encompasses a broad range of social practices. The authors compare media users' competencies across sample countries.

Chapter 8 introduces the conceptualization and operationalization of the four media system domain conditions – the legal context for freedom of expression and information, media accountability, journalism, and media users' practices and competences – and their calibrations (measurements) for the fsQCA. As media systems are influenced by several contextual factors,

they are also included in the study to evaluate their role in the outcome of deliberative communication. Contextual conditions relate to the economic, political, technological, and cultural development of each country based on international aggregate data. Dina Vozab, Filip Trbojević, and Zrinjka Peruško present the fsQCA analysis and the resulting combinations of media landscape and contextual solutions for two different types of outcomes – high deliberative communication and low deliberative communication. The authors employ a stepwise approach to reduce the number of conditions in different domains. In each separate step, specific media system domain conditions are related to the outcome to demonstrate which is more significant for attaining successful deliberative communication. The final analysis combines the most important conditions from the previous steps to reflect on path solutions to different levels of deliberative communication.

Chapter 9 presents the conclusions of the book while highlighting critical junctures in the changing media systems that have influenced the shape of media-related dimensions and the success of deliberative communication in the countries included in the study. Zrinjka Peruško, Epp Lauk, and Halliki Harro-Loit emphasize the interrelated aspects of structural and actor-focused variables in their review of the findings on media-related risks and opportunities.

This book presents a new model of the relationship between media and politics in which the various features of the key domains of media landscapes are demonstrated to form pathways as in a kaleidoscope, where different contextual and media conditions combine to produce risks or opportunities for the development of deliberative communication.

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2 Deliberative communication

From normative theory to empirical operationalization and measurement

Lars Nord, Mart Ots, and Dina Vozab

Deliberation, as an overarching idea in developing democracy and promoting free and equal communication in society, continues to attract substantial scholarly interest in many academic disciplines and has been described as ‘a flourishing field’ (Bächtiger et al., 2018, p. 1). In the social sciences, academic works on deliberation have expanded significantly in recent years. Meanwhile, current global developments seem to move in the opposite direction, with authoritarian, nationalist, and populist parties and candidates gaining more influence in many parts of the world (Kirchick, 2017; Levitsky & Ziblatt, 2018; Norris & Inglehart, 2019). Recurring observations of increased polarization of public debates, signs of eroded social cohesion, and declining public trust are factors that certainly make the successful implementation of deliberative ideals more difficult to achieve (Mounk, 2019; Sunstein, 2009). The gap between substantial academic interest in normative deliberation theory, on the one hand, and limited real-world conditions that allow for the implementation of deliberative practices, on the other, has probably always existed but now seems to have become more articulated.

A vast majority of the literature on deliberation is focusing on normative perspectives and, to a lesser extent, empirical observations (Bächtiger, 2018). Empirical operationalization comes with its challenges for several reasons. As Rucht (2013, p. 47) noted, representative and participatory forms of democracy can be recognized in formal rules and procedures, but deliberative democracy is not institutionalized to such an extent. When ‘understood as a framework of rules for political decision-making on a large scale, deliberative democracy simply does not exist’ (Rucht, 2013, p. 47). Difficulties for comparative research in deliberative democracy also stem from difficulties in the cultural ‘translation’ of the normative concept of deliberation, which might be problematic, as the Western normative concept (e.g. the specific notion of rationality) is being imposed for the evaluation of different cultures (Sass & Dryzek, 2014).

The basic idea behind this chapter was to partly bridge this gap in deliberation studies by offering a model for empirically operationalizing deliberation in a comparative context. In this chapter, we discussed the operationalization of conditions for deliberative communication, both in terms of its theoretical

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conceptualization and the manner it was calibrated as the outcome dimension in a fuzzy-set qualitative comparative analysis (fsQCA). The first section of the chapter is theoretically oriented and introduces the key concept of deliberation, its roots and origins, and the associated basic ideals in social science studies. Additionally, the relations between the two concepts of deliberative communication and deliberative democracy are discussed, along with the different possible analytical levels for examining deliberation processes. The second section contains an overview of the empirical applications of the news media's deliberative performance in journalism and political communication studies. The third and last section is empirically oriented and focuses on how conditions for deliberative communication have been operationalized. The basic principles behind the operationalization of the concept as an outcome variable of a fuzzy-set analysis are discussed.

What is—and is not—deliberation?

The basic idea of deliberation refers to societal situations where people, regardless of their number, gather and participate in conversations where they act respectfully, exchange views on topics of common interest, and agree on decisions on issues of future importance for them based on 'the best argument' (Elster, 1998). *The Oxford Handbook of Deliberative Democracy* offers the following definition of deliberation: 'Mutual communication that involves weighing and reflecting on preferences, values, and interests regarding matters of common concern' (Bächtiger et al., 2018, p. 2). The basic principle of weighing and reflecting on preferences, values, and interests is related to a demanding form of democratic decision-making where participants in the process are supposed to adhere to well-defined standards of rationality and impartiality, as well as have equal opportunities to political influence in the discussion, regardless of their resources and societal positions. Implicitly, these demanding standards also call for an absence of power or self-interest/interest group pressures, selective attention, inadequate information, and regard for side effects (cf. Bohman & Rehg, 1997; Elster, 1998).

Mutual respect and absence of power can be characterized as classical, unchallenged standards. Indeed, deliberation cannot occur without respectful attitudes towards other participants or including possibilities of sanctions or threats in the deliberative process. Other important components of deliberation include equality, reasons, and an aim of consensus. Most often taken for granted is the fact that deliberative processes allow participants to equally give their opinions, favour rational argumentation, and arrive at a common agreement accepted by everyone (Bächtiger et al., 2018). However, these components have also been criticized in recent literature. 'Equal opportunity to influence' has been suggested as a more realistic goal than 'equal influence'; convincing arguments can have a more emotional than rational base; non-political talk can have a distinct

value for developing interpersonal ties and bonds of respect; and conflict clarification may, under some circumstances, be as fruitful for deliberation as consensus (Beauvais, 2020; Mansbridge, 2015). As in many other disputed concepts of social sciences, deliberation is constantly under subject to discussion.

Meanwhile, what true deliberation *is not* has not been as difficult to find agreement on. Several examples of communication in contemporary societies certainly do not meet the above-mentioned standards. Different forms of one-sided information drives, campaigns, and propaganda are examples of non-mutual communication, as they are intentionally produced with the purpose to minimize public trust and increase polarization and fragmentation in public debate through activities such as disinformation and hate speech. Such communication forms are not based on rational considerations among equals but instead tend to heighten existing conflicts and controversies.

In the academic debate, deliberation is most often related to deliberative democracy, which has become an important point of theoretical departure in political studies and political communication. The number of peer-reviewed journal articles, books, and book chapters focusing on deliberative democracy greatly exceeds the number of works specifically dealing with the concept of deliberative communication. This is hardly a great problem as the two concepts are intertwined. Deliberative democracy is a model for decision-making based on arguing and bargaining as forms of communication, whereas deliberative communication can be perceived as a presupposition for—or an essential component of—deliberative democracy. In the words of Habermas, ‘deliberation is a demanding form of communication, though it grows out of inconspicuous daily routines of asking for and giving reasons’ (Habermas, 1987, 2006, p. 413).

The distinction between the two concepts is also connected to different analytical levels of deliberation. Deliberative democracy is studied at the macro level and based on a democracy model where collective decisions on issues of common concerns are taken among equal participants affected by the decision, after weighing arguments in public discussions characterized by a commitment to the values of rationality and impartiality (Elster, 1998). The meso level of deliberation refers to specific public fora, such as round table or plenary meetings, where a group of citizens deal with a specific issue, have an open and free discussion, and come up with possible consensus-based solutions. Finally, deliberative communication may also occur in a less organized and spontaneous manner at the micro level, at any time when persons come together and engage in a conversation in accordance with the principles described above (Gold et al., 2013).

To conclude, deliberation can appear in many different contexts and at various societal levels. As public conversations in contemporary societies are, to a large extent, mediated (Page, 1996), the role of the media in deliberative processes merits analysis.

Deliberation and the media

Democratic deliberation takes place in a vast number of mediated or interpersonal instances of communicative interaction in society. This section focuses on the specific role of the news media and professional journalism and how such role has been studied. Earlier research on the media's role in democratic deliberation has been described as 'idealized' and predominantly 'anecdotal' (Maia, 2018). At present, a growing body of empirical research has attempted to explore the link between deliberative democracy and journalism.

In a broad sense, the news media's role for deliberative democracy is said to be based on its ability to be impartial, host and mediate debate and opinion exchange, and provide participatory structures, allowing citizens to engage (Mansbridge et al., 2012; Raeijmaekers & Maesele, 2015). Such a definition of the media's role makes for a quite broad view of the media as forums and platforms for conversation; it also provides normative ideals for how journalistic reporting should be performed to support deliberative ideals (van der Wurff et al., 2016). Such ideals include

- a how the media can ensure that a diversity of ideas and perspectives are brought to the public's attention (Graber, 2003);
- b how the media can ensure that the arguments, interests, and rationales underlying these ideas are made transparent to the public (van der Wurff et al., 2013; Wessler & Rinke, 2014); and
- c how the media can uphold a constructive discussion climate in public debates (Cottle & Rai, 2006).

The fulfilment of these roles by the media generates a positive effect on public deliberation (van der Wurff et al., 2016), meaning that the public is more knowledgeable about the different arguments and perspectives on an issue (Iyengar et al., 2009) and more willing to debate and discuss issues of public concern (Wessler, 2008). Particularly, academic research has made significant efforts to explore how the media performs in its provision of diverse ideas and perspectives. Research has taken interest in how various market conditions affect the media's propensity to supply diverse content (d'Haenens et al., 2005; van der Wurff, 2004, 2005; van der Wurff & van Cuilenburg, 2001) and political perspectives (Garz et al., in press), as well as in the extent to which more diverse content can also lead to diverse public participation and opinion (de Vreese & Boomgaarden, 2006; Lecheler & de Vreese, 2012; van der Wurff, 2011). Altogether, researchers have connected and conceptualized the relation between the news media and public deliberation (Marien et al., 2020; Rinke, 2016; van der Wurff et al., 2016; Van der Wurff et al., 2013; Ziegele et al., 2020).

In the field of political communication, researchers have shown particular interest in the news media's deliberative performance in the coverage of elections and election campaigns. This includes descriptive accounts of how

political debates are mediated, that is, staged, dramatized, and adapted to fit media formats and mass media logic (Coleman, 2013), how political arguments and voices are framed (Dunaway & Lawrence, 2015), and how media support the deliberative qualities of argumentation (transparency of arguments, constructive climate) within broadcasted political debates (Marien et al., 2020). Deliberative theory is demanding in its expectations on the journalistic role. Meanwhile, deficiencies in the media's deliberative performance may be attributed to a lack of journalistic training (Marcinkowski & Donk, 2012) and conflicts with traditional professional norms (Rinke, 2016).

Scholars of deliberative democracy have long pointed out that traditional journalism is no guarantee for deliberation and that traditional mass media outfits do not necessarily represent public interest and diversity of ideas. The deliberative performance of the news media should therefore not be taken for granted but needs to be consistently monitored (Wessler, 2018). The news media are not independent but rather nested in systems of corporate power, own financial interests (Neblo, 2015), and, to various degrees, interlinked with various 'elite' actors (Habermas, 2006), state, and other societal agents (Hallin & Mancini, 2004; Williams & Delli Carpini, 2011). These elites have tended to dominate traditional news processes (Habermas, 2006). Meanwhile, grassroots voices generally face more difficulties to being heard. The media's own vested interests may also influence how they cover and frame political and legislative debates (Bailard, 2016; Gilens & Hertzman, 2000). Indeed, media ownership shapes the framing of international conflicts (Baum & Zhukov, 2019), thereby shaping the agenda and influencing the deliberative process in the public sphere.

Meanwhile, the media landscape has shifted dramatically, particularly owing to digitalization and the growth of social media. Research on the implications for the news media's role and deliberative performance is in its infancy but has increasingly recognized the need for a more systemic perspective (Dahlgren, 2005), including the interaction between news and other forms of mediated deliberation (Ziegele et al., 2020). Researchers have sought to elucidate the deliberative complexities of hybrid media systems, where traditional mass media (TV, radio, newspapers) are complemented by a variety of online forums, blogs, podcasts, social media accounts, hashtags, and threads. In essence, this development means that while corporations, political parties, and other societal elites had learnt to influence traditional journalism—amplifying their voices in the deliberative process—new mechanisms are at play in the hybrid landscape, allowing new stakeholders to participate (Chadwick, 2013). However, although digitalization can be assumed to have democratized the media and improved the diversity of opinion (Bohman, 2007), recent debates on fake news, social media manipulation, and online influence provide reason to maintain a healthy degree of scepticism (Chambers, 2021; Maia, 2018; Pfetsch, 2018). Therefore, each media type needs to be understood in relation to its own cultural and technological affordances in deliberative behaviour (Maia & Rezende, 2016).

Operationalizing deliberative communication

We operationalized deliberative communication as a product of two separate social dimensions—the macro/meso level and the micro level. The macro/meso level captures political decisions that occur at an institutional level and how they are presented and debated in public. At the micro level, we operationalized conditions for deliberative communication via indicators that could capture citizen discussion, citizen knowledge (perceived knowledge about environmental issues and politics and knowledge about the EU), the level of interpersonal trust, and polarization. These indicators were based on data at the aggregate (country) level, thereby highlighting the conditions for deliberative communication at the micro level rather than deliberative communication at the micro level *per se*.

Based on these two dimensions, we calculated a deliberative communication index by taking the average value of these dimensions. We analysed the variability of deliberative communication in the EU to define thresholds for belonging to the set of countries with highly deliberative communication and to calibrate the outcome. [Table 2.1](#) presents the data and their sources for the development of the deliberative communication index.

Deliberative communication at the macro/meso level

The macro dimension of deliberative communication refers to the level where collective decision-making occurs. At the macro level, deliberative democracy defines a model of democracy where collective decisions are taken after arguments are weighed in public discussion with no limits for citizens to participate on equal terms ([Bohman & Rehg, 1997](#); [Gold et al., 2013](#)). Most of the empirical research on deliberative democracy and communication has tended to focus on the macro and meso levels. Deliberative democracy is observed in practice via studies of deliberative groups, such as public forums, deliberative polls, citizen juries, assemblies (see [Polletta & Gardner, 2018](#)). These institutional forms of deliberation also form the strongest link with the systems of representative democracy. The rise in such institutional forms has been significant, especially since around 2010, leading The Organization for Economic Co-operation and Development (OECD) to label this democratic development a ‘deliberative wave’ ([OECD, 2020](#)). Other venues in which deliberation occurs at the meso level would be activist groups and social movements ([Della Porta & Rucht, 2013](#)), educational institutions ([Nishiyama, 2019](#)), and the media ([Patrona, 2016](#); [Wessler & Rinke, 2014](#)).

In our study, we used the V-dem deliberative component index (`v2xdl_delib`) for operationalizing the macro and meso levels of deliberative communication. The index measures the extent to which political decisions are reached based on ‘public reasoning focused on the common good’ and ‘the extent to which political elites give public justifications for their positions on matters of public policy, justify their positions in terms of the public good, acknowledge and

Table 2.1 Data used for the development of the deliberative communication index

	<i>Deliberative component index</i> ¹	<i>Citizen discussion</i> ² (%)				<i>Citizen knowledge</i> ³ (%)				<i>Level of interpersonal trust</i> ⁴	<i>Average of discussion, knowledge, and trust</i>	<i>Polarization of society</i> ⁵
		<i>National level</i>	<i>European level</i>	<i>Local level</i>	<i>Average citizen discussion</i>	<i>Politics</i>	<i>Environment</i>	<i>EU politics</i>	<i>Average political knowledge</i>			
Austria	0.85	29.31	18.51	25.15	24.32	23.00	27.00	27.82	25.94	73.20	41.15	1.56
Belgium	0.93	19.15	10.91	18.95	16.34	30.00	28.00	28.06	28.69	75.90	40.31	2.29
Bulgaria	0.81	34.82	18.54	31.50	28.29	14.00	5.00	25.17	14.72	62.60	35.20	0.57
Croatia	0.73	19.61	12.23	26.89	19.58	14.00	13.00	21.07	16.02	68.00	34.53	1.04
Cyprus	0.73	24.55	14.85	27.72	22.37	20.00	34.00	33.47	29.16	68.70	40.08	2.11
Czechia	0.77	20.02	8.03	16.75	14.93	39.00	15.00	23.19	25.73	71.00	37.22	1.87
Denmark	0.97	32.93	22.53	26.16	27.21	43.00	32.00	32.83	35.94	94.60	52.58	3.14
Estonia	0.74	33.10	17.40	31.81	27.44	22.00	17.00	37.57	25.52	82.00	44.99	1.73
Finland	0.93	26.07	16.05	21.11	21.08	21.00	17.00	41.93	26.64	90.20	45.97	3.36
France	0.93	18.78	9.15	17.10	15.01	31.00	27.00	17.10	25.03	61.60	33.88	0.81
Germany	0.98	34.57	21.87	35.18	30.54	34.00	32.00	21.37	29.12	73.30	44.32	1.53
Greece	0.89	50.69	31.99	42.13	41.60	22.00	15.00	35.83	24.28	64.90	43.59	0.84
Hungary	0.43	20.59	15.96	21.91	19.49	9.00	10.00	28.14	15.71	73.20	36.13	0.02
Ireland	0.9	52.94	24.38	39.60	38.97	32.00	26.00	39.90	32.63	90.10	53.90	1.64
Italy	0.92	25.22	13.53	24.05	20.93	5.00	7.00	20.54	10.85	57.70	29.83	0.80
Latvia	0.81	12.95	8.33	21.79	14.36	16.00	8.00	17.07	13.69	74.90	34.32	1.76
Lithuania	0.82	16.12	12.64	18.41	15.72	20.00	12.00	27.66	19.89	78.70	38.10	2.98
Luxembourg	0.97	39.64	27.64	32.73	33.34	35.00	35.00	41.64	37.21	73.80	48.12	2.68
Malta	0.79	12.95	7.17	27.89	16.00	37.00	26.00	20.72	27.91	45.60	29.84	0.56
Netherlands	0.96	49.50	31.87	28.59	36.65	29.00	25.00	20.82	24.94	92.10	51.23	1.47
Poland	0.59	22.70	16.59	20.95	20.08	17.00	15.00	28.13	20.04	73.20	37.77	0.04
Portugal	0.91	11.65	5.97	10.70	9.44	15.00	21.00	25.47	20.49	81.10	37.01	1.88
Romania	0.5	18.26	14.93	23.83	19.01	12.00	13.00	23.20	16.07	63.40	32.82	1.35

(Continued)

Table 2.1 (Continued)

	<i>Deliberative component index</i> ¹	<i>Citizen discussion</i> ² (%)				<i>Citizen knowledge</i> ³ (%)				<i>Level of interpersonal trust</i> ⁴	<i>Average of discussion, knowledge, and trust</i>	<i>Polarization of society</i> ⁵
		<i>National level</i>	<i>European level</i>	<i>Local level</i>	<i>Average citizen discussion</i>	<i>Politics</i>	<i>Environment</i>	<i>EU politics</i>	<i>Average political knowledge</i>			
Slovakia	0.78	20.61	10.96	12.53	14.70	32.00	13.00	33.98	26.33	61.10	34.04	0.55
Slovenia	0.74	13.04	9.58	16.30	12.97	20.00	18.00	33.70	23.90	68.00	34.96	0.16
Spain	0.88	18.49	9.98	15.91	14.79	24.00	24.00	21.15	23.05	79.70	39.18	0.13
Sweden	0.94	40.32	23.53	31.02	31.62	30.00	25.00	30.08	28.36	88.80	49.59	2.18

¹ Source: V-dem deliberative component index (v2xdl_delib) 2020. ‘To what extent is the deliberative principle of democracy achieved? Clarification: The deliberative principle of democracy focuses on the process by which decisions are reached in a polity. A deliberative process is one in which public reasoning focused on the common good motivates political decisions—as contrasted with emotional appeals, solidary attachments, parochial interests, or coercion. According to this principle, democracy requires more than an aggregation of existing preferences. There should also be respectful dialogue at all levels—from preference formation to final decision—among informed and competent participants who are open to persuasion’ et al., 2021 p. 54).

² Citizen discussions. Average of discussions on national, European, and local politics (% of those who discuss frequently). Source of data: European Commission, Brussels (2022). Eurobarometer 93.1 (2020). GESIS, Cologne. ZA7649 Data file Version 2.0.0, <https://doi.org/10.4232/1.13866>

³ Citizen knowledge. Perceived knowledge on environmental problems, including climate change, and politics (% of those claiming to be very well informed). Knowledge on EU politics (% of those who had three correct answers to questions about the EU). Source of data: For perceived knowledge on politics and the environment: European Commission, Brussels (2022). Eurobarometer 95.2 (2021). GESIS, Cologne. ZA7782 Data file Version 1.0.0, <https://doi.org/10.4232/1.13884>; For knowledge about EU politics: European Commission, Brussels (2022). Eurobarometer 93.1 (2020). GESIS, Cologne. ZA7649 Data file Version 2.0.0, <https://doi.org/10.4232/1.13866>

⁴ Level of interpersonal trust. Based on responses to the question, ‘How much do you trust people in your country?’ Percentages of ‘totally trust’ and ‘tend to trust’ responses are combined. Source of data: European Commission, Brussels (2022). Eurobarometer 93.1 (2020). GESIS, Cologne. ZA7649 Data file Version 2.0.0, <https://doi.org/10.4232/1.13866>

⁵ Source: V-dem polarization of society variable (v2smpolsoc) 2020. ‘How would you characterize the differences of opinions on major political issues in this society? While plurality of views exists in all societies, we are interested in knowing the extent to which these differences in opinions result in major clashes of views and polarization or, alternatively, whether there is general agreement on the general direction this society should develop’ (Coppedge et al., 2021, p. 329).

respect counter-arguments; how wide the range of consultation is at elite levels' (Coppege et al., 2021, p. 54). The index also includes the indicator 'engaged society', which refers to the extent of public deliberations on policy issues at non-elite levels, where deliberation is treated as 'discussion, debate, and other public forums such as popular media' (Coppege et al., 2021, p. 161).

The outcome variable thus captures both the macro and meso levels of deliberative communication, as it refers to deliberation at elite levels in political decision-making, as well as in such settings as civil society associations and the media. [Table 2.1](#) presents the extent of deliberative communication in these levels across the European Union. The distribution of the values in these countries served as a context for the evaluation of the extent of deliberative communication in the cases in our study. This measure shows that the widest deliberation occurs in democratic–corporatist countries (for the typology, see [Hallin & Mancini, 2004](#)), such as Germany and Sweden. Meanwhile, the most constrained deliberation occurs in the Central and Eastern European (CEE) region, with Hungary, Romania, and Poland being ranked as the least deliberative.

Deliberative communication at the micro level

At the micro level, deliberation is recognized in spontaneous, often unintended, everyday 'political talk' among citizens ([Conover & Miller, 2018](#)). Citizens are often unwilling to engage in deliberation as envisaged by theorists of deliberative communication. For example, people would rather avoid political discussions and tend to be afraid of disagreements, causing offence, and being embarrassed in discussions (see [Polletta & Gardner, 2018](#), p. 73). When engaging in discussion about politics, they prefer it with people who share their worldview or in their own social groups ([Anderson & Paskeviciute, 2005](#); [Conover & Miller, 2018](#); [Polletta & Gardner, 2018](#)). Moreover, everyday political discussions do not always meet the criteria of deliberative communication ([Conover & Miller, 2018](#)).

Political communication research confirms the beneficial aspects of political discussions among citizens for different outcomes connected with values of deliberative communication. For example, engaging in political discussion enhances political knowledge and knowledge about public affairs, political sophistication, tolerance of different worldviews, and civic engagement ([Anderson & Paskeviciute, 2005](#); [Conover & Miller, 2018](#)).

In terms of operationalization of conditions for deliberation at the micro level, researchers have used certain measures of political discussions among citizens (e.g. [Nir, 2012](#)). We referred to the frequency of discussion on politics at the national, European, and local level in the EU ([Table 2.1](#)). The frequency of political talk is reportedly higher in the US and in Western Europe compared with other world regions ([Conover & Miller, 2018](#)). The data presented in [Table 2.1](#) show a lower frequency of political discussions in Southern European and CEE countries.

Notably, the frequency of political discussions does not give information on the quality of such discussions in line with the propositions of deliberative communication. Therefore, for the operationalization of conditions for deliberative communication at the micro level, an indicator pointing to citizens' political knowledge might indicate the level of communication based on reason, which is central to the concept of deliberation in terms of rational argumentation (Harro-Loit et al., 2023). As shown in [Table 2.1](#), the highest shares of citizens with higher political knowledge (either perceived or tested) are found in democratic–corporatist countries with liberal media systems. Citizens in Hungary, Bulgaria, Latvia, and Italy report being the least knowledgeable about politics.

As explained by Nord and Harro-Loit (2023), one of the important values of deliberative communication and a precondition for deliberation to occur is a minimum level of trust between participants of deliberation. We measured trust by the level of interpersonal trust. [Table 2.1](#) shows that these levels are highest in democratic–corporatist countries (e.g. Sweden) and lowest in Mediterranean (e.g. Italy) and CEE countries (e.g. Bulgaria and Slovakia).

Deliberative communication also requires civility among participants in the deliberation and adherence to the values of the common good. To capture these criteria of deliberative communication, our research group used an indicator of the polarization of society, given that high polarization would lead to the situation opposite of ideal deliberation. Although polarization is often seen as an outcome of deliberation (successfully designed deliberation processes can decrease polarization, in [Fishkin et al., 2021](#)), we argue that high polarization would impede the occurrence of deliberative communication. A highly polarized society would be divided into conflicting groups with little space for mutual recognition and discussion. [Table 2.1](#) demonstrates levels of polarization in the EU; countries with the highest scores have the least polarized societies (again, democratic–corporatist countries, such as the Nordic countries, rank the highest, with Lithuania as an exception), whereas those with the lowest score have the most polarized societies (e.g. CEE countries Poland and Hungary).

Data and the calibration process

We collected data on all the proposed indicators of the conditions for deliberative communication. As the calibration referred to the context of EU countries, we evaluated the variability of data in the EU and calculated thresholds for inclusion and exclusion from the set, along with the crossover point. We used percentiles to define thresholds ([Pappas & Woodside, 2021](#); for details on the procedure, see [Chapter 8](#)).

We measured deliberative communication as a composite outcome based on different levels of deliberation. First, we calibrated the macro/meso level variable (deliberative component index) based on the percentile method described above (delcomp). We also calibrated the average of citizen discussion,

Table 2.2 Calibrated values of the data and calibrated index of deliberative communication

<i>Country</i>	<i>delcomp</i>	<i>microdelib</i>	<i>polarization</i>	<i>delcomm</i>
Austria	0.5	0.65	0.51	0.55
Belgium	0.87	0.61	0.79	0.76
Bulgaria	0.42	0.26	0.13	0.27
Croatia	0.29	0.21	0.27	0.26
Cyprus	0.29	0.6	0.73	0.54
Czechia	0.35	0.43	0.64	0.47
Denmark	0.95	0.95	0.94	0.95
Estonia	0.3	0.8	0.59	0.56
Finland	0.87	0.83	0.96	0.89
France	0.87	0.18	0.19	0.41
Germany	0.96	0.78	0.5	0.75
Greece	0.72	0.75	0.2	0.56
Hungary	0.04	0.33	0.05	0.14
Ireland	0.77	0.96	0.55	0.76
Italy	0.84	0.04	0.19	0.36
Latvia	0.42	0.2	0.6	0.41
Lithuania	0.44	0.5	0.92	0.62
Luxembourg	0.95	0.88	0.88	0.90
Malta	0.39	0.04	0.12	0.18
Netherlands	0.93	0.93	0.47	0.78
Poland	0.12	0.48	0.05	0.22
Portugal	0.81	0.41	0.65	0.62
Romania	0.06	0.12	0.41	0.20
Slovakia	0.37	0.18	0.12	0.22
Slovenia	0.3	0.25	0.06	0.20
Spain	0.67	0.56	0.06	0.43
Sweden	0.89	0.91	0.76	0.85

knowledge, and interpersonal trust with the percentile method (microdelib). We similarly calibrated the variable referring to the polarization of society (polarization). Finally, we calculated the average of these three calibrated variables, resulting in the index of deliberative communication (delcomm). The calibrated values of deliberative communication are presented in Table 2.2. Among the 14 analysed cases, Sweden, Germany, Greece, Estonia, and Austria belong to the set of high deliberative communication (albeit to a different extent), whereas Czechia, Spain, Latvia, Italy, Bulgaria, Croatia, Poland, Slovakia, Romania, and Hungary belong to the set of countries with low deliberative communication.

Conclusion

We sought to explore deliberative communication in terms of its definitions and applications to propose an operationalization for empirical comparative research. The key ideas of deliberation are often associated with the most

advanced democratic theories regarding political awareness, political participation, and free and open political discussion. Notably, an increasing number of states—democracies, semi-democracies, and non-democracies—seem to be moving away from true deliberative ideals. Meanwhile, the deliberative role of the news media in contemporary digitized societies is contested. Good journalism can be expected to promote diversity of ideas and constructive discussions, but recent media developments also seem to facilitate the existence of filter bubbles and conflict-oriented conversations that rather polarize public opinion than keep different population segments of societies together.

The study presented in this book aims to provide a critical exploration of media-related risks and opportunities for deliberative communication in 14 countries in the EU. To successfully analyse these risks and opportunities within the fuzzy-set design, we carefully elaborated on the outcome dimension in the analysis: deliberative communication. In this chapter, we measured deliberative communication as a composite outcome based on the macro/meso and micro levels of conditions for deliberation using data from the V-dem study and the Eurobarometer. In line with the assumption that the ultimate test of the deliberative ideal is practical (Bohman & Rehg, 1997), the calibrated values and index of deliberative communication are intended to enable a truly comparative, sound, and reasonable analysis of how media developments in the past decades might have changed the prospects for deliberation in the analysed countries.

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3 Identifying the legal risks and opportunities for deliberative communication in Europe:

Freedom of expression and information

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Regulation provides the broader context within which deliberative communication through the media can (or cannot) materialize. The structural framework within which the media can operate and fundamental rights can be exercised and enjoyed through the media is shaped by regulation—particularly, in the ways in which regulation encompasses safeguards for fundamental rights and gives flesh to provisions for freedom of expression and its corollary, freedom of information, contained in constitutional, international, and European sources of protection. In Europe, free speech is not absolute. It can be subject to restrictions in the pursuit of legitimate public-interest objectives, and its relation with other rights and interests is commonly determined through regulation, which often plays an important role in terms of defining, demarcating, and eventually balancing freedom of expression with other rights and interests. Thus, regulation can carry both opportunities and risks for the exercise of free speech.

By adopting a freedom of expression and of information perspective, our research can approach with theoretical consistency and then empirically and comparatively assess the legal areas important for and relevant to deliberative communication through the media. This choice in perspective is based on the premise that in Europe, any sort of regulation addressing contemporary media ecosystems must be congruent with freedom of expression and information. National constitutions in the Member States of the European Union (EU) protect these freedoms, creating obligations for domestic laws and policies, including media laws and policies, to conform with the protective standards enshrined therein. The European Convention on Human Rights (ECHR) and the Charter of Fundamental Rights (CFR) of the EU have further enriched the arsenal of fundamental rights guarantees in Europe. The ECHR is binding on states that have signed and ratified it, and all EU Member States have done so. The provisions of the CFR are binding on the EU institutions and on EU Member States when they act within the scope of EU law.¹

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As such, freedom of expression and freedom of information have come to form the conceptual basis for studying opportunities and risks for deliberative communication through the media in law. Importantly, these freedoms have also been operationalized into a set of dimensions (operational variables) that serve to assess whether the rules, as adopted and implemented within individual countries, create an enabling environment for the exercise of both freedoms. Apart from the free speech provisions contained in national constitutions and other legal instruments of rights protection, other relevant variables pertain to defamation laws, data protection rules, intellectual property legislation, and laws on disinformation and their implementation. Relevant variables also cover rules concerning access to information and public documents, the confidentiality of journalistic sources, whistleblowing through the media, trade secrets, and transparency of media ownership and their implementation. In what follows, this chapter presents a discussion on freedom of expression and of information as core components of any legal system supportive of deliberative communication through the media in Europe, paying due attention to relevant European case law. We also present the set of dimensions that are considered crucial for sustaining the exercise of freedom of expression and information.

The chapter also gives a review of the key findings of country case studies performed in 14 EU member countries (Austria, Bulgaria, Croatia, Czechia, Estonia, Germany, Greece, Hungary, Italy, Latvia, Poland, Romania, Slovakia, and Sweden), which form the basis for this chapter's comparative section. The case studies were carried out in the framework of the EU-funded Mediadelcom research project and guided by the concepts of freedom of expression and of information and the operational variables drawn from these. In this chapter's comparison of the legal situation, we also drew information from major collaborative media monitoring projects and published research.

Theoretical conceptualization and operationalization

Key concepts: Freedom of expression and freedom of information

Free speech is a basic right in a democracy and an essential condition for deliberative communication (Rostbøll, 2011). Free speech is necessary for communicative interaction and a prerequisite for the open exchange of views and ideas on matters of common concern. There can be no participation in public debate whereby different viewpoints are tried out, weighed, and reflected upon without all participants being able to express themselves freely. Deliberation also presupposes the citizen's right to receive information. Citizens need information about public matters to form opinions, engage in discussions, and participate in politics (Brady et al., 1995). Information is also indispensable for the media to be able to serve the public's right to know. When information is not available or accessible, the media cannot provide an effective forum for democratic debate nor help people make informed choices.

Freedom of expression and freedom of information must therefore be seen as indispensable conditions for enlightened discussion, reflective opinion formation, and the joint search for reasoned viewpoints on issues of common concern.

Freedom of expression and freedom of information are protected by both the ECHR and CFR (Woods, 2017). Article 10 of the ECHR and Article 11 of the CFR firmly assert that everyone has the right to freedom of expression. Both articles also explain that free speech protects the right to voice opinions, views, and ideas and to receive and impart information. Freedom of information is thus intrinsically linked to freedom of expression. The jurisprudence of the Court of Justice of the European Union (CJEU) on Article 11 of the CFR is gradually expanding. The jurisprudence of the European Court of Human Rights (ECtHR)—the judicial arm of the ECHR—on Article 10 of the ECHR is particularly enlightening in terms of the nature and scope of the protection granted to freedom of expression and information (see Benedek & Kettemann, 2020; Voorhoof, 2022; Woods, 2023). In several instances, the ECtHR has recognized that freedom of expression ‘constitutes one of the essential foundations of a democratic society and one of the basic conditions for its progress and for each individual’s self-fulfilment’.² Free speech, it has been emphasized, ‘is applicable not only to “information” or “ideas” that are favourably received or regarded as inoffensive or as a matter of indifference, but also to those that offend, shock or disturb’.³

Article 11 of the CFR proclaims in paragraph 2 that the freedom (and pluralism) of the media should be respected. Media freedom is a derivative of free speech and benefits from constitutional protection in certain EU Member States, mostly through constitutional guarantees of the freedom of the press. The ECHR does not distinguish between freedom of expression and the freedom of the media or the press but has thoroughly examined their interaction and interrelation (Psychogiopoulou, 2014). The ECtHR has stressed the vital function of the press as a ‘watchdog’ in a democratic society.⁴ It has also emphasized the duty of the media (apart from its concomitant right) to impart information and ideas on matters of public interest. The ECtHR has purposefully linked such a media duty to the public’s right to receive information and ideas on matters of public interest.⁵ Significantly, the ECtHR has also underlined the role of the internet in enhancing the public’s access to news and facilitating the dissemination of information.⁶ It has recognized that the function of bloggers and popular social media users may be assimilated to that of ‘public watchdog’.⁷

Typically, the ECHR and CFR guarantee the protection of fundamental rights, including the protection of freedom of expression and information, through negative and positive obligations. Negative obligations take the form of a duty of non-interference by the state in the exercise of the rights concerned. Positive duties require the adoption of measures—whether of a substantive or procedural nature—to ensure the effective exercise of the protected rights. The jurisprudence of the ECtHR follows a two-pronged approach, interpreting the ECHR as introducing both negative and positive obligations

for states party to the ECHR (Akandji-Kombe, 2007; Beijer, 2018; Lavrysen, 2016; Mowbray, 2004; Xenos, 2012). The CFR follows a similar logic. According to Article 51(1) of the CFR, EU institutions and Member States (when they act within the scope of EU law) shall respect the CFR rights, observe the CFR principles, and promote the application thereof in accordance with their respective powers and with due consideration for the limits of EU powers. The CFR thus recognizes a negative obligation of non-interference (to respect the CFR rights and observe the CFR principles) incumbent on EU institutions and Member States when they act within the scope of EU law, and a positive duty to promote the application of the CFR rights and principles.

In line with the ECtHR jurisprudence on Article 10 of the ECHR imposing a negative duty of non-interference on states, the ECHR safeguards the media and their professionals significant protection against state censorship and control. The ECtHR also construes Article 10 of the ECHR as requiring state authorities to take positive measures to create an enabling environment for the exercise of free speech and freedom of information. Evidently, such recognition enjoys much interpretative potential for disentangling states' responsibilities vis-à-vis the media. In the field of audiovisual media, for instance, the ECtHR has ruled that states are under a positive duty to ensure that 'the public has access ... to impartial and accurate information and a range of opinion and comment and, second, that journalists and other [media] professionals ... are not prevented from imparting this information and comment'.⁸ The ECtHR has also stated that the proper functioning of democracy requires both the provision of 'impartial, independent and balanced news, information and comment' and 'a forum for public discussion in which as broad a spectrum as possible of views and opinions can be expressed'.⁹ Further, state authorities may have a positive obligation to 'put in place an appropriate legislative and administrative framework to guarantee effective pluralism'.¹⁰ More broadly, positive obligations may require states to 'create a favourable environment for participation in public debate by all the persons concerned'.¹¹

The ECtHR also recognizes that the state may intervene on a number of public-interest grounds to justify restrictions on free speech. According to Article 10(2) of the ECHR, such grounds include the interests of national security, territorial integrity or public safety, prevention of disorder or crime, protection of health or morals, protection of the reputation or rights of others (e.g. the right to respect for private and family life or the right to intellectual property), prevention of the disclosure of information received in confidence, and judicial authority and impartiality. Restrictions can be allowed, provided that they pursue one of these legitimate aims, are prescribed by law, and are 'necessary in a democratic society' by corresponding to a 'pressing social need' and by being proportionate to the aim pursued. Article 52(1) of the CFR, in turn, states that any limitations on the exercise of the rights and freedoms recognized by the CFR must be provided for by law, respect the essence of these rights and freedoms, and, '[s]ubject to the principle of proportionality, ... be made only if they are necessary and genuinely meet

objectives of general interest recognized by the Union or the need to protect the rights and freedoms of others’.

Issues regarding access to information have also been addressed under the rubric of Article 10 of the ECHR. In relevant cases, the standard jurisprudential position of the ECtHR is that a state is not allowed to prevent a person from receiving information that others wish or may be willing to impart,¹² although the state has no positive obligation to collect and disseminate information of its own motion. However, such a positive obligation may arise where access to information is instrumental for the exercise of ‘the freedom to receive and impart information’.¹³ In its jurisprudence, the ECtHR has thus placed emphasis on whether information gathering is a preparatory step in journalistic activities and in other activities that constitute ‘an essential element of informed public debate’.¹⁴ ECtHR case law on Article 10 of the ECHR has also covered issues related to the protection of journalistic sources and whistleblowers. Relevant case law indicates that the right of journalists not to disclose their sources is more than mere privilege; it is part and parcel of the right to receive and impart information.¹⁵ It also establishes direct protection for whistleblowing *through the media*.¹⁶

Operational variables for freedom of expression and freedom of information

Laws and regulations can be used as positive measures by states to create an enabling environment for the exercise of free speech and freedom of information. They can also be used to balance freedom of expression and information with other rights and interests. Rule-making thus presents clear implications for freedom of expression and information, the nature and depth of the protection granted to them, and, in consequence, the ability of the media to support deliberative communication. Rule-implementation also has repercussions: rules properly designed to create an enabling environment for the exercise of freedom of expression and information may be subject to ineffective implementation or eroded by arbitrary practices. Concurrently, rule-implementation can *contain* deficiencies in regulation. When laws are excessively restrictive, for instance, non-implementation may favour freedom of expression and information.

We developed operational variables to assess whether rule-making and rule-implementation support freedom of expression and freedom of information to the benefit of deliberative communication, combining different elements. Starting with freedom of expression, the first variable we considered is the existence of free speech provisions. Safeguards for freedom of expression may stem from national constitutions, domestic laws and charters of rights, and major international and European treaties, such as the ECHR and the CFR. In light of the importance of the internet for the exercise of freedom of expression, existing safeguards may explicitly address the online environment or be interpreted as covering and applying to it.

Another variable is the legal framework that places restrictions on the exercise of freedom of expression to protect other fundamental rights and interests. Under the ECHR regime, any restriction of the right to freedom of expression must be compatible with Article 10(2) of the ECHR. Specifically, restrictions must be prescribed by law, which must be accessible, clear, unambiguous, and sufficiently precise to enable individuals to regulate their conduct, according to the ECtHR. Restrictions must pursue one of the legitimate aims that are exhaustively enumerated in the ECHR, must be adequate to pursue the aim at issue, and must be the least restrictive options. As such, the operational variables for freedom of expression cover restrictions on freedom of expression contained in defamation laws, data protection rules, intellectual property legislation, and laws on disinformation and their implementation. Whether they might pose a risk to the exercise of free journalistic speech is then assessed.

Regarding defamation legislation, according to the ECtHR, the exercise of the right to freedom of expression must be balanced against the right to the protection of one's reputation, which typically comes within the scope of the right to respect for private life (Article 8, ECHR).¹⁷ The ECtHR has declared that no hierarchy exists regarding the rights laid down in Articles 8 and 10 of the ECHR: they are of equal weight and deserve equal respect (*Smet*, 2010). Thus, whether defamation laws are overly broad or protective must be examined, given that they can have a chilling effect on freedom of expression. Useful elements include the public nature of the targeted person's status or role.¹⁸ The 'limits of acceptable criticism', as the ECtHR has noted, are wider when the allegedly defamed person is a politician, public official, or public figure—meaning an individual who is active in public life (*European Court of Human Rights*, 2022). Domestic rules that result in far-reaching remedies or sanctions, including prison sentences, excessive fines, or disproportionate awards of damages, may also undermine freedom of expression.

The protection of personal data falls within the remit of Article 8(1) of the ECHR and constitutes a separate, self-standing right under the CFR (Article 8, CFR). The General Data Protection Regulation (GDPR, Regulation 2016/679¹⁹) regulates potential conflicts between the right to data protection and freedom of expression. With a view to ensuring that the media can fulfil its role in a democratic society, Article 85(1) of the GDPR provides that 'Member States shall by law reconcile the right to the protection of personal data [...] with the right to freedom of expression and information, including processing for journalistic purposes [...]'. Article 85(2) of the GDPR explains that the processing of personal data for journalistic purposes shall be subject to exemptions or derogations from certain provisions of the GDPR, provided for by the Member States, if necessary to reconcile the right to protection of personal data with freedom of expression and information. Thus, how the Member States have sought to balance the rights at issue—and whether any exemptions or derogations have been adopted at the national level—needs to be considered, with attention to the outcome of such balancing, as crystallized in law and implemented in practice.

Copyright and related rights establish exclusive rights for right holders over the use of their protected works or other subject matter. Such exclusive rights can interfere with the exercise of freedom of expression (Geiger, 2009; Izyumenko, 2016). Meanwhile, the protection of intellectual property, including copyright, is safeguarded under the CFR (Article 17, CFR) and ECHR (Article 1 of the First Protocol to the ECHR on the right to the peaceful enjoyment of possessions is applicable to intellectual property²⁰). The interrelation of copyright and freedom of expression is reflected in EU copyright legislation. Directive 2001/29/EC on the harmonization of certain aspects of copyright and related rights in information society (the Copyright Directive) has introduced optional exceptions to the exclusive rights of authors, performers, producers, and broadcasters, specifically devised to facilitate freedom of expression and of the press (Cabrera Blázquez et al., 2017).²¹ Directive 2019/790 on copyright and related rights in the digital single market has, in turn, rendered exceptions for ‘quotation, criticism, review’ and ‘caricature, parody or pastiche’ mandatory in favour of users who upload and make available user-generated content on online content-sharing services.²² Thus, the existence of national rules that introduce exceptions or limitations to copyright protection, with a view to facilitating free speech, needs to be considered, along with their implementation.

Disinformation has recently been brought centre stage in the discourse on free speech and democratic debate. Alongside technological solutions that seek to debunk disinformation, the growing prevalence of fabricated and inaccurate information on the internet has led some European countries to adopt rules intended to combat disinformation online (van Hoboken & Fathaigh, 2021). However, disinformation requires a cautious approach from a regulatory perspective. Excessive focus on unduly restrictive measures could thwart the exercise of free speech and jeopardize the free exchange of views and ideas. As aptly observed in the UN-led Joint Declaration on Freedom of Expression and ‘Fake News’, Disinformation and Propaganda, general prohibitions on the dissemination of information ‘based on vague and ambiguous ideas, including “false news” or “non-objective information”’ are incompatible with free speech guarantees and should be abolished (UN/OSCE/OAS/ACHPR, 2017). Even free-speech-sensitive legislation could eventually damage free speech if the enacted rules are arbitrarily applied, resulting in censorship and the curtailment of speech that ‘offends, shocks or disturbs’. It is thus crucial to ascertain whether any legislation adopted to counter disinformation refrains from imposing overly broad restrictions on freedom of expression.

Moving on to freedom of information, the starting point is the explicit legal recognition of the right to information in national constitutions, domestic laws, and charters of rights. The existence of laws meant to provide citizens with the right to access information, particularly information held by government and public bodies, is a relevant variable. The contribution of so-called Freedom of Information (FOI) laws to stimulating public debate is highlighted by international human rights bodies, such as the Council

of Europe (2020). Nonetheless, these laws may be designed such that they provide only a minimum level of access. Thus, the extent to which legislation is consistent with the notion of maximum disclosure should be considered. Maximum disclosure refers to the presumption that all information should be subject to disclosure and that this presumption may only be overcome in the case of specific legitimate reasons (Ibid). This implies, first, that the range of information and the definition of ‘public bodies’ to which the law applies should be broad (Article 19, 2016, p. 4), and second, that any access restrictions laid down in legislation to protect other fundamental rights and interests are compatible with Article 10(2) of the ECHR. Exceptions deriving from personal data protection rules in relation to access to official documents held by public bodies are particularly relevant in this respect. Article 86 of the GDPR allows Member States some regulatory leeway with a view to ‘reconcil[ing] public access to official documents with the right to the protection of personal data’. Whether domestic laws include operational provisions to support access in response to Article 86 must be examined.

The protection of the confidentiality of journalistic sources is another variable. When confidentiality is not protected, according to the ECtHR, ‘sources may be deterred from assisting the press in informing the public on matters of public interest ... and the ability of the press to provide accurate and reliable information may be adversely affected’.²³ It is thus crucial to examine the existence of safeguards for the protection of journalistic sources, considering any applicable restrictions and their compatibility with Article 10(2) of the ECHR, and to assess their implementation. Relevant safeguards may stem from legislation or national jurisprudence in accordance with Article 10 of the ECHR.

The next variable concerns the protection of whistleblowing through the media. Typically involving insider informants who reveal information about organizational misconduct, whistleblowing is an important component of FOI (Vandekerckhove, 2016). The Council of Europe (2014), in its most recent Recommendation on the protection of whistleblowers, invites Member States to provide channels for public disclosures of information on threats or harms to the public interest. Moreover, the EU’s Whistleblower Directive provides for the protection of those who blow the whistle through public channels, such as the media.²⁴ Thus, the existence of comprehensive provisions granting protection to whistleblowers who disclose information through the media needs to be addressed, along with their implementation. Elements that define the comprehensiveness of the relevant provisions relate to the breadth of the definition of whistleblowers, the ‘material scope’ for which public disclosures are protected, and the extent of the protection afforded (Council of Europe, 2014, para. 4.4.).

Another variable concerns the transparency of media ownership. Media ownership ‘confers the right to set corporate priorities, develop an editorial agenda and to hire a team that will best execute the will of the owner’ (Freedman, 2014, p. 53). Ownership entails the risk of editorial choices and news

output being influenced, regardless of whether the owners do indeed exercise such influence in practice. These concerns have led to arguments and initiatives to guarantee that adequate and reliable information about who owns the media is available to the public. This is important to ensure that citizens can exercise their right to information and make informed choices about the media they use. When ownership structures are obscure, citizens may not easily assess the credibility of news and identify any bias or strategic distortions in news coverage (Craufurd Smith et al., 2021, p. 2). The existence of rules setting out media ownership disclosure obligations is a key condition for ensuring transparency in media ownership. In its recent Recommendation on media pluralism and transparency of media ownership, the [Council of Europe \(2018\)](#) calls on Member States to set out specific media transparency requirements. These include a requirement for media outlets ‘to disclose ownership information directly to the public on their website or other publication and to report this information to an independent national media regulatory body or other designated body, tasked with gathering and collating the information and making it available to the public’. Thus, whether domestic laws provide for the disclosure of media ownership information and the implementation of these laws in practice must be examined. Moreover, the revised Audiovisual Media Services Directive states that Member States may adopt legislation requiring media service providers to make ‘accessible information concerning their ownership structure, including the beneficial owners’.²⁵

Comparative findings

In comparatively evaluating the legal aspects of the protection of freedom of expression and information in the 14 country cases, we could not rely too much on pre-existing studies and indexes. Although a number of international indexes have provided comparative rankings of countries with regard to freedom of expression, freedom of information, the internet, and media pluralism, they do not answer the questions posed in our theoretical definitions of the key aspects in the regulatory realm that impact deliberative communication. Consequently, most of the requisite comparative information was provided by the country case studies conducted. Expert coding for the purposes of country comparisons was performed based on the information collected in the country case studies (see [Chapter 9](#) for details on the research process and coding). Existing published research was also used as needed.

For the comparison of countries in the legal domain, we operationalized freedom of expression and of information with the following sub-sets. First, for assessing freedom of expression, we selected three elements from the theoretical framework for analysis: (a) whether regulatory safeguards creating an enabling environment for the exercise of freedom of expression exist; (b) whether defamation laws and their implementation safeguard freedom of expression; and (c) whether data protection laws and their implementation safeguard freedom of speech.

As far as the existence of regulatory safeguards is concerned, all the countries in this study are members of the EU and Council of Europe and they are all signatories of the ECHR and the CFR. Thus, certain regulatory safeguards that create an enabling environment for the exercise of freedom of expression in principle exist. The implementation of the ECtHR decisions in freedom of expression cases that found a violation of Article 10 of the ECHR is an important corrective to national legislature, administrative practice, and judicial interpretation and works as an equalizer across the Member States.

In the field of defamation, we noted similarities between the country cases in terms of the criminalization of defamation and its inclusion in the penal code (which can pose a risk for freedom of expression), severity of possible punishment, and inequality of protection. Concerning the latter, having specific categories of citizens enjoy a higher level of protection against alleged defamation than others (e.g. politicians, heads of state, and/or other high officials, domestic or foreign) is considered to pose a higher risk against freedom of expression. Every country in which defamation is criminalized is considered to belong to the group of countries in which freedom of expression is insufficiently protected. Those countries which, in addition, privilege certain groups over others when it comes to protection from defamation are evaluated as the worst case vis-à-vis legal structure. These include Austria, Germany, Greece, Italy, and Sweden. [OSCE \(2017\)](#) confirmed that even democratic European countries—those that score highest on various democracy indexes—have harsh criminal defamation laws with prison sentences for offenders, including journalists (although these are generally suspended), along with special protections for public officials or heads of state.

Countries that keep defamation in the criminal code with a prison sentence among the possible penalties are considered to have a legal framework that presents significant risks against freedom of expression; they include Czechia, Hungary, Poland, and Slovakia. Countries that have repealed the possibility of a prison sentence while retaining defamation in the penal code are evaluated as more positive legal environments. For instance, Bulgaria criminalizes defamation and high fines are foreseen for offenders, whereas Croatia includes defamation in the penal code but imposes fines alone, with no possible prison sentence. Estonia and Romania have decriminalized defamation and similar offences, but Estonia has other special laws on insulting public officials and criminalizes the defamation of foreign heads of state, albeit with no prison sentences provided for ([OSCE, 2017](#)). In our sample, only in the newest EU Member States have defamation been decriminalized and prison sentences repealed, probably in conjunction with the EU enlargement process whereby higher standards were expected of new members.

Evaluating the implementation of defamation laws is not straightforward. In some countries, judicial protection may be limited. In others, the frequency of the misuse of defamation laws by politicians is seen to negatively impact freedom of expression, even if lawsuits often fail in court (e.g. Croatia,

[Peruško et al., 2022](#)). At any rate, defamation decisions being often overturned by the ECtHR is a clear indication of risk. More weight is therefore given to how the courts judge defamation cases.

Some countries with overly restrictive laws offer a very good level of protection for freedom of expression, either because the laws are not implemented or the courts apply the ECHR standards and national media-specific laws that guarantee freedom of expression. This is the case in Sweden and Estonia ([Berglez et al., 2022](#); [Lauk et al., 2022](#)). However, judicial implementation is mostly acceptable in the majority of the countries under study, with the ECHR often referenced in acquittals (e.g. Croatia, [Peruško et al., 2022](#)).

In other countries, troubled implementation is combined with restrictive laws, as in Austria and Greece ([Eberwein et al., 2022](#); [Psychogiopoulou & Kandyla, 2022](#)). In Austria, for instance, the ECtHR repeatedly overturns national courts to protect freedom of expression in defamation cases ([Eberwein et al., 2022](#)). In Bulgaria, although the legislation is relatively supportive, stakeholders face problems with implementation attributed to the imposition of high fines, which have a chilling effect. The ECtHR has overturned national court verdicts in several instances ([Raycheva et al., 2022](#)). This is also the case of Croatia, where the implementation of the ECHR is uneven and complaints brought to the ECtHR on the basis of Article 10 of the ECHR have been upheld ([USUD, 2023](#)).

As regards data protection legislation and its effects on freedom of expression, the countries examined can be differentiated on the basis of whether they have provisions in place for journalistic exemption in response to the GDPR. Countries without journalistic exemptions are considered to present the greatest risk to freedom of expression. Croatia and Hungary belong to this group ([Peruško et al., 2022](#); [Urbán et al., 2022](#)). In Austria, an exemption is provided for media organizations but not for journalists, academics, or NGOs ([Eberwein et al., 2022](#)). In Bulgaria, the Personal Data Protection Act (PDPA) (in force from 1 January 2002) protects persons with regard to processing of personal data. Under Article 25h of the PDPA, the processing of personal data for journalistic purposes is lawful when carried out for the realization of freedom of expression and the right to information, while respecting privacy. In 2019, the Constitutional Court repealed Article 25h para. 2 of the PDPA, which had introduced some criteria for assessing the balance between the rights involved. After a 2021 decision of the Supreme Administrative Court, balance shall be struck on a case-by-case basis ([Raycheva et al., 2022](#)). At the other end of the spectrum in Sweden, where freedom of expression is seen to outweigh data protection: the country has a strong journalistic exemption in place in line with the GDPR ([Berglez et al., 2022](#)).

Turning to implementation, given the relative newness of the GDPR, many countries have no case law as yet or implementation therein remains under-researched. However, in some countries, such as Romania and Hungary, the application of the GDPR by courts and data protection authorities appears to have a direct negative effect on press freedom ([Avādani, 2022](#); [Urbán et al., 2022](#)).

Next, in the assessment of freedom of information, the following elements have received attention: (a) whether regulatory safeguards exist for accessing documents held by public authorities and how these are implemented; (b) protection of journalistic sources; and (c) media ownership transparency.

Countries differ with respect to the existence of regulation in support of freedom of information, especially FOI laws. Most countries have some kind of regulation that ensures access for citizens and journalists to information held by public authorities. However, in some, the legislation does not effectively guarantee maximum disclosure. This is the case in Hungary, Poland, and Greece (Głowacki et al., 2022; Psychogiopoulou & Kandyla, 2022; Urbán et al., 2022). As far as implementation is concerned, the question remains whether citizens can access official documents and information held by public authorities. In Italy, a study quoted in *Liberties* by Zanellati (2017) showed that the majority of FOI requests do not receive an answer within 30 days (see also Piacentini et al., 2022). The situation is similar in Poland, where information is not readily provided to citizens and journalists by either public or private institutions (Głowacki et al., 2022). In Germany, Greece, Latvia, Slovakia, and Bulgaria, the implementation of FOI regulation is generally found to be satisfactory.

Regarding the protection of journalistic sources, laws protecting the confidentiality of journalistic sources have been enacted in all the countries examined. In Greece, the confidentiality of sources is mostly recognized on the basis of the constitutional provisions on freedom of expression (Psychogiopoulou & Kandyla, 2022).

As for media ownership transparency, Austria, Croatia, Germany, Greece, Italy, Latvia, and Slovakia have put specific media ownership transparency laws in place that apply to all media. In some countries, transparency of ownership legislation only targets certain media categories (Romania, Bulgaria, and Poland, for example, target broadcasting alone). Meanwhile, Estonia, Sweden, Hungary, and Czechia only have general business or company registers that require all companies, including the media, to register and disclose their ownership structures.

There are differences in implementation too. The evaluation accounted for the kind of disclosure requirements set forth in the domestic legal framework and was based on whether easy access is available to transparent media ownership data. In some countries, the implementation is better than the existing legal framework. Germany and Italy report the most transparent access to information about media ownership. Bulgaria, Czechia, Hungary, Poland, and Slovakia face many problems in this area, either because of obstacles to accessing information on media owners or because the information is not publicly available. For instance, laws are circumvented when beneficial owners are hidden within complex ownership structures; this is the case in Hungary (Urbán et al., 2022). In some countries, such as Croatia, the revision of the Audiovisual Media Services Directive and EU legal harmonization have resulted in notable improvements (Peruško et al., 2022).

Conclusions

We proposed a theoretical framework for identifying risks and opportunities for deliberative communication through the media as reflected in risks and opportunities for the exercise of freedom of expression and information derived from law and its implementation. Legal acts and regulations elaborate on freedom of expression and information guarantees set forth in constitutional sources and major fundamental rights instruments, determining the nature and degree of protection provided. This can bolster protection but it may also entail restrictions when legislators balance freedom of expression and information against other rights and interests. In identifying and examining the legal areas where such balancing was attempted, we developed a set of variables that can be used to guide the assessment of rule-making and rule-implementation in the context of media policy. These variables also hold the potential to support deliberative communication through the media in a comparative fashion.

By applying these variables to the Mediadelcom countries, our comparative analysis concludes that the existence of good or satisfactory regulation does not guarantee good implementation, and vice versa. Moreover, in several countries characterized by legislative gaps, or where the law seems to treat a certain issue harshly in a way that hinders freedom of expression and information, the implementation may be quite satisfactory. Germany and Sweden are good examples in this respect; both have strict laws on defamation that are not implemented, thereby supporting freedom of expression overall. This finding has strong policy implications, making it clear that more systematic and comparable ways of evaluating rule-making, rule-implementation, and the relation between the two need to be developed. [Chapter 9](#) shows how the legal framework and rule-implementation play out as either risks or opportunities for developing deliberative communication.

Notes

- 1 See Article 51(1) CFR. See also [Ward \(2021\)](#).
- 2 ECtHR, *Lingens v. Austria*, appl. no. 9815/82, para. 41; *Handyside v. the UK*, appl. no. 5493/72, para. 49.
- 3 *Ibid.*
- 4 ECtHR, *Observer and Guardian v. the UK*, appl. no. 13585/88, para. 59; *Jersild v. Denmark*, appl. no. 15890/89, para. 31; *Bladet Tromsø and Stensaas v. Norway*, appl. no. 21980/93, para. 59; *Von Hannover v. Germany (no. 2)*, appl. nos 40660/08; 60641/08, para. 102.
- 5 ECtHR, *Lingens*, para. 41; *Jersild*, para. 31; *Observer and Guardian v. the UK*, para. 59; *Bladet Tromsø and Stensaas v. Norway*, para. 62; *Von Hannover v. Germany (no. 2)*, para. 102.
- 6 ECtHR, *Times Newspapers Ltd v. the United Kingdom (no. 1 and no. 2)*, appl. nos. 3002/03; 23676/03, para. 27; *Delfi AS v. Estonia*, appl. no. 64569/09, para. 133; *Abmet Yildirim v. Turkey*, appl. no. 3111/10, para. 48.
- 7 ECtHR, *Magyar Helsinki Bizottság v. Hungary*, appl. no. 18030/11, para. 168.
- 8 ECtHR, *Manole and Others v. Moldova*, appl. no. 13936/02, para. 100.
- 9 *Ibid.*, para. 101.

- 10 ECtHR, *Centro Europa 7 S.r.l. and Di Stefano v. Italy*, appl. no. 38433/09, para. 134.
- 11 ECtHR, *Dink v. Turkey*, appl. nos. 2668/07; 6102/08; 30079/08; 7072/09; 7124/09, para. 137; *Khadija Ismayilova v. Azerbaijan*, appl. nos. 65286/13; 57270/14, para. 158.
- 12 ECtHR, *Magyar Helsinki Bizottság*, para. 156.
- 13 *Ibid.*
- 14 ECtHR, *Österreichische Vereinigung zur Erhaltung, Stärkung und Schaffung v. Austria*, appl. no. 39534/07, para. 36; *Roşianu v. Romania*, appl. no. 27329/06, para. 63; *Társaság a Szabadságjogokért v. Hungary*, appl. no. 37374/05, paras. 27–28.
- 15 ECtHR, *Nagla v. Latvia*, appl. no. 73469/10, para. 97.
- 16 ECtHR, *Guja v. Moldova*, appl. no. 14277/04; *Bucur and Toma v. Romania*, appl. no. 40238/02.
- 17 ECtHR, *A v. Norway*, appl. no. 28070/06, para. 64.
- 18 See ECtHR, *Axel Springer AG v. Germany*, appl. no. 39954/08; *Von Hannover v. Germany (no. 2)*.
- 19 Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) [2016] OJ L 119/1.
- 20 ECtHR, *Anhuser-Busch Inc. v. Portugal*, appl. no. 73049/01.
- 21 Directive 2001/29/EC of the European Parliament and of the Council of 22 May 2001 on the harmonization of certain aspects of copyright and related rights in the Information Society [2001] OJ L 167/10.
- 22 Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market and amending Directives 96/9/EC and 2001/29/EC [2019] OJ L 130/92, Art 17(7).
- 23 ECtHR, *Goodwin v. the United Kingdom*, appl. no. 17488/90, para. 39; *Roemen and Schmit v. Luxembourg*, appl. no. 51772/99, para. 57; *Tillack v. Belgium*, appl. no. 20477/05.
- 24 Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law [2019] OJ L 305/17.
- 25 See Art. 5 and recitals 15 and 16 of Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation, or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities [2018] OJ L 303/69.

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4 Media accountability and its contribution to deliberative communication

Recent trends and current practices

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When the news media are perceived as a vital system for identifying and discussing socially relevant topics, a question of crucial importance for democratic societies at large is, ‘What are journalistic media supposed to do and, not less important, what are they supposed not to do?’ The approach applied for this study addresses the question from two different perspectives: The legal environment and regulation by-laws, on the one hand, and media accountability practices, on the other. If implemented successfully, such mechanisms of making the media accountable to the public can help safeguard journalistic autonomy—and thus support deliberative communication—by avoiding far-reaching legal and political interference. They can also work as a means of quality control that may help (re)gain public trust. Here, case studies on critical junctures and developments in the first two decades of the 21st century include specific sections on the situation and evolution of media accountability in the 14 countries. This chapter begins with a short overview of theoretical and methodological considerations behind the case studies, followed by a comparison of country-specific findings on professional, market, political, public, and international accountability instruments. Finally, the comparative approach allowed us to group countries with similar risk and opportunity structures in this field. Detailed accounts of the situation in the 14 countries under study can be found in the case studies ([Mediadelcom, 2022a](#)).

Theoretical conceptualization and methodological aspects

We aimed to present a holistic view of public communication in the case countries. To achieve an equally holistic view of media accountability, we adopted a theoretical approach for this area that attempted to cover all possible aspects of the field, being open to different instruments and agents of

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media accountability, as well as to developments and trends during the period of 2000–2020.

Our analysis adapted a model of accountability based on the one by [Bardoel and d’Haenens \(2004\)](#), which distinguishes four ‘frames’ of media accountability. [Fengler et al. \(2022\)](#) refined this model, creating an even broader approach by widening the notion of ‘frames’¹: The approach suggests distinguishing five groups of *actors* (professional, organizational, societal, political, and international) involved in holding the media to account, each of them using the most suitable media accountability instruments (MAIs) to pursue their idiosyncratic media accountability goals:

- The *professional accountability* frame is linked to instruments that include ethical codes and performance standards, which are used within the media and should help in counterbalancing every excessive dependence upon politics and the market. In this frame, the key stakeholders are media professionals and professional associations, such as journalists’ trade unions and media owners’ associations. [Richards \(2011, p. 257\)](#) underlined the relevance of the professional frame, arguing that ‘[s]elf-regulation of ethical standards could not be defended for a moment if most journalists could not be trusted to apply common standards to themselves and their colleagues’. However, following a comparison of media self-regulation in a number of African countries, [White \(2012, p. 137\)](#) concluded that professional stakeholders might also pursue various interests in terms of media accountability in emerging democracies: ‘Often, the different factions each want to form its own independent council. In the end, none of the organizations functions well’.
- The *market accountability* frame refers to the system of supply and demand, with free audience choice—at least in theory, as the dominance of few media oligarchs in some Central Eastern European (CEE) media markets shows. Considerations of efficiency and competition (accountability as a ‘signal of trustworthiness’, see [Fengler & Speck, 2019](#)) also play a role. The key stakeholders in this frame are media companies.
- The *public accountability* frame corresponds with the media’s fundamental assignment of maintaining relationships with citizens, in addition to their relationship with the aforementioned accountability frames. Key stakeholders in this frame are the public, media-related NGOs that may represent the interests of certain groups in society (e.g. children, women, minorities) in media coverage, NGOs defending the interests of media in restrictive regimes, as well as institutes and researchers of journalism and mass communication.
- The *political accountability* frame includes all types of formal regulation stipulating, for example, statutory forms of media accountability, or media capture of MAIs, most notably statutory press councils, as well as broadcast ombudspersons stipulated by law. In this frame, political stakeholders

play the dominant role. Jones (1999, p. 18) highlighted the many ‘petty mobilisers’ in restrictive regimes, i.e., advertisers indirectly pressuring media to fulfil propaganda goals.

- The fifth ‘frame’ of media accountability is the *international accountability* frame, which (although it may overlap with the four previous frames) highlights all those media accountability initiatives that are driven by international actors from the political, economic, professional, and public sphere. Consequently, this frame includes transnational actors as stakeholders, such as foreign donor organizations, international foundations, and NGOs implementing MAIs in transition countries, as well as the meta-coverage of media systems and journalistic practices abroad.

For any analysis that reaches beyond the context of established Western democracies, the political field is especially relevant. In commonly studied liberal countries, government commissions—such as those set up in Canada, Australia, and Sweden that echo global debates on the effectiveness of non-statutory versus statutory accountability after the ‘Leveson Inquiry’—might be an example for instruments located within the political frame. These commissions have provided a forum for expert analysis and advice on media issues and also political debate, but they lack any legal or punitive powers. In a global perspective, these are rare examples of non-intrusive political accountability, in countries where press freedom and media autonomy are clearly established. Puppis (2009, p. 59), holding a ‘Western’ perspective, derived the need for media regulation and media self-regulation from the political goal to ensure access to information, media pluralism, and quality of journalism. Actors across countries obviously have differing intentions in the context of media accountability. Many countries have established statutory instruments with a quasi-legislative function, or even media ‘councils’ with a clearly regulatory function to exert censorship and suppress professional independence. Therefore, our analysis regarding the political frame had a complex scope.

Referring to societies in political transition, Tettey (2006, p. 244) stressed that ‘different actors define the concept differently, based on their own professional or political interests’. Duncan (2014, pp. 178–179) explicitly warned of a structural bias of the media industry in recently deregulated media markets, arguing that certain ‘Western’ models of self- and co-regulation are often not functional in transitory democracies, as the interests of actors involved in the process differ starkly from those in ‘Western’ textbook descriptions. Most notably in Poland and Ukraine, several competing journalism federations have emerged in the transition period following the collapse of communism, adopting different codes of ethics. Consequently, the profession lacks a press council with broad acceptance. The case of Hungary points to another aspect visible in the post-Soviet space: Following regime change and media market deregulation, foreign investors bought considerable shares of the media market for

commercial profit but did not care for the sustainability of their investment in terms of journalistic professionalism and accountability. Before the transition period, journalists' unions had taken over a propaganda function in most of these countries and were thus, in many cases, discredited or too ill-equipped to become engines for the establishment of sound media accountability structures. A political divide may become visible between representatives of the old system still in charge and reform-oriented members of the profession. Furthermore, the international field must be taken into account as an additional level of analysis. International actors (e.g. organizations like the Organization for Security and Cooperation in Europe [OSCE], the European Union [EU], and the United Nations Educational, Scientific and Cultural Organization [UNESCO]), international donors (e.g. national media development actors, global foundations like Open Society Fund), and donor-funded exile media supply a relevant share of media accountability initiatives in countries with weak or restricted accountability systems (for a typology of media development actors, see [Price, 2002](#)). Regarding media accountability, [Hamelink \(2011, p. 450\)](#) emphasized the need to question the 'institutional setting and the cultural context in which choice-situations are located'.

However, structures can evolve amidst changes in the preferences of actors and in the structures, implying changes in the preferences and behaviour of actors and *vice versa*. [Fengler and Russ-Mohl \(2014\)](#) provided a theoretical framework to analyse the interests of the various actors involved in the process of holding the media accountable in a Western context.

Based on the findings outlined above, the approach developed in *The Global Handbook of Media Accountability* ([Fengler et al., 2022](#)) promotes an inclusive notion that integrates *all kinds of actors, contexts, and processes of media accountability* as long as *they uphold a notion of media freedom and pluralism in their intent to monitor, comment on, and criticize journalism and seek to expose and debate problems of journalism*. In drafting [Figure 4.1, Fengler et al. \(2022\)](#) referred to a collection of MAIs found in countries beyond the small cluster of liberal Western democracies. They differentiated the appropriate MAIs for each accountability frame, and identified the *actors* involved in holding the media to account in the five 'frames'.

We deemed this five-frame model highly suitable for our analysis. It provides an accountability framework with arguably the widest scope in terms of both MAIs and stakeholders. However, as we intended to stress the diachronic perspective of how countries developed in the different domains as well as the question of impact and effectiveness of media accountability for the overall goal of deliberative communication, we adapted the approach to cover three categories of variables:

- a status-related, evaluating the existence and reach of certain accountability instruments and the role of relevant stakeholders (guided by the frames described above),

- b efficacy- or outcome-related, evaluating the effect of accountability instruments on journalistic conduct and content production, and
- c development-related, evaluating the temporal dimension of trends in the existence and application of the described instruments.

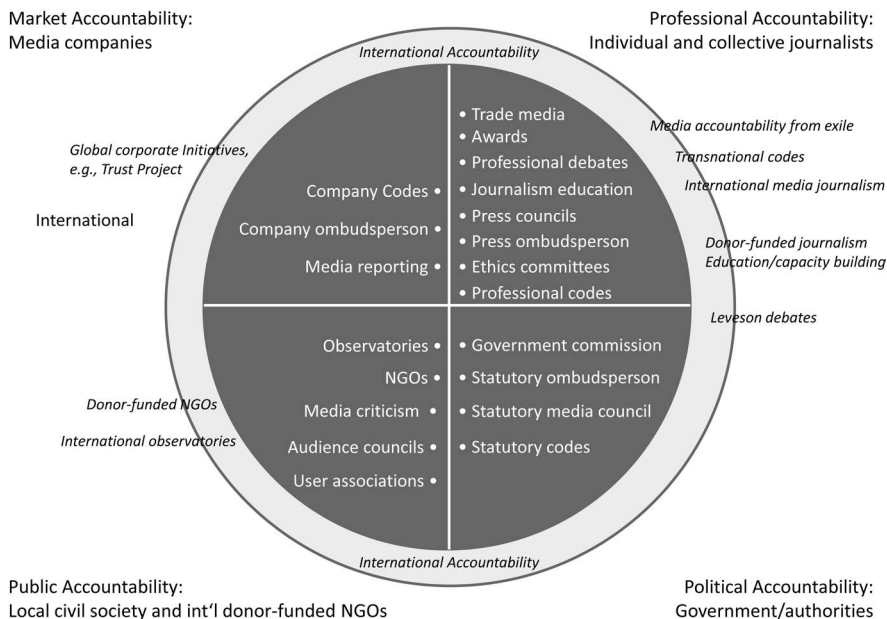


Figure 4.1 The five frame model of media accountability

Source: Fengler et al. (2022) (based on Bardoel & d’Haenens, 2004; Bastian, 2019).

In effect, our tasks for the country case studies were to check the MAIs in place in a given country and the roles played by the respective stakeholders, assess how this situation has developed during the 20-year time frame of interest for the project, and ascertain if any conclusions can be made concerning the efficacy of said media accountability activities.

In the evaluation of the risks and opportunities regarding deliberative communication, these types of variables must be interpreted in slightly different ways. The *existence* of certain accountability instruments represents an opportunity for appropriate self-regulation, but their efficacy may be lacking. For example, the UK adopted the notion of a press council as early as in the early 1950s and served as a role model for many other countries. However, in the long run, the system failed to tame a particularly aggressive tabloid press, leading to the collapse of several self-regulatory bodies. Meanwhile, the absence of specific instruments can be seen as a risk, but the interplay of other instruments may nonetheless yield an opportunity of satisfactory results or *outcome*: A national accountability system may be

Existence (of single instruments)	Efficacy/Outcome (overall in frame)	Trend (overall in frame)
yes → opportunity	yes → opportunity	stable/positive → clear opportunity
		negative → risk of decline
	no → risk	positive → opportunity to improve
		stable / negative → clear risk of decline
no → risk	yes → opportunity	positive → opportunity to improve/stabilize
		stable → risk of decline/opportunity to stabilize
		negative → clear risk of decline
	no → risk	positive → opportunity to improve
		stable/negative → risk

Figure 4.2 Interplay of existence, efficacy, and trend aspects of media accountability variables

Source: Kreutler and Fengler (2023).

functional even without certain instruments that are being applied elsewhere. Finally, the field of media accountability is in constant change. Instruments as well as the general consensus to ‘play by the rules’ set forth by different actors may show certain tendencies or *trends* that can be interpreted as either risks or opportunities from a diachronic perspective. Figure 4.2 gives an overview of the different interpretative paths in the interplay of different categories of variables.

These risks and opportunities aim at the functionality of media accountability measures in the context of social discourse (cf. Fengler, 2022). The resulting opportunities of functional media accountability and self-regulation are improved or help regain trust in journalism and the media in general, as well as promote autonomy of the media from external, political interference through legal regulation. In case of outlet-specific instruments, increased prestige and, consequently, chances on the market may represent opportunities (Fengler & Speck, 2019).

Meanwhile, the risks are more diverse (Fengler, 2022):

- a A lack of functional media accountability systems will jeopardize public trust in the media. It may also lead to stricter legal regulation and, thus, a decrease in autonomy and, possibly, in the media’s capacity to independently monitor and criticize governmental/political actors.
- b A lack of efficacy of or compliance with existing MAIs also brings a risk of waning trust in the media as well as a loss of significance of such inefficient accountability instruments and, again, a probability of exposure to legal action.

- c Another risk is connected to overcompliance with self-regulatory limitations, either with or without ‘capture’ of instruments of self-regulation by non-media players. While not calling for further legal regulation, this risk is rather connected to dysfunctional media unable to fulfil their role owing to self-censorship.

As in the other domains studied in this project, media accountability has several connections to other fields, particularly legal regulation, journalism, and media usage:

- Legal Regulation: Media regulations based on legal procedures, on the one hand, and self-regulation through instruments of media accountability, on the other hand, have been described as a continuum of legally based media regulation, co-regulation, and self-regulation (Puppis, 2007). This model developed in the context of Western democratic countries and can describe the gradual process of media deregulation, as well as the historical development of professional self-regulation against the backdrop of established press freedom (Fengler et al., 2022). From a structural perspective, and connecting the subdomains of ethical and legal regulation, media accountability fills and preserves a space granted by the legal framework, relating to both freedom of expression (in self-regulation of reporting content and manner) and freedom of information (in self-regulation of journalistic conduct in information gathering).
- Journalistic Professionalism: Questions on the autonomy of journalists in terms of self-regulation and knowledge about/adherence to professional ethics are closely connected to the concept of journalistic professionalism, and to the training of journalists as a means to develop and distribute professional values. While relevant to both domains, we decided to encompass the debates on professional cultures as well as journalistic education and training within the journalism domain. As such, media accountability activities remain part of the current chapter on accountability, but questions on their effects on professional culture fall within the chapter on journalism (Chapter 5).
- Media Usage: Media accountability has been defined as ‘any non-State means of making media responsible towards the public’ (Bertrand, 2000, p. 107). Conversely, the concept does not typically include means to hold *citizens* accountable for their media usage—or, in other words, to make *the public responsible to the public*. This aspect is increasingly relevant in a media environment where users can publish content in an editorial environment, consequently raising the question of responsibility for such content: Is it the user as the author/producer, the media professional with their editorial responsibility for their platforms, or a new entity characterized by the co-regulation of users and professionals? Here, we focused on media accountability in the narrower sense outlined above. Information on the ethical capacities of media users is presented in the chapter on media usage (Chapter 6).

A general observation for the media accountability domain is that quantitative data are scarcely available. Existing evidence offers some insight mostly into the case work of well-established self-regulatory bodies. Studies on knowledge about and adherence to the rules of professional ethics are also relevant (discussed within the journalism domain, for the purpose of this study). For most MAIs other than councils, case studies on research and monitoring capabilities (Mediadelcom, 2022b) have shown available monitoring to be mostly qualitative, at times relying strongly on specific experts' evaluations. These sources offer valuable insights into the national situations of media accountability. However, cross-country comparisons must be made carefully, with full recognition of the limitations in the monitoring of the field.

Comparative findings

Professional accountability

Among the practices related to the professional accountability frame, the examples of (non-statutory) press and media councils as well as professional codes of ethics have key relevance, although they are by no means the only MAIs that can be described as 'professional'. They are complemented by various other mechanisms motivating a meta-discourse on journalistic conduct (e.g. trade journals and journalism awards) or an active discourse in journalism associations/trade unions, all of which are documented in at least some of the country studies. The MAIs in the professional frame can mostly be considered traditional instruments of media self-regulation. Compared with the other accountability frames we evaluated, these instruments certainly dominated the debate on media accountability in our country reports. However, the discrepancies among European countries are substantial—a circumstance that also affects the availability of relevant research output across the continent (Eberwein et al., 2011, 2018; Fengler et al., 2014). This insight is backed by the comparative analysis conducted for this study.

We found that institutionalized media self-regulation in the form of *press and media councils* is most common in the North-Western European countries of the sample, where these types of institutions have the longest tradition. Notably, they have been the focus of academic analyses repeatedly (e.g. Puppis, 2009). In Sweden, for instance, the *Pressens Opinionsnämnd* has existed since 1916 and can be considered the oldest press council in the world. The German Press Council was founded in 1956 and has been triggering debates about journalistic accountability ever since. The Austrian Press Council, originally founded in 1961, can also look back on a long history, although it has been dysfunctional for almost a decade after the turn of the century. Still, all three institutions comprise a key factor justifying the top positions of Sweden (third rank), Germany, and Austria (tied at fourth) on the prototypical European Media Accountability Index (Eberwein et al., 2018), which measures the diffusion and effectiveness of MAIs across the continent.

In contrast, similar institutions in Central, Eastern, and Southern Europe have a much shorter track record, if they exist at all, and are commonly judged as less effective. In Poland, for example, the Press Law of 1984 established the Press Council as a consultative body for the prime minister, but it never became operational. In Estonia, two different press councils were established in the transformative years after the fall of the Iron Curtain (in 1991 and 2002), but they continue to compete for acceptance among media professionals. In Slovakia, the Press Council has been active since 2002. In Bulgaria, a National Council for Journalistic Ethics was founded in 2005; however, disagreements between the organizations of media owners led to rapid structural adaptations. Latvia's media organizations established a self-regulatory Media Ethics Council in 2018. In Croatia, the idea of a media council has been discussed among practitioners, without apparent results. Similarly, Greece, Czechia, and Romania have no working press or media councils.

The Italian Ordine dei Giornalisti (OdG), which was established by law to regulate access to the profession, is often regarded as an organization similar to a press council, but it does not fulfil the requirements of voluntary media self-regulation. Likewise, the Hungarian Media Council, established on the grounds of the restrictive media law of 2010, is more of a statutory institution rather than an example of professional accountability.

We also noted similar discrepancies among countries in terms of *professional codes of ethics*. All 14 countries covered by our project can report at least one example of such a code. However, these codes demonstrate differences with respect to public visibility, acceptance within the journalistic community, and effectiveness. Positive examples can be found in Sweden and Germany, where the central professional codes are well known among journalists and often referred to in debates on media performance. Similarly, the Italian Testo unico dei doveri del giornalista is judged to be an effective code; it must be signed by all members of the OdG and is therefore considered binding. Doubts about the effectivity of professional codes may arise when they are not updated on a regular basis (as in Estonia) or when no organization like a press council exists to enforce their rules (as in Greece and Czechia). Critical views are found in the country studies for Poland, Romania, and Hungary: In these countries, different professional codes exist in parallel. Consequently, ethical standards that are applicable to the profession as a whole are difficult to identify.

Compared with the aforementioned MAIs, we found fewer relevant examples of a lively *meta-discourse on journalistic conduct*. Notable exceptions are, again, Germany and Sweden: In both countries, regular journalistic coverage about media issues is a typical feature, both in general interest and specialized trade media. Other countries, such as Croatia and Slovakia, highlight specialized (trade) journals and/or journalistic associations as drivers of the discourse on media performance. However, in most media systems covered by our study, the influence of such instruments on newsroom practice seems

to remain weak. In the Austrian case study, for example, the few existing trade journals reach comparably small audiences and have marginal relevance. Although we found examples of journalism awards in all 14 countries, their merit as a driver of journalistic accountability was described as low.

Market accountability

Market accountability is one of the least addressed media self-regulatory aspects in analyses of research on the 14 countries, both in specific accountability and broader media and communication discourse. Although we set three groups of categories to review market accountability (instruments and measures, implementation effectiveness, and development), there is no consensus on the conceptual framework for the qualitative evaluation of market accountability. Market accountability is mostly seen using the corporate social responsibility approach (Fengler et al., 2014) when evaluating the activities of media organizations. Market accountability includes the instruments of media-internal ombudspersons, publicly available organizational codes of conduct (as in Austria and Croatia), and regular meta-reporting on media/society relations in mass media. In some cases (Bulgaria, Poland, Croatia, Romania, Slovakia), market accountability development is attributed to such market or media policy factors as competition, concentration, media ownership transparency, political influence, and market-driven media accessibility (Estonia).

The market accountability analysis reflected the overall development of the self-regulation system and health of the media market in the evaluated countries. Sweden, as a state with the longest tradition and institutionalized media self-regulation, where the social responsibility approach is embedded in media operating culture, could be an example. In Sweden, both internally and externally set principles of self-regulation are respected in media organizations, and the media promotes an active public discussion about media ethics.

Based on country case studies, we assessed the market accountability situation as developed according to its integration level in media culture in two cases (Sweden, Germany). At the same time, we deemed it insufficiently effective in countries where media self-regulatory instruments have existed since the 20th century (Austria, Germany, Estonia) and that have scored high on the Media Accountability Index (Eberwein et al., 2018). In contrast, in several countries where the media systems have experienced a transformation from a communist regime to an independent democracy after the collapse of the Soviet Union, the development of market accountability at the macro level was influenced by an overemphasis of neoliberal doctrine in the media business discourse (Czechia, Latvia, Hungary, Bulgaria, and Poland).

The lack of market accountability traditions in the culture of media organizations could not be solved by the self-regulatory organizations established in the 1990s in countries (Czechia, Hungary, Latvia, Greece), whose

activities were often fragmented and whose influence on processes at the meso-level of the media market was relatively low.

These conclusions can be illustrated by the example of Austria. It is one of the few countries where the functioning of MAIs can be assessed. The media house of the daily newspaper *Der Standard* has created the position of ombudsman, whose duty is to explain editorial decisions to readers and respond to reader complaints. It shows a clear direction of development; however, one example cannot change the overall denial of market accountability solutions by most media firms. Even in Austria, regular media formats that include critical discussions of media activity are the exception rather than the norm.

Several interrelated reasons explain the underdevelopment of market accountability. The main risks pertain to the lack of cooperation between media companies and stakeholders (Bulgaria), underdeveloped tradition of self-regulation (Croatia, Latvia, Italy, Greece), media owner transparency problems (Bulgaria, Croatia, Latvia), and media oligarchization that, in contrast to the Western-style profit-driven commercial model (Štětka, 2015), identifies a structure of media ownership in which local business magnates or oligarchs are directly involved in politics and use media outfits to increase their political and economic power (Hungary, Bulgaria, Czechia, Poland, Slovakia, Latvia). Self-regulation may be lacking at the level of individual media companies (Greece, Hungary, Romania, Slovakia, Latvia), limited by economic instability (Hungary), or replaced by national legal norms (Italy, Croatia).

Regarding the development directions of market accountability, we noted that for media organizations, whose multimedia content platforms and audiences are becoming more diverse, future scenarios determined by audience perception of journalism quality (Klimkiewicz, 2019) can implement market accountability tools that meet the current conditions of media operations. Digitalization allows rapid experimentation of market accountability solutions and evaluation of effectiveness in situations where media regulation cannot keep up with the speed of changes in the media environment. The trends of media convergence (merging of telecommunications, media, and online industries) and media market concentration require the development of regulatory and self-regulating solutions in conditions where the market accountability of mass media would relate to market accountability solutions of global platforms, through the creation of public responsibility standards for the various participants of the public communication environment.

Political accountability

Accountability instruments in the political frame often follow similar logics as in the professional and market frames, but as a statutory variant. Ombudspersons, councils, or codes of conduct are statutory, that is, prescribed by law. Some instruments may also be interpreted as quasi-statutory, such as when the ombudspersons of both Bulgarian public broadcasters are not

explicitly prescribed but installed based on an interpretation of broader legal requirements.

The statutory nature of accountability instruments does not necessarily imply direct political influence on the application and proceedings. Nonetheless, a close evaluation of this risk is necessary. In a broader sense, political influence may be relevant even beyond these political accountability instruments. As a conceptual risk, politics may resonate with broader media contexts, such as the political orientations of trade unions, journalistic associations, and editorial policies challenging media accountability from the perspective of autonomy and newsroom independence.

Through the normative overview of the media system and media–political conceptualizations, such as political parallelism and the power distance between media and politics in a democratic country, we examined our findings as a potential extension of knowledge on comparative media and journalism accountability systems. On the surface, the analysed countries referenced the normative models of the democratic–corporatist (northern/central) and polarised–pluralist (South European) traditions. At the same time, the quality of deliberative communication calls for additional lenses and comparative criteria (Hallin & Mancini, 2004, 2012; Peruško et al., 2021).

First, Germany, Sweden, and Austria are still characterized by solid institutionalization of media accountability and self-regulation, to manifest media’s independence from politics. The Swedish systems for non-statutory media councils have existed since the early 1900s and have become a significant part of the media–political democratic corporatist culture, based on strong intervention coexisting with strong professional ethics and identity. Our dataset highlighted the critical role of public authorities, stakeholder organizations, and NGOs in many public enquiries to support media quality (see the Swedish example of ethical reviews of the Granskningsnämnden [The Review Board] and public service media owned by an independent foundation).

In Germany, political accountability is most relevant in the established media co-regulation in the broadcasting sector, where statutory monitoring and complaints bodies represent different social groups based on legally (and thus politically) defined rules of group inclusion. This basic accountability construct applies to the broadcasting (in the regional ARD broadcasters), television (ZDF), and radio (Deutschlandradio) councils of public broadcasting, as well as the Landesmedienanstalten, which are the relevant bodies in private broadcasting. Our dataset provided examples of German journalists following media ethics and ongoing discourse on the importance of media independence. The Austrian media–political democratic corporatist traditions have widely revealed that media self-regulation in the country has a lower impact compared with the European average. On the surface, recent studies on Austria highlight the ongoing challenge of business–political parallelism, despite the reinvention of the Press Council and high engagement from academia.

Countries in Southern Europe represent high political parallelism coupled with weak media accountability institutionalization, which is related to both limited media accountability effectiveness and limited research and general interest (Splendore, 2022). Media–political relations as the role model of the polarized pluralist traditions have been profoundly marked by an essentially government-centred model of media policymaking and the late introduction of journalistic codes and the related checks and balances. The Italian case further highlights the culture of media–political accountability via frequent legislative changes in the media and related industries, alongside the lack of coherent and forward-looking strategies for independent media. The potential negative impact of politics on media accountability systems has been the case in Central and Eastern Europe, with more recent experiences in the aftermath of 1989. Romania and Croatia highlight weakness of the journalistic codes and unions and low media accountability effectiveness owing to political–business parallelism. In Croatia, the Croatian Journalists’ Association and Union of Croatian Journalists are among the key agents in media accountability and democratic quality. However, political accountability is still not fully independent from political elites and their interests.

Other examples of high-level parallelism are seen in Hungary and Poland, where media freedom has been recently challenged by illiberal turns in media regulation or the governmental capture of media ownership and control. In Hungary, media accountability institutions, such as the Commissioner for Fundamental Rights, have been reformed based on political ties or discontinued. On the surface, the Polish case also illustrates highly ideological–political media landscapes with MAIs, such as codes of ethics and journalistic professionalization as subjects (and the core) of a deeper societal and cultural polarization.

Finally, Slovakia, Czechia, Latvia, and Bulgaria are countries with relatively low institutionalization of political accountability alongside minimal involvement or lack of interest on the part of the stakeholders. In Slovakia, political influences and pressures from media owners are regarded as challenges to effective self-regulatory practices and systems. In Czechia, among the key contextual factors are the high media concentration and emergence of new political movements—populist voices in the context of the socio-economic changes that followed the economic crisis of 2008. Oligarchizing and the pressure that new politicians have exerted on the media are the fundamental factors in the development of the media in Czechia and the media systems’ cultural conceptualizations. The media–political contexts in Latvia and Estonia can be seen as an interplay of several traditions, including liberal (the free market as primarily regulating force), democratic–corporate, and polarized pluralistic traditions with high political parallelism in public service media and more general structural risks for market plurality and media accountability monitoring. Media accountability in Bulgaria is generally ineffective; the public service function of both private and public media (the Bulgarian National Radio and Bulgarian National Television) is undermined by attempts for media capture.

Public accountability

The public accountability frame refers to any means of public actors, such as NGOs, scholars, and citizen initiatives, to actively influence discourse on media conduct. The studied countries differed in public accountability culture, with a wide range of evidence in social science, including on the trust in public institutions, political engagement, culture of activism, tradition of public consultations, and more general cultural path dependencies. The challenge of drawing models for public accountability in the media has yet to become a systemic topic of investigation, with more recent comparative projects discussing media accountability innovations online or the power of multi-stakeholder dialogues. The countries in our studies showed the potential of monitoring media quality using online tools. These tools, such as media blogs and criticism via social media (Heikkilä et al., 2014), have recently supplemented fact-checking initiatives. Examples of media watch blogs are the Austrian *Kobuk*, on journalistic misbehaviour, and the Slovak watch blog *omediach.com*. In Croatia, the country case study notes a high relevance of initiatives by human rights organizations, some of which place a special focus on fact-checking, an activity now relevant in most European countries. Meanwhile, we found no web-based media criticism by civil society actors in the form of media blogs that could impact journalism practice.

International accountability

The international frame had limited impact in the 14 countries in our study. Notably, media accountability development analysis showed an impact of EU-driven processes (e.g. liberalization of the media market, protection of personal data, support of professional journalism, and media literacy), which determined the development trends in the media market and market accountability standards, such as media market pluralism criteria (Brogi, 2020). The EU policy, meanwhile, promotes a free media while also emphasizing the media's social responsibility in changing the media ecosystem (Kostovska et al., 2021) and modifying trust in the media (Strömbäck, 2021). The same applies to international NGOs (Article 19, Reporters Without Borders), which aim to monitor media accountability and foster actions to strengthen healthy systems of media self-regulation. In most of the country case studies, national journalistic unions and associations collaborate with international networks, including the European Federation of Journalists and International Federation of Journalists.

Conclusion

Overall, the situation in the different frames of media accountability, and their ability to support deliberative communication, varies considerably. Sweden, Germany, and Austria are often mentioned as examples with rather well-established and accepted accountability landscapes throughout the

different frames. However, case study data also frequently hint to positive trends in at least some accountability frames in Estonia, Greece, Croatia, and, to a lesser degree, Bulgaria and Slovakia, albeit with doubtful track records in terms of efficacy or outcome.

Accountability is related to questions of trust—it may help build trust in media action and contents but it also requires trust among different actor groups. As such, polarization is an obvious risk. A society polarized along the lines of political-economic cleavages is a risky environment for media accountability, as stakeholders have difficulty agreeing on the common goal of making the media accountable to society as a whole. Political parallelism and aggressive polarization hamper media accountability at different levels, and countries affected by it see more critical evaluations with respect to existence, efficacy, and trends in media accountability. Media accountability activities can be a decisive factor in building or upholding audience trust, but to do so, their existence and procedures need to be known well by that same public. While this is a task for the stakeholders involved in a specific MAI, it also asks for a reflection of media accountability in media literacy programmes, both for students and adult citizens.

Following the analytical path of taking the existence of MAIs, their efficacy, and trends into account, we identified different approaches of grouping the countries. An obvious approach is probably a hierarchical grouping based on the existence and performance of different MAIs. In the European Media Accountability Index (Eberwein et al., 2018), such a ranking is already available for 30 European countries, including all countries studied in this project, and the information processed in that index's creation is recent. In contrast to such a ranking of media accountability efficacy, the analytical approach we applied allowed for a different approach: A tentative grouping of the countries based on the accountability frame that is central to the risks and opportunity structures in media accountability. While data were often most conclusive for the professional accountability frame, the comparative analysis revealed that this frame was not always described as decisive for the overall—positive or negative—situation of media accountability. This perspective goes beyond comparing the status quo with a normative idea of how a full-fledged accountability system could look like; instead, it asks how a given situation has developed by attributing it to specific strengths and weaknesses, thus identifying frames that could require special attention to develop a lacking or preserve a functional media accountability system.

Indeed, the professional frame is the central frame mainly for countries with a longer history of well-established self-regulatory mechanisms within the journalistic profession: Germany and Sweden. While instruments of market and political accountability (in the form of statutory councils or politically inspired enquiries) play a visible role in Germany and Sweden, these countries profit from and build on the foundation of a well-established professional accountability system that sets a framework and helps build trust in self-regulation. For example, in Germany, the press council's *Pressekodex*

(professional code of ethics) is widely known and accepted in both society and the profession, (including broadcasting, although there with a statutory complaints structure). Austria partly falls into this group of countries, benefitting from both a tradition and progress made in recent years in the professional accountability frame. Nonetheless, the levels of autonomy from political and market influences enjoyed by the Swedish and German institutions of media accountability have not been reached.

The political accountability frame is central in several country cases that are characterized either by a traditional focus on legal regulation and political parallelism or more recent attempts of governmental actors to gain control over the media by founding new regulatory bodies or establishing influence over existing ones. Italy, with its legally prescribed OdG, is a prime example of the first group, but a focus on political regulation also plays a role in Greece and Bulgaria. Another group includes Poland and Hungary, with different levels of direct political control or socio-political polarization within weakly established MAIs.

Market accountability, or rather a market-induced lack of accountability, is central to several media systems that underwent a harsh process of privatization and liberalization after the end of communist power in the early 1990s. Notably, the end result of such rushed privatization after communism is not much different to that in Latin American countries with a longer tradition of high media ownership concentration (Paulino et al., 2022). Although political influences may play a role, it is mainly a market shaped by unchecked competition that hinders any kind of accountability activities, in the market frame or elsewhere. Market actors that are fully focused on economic competition are unlikely to dedicate room, time, or financial resources to both in-house and external accountability practices and the reflective processes involved in them. Variations of market-induced lack of accountability activities have been described for Croatia, Czechia, Romania, Slovakia, and Latvia. It may have also existed in Hungary and Poland before political influence and parallelism became prevalent—a development that demonstrates the dynamics of the field.

Conceptually, the strong institutionalization of media accountability practices in one of the frames may outweigh deficits in others. For instance, a successful application of professional accountability may create a situation where public stakeholders see no need to add much initiative. However, our results hint towards the opposite: A general consensus that professionals, companies, and the public are likewise responsible for accountable and dependable media seems to foster implementation in different frames, indicating a clear opportunity for media accountability overall. Similarly, the different frames also seem interdependent in terms of risks: Political polarization can hinder MAIs in all frames as it permeates into cultural, social, and economic routines. The only frame that seems to fall outside this logic is the international frame. This frame is not overly relevant in the studied countries in terms of international

donor organizations or foreign media companies that import their media accountability ideas. Rather, it is the EU that may have an indirect but significant impact. By influencing the conditions of media markets and promoting pluralism and responsibility in the media sector, the market-driven conditions for media accountability described above could be changed for the better.

Note

- 1 The following paragraphs on the frame-based conceptualization of media accountability have been previously published in another Routledge publication by Fengler et al. (2022), *Global Handbook of Media Accountability*.

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5 What is journalism's contribution to deliberative communication and democracy?

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In this chapter, our normative point of departure is that *professional journalism still matters*. Perhaps it matters more than ever for the achievement of deliberative communication and democracy. This statement could be seen as a response to the utopian theories of the early internet era and notions of replacing professional journalism as the 'fourth estate' with dynamic many-to-many communication, provided by numerous networked actors (Benkler, 2011), with journalists as only one contributor to democracy among many others. Hence, for the past decades, scholars have often suggested the relative or even decreasing democratic importance of professional journalism in relation to other actions and actors in globalized and digitalized economies. However, professional journalism, driven by democratic ideals, norms, and practices, has an important mission in society when it comes to

- empowering citizens with reliable information and knowledge, which, together with other sources, can guide them in their political deliberation with others (i.e. Dewey, 1927/2012; Habermas, 2022);
- enlightening citizens about how 'anything' could be transformed into political struggle and citizenry deliberation (on how to change the unwanted condition of A into B) often referred to as *the political* (Mouffe, 2013).

More precisely, in many countries, including those in Europe, professional journalism must retake its position as a central node of the public sphere—a position that has been challenged and even 'disrupted' by social media platforms (Habermas, 2022; Van Dijck & Poell, 2013). Professional journalism should bring *knowledge stability* to communicative deliberations in times of deep net delusion (Morozov, 2012) and 'fake news' or free flow of propaganda (which, however, does not mean bringing the 'truth').

We aimed to examine how professional journalism can contribute to these processes in a European context. Specifically, we intended to identify the structural conditions and factors that are essential for its generation of deliberative communication and democracy (Nord & Harro-Loit, 2023).

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We theorized what we referred to as the journalism domain, involving the various aspects of journalism considered. We adopted a combination of media sociological, media theoretical, and political communication-oriented thinking. We then operationalized the role of journalism for deliberative communication and democracy into a few variables, which we adopted in our analysis of the condition of journalism in 14 EU countries from 2000 to 2020. Finally, we discussed how to interpret the data with a focus on the capacity of journalism to contribute to deliberative communication and democracy in the 14 countries.

Journalism domain and theory

Particular role of professional media work

Here, we concentrated on the *production* of journalism, including the basic factors of media organizations' capacity to serve as generators and providers of dynamic deliberative communication in society.

As shown in the inner circle in [Figure 5.1](#), the actors who are supposed to produce and generate the media content to be used by consumers/citizens, namely, the journalists and/or other media workers in the newsroom and field

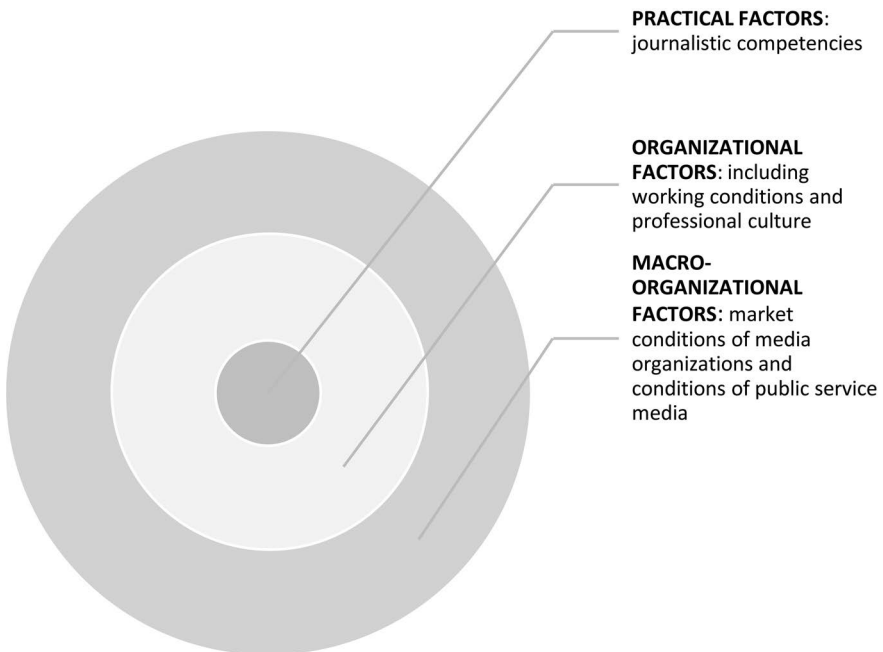


Figure 5.1 Three-level perspective on journalism's contribution to deliberative democracy

(e.g. editors, photographers, data analysts), are ideally provided with competencies to enhance deliberative communicative processes in society. In turn, such practical competencies are dependent on, and in a mutual relation with, different structural factors at the meso and macro levels of media production (cf. Fairclough, 1995; Shoemaker & Reese, 2017). In the middle circle are the different organizational factors, followed by the macro-organizational factors, which are both internal and external. The latter involve processes that originate from outside the media sector, in which media organizations are not the driving force but rather react to a changing world.

Theoretical conceptualizations

Table 5.1 presents in detail the analytical focus of our study at each level. Regarding the macro-organizational factors (i.e. the conditions of the media market and public service media (PSM), in the earlier case), we concentrated on the economic resources/sustainable business models among media organizations, ownership structures, role of foreign interests, labour market, digitalization, and conditions for niche news media production. Regarding PSM companies, we focused on the matter of autonomy (in relation to external actors) and financing. As for organizational factors, we focused on the level of workforce diversity (e.g. gender, class, ethnicity) and resources for advanced journalism, such as investigative and foreign reporting. Concerning working conditions, we concentrated on the employment situation

Table 5.1 Theoretical conceptualizations of the journalism domain

Market conditions

News media economic situation (income, resources)
 Ownership + foreign interests
 Labour market
 Niche journalism market conditions
 Digitalization

Public service media conditions

Autonomy
 Financing

Organizational conditions

Workforce diversity (e.g. gender, class)
 Organizational economic situation (investigative resources, foreign offices)

Working conditions

Employment conditions
 Satisfaction; security/threats/harassment/hate against media workers

Professional culture

Journalistic roles and values, autonomy, ethics

Journalistic competencies

Education and training, knowledge and ability, skills and practice

(i.e. job satisfaction) and staff conditions concerning external threats, harassment, and hate. Professional culture involves understanding of the staff's roles as journalists—their values, ethics, and autonomy in relation to different interests. Finally, regarding the practical factors (i.e. the matter of journalistic competencies), we concentrated on the extent of education, training, and different kinds of relevant skills/competencies with respect to a deliberative democracy perspective. We selected these variables owing to their particular relevance for understanding the sustainability of journalism in the European context, following the rationale of [Hallin and Mancini's \(2004\)](#) seminal understanding of media systems.

Operationalizations and observable indicators

The qualitative meta-analysis presented here is based on previous national case studies ($n = 3,283$) of the media transformation in 14 European nation-states during 2000–2020 (Mediadelcom, 2022c, p. 12) and previous research. The above-mentioned conditions for journalism were operationalized into observable indicators. For example, the level of digitalization in editorial rooms could be analysed in terms of the percentage of total editorial resources that are earmarked for digital programmes or equipment. A way to measure working conditions is to examine job/employment satisfaction, i.e. journalists' perception of job satisfaction (% satisfied). The conditions of the public service system in societies could be analysed in terms of the level of autonomy in relation to politics/governmental power, and through existing PSM mandates. The organizational diversity conditions, involving gender, age, class, or cultural balance, could be measured in terms of extent of staff members representing different identity belongings or positions (%). This is what [Hallin and Mancini \(2004, p. 29\)](#) defined as the internal pluralism of media organizations.

Notably, we created these variables and their operationalizations without having the entire picture on data availability for all 14 countries (see [Mediadelcom, 2022a](#)). Consequently, we assumed that, owing to lack of data in some countries, only some types of comparisons would be possible to complete, whereas the lack of data in different countries would be seen as an important result as such ([Lauk & Berglez, 2024](#)).

Comparing journalism conditions in the 14 countries in terms of risks and opportunities

Our comparative approach highlighted the state and development within the nation-states' journalism domain in terms of risks and opportunities (see also [Mediadelcom, 2022b](#)). For example, lack of knowledge on the importance of professional autonomy among media workers is a risk. When it comes to the material resources for producing journalism, risks are associated with media monopoly or far-gone AI-robotization of media production. Meanwhile,

opportunities concern positive developments, such as increasing resources for investigative journalism or increasing work staff diversity. We identified and analysed common patterns across, but also unique trends in, the 14 countries, as well as critical junctures, i.e. ‘game-changing’ events.

Factors that constitute the conditions for the media’s capacity to serve deliberative communication and democracy in 14 EU countries: An overview

Market conditions

Among the possible constraints to the realization of an ideal deliberative media, *market conditions* play an important role as they reveal the economic environment in which journalistic production takes place. Our country’s data clearly showed that market conditions are changing, not the least due to digitalization. Below, we exemplify some of the main trends, risks, and consequences associated with the market conditions of journalism, with a focus on financial constraints and ownership concentration.

On financial constraints, traditional producers of journalism (particularly newspapers) have been losing both audiences and advertisers over the past decades (Papathanassopoulos et al., 2023), particularly to multinational tech giants, social media firms, and global streaming platforms. This is a universal trend where news suddenly competes an abundance of omnipresent digital entertainment and other media distractions. Fewer customers are willing to pay for printed news, and digital paying readers (although growing in numbers, as in Sweden) are typically expecting and willing to pay less for their subscriptions compared with print customers. All in all, this puts pressure on news producers to reduce costs and be more efficient.

Owing to market deregulation and the inflow of government subsidies, the number of publications, TV stations, and radio stations has increased in some markets, whereas the combined total audience and circulation figures have continued to decline (e.g. Croatia, Greece, Sweden) (see Papathanassopoulos et al., 2023). This puts even more economic resource pressure on the industry, as an increasing number of publications require content while serving a declining audience base.

On ownership concentration, a broad effect of the declining resources is that weaker media firms are merged or acquired by national or international competitors. This increases ownership concentration, placing national news media markets under the control of a small number of corporate conglomerates (Artero et al., 2020; Grassmuck & Thomass, 2023). High levels of ownership concentration are reported (e.g. Bulgaria), particularly in terms of local and regional journalism (Austria, Hungary, Sweden) or specific media sectors (Croatia, Latvia). In some states, ownership concentration also spans across media, where regional companies control print news, TV, and radio in a limited geographic area (Austria).

In several countries (e.g. Austria and Sweden), digitalization has not had a huge impact on total ownership diversity, as traditional media conglomerates tend to dominate online news. However, we noted examples where born-digital, independent news media have managed to attract sizeable audience figures and enrich the overall media diversity (e.g. *Fanpage* and *HuffPost* in Italy). In some countries (e.g. Romania), free dailies have diversified the overall media landscape but have done so at the expense of journalistic quality and by introducing clickbait journalism.

On non-media and foreign owners, owners in a financially unstable media sector may want to diversify their investments. This can include diversification strategies where media companies branch into non-media business (Estonia, Latvia). Other countries have seen an inflow of investors from other sectors—large business conglomerates and investor moguls with a range of financial and political interests in society are now holding ownership control of the media watchdogs in society (e.g. Bulgaria, Czechia, Greece, Romania).

Foreign ownership of media is not necessarily negative so long as ownership diversity is maintained. Foreign owners may bring financial capital, media content rights, technological platforms, and other resources that may improve national media (e.g. Czechia, Hungary, Latvia). For periods of time, foreign owners have even been regarded as guarantees of political independence of the media (Hungary). Whereas several countries report increasing degrees of foreign ownership in print, TV, radio, and online media (e.g. Latvia, Slovakia, Sweden), others report a complete foreign dominance in certain media sectors (German dominance of the Austrian TV sector). In some countries, the degree of foreign ownership has declined (Czechia). In several examples, media ownership has become a tool to realize economic and political interests, and some media outfits financially rely on the continued favours of ruling parties.

In an increasing number of countries, ownership often remains opaque, and the entities who actually control and exert influence over media are difficult to assess (Bulgaria). As non-media investors take control of the media, relationships between media owners and political parties are often unclear (Greece, Latvia). Journalism can then become a tool for media owners to pressure political parties for business favours, or vice versa—where ruling parties seek to control the public narrative (Hungary). Such unfair economic dependencies and influence on journalism from politics are, to different extents, reported in a number of countries (Bulgaria, Greece, Hungary, Poland). Political parallelism is seen as a possible component in a democratic media system (Hallin & Mancini, 2004), but it carries a democratic risk when political parties are creating dependencies by selectively channelling state funding to allied media (Austria, Hungary). Even EU funding (Bulgaria) give unfair economic advantages to politically friendly news media. Overall, the arbitrary distribution of state advertising appears to be one of the most common tools for ruling parties to control the media via economic dependencies and thereby limit journalistic independence.

Public service media conditions

The democratic role of PSM has been the centre of attention of media scholars for decades (e.g. [Aslama Horowitz et al., 2020](#); [Ibarra et al., 2015](#); [Wilson, 2020](#)). PSM is most often seen as an agent able to support public interest against the commercial media's profit interests (e.g. [Sehl et al., 2020](#); [Sjøvaag et al., 2019](#)), keeping matters of common concern in the agenda, and facilitating public discussion (e.g. [Debrett, 2015](#); [Newton, 2016](#)). Along with the rapid development of the internet and digitalization, public service broadcasters have become more multimedia- and multichannel oriented, moving beyond television and radio broadcasting ([Just, 2020](#)). Because of the public service model (public procurement and financing), PSM can offer more varied programming to diverse groups of society, including various minorities and marginalized ones. Therefore, the PSM are vital for deliberative communication to develop. The conditions for the PSM to fulfil their public functions vary across countries. Two basic preconditions, however, remain the same: political detachment and financial independence. A sufficient and flexible financing model keeps the PSM separated from the advertising market and helps avoid economic competition with private media. Simultaneously, a strong financing model also strengthens the political independence of the PSM. In reality, however, no ideal model exists.

In all the 14 countries, the PSM struggle for finances, and editorial autonomy often experience political pressures. Among the nine countries in Central and Eastern Europe (CEE) (Bulgaria, Croatia, Czechia, Estonia, Hungary, Latvia, Poland, Romania, Slovakia), most had no PSM before the collapse of Soviet communism. The early 1990s was a period of 'reformatting' the state-owned broadcasting to the public service broadcasting in these countries, which was not a smooth process. Political elites maintained control over broadcasting, as the new broadcasting laws authorized the Parliaments to appoint the management and most of the members of the Broadcasting Councils. This resulted in significant political pressure on the editorial practice in most of the CEE countries. Political pressure and 'governmentalization' are characteristic to immature democracies and even more to countries deviating from democratic development. As [Dobek-Ostrowska and Głowacki \(2015\)](#) argued, Polish media and related policies have never been entirely free from politics. The same applies to the other CEE countries. The Western democracies (e.g. Germany, Austria, Greece) also experience certain political pressure from their governments and politicians, but direct intervention is less frequent. Moreover, legislative and administrative measures protect the political independence of public broadcasters. For example, in the case of the Austrian public broadcaster ORF, relevant provisions are laid down in the ORF Act, which secures formal autonomy to the public service broadcaster ([Eberwein et al., 2022](#)). The strongest means in the hands of the governments to influence the activities and even content of the PSM are economic ones.

Several of the PSM in our studied countries are fully or partly financed by the state budget. Subsidies from the state budget are often combined with advertising revenues and/or broadcasting fees paid by the public. In Estonia and Latvia (since 2021), the PSM are financed only from the state budget. They never introduced a broadcasting fee, and they do not sell advertising. Both countries adopted a separate law (broadcasting act) for regulating public broadcasting. On the one hand, state financing gives stability for developing the programming, technological facilities, and working conditions of the staff. On the other hand, politicians engage in continuous attempts to exert political pressure on editorial decisions. A clear risk is that the government can cut funding depending on changing economic or political conditions in the country.

In countries where PSM funding is not connected to the state budget, the public pays broadcasting fees, and the PSM are allowed to sell advertising and licences for their original production. The PSM using this model depend on how the country's legal framework defines the conditions for their activities. In Croatia, for example, where the PSM is financed by broadcasting fees, the government has the possibility to reduce the fee for the next contractual period (Peruško et al., 2022). In Greece, where the broadcasting fee is levied on electricity bills and a minimum fixed rate, the PSM is financially independent (Psychogiopoulou & Kandyla, 2022). In Germany, the legal framework protects the PSM from the government's interference, such that these attempts are taken to the Constitutional Court (Kreutler & Fengler, 2022). Along with rapid digitalization, the PSM in all countries face online competition. Private media conglomerates try to find ways to restrict PSM activities online (e.g. Sweden, Estonia), arguing that public funding puts them in a favoured situation in comparison with commercial channels.

In addition to the economic and independence issues, the spread of online news platforms and alternative channels have challenged the PSM's position as the most trusted news provider in many countries (Hungary, Bulgaria, Croatia, Poland, Greece, Romania), which tends to be indicated in reports from Reuters Institute.¹ Decreasing public trust is mostly the result of low-quality journalism and certain commercialization of the programmes in competition with private media. The decrease in reliability and trust is also connected to political pressure, as the cases of Greece, Poland, and Hungary confirm. However, in Sweden, trust in news media, including the PSM, increased from 40% in 2016 to 50% in 2019 (Berglez et al., 2022).

Organizational conditions

As the transformative process of digitalization has changed advertising-dependent revenues for media companies, resources are getting scarce. Cost-intensive and time-consuming formats, such as *investigative journalism*, are being reduced despite their crucial role to maintain basic democratic functions and deliberative communication. Except in Sweden and Germany,

where sustainable resources have been comparatively stronger, journalists lack time and financial support for such extensive reporting.

Of concern is the increased political and corporate pressure that cuts back investigative journalism resources (Hungary, Poland, Romania, Bulgaria, Austria) and can even lead to pseudo-investigative journalism (Gerli et al., 2018), where media owners use the media to attack political and/or economic opponents, thereby posing a clear threat to deliberative communication. Assaults, the lack of administrative and legal protection, and post-COVID austerity measures are additional risks (Bulgaria, Croatia, Latvia, Slovakia, Romania).

To continue to serve the public interest, journalists often link with NGOs or collaborate in cross-media or international investigations (Austria, Estonia, Hungary, Romania, Latvia, Sweden) (see Berglez & Gearing, 2018). In Germany, platforms for investigative journalism were established, after fundings were withdrawn. Especially when the political environment poses a risk to media independence, high-quality investigative journalism thrives on dedicated individuals, often online, and is financially supported by private foundations or donations (Bulgaria, Croatia, Hungary, Latvia, Romania). However, such collaborations cannot compensate for the fundamental lack of resources for journalistic work. Without sustainable and independent financing, the risk of political pressure and dependency increase. Sweden and Germany show that politically independent journalism resources must be available if deliberative communication is to be sought.

Foreign offices seem to face similar challenges, although only a few countries provide data on this: Apart from Austria, where the situation is relatively stable (Brüggemann et al., 2017; Terzis, 2015), funding for foreign offices and travel are largely reduced or discontinued.

Regarding *workforce diversity*, in many countries, data are limited in several respects (e.g. class belonging, gender, cultural background); age and education are better covered. Some CEE countries lack basic policies on gender equality and diversity (Croatia, Czechia, Hungary, Poland, Slovakia). However, the number of female journalists is traditionally high or higher compared with male journalists (Bulgaria, Estonia, Latvia, Romania). The number of female journalists has steadily increased in Germany (Dietrich-Gsenger & Seethaler, 2019) and Austria and is balanced in Sweden. Nevertheless, women hold fewer top positions in management or among the owners; and they are often paid less and are underrepresented in media coverage (Austria, Croatia, Estonia, Germany, Greece, Hungary, Italy).

Ideally, journalists' *age* groups should be balanced, to ensure continuity and development of journalistic values, expertise and know-how, provided by experienced journalists. Meanwhile, younger people 'foster innovation and thus stretch existing boundaries in the profession' (Broersma & Singer, 2021, p. 821). Romania and Hungary have the lowest average age of journalists, whereas Austria, Germany, and Slovakia have the highest concerns about ageing media staff, with an average age of 45 years; both conditions run the risk of imbalances (Mediadelcom, 2022b).

Working conditions

In the current context, *risks* are connected to the deterioration of working conditions; lack of satisfaction; worsening professional standards and restrictions on the professional autonomy of journalists, caused by changes in production; organizational and business models generating job insecurity; and media commercialization and political attacks on journalists. Several critical junctures have had an impact on the working conditions of journalists in all countries: technological change, global financial and economic crises in the end of the 2000s, the rise of political populism and growing anti-media discourse in the middle of the 2010s, and the COVID-19 pandemic. A specific group consists of new EU member countries (Bulgaria, Croatia, Czechia, Estonia, Hungary, Latvia, Poland, Romania, and Slovakia). Junctures resulted in higher requirements, intensified workload, increased job insecurity, decreased work satisfaction, underlined importance of lifelong learning, and, in many countries, endangered safety and work of journalists in terms of economic, emotional, and physical abuse and harassment. These tendencies were also present in countries with relatively high journalist safety and strong trade unions, such as Sweden and Germany (Papendick et al., 2020). A specific risk is the crisis of trust and anti-media discourse developed by political parties that are using a populist political communication approach (Rožukalne, 2020).

Economic pressure and expanding workload appear to be the main reasons for the loss of job satisfaction, even in old EU countries, like Austria, where the number of satisfied journalists decreased from 75% in 2008 to 50% in 2019 (Kaltenbrunner et al., 2020, p. 82). Mostly, only around two-thirds of journalists have full-time job contracts, with the proportion of freelancers growing, especially after the 2008 global financial crisis. An exception is Estonia, where 93% have full-time job contracts (WJS in Harro-Loit & Lauk, 2016, p. 2). In the wake of the global recession in 2008, the work market for journalists shrank significantly. In Greece, where the unemployment rate was 50% in 2017 (Skamnakis, 2018, p. 12), journalists had to accept pay cuts and, often, extended delays in getting paid (Papathanassopoulos, 2020, pp. 133–134; Skamnakis, 2018, p. 12). The COVID-19 pandemic also demonstrated the vulnerabilities of journalists.

Social insecurity is a problem in many countries, and the situation is more complicated in new EU countries. In Latvia, many media organizations offer a salary consisting of two parts, a basic wage (with social insurance taxes paid) and authorship fees (not subject to social security payments); this practice leads to the potential risk of poverty. Meanwhile, in several countries (Hungary, Poland), the past decade was marked by increasing political pressure. In Italy, the end of the Berlusconi era did not bring the expected autonomy in the context of commercialization and political parallelism.

Journalists do their work risking their physical health and life. In the climate of populist politics, journalists receive threats from individuals and

right-wing activist groups even in countries with a long tradition of deliberative democracy, such as Sweden. In all studied countries, journalists' working conditions are affected by online harassment, which manifests itself as threats and physical stalking, reducing the popularity of journalism as a profession and affecting its quality.

The efforts of media organizations to defend journalists demand additional resources for providing journalists with legal and psychological assistance and protecting them from cyber-attacks. However, protection measures for journalists may increase stress levels for professionals and create conflicts within newsrooms when organizations that must invest resources to protect investigative journalists, such as in cases of strategic lawsuit against public participation claims. Thus, professional solidarity is important. In February 2018, when Slovakian investigative reporter Ján Kuciak was assassinated supposedly because of his investigative journalistic work, Kuciak's unfinished article appeared in other media. The piece that reflected links of illegal Italian businesses to national government brought about massive society-wide protests and the resignation of the prime minister.

Professional culture

Our analysis primarily examined *professional culture* through the intertwined concepts of *journalistic roles and values* and *autonomy*. A group of countries is progressing towards deliberative communication (Sweden, Germany, Austria, Estonia) but demonstrates internal differences and changes from 2000 to 2020. Swedish journalists excel in fostering a professional culture of deliberative communication by not only informing but also giving voice to the voiceless. Journalists in Germany, however, are losing distance from political representation, whereas Austria is facing severe concerns about journalistic dependence and political influence. Estonia is moving towards Nordic journalistic standards, as it has a tradition of journalism culture supported by academic education. Indeed, 'Estonian editorials have overcome click-journalism and other "children's diseases" of the early days of online journalism' (Lauk et al., 2022, p. 188).

Another group of countries is characterized by certain professional cultural barriers and/or experiences of crises, hindering deliberative communication (Greece, Italy). Greece and Italy (Piacentini et al., 2022; Psychogiopoulou & Kandyla, 2022) struggle with the far-gone proximity of media and politics that is affecting professional journalistic culture. Greek journalists do not consider journalism independent 'of political parties, the State and political elites' (Psychogiopoulou & Kandyla, 2022, p. 260). Nevertheless, the self-perception of autonomy among journalists is generally high, even if content and structural analyses show the opposite.

A third group consists of Bulgaria, Croatia, Czechia, Latvia, Romania, and Slovakia. They share a transition experience from a socialist to liberal-democratic phase of journalism. This transition might involve quite different manifestations, such as close ties between journalists and politicians

(Romania, Bulgaria, Slovakia), economic interests overshadowing professional principles that force journalists to prioritize revenue-generating reporting over public interest (Croatia, Latvia), weak journalistic autonomy owing to media ownership concentration (Czechia), double ethical standards (Latvia), lack of reflection on digitalization transformation (Croatia, Romania), and issues with journalist safety (Bulgaria, Slovakia).

In the fourth group, Poland and Hungary have also witnessed the aforementioned transition process (see group 3), although it is noted to show increasing self-censoring and biased reporting, either to support leading parties, or as a 'counterbalance' to 'partisan reporting from the "other side"' (Urbán et al., 2022, p. 310). These polarized practices are supported by professional organizations, which change the public's perception of the journalistic culture and roles. For example, most Hungarian journalists agree that codes of ethics should be respected, but at the same time 'more than half of them said [...] it is acceptable to set aside ethical standards when exceptional circumstances require it' (Urbán et al., 2022, p. 310).

Journalistic competencies

A long list of professional journalistic skills and practices encompasses expected journalistic competencies: writing, interviewing, photography, use of software and digital tools (Carpenter, 2009), and professional ethics (Donsbach, 2014, p. 668). Considering key changes between 2000 and 2020, some countries in our sample have shown progress in professionalism—in terms of development of higher education, degree of critical thinking and self-reflection, knowledge of ethical rules in journalism, or willingness to engage in dialogue with the audience. This is the case with Austria and Sweden. In the Swedish case, the core set of competencies has been expanding to include up-to-date skills relevant to cope with the 'high-speed society' that is attributed to 'internetisation' and digitalization, globalization, financial crises, and climate change (Berglez et al., 2022).

Nevertheless, the level of journalistic competencies varies and, in most analysed countries, we found no generally agreed criteria for assessing journalistic competencies. However, Italy is a case with a clearly defined process and list of requirements to become a journalist. These include training either at university and passing an examination of professional suitability, or through internships and courses. The key critical juncture for the development of journalistic competencies is the development of education and training institutions, and at the same time, practitioners' awareness of the importance of practical journalistic skills and willingness to incorporate them in their teaching and training (Croatia, Czechia). Nevertheless, there is a traditional tension between academic journalistic education, the industry, and journalistic practice (Estonia, Latvia, Romania, Czechia).

However, the state of educational institutions may become a risk for ongoing development. For instance, universities in Estonia experience

‘scarcity and instability of funding of journalism education’, which increase ‘the risk of lowering professional competence among journalistic staff’ (Lauk et al., 2022, p. 186). In Romania, universities are criticized for their outdated curricula and for producing journalism graduates who ‘do not fully understand and internalise journalistic professional values’ (Avădani, 2022, p. 458).

In addition to academic institutions, media organizations or various public bodies have organized a growing number of training courses (Croatia, Greece, Czechia, Romania, Estonia, Slovakia, Bulgaria). Simultaneously, the number of journalism graduates is too high for some media markets (Croatia). The initial motivation of journalism students decreases over time, leading many to shift to a career in PR (Croatia, Latvia). Moreover, lifelong learning opportunities attract fewer journalists (Romania). In some analysed countries (Germany), the proportion of journalists with a university degree is rising, whereas in other countries (e.g. Czechia), the majority of journalists lack professional education and awareness about the importance of lifelong learning (Greece).

Although improved journalistic competencies can be considered an opportunity, rapidly evolving new requirements of skills owing to digitalization may pose a risk of ‘worsening working conditions and increasing pressure among journalists’ (Berglez et al., 2022, p. 529). Potential opportunities and risks can accompany critical junctures, such as the speed at which the education system is being established. The first journalism school in Sweden was established in 1947, but in Greece, only in the late 1990s.

Simultaneously, data are considerably limited with respect to the quantity and quality of journalism education and training in some of the analysed countries (Greece, Latvia, Poland, Slovakia). There is both a scarcity of knowledge on journalists’ perceptions of their competencies and skills and on employers’ requirements on journalistic competencies (Estonia, Latvia). Moreover, in some countries, typically in Hungary, there are fewer ‘training opportunities, internships and even fewer independent media outlets with satisfying ethical standards to employ journalists’ than ever (c.f. Poland) (Urbán et al., 2022, p. 309). This is particularly striking considering that the journalistic competencies and related professionalism of journalists are among the key prerequisites for deliberative communication.

Concluding comments

Table 5.2 gives a general overview of the development of the journalism domain from 2000 to 2020. It gives a picture of the overall structural conditions and transformations in society influencing the journalism domain, and how this has affected and/or has been handled at the meso and micro levels of journalism. Notably, we could not present statistical correlations of our cause-and-effect explanations. To illustrate probable connections between the different levels, we used a numerical system.

Table 5.2 Development of the journalism domain from 2000 to 2020

<i>Level of analysis</i>	<i>Some central observations</i>
<i>Important critical junctures in EU society (general processes)</i>	
	<ul style="list-style-type: none"> • Global financial/economic crisis in the end of the 2000s (1) • Digitalization/social platformization of media production (2) • Rise and expansion of political populism, 'anti-established media' discourse, and polarization (3)
<i>Macro-organizational factors</i> (conditions for a working media market and for public service media)	<ul style="list-style-type: none"> • Gradual loss of both audiences/users and advertisers (general process) (1, 2) • Expanding media concentration (e.g. Austria, Bulgaria, Croatia, Hungary, Latvia, Sweden) • Diversification/broadening of investments among media firms (Sweden) (1) • Media ownership to realize political interests (Bulgaria, Greece, Hungary, Poland) • Public service media funding challenges (general process) (2) • Private media conglomerates' strategies to transform or restrict public service media activities (e.g. Sweden, Estonia) (1, 2)
<i>Organizational factors</i> (organizational conditions, working conditions, professional culture)	<ul style="list-style-type: none"> • Weak autonomy owing to media ownership (Czechia) • Remaining (Bulgaria, Greece, Romania, Slovakia) or increasing political parallelism with some barriers to independent media production (Hungary, Poland) (3) • Decreasing resources or political barriers to journalistic investigative work (Hungary, Poland, Romania, Bulgaria, Austria) (1, 2) • Strong adaptation to new digital conditions (Sweden, Germany) (2) • Decreasing job satisfaction owing to changes in professional standards; deepened commercialization/algorithmization logic and change in production (general process) (1, 2) • Hate and threats against media workers (e.g. Sweden, Slovakia) (2, 3)
<i>Practical factors</i> (sustained, obtained, or refined journalistic competencies)	<ul style="list-style-type: none"> • Longstanding problem with de-professionalization mechanisms (Czechia) and lack of training opportunities (Hungary) • Growing professionalism in digital times (Sweden, Germany) (2) • Development of 'biased' reporting OR hindering of performance of certain competencies owing to increasing self-censorship (Poland, Hungary)

We encountered uneven access to data in the case of the journalism domain in the examined countries, which should be viewed as a risk in itself and an important result worth highlighting. Additionally, the actual period of empirical investigation (2000–2020) could not offer a full-fledged diachronic analysis over the two decades. Most of the results/data were from the recent decade (2010–2020), with the earlier decade (2000–2010) primarily serving as an important context.

The results presented in this chapter should thus be read and analysed together with the other domain studies presented in this anthology, thereby to achieve a more holistic understanding of the media development in Europe and interpretations of ways forward for the further strengthening of deliberative communication and democracy.

Note

- 1 See Digital News Report 2023 | Reuters Institute for the Study of Journalism ([ox.ac.uk](https://www.ox.ac.uk)). See also <https://europa.eu/eurobarometer/surveys/detail/2832>

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6 Media audiences practices

From powerless masses to powerful producers

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Numerous theoretical works have explored the topic of the essence of media usage in the context of deliberative communication as a system for making politically binding decisions through public discussion, including elements of both direct and representative democracy (Bessette, 1980; Habermas, 1996; Rawls, 1985). Even back in the 16th and 17th centuries, the eras of Thomas Hobbes, John Locke, and Jean-Jacques Rousseau—the most prominent representatives of the doctrine of the social contract—human beings were perceived as equal by nature in their freedom, and voluntary rational consent is the basis for democracy. Habermas later (2002) claimed that (communication) participants recognize one another as mutually equal (value: human dignity), that they are equally able and expected to express their truth claims in the communication situation (values: autonomy, truth), and that their motivations to participate are known (transparency). Participation also presupposes that participants are well-informed about the topics they are discussing.

Deliberative communication is thus a type of communication that aims to facilitate reasoned and rational discussion among people with different opinions and/or interests with a view to improving the functioning of democracy by proposing effective socially significant solutions. One of the conditioning factors for deliberative communication is full and equal information provision to citizens/participants in speech acts. ‘The basic assumption is that political knowledge is key to people as citizens¹ and is possible to measure’ (Moe, 2020, p. 208). The media serve to mediate between citizens and society; the media mediate information on ‘what happens’ in the world, allowing citizens to discuss public issues. According to Couldry et al. (2007), the media enable ‘public connection’. Without proper, factual, and up-to-date information, individuals are not able to participate effectively in the interactions needed for deliberative communication.

In the contemporary digital world, the new ‘mosaic culture’ is characterized by the demassification of the media and of society itself (Toffler, 1980). The dynamics of new information technologies and telecommunications

since the beginning of the current millennium are fundamentally testing the structure and practices of traditional media systems, creating challenges for transformation—from linear to non-linear services. Understandably, other conditioning factors for deliberative communication that are more clearly related to new forms of media (digital media) indicate the importance of free and equal access to discussion arenas that are often not accessible to all for a variety of reasons (e.g. digital divide, c.f. [van Dijk, 2005](#)).

Theorizing and operationalizing media use

In attempting to explain the relations between media use and democracy, we collected evidence from crucial components of the deliberative communication (as ideals to attain) and media research (including audience and media usage research). The research can be divided based on their research questions and focus into three clusters: **the media's role to inform** populations ('informed citizen' ideal); **the media's role to support** social, political, and civic **participation** (audience engagement theory); the media's role to **empower citizens vs. manipulate** as docile users and consumers. Following the ideal of an informed citizenry, media research has gathered information on access to news and news following among populations. Results have shown that some media provisions, such as the availability of strong public service media, are conducive to informed citizenship ([Aalberg et al., 2010](#); [Curran et al., 2009](#); [Dimock & Popkin, 1997](#); [Jenkins, 2006](#); [Iyengar et al., 2010](#)). Going further, media use research can focus on the participation dimension. Researchers have deliberated on how the media support population participation in social and political spheres (e.g. [Lazarsfeld & Merton, 1948](#); [Norris, 2001](#)) or engage citizens ([Aalberg & Curran, 2013](#); [Ytre-Arne, 2023](#)). In response to the media-centred approach, the audience-centred approach has been developed, which asks how the media are used for personal needs and self-realization, the so-called uses and gratifications approach ([Katz et al., 1973](#)) that also reflects on the opportunities and risks of voluntary participation in today's digitized/social media-driven world ([Bilandzic et al., 2012](#); [Noor & Hendrics, 2012](#)).

Thus, our analysis of media use started with the premise that people have matured in hybrid media contexts ([Chadwick, 2013](#)) and have several ways to be involved in media communication—they have their unique individual media repertoires. The concept of media repertoire has been central to the actor-centred analysis ([Adoni et al., 2017](#); [Hasebrink & Domeyer, 2012](#); [Hasebrink & Popp, 2006](#); [Schröder, 2015](#)). A media repertoire is a combination of media channels and outlets by which to be informed, entertained, and participate in a mediated interaction with others. The media repertoire describes the mediated part of the lifeworld of an individual and indicates the ways and channels in which an individual is involved in media communication.

The individualized media communication of people can be treated as a precondition to participation in deliberative communication in a

mediatized world. Media usage enables public connection, but media usage can relate a user to public objects that have low importance for deliberation (e.g. when someone follows large-scale sports events) (Couldry et al., 2007). Different media repertoires carry different potentials to be involved in deliberative communication, depending on the function of a media outlet/channel, content provided by media, and prominence given to the particular media.

As such, we analysed media usage as the interplay of structural- and actor-level factors. We adopted the following rationales for searching audience's media use patterns based on the expectation that the media can support public connection and deliberation. Structural factors explain how the media environment has been built and can be perceived as a system of different media channels; these factors relate to the system of the media channels available in a country, including different outlets and the significance of different channels for media users. Actor-level factors explain the choices (why and how) one makes based on personal preferences, needs, abilities/capacities, and possibilities. Even commonly inaccessible content (e.g. foreign news outlet) can be accessed by a skilled user, highlighting the individuality of content obtainment, which merits attention.

On the one hand, the environment in which people operate explains the choices they make in developing their media repertoires. If public service media do not exist in the media system, then they cannot be included in any person's media repertoire. Moreover, technological boundaries need to be considered—if one does not have access to the internet, then one immediately lacks particular sources. On the other hand, individual preferences, habits, and other personal factors play similarly crucial roles. Thus, a unique media repertoire emerges as an interplay of structural and individual factors (c.f., Hasebrink & Domeyer, 2012; Schröder, 2015). This codependent relation between the structural and individual levels is precisely why it is not fruitful to distinguish between structural and actor levels in the media usage realm. Instead, the focus should be on the result of the mentioned interplay between those dimensions across the researched countries.

Therefore, we constructed three relevant variables to reflect the structure-actor interplay that can help explain the media repertoire of an individual, and consequently, the state of media use in particular countries: **access to media**, **relevance of news media**, and **trust in media**. These three are also closely related to media literacy, a variable addressed in Chapter 7.

The importance of reflecting the conceptual variable of **media access** across the countries studied is clearly based on the need for free access to communication with equal inclusive rights for all participants to express their views and participate in public discourse, while considering the diversity in cultural contexts, socioeconomic resources, technological knowledge, and psychological skills (cf. Bucy Erik & Newhagen, 2004; Ellcessor, 2016). The interplay between the structural- and actor-based levels is then represented in the pre-existence of diverse contents, forms, and types of media that can be accessed

with how they are actually used—meaning how personal preferences and habits of individuals influence and shape their final usage. Being able to access media is not only predetermined by the pre-existence of an adequate offer (no single channel can provide multi-sided and varied information) but also by one's competencies and economic determinants (e.g. having the means to buy a TV or computer) that influence the final (and individualized) possibilities of gaining media access.

Closely related is the second variable, **relevance of news media**. This variable reflects one's interests in matters of politics, culture, and economy, with respect to lifestyle, professional, and leisure activities and topics related to one's identity in general. The individual importance of any given topic then determines the time and attention one is willing to invest in the chosen media/content. As such, while the accessible media can be very much diverse, media use still depends on the individual behaviour and preferences that are the result of audiences' different skills and preferences—in sum, their accumulated capitals (economic, cultural, social, c.f. [Bourdieu, 1986](#)).

The above shows a clear connection to the third variable, **trust in media**. Trust in media is one of the crucial questions of media studies, revealing the role of trust in communication, in society, and in media, as evinced by such phenomena as gatekeepers, echo chambers, and fake news. Exploring truth and trust in journalism should account for the role of algorithms and robots in media, and the relation between social media and individual trust, focusing on users, writers, platforms, and communication in general, and on media competency, skills, and education in particular (eg. [Osburg & Heinecke, 2019](#)). Trust in media is obviously a result of previous experiences one has with media (e.g. perceived inequality in the treatment of personally proximal topics). The identity of the individual also plays utmost importance—not only gender, race, sexuality but also political preferences, habitual media practices, and other identity components.

We focused on these three variables across the consortium countries of this study and on the question of how individual country teams reported on these issues alongside and in the context of data from bigger (whole-European) studies.

Access to media

Media access and diversity vary across the 14 European countries in our sample, reflecting changing media landscapes and technological advancements. However, the general issue for all is that internet usage is rising, whereas traditional media, like print and terrestrial television, face challenges in retaining audiences. In almost all the countries, trust in the media also fluctuates, influenced by such factors as transparency and media ownership.

The issue of media access and diversity in **Austria** can be understood through usage data from applied audience research. Austria is known as a 'country of newspaper readers' ([Stark & Karmasin, 2009](#); see also [Seethaler](#)

& Melischek, 2006). Notwithstanding, usage of print media is on the decline. Internet usage has surged, with 91% of Austrians aged 14 years and older using it in 2021 and 80% using it daily ([Austrian Internet Monitor, 2022](#)). Taken together, print media is not doing well and is being supplanted by internet content, steering readers from the analogue. Swedish people, similar to Estonians, are highly digitized, with widespread internet and social media usage. Fibre broadband connection is expanding, and mobile phones are the most common way to access the internet, especially among young people: 100% of young Swedish people aged between 16 and 25 years use smartphones.

Bulgaria reports a wide range of media access, including television, radio, smartphones, computers, and tablets. Digital inclusion is high, especially among children and young people, with nine out of ten young Bulgarians owning a personal smartphone. Television remains the most trusted source of information, although public trust in media has declined. Social networks and social media also enjoy relatively high trust (*Attitudes of Bulgarian Citizens on Topics Related to the Media, 2020*; [Eurostat, 2021](#)). Similarly, Croatia has witnessed a digital transformation in media access ([Mattoni & Ceccobelli, 2018](#); [Peruško et al., 2015](#)). Internet use has risen significantly, reaching 82% in 2021. The internet has become a primary means to access social media sites, with 61% using it for that purpose ([Eurostat, 2021](#)). Audiences access online media directly and through intermediaries, including search engines and social media ([Bilić et al., 2017a,b](#); [Vozab & Peruško, 2021](#)).

Germany has likewise witnessed a significant increase in internet use, reaching 88% in 2020, with almost 100% among those below 49 years old ([Initiative D21, 2021](#)). Linear television remains common, but traditional TV sets are becoming less relevant as smartphones and tablets gain importance ([Die Medienanstalten, 2021](#)). Meanwhile, Hungary has seen a decline in television's popularity, with the internet becoming the leading news source ([Bognár, 2022](#)). The internet and social media have taken over as primary news sources for the Hungarian population. In the case of Poland, although internet access is growing rapidly, with smartphones as the primary device for connecting to the internet, television's role remains critical. The late 1990s and early 2000s have been considered a time of market consolidation in Poland, with the dominant role of legacy media shrinking with newspaper readership ([Dzierżyńska-Mielczarek, 2017](#)). Changes in the radio and television sector in 2010–2015 focused on new production skills and organizational responses to market fragmentation ([Filas, 2006](#); [Konarska, 2008](#); [Szpunar, 2009](#)).

In Greece, liberalization of the broadcasting market has influenced media access. In 2010, the country had 135 TV broadcasters and 988 radio operators, but by 2021, only nine national TV broadcasters remained. The press market featured 66 national newspapers in 2000 ([Psychogiopoulou & Kandyla, 2022](#)). Italy has a high level of media concentration but offers a

growing proliferation of media options for news consumption. Nearly 98% have access to their preferred media channel, and 94.9% watch/read news daily. In contrast, **Romania** has a diverse but fragmented media market. Media users have access to various channels, but the quality of content varies. Media ownership transparency is lacking, posing a risk to consumers. Challenges are brought by the complicated legislation regarding monopolization or dominance in the market, making it difficult even for the educated consumer to identify the direct and ultimate beneficiaries of the media outlet they follow.

Compared with other countries, **Latvia** faces some unique challenges owing to its small media market, a linguistically divided audience, and influence from neighbouring Russia's media. Given the ethnic structure of the audience, one of the main tasks for researchers of media and communication before the country joined the EU in 2004 was connected to social integration issues and the inclusion of minority groups via media access and agenda.

Relevance of news media

According to the results of country case studies on critical junctures in the media transformation process, free access to quality news information—meeting criteria such as objectivity, balance, comprehensiveness, and impartiality—is an essential condition for democracy and the promotion of civic engagement and space for deliberative platform and communication. In all the studied countries, audiences receive information mainly from television and online news sites (2022), and only minimally from newspapers or radio.

Digital News Report research has shown that in all the analysed countries, the online space is the primary source of news acquisitions (the highest, at 89% of the population, in **Greece**, and the lowest, at 69%, in **Germany**), with all but three countries achieving online news viewership above 80% of the population (Newman et al., 2021). The percentages in favour of the online space are likely to increase; detailed analyses of several sample country studies show that the online space (online news portals, on-demand services, and media archives on the internet) is becoming an increasingly dominant media space, at the expense of linear traditional media broadcasting and print newspaper.

Television is then a second source for newsgathering (Newman et al., 2021), although some country case studies (Austria, Hungary, Romania) cite it as the primary source for newsgathering (Country Case Studies..., 2022). According to the Digital News Report research, the gap between online and TV as news sources is very small in some of the research countries. In Germany, the percentages are identical (Newman et al., 2021).

Analyses of country research reports also show that social networks are emerging as an essential medium for information gathering. Their importance

can be expected to increase as Gen Z (people born in 1997–2012) matures. Gen Z follows traditional or online media sites mainly through social networks (Kraus et al., 2020; Seemiller & Grace, 2018; Vision Critical, n.d.). Print media had the lowest percentages of readership, which has shown a steadily declining trend (Newman et al., 2021). This was also noted by all project research teams in their reports. However, print media coverage remains of interest to 45% of the Austrian population (Eberwein et al., 2022). Meanwhile, Hungarians (12%) are the least interested in print media coverage (Urbán et al., 2022). According to Digital News Report research, Germany and Sweden have the best print media coverage, at 96%, whereas Bulgaria has the least coverage (Newman et al., 2021).

Meanwhile, news portals are increasingly implementing paywalls, but only a small percentage of the population is willing to pay for news content on the internet. The Swedish population is the most willing to pay for online news (30%), and the Croatians, the least willing (7%). In other countries, the willingness to pay for online news oscillates between 10 and 15% (Newman et al., 2021). Interestingly, the second least willing to pay is the population of Germany. This may be a consequence of the significant decrease in interest in text news (Kreutler & Fengler, 2022). Such low interest in paying for professional news content may be considered a threat to democracy and deliberative communication. If professional newsrooms are not paid for their work, their existence could be threatened, which would deprive the media space of quality journalism. Moreover, if users are unwilling to pay for journalistic content, they may seek out freely available news, not all of which is the product of professional journalism (e.g. characterized by ethical codes of conduct).

Another risk for democracy and the development of deliberative communication in the EU may be the increase in the number of people avoiding the news. Researchers have offered several explanations for this behaviour. One is the overload of negative news during the COVID-19 pandemic. From an initial intense news viewing, people gradually moved to rejecting negative news, a tendency that has persisted for some (Hudíková, 2020; Iwanowska et al., 2023). Another explanation is that for the younger generation, social media (often news mediated by friends or family) have become the dominant source of news/information, gradually eliminating traditional news sources. Yet another possible explanation is that the globalization of the media space has resulted in a higher number of negative news stories clustered in a small space. This phenomenon is considered an incitement to mental health problems (e.g. Johnston & Davey, 1997; McNaughton-Cassill, 2001). Therefore, for example, Gen Z believes that avoiding watching the news is a means of mental health protection. A final reason is that readers tend to read only headlines, which offer a basic orientation, paying attention to the entire article only when the headline elicits their bias or deeper interest (The Everything Guide to Generation Z). This tendency leads to a distorted understanding of the facts and their context.

Trust in media

Trust in the objectivity of information (information without bias) is declining. The rise of distrust towards the media has caused the opinion-forming influence of alternative media to strengthen in many European countries (Pravdová & Karasová, 2020). The role of the news media is to convey information to the public (Holbert, 2005). Such news should provide people with information that can inform opinions (Kovach & Rosenstiel, 2014). In case of distrust in the media, people look for alternative sources of information (Strömbäck et al., 2020).

Findings from research on recipients' trust in the news media in Europe, emphasizing countries involved in this study, show a decrease in trust, especially in the so-called post-COVID period. For the analysis of trust in news information in the European area, we referred to **The Reuters Institute for the Study of Journalism** and its annual report on digital news for 2023. Another source was the 2022 **Standard Eurobarometer** survey covering all EU Member States. These research initiatives provide an opportunity to track the gradual evolution and changes in the attitudes of media audiences towards the news media. Both surveys are complemented by the results of national media credibility surveys focusing on the news media. In addition, we referred to the results of the **Edelman Trust Barometer** (2023) and the research projects of the individual authors mentioned above when dealing with the trustworthiness of news media in the countries included in the current anthology.

During the COVID-19 pandemic, the level of media trust was high (Mediaguru, 2020). After the announced end of the pandemic, almost all countries surveyed showed a decline in trust, as evidenced by the results of the research institutions mentioned above. According to research by The Reuters Institute (2023), **Sweden** (50%), **Germany** (43%), and **Poland** (42%) recorded the highest levels of trust in the media. In the case of **Sweden** and **Germany**, higher levels of trust are associated with public media, whereas in **Poland**, it is more likely to be private media. In **Sweden** and **Germany**, public institutions are perceived as trustworthy. In **Sweden**, 56% of the population trusts news in the public media (Newman et al., 2022).

Germany has an established public service media sector, including ARD and ZDF television channels and Deutschlandradio radio. Even in the light of these relatively favourable numbers, media scepticism is a relevant research topic (Kreutler & Fengler, 2022). A longitudinal study on trust in the media showed a marked increase in trust and a decrease in media cynicism during the first year of the COVID-19 pandemic in 2020. The share of people who would trust or totally trusted the media and the share of those who would rather distrust or totally distrusted them have almost doubled (Jakobs et al., 2021).

Although trust in the media is high in Poland, concerns about the concentration of media ownership have emerged (Media Pluralism, 2022). A survey

by IBRiS and IBiMS (2021) on Poles' trust in individual social media channels indicated that more than half of Poles do not trust social media. This indicates a relation between the range of education (including media literacy and individual skill sets) and media (dis)trust (the higher the education, the higher the trust).

According to the Reuters Institute, news consumers in **Greece, Hungary, Bulgaria, and Slovakia** have the lowest trust in the media. The influence of political power and the business environment on the media is also evident in these countries. This raises concerns on the independence and objectivity of the news media. Evidence also shows a tendency towards media concentration and ownership by corporations, interest groups, and political elites in **Greece**. However, regional news is highly trusted. Partisan commercial television, tabloid newspapers, and online tabloid news websites are the least trusted. The lack of trust in the news media in Greece is mostly attributed to perceptions about the news being biased (with political and business interests driving news selection and reporting), low quality journalism, and confusing, sensationalist, and misleading content ([Kalogeropoulos et al., 2021](#)).

According to the Reuters Digital News Report 2022, trust in news in Hungary is extremely low, at 27%, and trust in the news sources used by the users themselves is at 47%. The news sources considered the most credible are those deemed not close to the government, such as HVG, RTL Klub, 24.hu, and Telex. The scandal surrounding Index has caused the news portal's credibility to fall by 17% in two years. After the editor-in-chief was sacked because of his statement that he could not write freely, 70 staff members left the newsroom in protest ([Bognár, 2022](#)).

In **Bulgaria**, trust in media is also low. Television and radio stations, including the public broadcaster and the two largest commercial stations, are among the most trusted. The public service media enjoys the highest level of trust. Corporations or political elites own some media. Concerns about the independence and objectivity are once again present. A study by the Konrad Adenauer Foundation and the sociological agency Alpha Research showed that trust in the media remains weak and that only 10% of Bulgarians believe in the autonomy of the media in the country. Television leads the rankings with 60% of Bulgarians trusting TV news ([Konrad Adenauer Foundation, Media Program for Southeast Europe, 2018](#)).

Similarly, trust in media is low in **Slovakia**. This is attributed to decades of interference in the media by business and political leaders. Nonetheless, television stations, including the public broadcaster RTVS, enjoy a relatively high level of trust. However, news consumers are less trusting in online news media. In an analysis of 46 countries, Slovakia fell in 2022 to last place in trust in the media, together with the US ([Struhárik, 2022](#)). In 2023, trust in the media increased by a small degree to 27%. According to research conducted by the national MML-TGI (2021, 2022, and 2023), Slovak audiences have consistently ranked Slovak TV as the most trustworthy source of news

for the tenth consecutive quarter. Nevertheless, both expert evaluations and public appraisals have also elicited worries regarding partiality and a lack of professionalism in the reporting carried out by public media. In the case of **Czechia**, radio is the most trusted medium. In 2022, 67% of Czechs reported trusting information on the radio, compared with the 58% for television ([Statista.com, 2022](#)).

Meanwhile, according to the Eurobarometer 2022, **Estonia** has the highest trust in the public service media among the consortium countries. Up to 67% of the respondents said they trust the public service media ([Jõesaar & Kõuts-Klemm, 2019](#)). After **Finland** (73%), Estonia has the highest trust in public the service media of all EU countries. Among the countries included in our study, **Sweden** follows with 66%, **Germany** with 62%, **Austria** with 56%, and **Latvia** with 51%. Countries with high trust in the public service media share several common characteristics. The public service media in these countries have strong independence from political influences and external commercial interests. Their funding is transparent and their reporting is of high quality and credibility, objective, accurate, balanced, and fair. Moreover, the journalists are competent and adhere to ethical rules.

In **Austria**, according to [Gadringer et al. \(2021\)](#), the public broadcaster ORF is the most trusted media news outlet (74%). A qualitative study among young adults (aged 18–25 years) in Austria showed that their trust in traditional media is significantly lower than the Austrian average and that they often tend to be uncritical of social media news ([Russmann & Hess, 2020](#)).

In **Latvia**, 68% of recipients trust the information provided by the national media. In 2018, 58% of Latvians trusted national news sources, 42% trusted Western media (e.g. CNN, BBC, Euronews), and 22% trusted Russian media. However, the level of trust is lower among younger and non-Latvian audiences (63%) ([Latvijas Fakti, 2018](#); [Jõesaar et al., 2022](#)).

The lowest trust in public media is in **Poland** (22%) and **Hungary** (23%). Relatively low trust in the media is also found in **Greece** (34%), **Croatia** (39%), **Slovakia** (43%), **Bulgaria** (44%), **Italy** (45%), and the **Czechia** (50%). Regarding online news, including blogs and podcasts, Eurobarometer 2022 data showed the least trust in **Germany** (7%), **Sweden** (8%), **Poland** (11%), and **Latvia** (12%). On the contrary, these news platforms are the most trusted in **Greece** (27%) and **Bulgaria** (23%). Thus, in countries where trust in the public media is high, trust in online news is declining and vice versa, with the exception of Poland.

Conclusion

We described and explained three relevant variables in the context of media usage, namely, access to the media, relevance of the news media, and trust in the media. Our approach to the topics reflected on the structure–actor level interplay manifested in the media repertoire of individuals ‘clashing’ with the existing offer of media content. The findings from the 14 European countries

showed diversity. Nonetheless, we also noted some particular tendencies shared among the countries.

In the studied countries, the media are generally accessible. The countries differed in the offering of the public service media and commercial media, resulting in differences between the means of access. All the countries reported continually rising internet media usage and a simultaneous decrease in traditional media usage. However, despite the decrease in the usage of traditional media, people still (can and do) access it, now additionally via online and virtual access points, which creates a merge of ‘the old and the new’ sources. The decrease of traditional media usage is gradual and varied in each country (in Poland, for instance, television still holds relevance, whereas in others, online media have taken the dominant role, as in Sweden and Austria).

An issue is the low willingness to pay for the news, which is closely connected to the accessibility of the media—some content is accessible only behind paywalls. The emerging risk is the fact that quality journalism might be accessible only to those who are willing to pay, and the number of those is quite small (e.g. Swedish people are the most willing to pay for online news content; in the Czechia, the willingness to pay for news is low compared with paying for music or movies and entertainment media in general). Meanwhile, freely accessible content often employs the tactics of disinformation, infotainment tendencies, and other strategies for attracting the attention of widespread audiences. Such content tends to be produced without the effort of upholding the standards of journalism. This element is connected to the fact that this is the new business model of news outlets—articles are written by people who need to be monetarily rewarded for their work. Simultaneously with these tendencies, people in many countries are starting to avoid news coverage altogether.

These all connect to the observed rise in distrust in the news across the studied countries. The more visible (albeit gradual and continual) decrease in trust is ascribed to the post-COVID-19 atmosphere, oligarchizing and politicization of the media, and success of misinformation and disinformation connected to the rise of alternative media. We observed that some of the more western countries, such as Sweden, Germany, and Austria, report higher trust compared with more eastern countries, such as Hungary or Slovakia. Although not clear cut, this divide is closely related to the rise in more right-wing tendencies in the latter countries and success of misinformation. A crucial role belongs to the media literacy of audiences and citizens. This issue is extensively addressed in the next chapter.

Note

- 1 Citizens have a dual role in democracy, as stressed by Christiano (2015) (cf. Moe, 2020). On the one hand, they indicate their expected developments and, on the other, they need to make sure that society moves towards the correct direction.

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7 How competencies of media users contribute to deliberative communication

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As media consumption has increased in today's information society, so too has the need for media users to develop competencies to effectively navigate, evaluate, and create media content. Media user competencies refer to the skills and knowledge necessary for individuals to interact with media in an informed and responsible manner (Livingstone & Helsper, 2007). The concept of media user competencies has been studied extensively in the field of media literacy.

The development of media literacy competencies is crucial as individuals are increasingly exposed to a variety of media messages that may contain inaccurate, biased, or misleading information (Hobbs, 2010). Several models of media literacy have been proposed to help educators and researchers understand the competencies required of media users. For example, the revised version of the media literacy education framework developed by the National Association for Media Literacy Education identifies the following critical components of media literacy education: integration of multiple literacies; use of the background, knowledge, skills, and beliefs of media users; promotion of curious, open-minded, and self-reflective enquiry; practice of active enquiry, reflection, and critical thinking about the media messages; support for ongoing skill-building opportunities; development of a participatory media culture; recognition of the media institutions as agents of socialization, commerce, and change; critical enquiry on media industries' roles in a democratic society (NAMLE, 2023). Similarly, the media and information literacy (MIL) framework developed by UNESCO (2011) identifies four key competencies: accessing, understanding, evaluating, and creating media and information. The importance of media user competencies is reflected in the increasing emphasis on media literacy education in schools and other educational settings. Media literacy education can improve critical thinking skills, increase civic engagement, and promote positive attitudes towards the media (Mihailidis & Cohen, 2013). The development of media literacy skills can help individuals become informed and responsible media users.

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In this chapter, we discuss the importance of media users' competencies and ability to interpret and create media content in the context of effective learning and deliberative communication. The competencies of media users are shaped by their habitual forms of media use and socialization. We aimed to analyse the risks and opportunities related to the personal and societal dimensions of media users' competencies based on an international comparative analysis of 14 case studies and existing international sources (e.g. International Assessment of Adult Competencies, Programme for International Student Assessment, Media Literacy Index (MLI), Eurobarometer).

Theoretical conceptualization

The awareness of the need for media-related competencies and their incorporation in formal and informal education follows the observation that media content can shape the audience's beliefs, values, and behavioural models, whereby the audience is understood as a passive recipient of messages, reacting directly to media stimuli. Therefore, early media skills education programs tended to focus on strengthening audiences' ability to withstand the direct impact of mass media messages and then evaluate their content critically. Another important driver in the conceptualization of media education and media-related competencies was the educational philosophy of John Dewey, who pointed out the interrelatedness between education and life experience and the importance of the ideal of activity and creativity in the learning process and social life (Dewey, 2001). These ideas and approaches were involved when, at the very end of the 20th century, the introduction of internet and communications technology (ICT) in the various areas of social and individual life and, especially, the development of the internet underlined the need for a new, more complex vision of literacy and multiple competencies related to old (traditional, analogue) and new (digital, networked) media. The concept of multiliteracy was developed, including an authentic approach to pedagogy and the situatedness of learning in the (media-saturated) everyday life experience (The New London Group, 1996). Theory development accounted for access to and use of media technologies, many aspects of working with information and data, and the specifics of networked communication. Media-related changes were conceptualized to elucidate competencies in interrelation to texts and power (that expresses itself in the institutional set-ups and policies of education) (Livingstone, 2003, p. 2004). The history of the conceptualization of media-related competences, media literacy, and education shows that given the complexity of the concept, its envisioning through strategic plans and policies and implementation in teaching asks for careful re-thinking and must be continuously corrected with respect to the new emergence of the communication field. For example, recent media developments have led to disinformation, which has shifted theoretical and practical work on media-related skills towards fact-checking and critical media usage in general and requires a re-thinking of the relation between media and education (Frau-Meigs, 2022).

The introduction of various elements of media-related competences in different levels of formal education is one of the most relevant challenges.

Critical thinking is often discussed in this context, related with the ability to produce content using and accessing all possible (and developing) types of media effectively and ethically. In the set of competencies, audience strategies are recognized to support and use all other elements (Baran, 2017, p. 20). An essential aspect of today's development of media literacy in the context of the changing media environment is the need to connect core competencies with evidence on media usage. Livingstone (2007) pointed to parallels between media audience research and critical literacy research.

Media-related competencies must react to media change; media users must continuously adapt the respective competencies according to the conclusions of audience research. Thus, the literacy research field is a crucial interdisciplinary field. To become a responsible, engaged citizen and participate in deliberative communication, a media user must possess critical knowledge of the media industry and its political and economic bases (Livingstone, 2007, p. 6). This involves concentrating on more than merely formal education—it must also include people of all generations whose media usage patterns and experiences strongly differ. Notably, finding unified criteria to assess media literacy is challenging (Rasi et al., 2019, p. 2).

The ethical foundations elaborated in enlightenment liberal philosophy and refined into the self-regulating socially responsible normative system of society in modernity—which places communication in the centre of democracy via deliberation, discussion, and negotiation-based political system—propose critical thinking, informed, and responsibly acting individuals and organizations as agents. Digital/network communication, commercialization, and globalization of the media field and the prosumer-driven, algorithmized info spaces call for the relaunching of the basic toolkit of skills and competencies needed to ensure the future of democracy and avoid emerging risks. Therefore, MIL policies call for urgent actions at the global, regional, and national levels, based on a wide network of governmental and non-governmental actors and stakeholders.

Indeed, governmental and non-governmental, local, and international organizations are important partners in the network of actors promoting MIL. One essential worldwide organization in this regard is UNESCO. Research on media literacy and its development strategies published by UNESCO reflects five laws of MIL that are essential pre-conditions of a functioning deliberative democracy. The first rule is the usage of information sources and technology for critical civic engagement and sustainable development. The other laws pertain to access to information and access to expression for everyone, which make the values and biases contained in messages transparent and ensure the rights to communicate and access information. The last rule underlines the importance of knowledge, skills, and attitudes, and names several elements that are part of MIL, such as access, assessment, use, production, and communication, by elucidating the nature of information, media, and technology. The fifth

law also foresees the necessity to acquire MIL throughout one's life as a 'lived and dynamic experience and process' (Grizzle & Singh, 2016, p. 35).

An analysis of models of media literacy achievement in the EU has shown that environmental conditions (policy, industry, education, civil sector) must be taken into account when assessing media literacy, which is not only the ability to use (technological skills) (Tornero et al., 2010). Moreover, they show that the shift towards complexity, including not only critical literacy but also communicative ability in content creation and media participation, marks the conceptual frame of media-related competencies in Europe (Tornero et al., 2010, p. 91). More recently, the need to react to developments immediately was expressed in the plans of activities aimed against the spread of disinformation online. EU policies envision the involvement of a network of stakeholders that can contribute to achieving the growth of media-related competencies. Schools and universities must be supported in the development of educational curricula and programs, and they must collaborate with various partners in cross-country cooperations with various players involved in the field, including the public and private sector, NGOs, and media outfits (see the Action Plan against Disinformation of 5.12.2018) (European Commission, 2018b). Regular reporting on measures to increase and promote media literacy is required by the Directive (EU) 2018/1808 of the European Parliament and the Council of 14.11.2018, which includes an amendment on media literacy (Article 33a) in the existing Audiovisual Media Service Directive.

Thus, the first decades of the 21st century are marked by the development of the EU policy framework that could ensure adequate media competencies for EU citizens. However, the conceptualization of the competencies needed and their achievement and assessment comprise a rather complex task because of the multidimensionality of these competencies. Research, policies, and methodologies have tended to follow and react to new trends and problems in the communication environment, resulting in inconsistencies in positioning into one field. In addition, national contexts, shareholder frameworks, and policies differ. In analysing MIL governance in the EU, Frau-Meigs et al. (2017, p. 19) pointed out the oscillation between educational, media, and communication sectors that, in the broader context of national policies, cause 'a "disconnect" or a time-lag between the EC recommendations and the member states' actions'.

The history and theory of the concept show that the definition of media-related competency is complex and related to the changing media used by audiences. As the media landscape is constantly changing itself, media-related competencies must be re-conceptualized in the policy documents and national strategies. Ensuring citizens' media-related competencies requires that formal education be supported by informal initiatives as part of a wider network of actors and collaborators from the academic, non-governmental, and private sectors, both national and international. Comparative research and recent EU initiatives are important factors of enhancing national developments in the field.

Operationalization

The competencies of media users can be framed in two dimensions. The first pertains to personal characteristics that enable effective self-realization amid the rapidly changing and media-mediated society (Kačínová, 2018). Media competencies have the potential to develop citizens' personal autonomy and foster their social and cultural commitment (Ferrés & Piscitelli, 2012). The second dimension encompasses a broad range of social practices that are embedded in the social environment as well as in the wider social, cultural, and political contexts (Baacke, 1996; Buckingham, 2007).

Competence interactions also occur within a structural, institutional, legislative, and regulatory context that influences individual actors, such as teachers, stakeholders, and journalists, as well as the environment in which these interactions take place. The concept of media competence can be used to refer to a general human capacity that serves as a goal for various structured media education activities (Tulodziecki & Grafe, 2019) and to describe self-organizational abilities with media. The latter means that media users should aim to apply media in a self-determined, organized, reflective, and creative manner (Hugger, 2006).

Media user competencies encompass a broad range of contextualized activities that involve the interpretation, creation, and evaluation of messages across various contexts (Hague & Williamson, 2009). These competencies are also shaped by habitual media use and socialization (Park, 2017). The conceptual variables that relate to risk and opportunities (ROs) for deliberative communication are also reflected in the context of the 'prosumer' phenomenon, which allows individuals to produce and disseminate their own messages in addition to consuming messages produced by others (Ferrés & Piscitelli, 2012). Therefore, media competence involves critically interacting with messages produced by others and being capable of creating and disseminating one's own messages. Media competencies play a vital role in supporting deliberative communication in the media space (Dahlgren, 2005; Mansell, 2010).

The perspective underlying the conceptual variables related to ROs for deliberative communication in the media users' competencies subdomain is holistic and anthropological in nature. This approach acknowledges the interplay between the medium and the user, which is rooted in social practices and includes individual competencies that are developed through active and passive media use and further strengthened through lifelong learning. We thus analysed and compared the ROs related to the personal and societal dimensions of media users' competencies in the 14 European countries in the following five areas: 1. policy directions and actors involved, 2. media-related competencies in policy documents, 3. media literacy programs in formal or non-formal education, 4. actors and agents of media-related competencies (risks and opportunities), and 5. assessment of media-related competencies among citizens. All information was downloaded and evaluated (analysed and compared) from the media-related competencies domain of the project.

Our ultimate goal was to evaluate the general state of media users' competencies in the 14 countries and, in particular, the ROs of media users' competencies in relation to deliberative communication and democracy.

Comparative findings

Policy directions and actors involved

In the context of the continuously changing field, common trends in 14 countries include, first, the oscillation of the attention of policymakers and other actors between two main focuses, the development of digital competencies and the ability to discern between news and disinformation. The second refers to the shared and changing governance by bodies of both media and educational fields (e.g. the Ministry of Education and Ministry of Culture in Slovakia). Lastly, the countries demonstrate the involvement of a wider network of stakeholders, especially NGOs, regarding concerns in lifelong, adult, and older adult media education. At the end of this period, developments on policy and implementation levels can be connected to EU requirements, observable risks in the context of Russian propaganda, hybrid warfare, and the COVID-19 pandemic. However, in many countries, the lack of political will or discussion and in-depth understanding of the complexity of the topic and insufficient research have resulted in inconsistency in national policies aimed at the development of media-related competencies and the implementation of measures foreseen by these policies. For instance, in Bulgaria, the field is regulated by the Pre-school and School Education Act (2015) but it does not define media literacy and does not link the implementation to the allocation of resources. In Estonia (and similarly, in Croatia), the lack of political decisions has formed a barrier to citizen education (Ugur & Harro-Loit, 2010, p. 134); teaching, formally introduced to the curricula, strongly depends on the motivation of schools or teachers (similar to Hungary). Several attempts to introduce media education in Italian schools have also failed in terms of successful teaching practices.

Scepticism on the ability of governments to deal with issues connected to ICT development is widespread. In Germany, where the level of digitalization is above the EU average (European Commission, 2021), 57% of the population does not believe in the federal government's competence in the field (European Center for Digital Competitiveness, 2020). Inconsistency in the policy and research creates concerns regarding reaching out to excluded groups. Austria has focused on ICT and digital skills to meet trends in the labour market but still deals with challenges connected to social inequality (Bonfadelli & Meier, 2021, p. 421). In Croatia, various NGOs supported by the Agency of Electronic Media promote MIL, but the country lacks a comprehensive or coordinated media literacy policy to include all age groups (Peruško et al., 2022).

Several frameworks can be distinguished in researching and assessing the development of media-related competencies: legal media policy, educational

content, involvement of legislative authorities, and engagement and participation of NGOs in decision-making. Some countries have restructured their administration, creating new institutions to coordinate activities. For example, in Greece, the National Centre of Audiovisual Media and Communication was created in 2015, and in Hungary, the National Media and Infocommunications Authority plays a significant role.

Local and international non-governmental actors (e.g. UNESCO, UNICEF, Open Society Foundations, Visual World Foundation, Child Rescue Coalition) have also shown significant involvement as agents for promoting, teaching, assessing, and discussing the introduction of media-related competencies to the curriculum. In Czechia, parallel to the inclusion of MIL in formal education, NGOs and private sector agents are involved in work with older adults. In Bulgaria, a similar outstanding example is the ‘Academy for the Elderly: Online Media Literacy’ implemented by the Coalition for Media Literacy. Romania and Poland have shown a considerable reliance on non-governmental activities in strengthening the awareness of media-related competencies in society. However, the results of, as well as the debate on, the inclusion of MIL in formal education cannot be considered systemic. The role of NGOs is also important in the field of research. Notably, in Czechia, where early academic research has mostly been theoretical, the involvement of NGOs has led to a situation where specific areas (digital literacy, user perspective) were neglected by researchers. Nonetheless, Czech media literacy data are gathered annually by the Committee for Radio and TV broadcasts (*Děti a média*, 2021).

In general, the development is positive. For example, activities of the Swedish Media Council since 2018 have ensured the introduction of media-related competencies at different levels of education (*Berglez et al.*, 2022). In Latvia, the development of the first Mass Media Policy Guidelines (*Cabinet of Ministers of LR*, 2016), together with general secondary and basic education standards adopted in 2018 and 2019 have ensured focus on MIL. In Slovakia, research on the media-related competencies of various social demographic groups has been closely linked to the internationalization of research and non-governmental activities, which has supported a sustainable inclusion of media-related competencies in Slovak formal and non-formal education (Gálik et al., 2022).

Media-related competencies in policy documents

In the 14 countries covered in this study, media-related competencies are anchored in specific strategic documents with varying degrees of detail and coherence. According to the respective theoretical positioning on media-related competencies, different requirements regarding media education are formulated in policy documents. Slovakia, for example, defines media education as a multidisciplinary concept, integrating knowledge from various social sciences. In Bulgaria, the basic idea is that media and digital literacy should

become an essential part of the concept of literacy. The Czech approach to media literacy, however, focuses on the ‘ability to analyse media content and evaluate its trustworthiness, additionally also to recognize the communication aim of the information’ (Waschková Císařová et al., 2022).

In general, two groups could be distinguished: countries in which media competencies are listed in detail and examined in specific documents (Austria, the Czech Republic, Estonia, Hungary, Slovakia) and countries in which they are mentioned only in documents of a more general content, not exclusively devoted to media competencies and less specifically developed. Croatia, for example, is one of the few countries in the EU that did not have a media literacy policy as of 2017 (Cernison & Ostling, 2017). Media literacy in Croatia has experienced sporadic development, mainly owing to bottom-up civil society initiatives and initiatives between NGOs and various public and educational institutions. In federally organized countries like Germany, media authorities of the federal states address media education issues.

NGOs play a very important role in countries where media education has already been legally introduced at an earlier stage and in countries where its regulation remains in the process of development. For example, in Austria, which took political measures very early on with the Principles Decree on Media Education of 1973, private initiatives mostly enjoy state support.

The countries have different priorities concerning media literacy in policy documents. These different approaches range from monitoring media-related competencies of the population—as in Sweden, where the Media Council monitors and analyses Swedish citizens’ media competencies, including their media usage patterns—to programs that foster lifelong learning, as in Estonia’s Lifelong Learning Strategy 2020, which prioritizes enhancing digital skills and literacies for the entire population.

Accordingly, an overwhelming number of initiatives targeting digital skills have been launched over the past decade. The Digital Success Program, initiated by Hungary in 2016, aims to develop the digital ecosystem and implement digital education strategies across all education levels. Child protection in the digital realm is also a key aspect. In the Action Plan until 2024 for the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021–2030), one of the goals is the development of digital and media literacy and cyber security skills in the school community, as well as the development of digital skills and creativity. Romania’s Education Ministry issued an order specifying digital competencies required for education professionals. Media literacy also appears in the audio-visual law (Avădani, 2022). As far as programs fostering digital skills are concerned, the EU also plays a vital role with many initiatives, such as the Digital Education Action Plan.¹

Not least because of the COVID-19 pandemic, measures have been taken to counter the spread of fake news and disinformation globally. Exemplarily, Latvia’s Plan for Implementation of the Mass Media Policy Guidelines focuses on promoting media literacy and critical perception of mass media content,

particularly among preschool and elementary school children. Greece adheres to the general definition of media literacy outlined by the European Commission. The revised Audiovisual Media Services Directive includes provisions for citizens' critical skills and knowledge in media literacy ([Psychogiopoulou & Kandyla, 2022](#)).

Media literacy programs in formal or non-formal education

All 14 countries offer both formal and informal media literacy education. In Austria, Croatia, Czechia, Estonia, Germany, Hungary, Greece, Italy, Latvia, Slovakia, and Sweden, media education or media literacy is part of other subjects. In Croatia and Estonia, media literacy is linked to national language learning. In Austria, media literacy programs are an obligatory part of the curricula. Extracurricular activities are offered as part of support programs for students and adults (further education) and available at all levels of education. In Croatia, media literacy programs have so far been provided in formal education program as media culture in the curricula of Croatian language and culture since the 1970s ([Kanižaj, 2019](#)). In Czechia, media literacy is addressed in a policy called Framework Educational Program that mandates all schools (elementary and high schools) to provide media education. In this regard, the non-profit sector plays an important role, especially the project One World at Schools and its media education initiative. In Estonia, media education is included in formal education but it has been reduced to one subject of the Estonian language, where the main topic of the media is approached from the perspective of journalistic genres. In addition, a few projects focus on media education and literacy. In Germany, media education is part of various subjects and is only introduced as a separate subject within the pilot program. International comparisons rank German school students' media skills in the middle tier; meanwhile, the digital infrastructure and amount of teaching in the area are comparably poor ([Eickelmann et al., 2019](#)). Media education in Hungary is incorporated in public education, both as a cross-curricular component and as an optional standalone subject. The promotion of media literacy is evident in the latest National Core Curriculum, as well as in governmental initiatives and strategic educational documents ([Urbán et al., 2022](#)). However, the implementation of this aim often lacks a coordinated strategy and practical execution. This can be attributed, in part, to outdated teaching resources, insufficient numbers of qualified teachers and professionals, and a lack of teacher training programs and educational opportunities ([Pelle & Neag, 2016](#)). Nonetheless, media literacy is integrated into various subjects, such as Hungarian language and literature, history, and social sciences. In Greece, media literacy education is not fully integrated into formal education. It is included in the school curriculum, albeit not as a standalone or compulsory subject. Primary and secondary education curricula include elements of media literacy both as a cross-curricular subject and

embedded within ad hoc school projects under various subjects (EMEDUS, 2014). In Italy, the National Digital School Plan is provided for in the La Buona Scuola law, which contemplates the strategies of media literacy in the country, focused on innovation in the school system and the opportunities for digital education. In Latvia, media competence has been included in the State General Secondary Education Standard and State Basic Education Standard as a mandatory part of the curriculum since 2018. In Slovakia, media education became part of the curriculum for the first time on the basis of school content reform implementation, which began in 2008–2009. Slovakia has media literacy programs implemented in formal education, but they are not widely applied. This phenomenon is mainly due to the lack of qualified and motivated teachers who could teach media education. In Sweden, media literacy is obligatory in the civics curriculum, but there are no media literacy programs *per se*.

In Bulgaria, Poland, and Romania, the implementation of media literacy in formal or informal school education has faced huge challenges. In Bulgaria, no media literacy program has been implemented in education. It has a Coalition for Media Literacy that aims to introduce media education in schools. The Coalition for Media Literacy started to regularly organize ‘Media Literacy Days’. In Poland, media education in schools is not systematically introduced. Subjects related to media literacy are mainly handled by NGOs, including the Foundation for Support of Sustainable Development, which published the Media Competence Handbook as part of the Network for Culture project (Głowacki et al., 2022). In Romania, media education is not a standalone discipline in the curricula. In the Romanian educational system, media literacy competence is not addressed in any educational curriculum. Most efforts in the media literacy field belong to a handful of NGOs who act in a sporadic and uncoordinated manner.

In all countries, we observed some effort to introduce, whether formal or informal, education in the field of media literacy, but the risks remain in the lack of qualified teachers, reduction of media literacy to language education, and weak activity on the part of the state in promoting it as an independent and compulsory subject in the educational system.

Actors and agents of media-related competencies: Risks and opportunities

NGOs and academic researchers are the main actors in promoting media competencies and media literacy in the 14 countries studied. Some countries have made progress in developing a unified state policy on media literacy; institutions generally lag behind the NGO and university sectors. However, state institutions are more actively involved in Slovakia, Hungary, Germany, and Austria. In the other ten countries, NGOs and academics are the main actors in terms of media competencies.

Slovakia aims to develop digital and civic competencies through media literacy initiatives targeting different age groups. It is integrated into lifelong

education and implemented at various educational levels. In Hungary, both formal and non-formal education actors are involved in media literacy. NGOs play a significant role, whereas the formal education sector lacks specialized teachers, adequate textbooks, and development methodologies. Qualified teachers and dedicated resources are needed to improve media literacy in the country. Germany's media literacy efforts cover various age groups and areas, including computer and online competencies, social media, and media production. The Federal Agency for Civic Education maintains a media literacy database, and the Federal Ministry of Education and Research supports research projects combating fake news. Media literacy initiatives also target children, parents, individuals with disabilities, immigrants, and other specific groups (Kreutler & Fengler, 2022). In Austria, the focus of media-related competencies, particularly in adult education, is on digital skills and employability. Institutions such as the Austrian VHS and Wi-Fi offer courses in digital skills. However, there is a lack of emphasis on broader media competencies and the social contexts of media and communication-related skills. Inequality in the distribution of digital problem-solving skills is evident in Austria (Eberwein et al., 2022).

In Bulgaria, NGOs and scientific workers are very active. We observed a particular focus on improving media literacy and access to diverse sources of information for minority groups and disadvantaged individuals. In recent years, there has been greater activity on the part of the institutions, including the Ministry of Education and Science (Raycheva et al., 2022). In Czechia, the Ministry of Education, Youth, and Sports aims to play a major role in enforcing media competencies and literacy. However, weak leadership and support from the Ministry result in NGOs driving media literacy activities and projects. The programs primarily target students in elementary and high schools and pay limited attention to other age or social groups, which may lead to inequitable access to media education.

Poland also has limited state policy on media education, but research institutions and third-sector organizations actively contribute. Various organizations focus on media education, digital support, and prevention programs related to web usage and digital hygiene. The situation in Romania is similar: media education initiatives are primarily driven by NGOs owing to limited state presence. Funding for media literacy projects mostly comes from the EU, the US, or private donors. Programs target high school teachers and students, as well as vulnerable groups and threats to democracy, such as fake news and disinformation.

In Estonia, media competencies and literacy are promoted by researchers, teachers, and various organizations. NGOs, such as the Young People's Media Club and the Estonian Union of Media Educators, enhance practical journalistic skills and raise media literacy among students. The National Library and Estonian Public Broadcasting contribute through educational resources and media competence projects. Media literacy education in Estonia focuses on topics such as fake news and understanding media functioning (Lauk et al., 2022).

In Sweden, the media landscape has evolved significantly, offering increased interaction opportunities but also posing risks, such as a digital divide and information overload. Media literacy, including source criticism, has become increasingly important, particularly within the Swedish school system.

Croatia relies heavily on civil society organizations for the development of media literacy initiatives. These organizations often collaborate with other institutions. Meanwhile, policy development is lacking and institutional support at the national level is weak. In Greece, media literacy initiatives focus on specific target groups, whereas comprehensive information on the reach and coverage of these activities is lacking. Mapping exercises are needed to ensure broader coverage and inclusivity.

In Italy, Suárez-Villegas highlighted the features of journalistic practice in traditional and digital media, with native digital media being more open to public participation. However, challenges in digital media include information verification, sensationalism, and monetization (Piacentini et al., 2022). Lastly, Latvia lacks centralized criteria for media literacy in teacher education programs, but media literacy is integrated into various subjects in basic and secondary education (Rožukalne et al., 2022).

Assessment of media-related competencies among citizens

The evaluation of media competences is carried out through various programs, research projects, and institutions, such as the Programme for International Student Assessment (PISA) (see Figure 7.1), EU Kids online, and Media Literacy Index (MLI) (see Figure 7.2). The 14 countries studied in the project achieved different outcome levels. Among the surveyed countries,

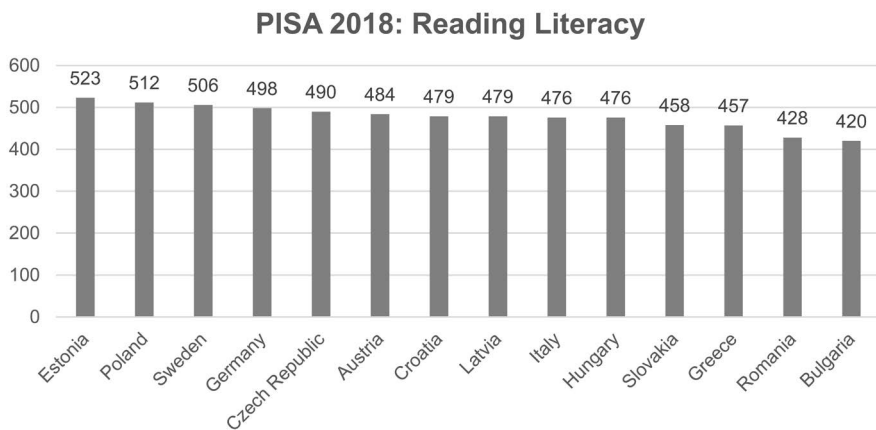


Figure 7.1 Comparison of reading literacy in the investigated countries for the year 2018

Source: Data from OECD (2018). PISA 2018 results. doi: 10.1787/fde77551-en.

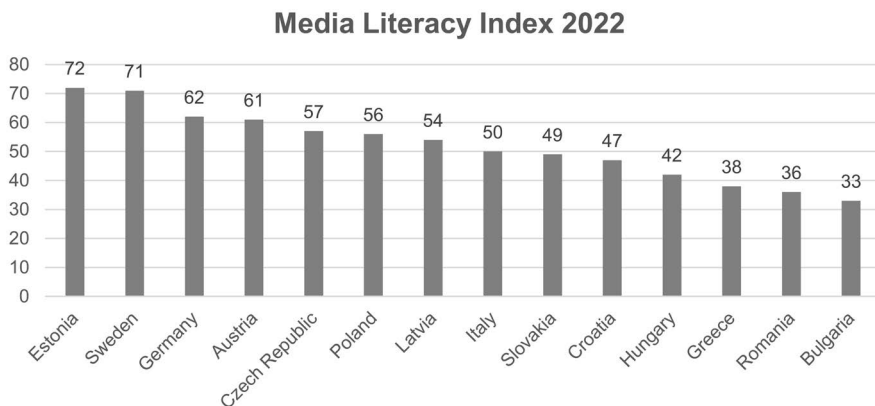


Figure 7.2 Comparison of the Media Literacy Index in the investigated countries for the year 2022

Source: Data from [Open Society Institute Sofia \(2022\)](https://www.osce.org/files/f/documents/0/4/534146.pdf). Media Literacy Index 2022. From <https://www.osce.org/files/f/documents/0/4/534146.pdf>.

Estonia was outstanding. Estonians are among the most media-literate populations (along with Finns, Danes, Swedes, and Irish, who also perform above the average in the EU). According to DESI data (2021), at least 62% of Estonian adults possess basic digital skills.

The annual MLI ([Lessenski, 2021](#)) assesses the potential resilience to the spread of fake news in 35 European countries, using indicators of media freedom, education, and trust between people. In the most recent issue of the MLI from 2022, Estonia, Sweden, Germany, Austria, Czechia, Poland, and Latvia show above-average and average-level scores for media competence. Several measures of cognitive abilities, such as PISA, are also the basis for media literacy measurement. For example, Austria performed at the Organisation for Economic Co-operation and Development average level according to the results of previous PISA studies ([OECD, 2018](#)).

Slovakia, Croatia, Bulgaria, Greece, Hungary, Romania, and Italy show an average or below-average level of media competence. However, in some cases, data on media competence research are also missing. Slovakia ranks 22nd of 27 EU Member States in the 2021 edition of the Digital Economy and Society Index. In Croatia (24th on the MLI 2021), around 50% of the citizens have basic or above-basic digital skills (53% in 2021), which is slightly below the EU average (58% in 2021). Hungary (25th on the MLI 2021) has an average numeracy score of 272 (10 points higher than the OECD average), whereas literacy is scored 264 (vs. the OECD average of 266). According to the 2021 edition of MLI, hosted by the Open Society Institute Sofia, Bulgaria ranks 30th in the ranking of 35 countries. Greece (27th on the MLI 2021), according to the OECD's survey of adult skills, is relatively low in terms of information-processing skills ([OECD, 2015](#)). In the 2018 PISA

study, the mean reading score of Greek students was 457 on the PISA scale, lower than the OECD average of 487.

As for digital skills across the population, levels have improved, although Greece consistently scores below the EU average. Romania stands one rank lower on the MLI 2021. The PISA test results show that Romanian students score below the OECD average in reading, mathematics, and science. In Italy, the level of media literacy is average or low. The case of Italy is peculiar because the country is characterized by digital backwardness owing to the more conspicuous presence of citizens who belong to the group of information have-nots compared with other European countries. As such, Italy is unable to fully exploit the benefits of digitalization (Mingo and Bracciale, 2018).

In the 14 countries studied, media users' competencies have different levels. Estonia clearly comes out as the best, followed by above-average countries, such as Sweden, Germany, and Austria. Countries that are below the average include Slovakia and Italy. Notably, in several countries, including the better-rated ones, media competence is showing a declining trend.

Conclusion

The status of the media-related competencies in the 14 countries differs greatly, in terms of policies, agents, and evaluation. There is no generally accepted definition of media literacy or a shared or prevalent model in the education and evaluation of media-related competences. In general, they overlap with digital competencies. This practice creates a risk for deliberative communication; a focus on technologies can obfuscate the role of media and journalism in a democratic society.

In all countries, media competencies are included in specific strategic documents, with varying levels of detail and coherence. Austria, Czechia, Estonia, Hungary, and Slovakia have specific documents that describe the competencies in detail. In the rest of the countries, such competencies are mentioned in documents of a more general content, not only devoted specifically to media, and are not developed in such detail. Monitoring and promoting media literacy also play a role in certain countries' regulatory frameworks (Romania, Greece) via EU legislation. Notably, media competencies started to be framed in the context of disinformation, stimulated by the COVID-19 pandemic and the war in Ukraine. This poses a new risk, as such a discourse links media competencies to national security rather than deliberative communication and invites defence and law enforcement agents, whose commitment to freedom of expression remains to be seen.

Media literacy is promoted via both formal and informal education. In formal education, it appears rarely as a stand-alone course (Hungary). In Austria, Czechia, Croatia, Germany, Estonia, Italy, Latvia, Slovakia, and Sweden, media education or media literacy is a part of other subjects, including language learning. Bulgaria, Poland, and Romania have a less clear

approach to the integration of media literacy in formal education. All countries have taken notable efforts to introduce, whether formal or informal, education in the field of media literacy, but the risks remain in the lack of qualified teachers, reduction of media literacy to language use, and weak activity on the part of the state in promoting it as an independent and compulsory subject in the educational system.

NGOs and academic researchers are the main actors in promoting media competencies and media literacy in the 14 countries studied. While some countries have made progress in developing a unified state policy on media literacy, institutions generally lag behind the NGO and university sectors. State institutions are more actively involved in Slovakia, Hungary, Germany, and Austria. In the other ten countries, NGOs and academics remain the main actors in terms of media competencies. This raises the risk of inconsistency in efforts, as NGO projects are scattered and donor-dependent and do not secure longitudinal continuity in time or proper geographic coverage. Moreover, such programs are mainly targeted at young people, whereas older adults, who are also informationally and technologically vulnerable, are mainly unattended.

The evaluation of media competencies is carried out through various programs by research groups and institutions at the international level. Estonia has emerged as having the highest level of competencies. Germany, Austria, Latvia, Hungary, and Sweden show above-average and average levels of media competence, whereas Slovakia, the Czech Republic, Croatia, Bulgaria, Greece, Poland, Romania, and Italy show average or below-average levels of media competence. Two worrying aspects are the lack of consistent and comparative data on media-related competencies and the reported decline in media competence.

Attention has to be given to the role of the EU and its important impact on setting standards and mapping the media literacy efforts. EU activities have included offering a media literacy definition, designing a framework of competencies, imposing obligations to the states via directives, creating an enabling environment for multi-agent, cross-country cooperation, and financing research.

Note

- 1 European Commission, Digital Education Action Plan, <https://education.ec.europa.eu/focus-topics/digital-education/action-plan>

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8 Finding the path to deliberative communication

The fuzzy set qualitative comparative analysis approach

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We started this study with the ambition of empirically relating media system domains with deliberative communication. We identified four domains on the basis of previous research and normative expectations on the role that the media should play in enabling and ensuring deliberative communication. These four main media system domains were determined to be the most important in this respect: the legal framework for freedom of expression and of information, media accountability, journalism, and audiences' media usage practices and competencies. We analysed the four domains in [Chapters 3–7](#), and deliberative communication in [Chapter 2](#). These chapters provide the theoretical conceptualizations and substantive country-related information, on which we based the analysis in this chapter. Additionally, our analysis was based on an iterative process of calibration—theoretical conceptualization and measurement, performed in the course of the study.¹

We aimed to answer the following key questions: What media structures and practices contribute to deliberative communication? In terms of the risks and opportunities discourse, what are the media domain conditions that present risks or opportunities for deliberative communication?

We sought to clarify the level of polity for our investigation of deliberative communication and its influencing conditions. Although most of our conditions came from the media system, and given that communication media are increasingly global or trans-national, and at times also sub-national, we focused on the national or country level, or the national media system, which continues to predominantly shape both the structural aspect and practice of media production and consumption ([Flew & Waisbord, 2015](#)). Many empirical studies of deliberative democracy have been conducted not at this macro but at the meso level of regional or local institutions. Thus, in our arguments, we focused on the broad macro level of the country. Given this important issue of the multilevel character of the phenomenon, we included the meso level data in our deliberative communication index but continued to investigate the media system conditions at the level of the country. The amount of data required for any other form of investigation would make this 14-country comparative study entirely too complex.

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We were interested in neither ranking nor classifying countries but rather in elucidating the conditions of the broader context and the chosen media system domains that make a positive or negative contribution to deliberative communication. We expected our findings to show that similar conditions and variables play a role in high or low deliberative communication potential. Moreover, certain variables under some conditions play a positive role and no role under different conditions. These findings have important implications for policy.

Study overview: fuzzy set qualitative comparative analysis as a research approach

We employed the fuzzy set qualitative comparative analysis (QCA) (fsQCA) (Ragin, 2008; Schneider & Wagemann, 2012) using fsQCA software 4.1 (Ragin & Davey, 2023). Although this method has so far been used rarely in communication research, it has been recommended especially in relation to media systems research (Downey, 2020). QCA was used in the analysis of the personalization of political communication (Downey & Stanyer, 2010), construction of typologies of media systems (Büchel et al., 2016), and investigation of the key dimensions of change in media systems across time and space (Peruško et al., 2021).

As the method is not widely known, we briefly introduce its main characteristics and research steps. Next, we describe the outcome condition of deliberative communication and the input contextual and media system conditions. The analysis of the configurations and paths that support the potential for higher or lower deliberative communication is presented next in a stepwise strategy, focusing first on each domain separately, followed by the overall analysis and the conclusion.

In the QCA, influencing conditions (input) are placed in relation with the outcome variables/conditions, and then the necessary and sufficient conditions that are needed for the outcome are uncovered. Both agency and structural variables/conditions can be analysed simultaneously to reveal their part in the configurations. In our study, the input conditions (or independent variables) were the four media system domains and four contextual domains, and the outcome (output or dependent variable) is deliberative communication.

Fuzzy set analysis is based on set theory, in which sets can be crisp or fuzzy. Crisp sets are binary—a case is either in or out of the set. As life is typically fuzzy, phenomena are often better described in relation to the degrees of their membership in the set. In this way, in a fuzzy set, we can have partly free media systems instead of only free or not free ones. The dividing lines are defined in relation to both theoretical conceptualizations and substantive knowledge. In our approach, some conditions were dichotomous (i.e. crisp) and some are fuzzy as well as the overall analysis. Flexibility in the types of values/measures of different conditions or outcomes (i.e. variables) is another quality of the approach.

fsQCA is more than a method of analysis; it is also a research approach, different from the typical linear causal inference of the functionalist approach

(Downey & Stanyer, 2010). Fuzzy set theory enables the handling of vagueness in a systematic fashion and with theoretical fidelity as ‘theories are often expressed in logical or set-wise terms’ (Smithson & Verkuilen, 2006, p. 2). This approach has several advantages for comparative communication analysis. For one, it fills a gap in comparative research, which is commonly set to a small or large N of cases, apt for the analysis of 5–50 cases (Schneider & Wagemann, 2012). For another, it focuses on causal explanations but is based on a logic different from the one used in statistical analysis in quantitative comparative research. Thus, fsQCA can explain causal mechanisms or outliers that cannot be explained by statistical analyses.

The terminology is also different. The ‘variable’ (dependent and independent) is replaced with (causal) *conditions* and *outcomes*. The context in which conditions come into play influences the outcome. Hence, the same causal conditions in a different context create a different outcome. A good example can be seen in the regulatory changes of introducing PBS in Central and Eastern Europe, where one model—German—had been introduced into contexts without the political conditions that enabled the model to work in the original country, leading to failure in the new contexts. *Equifinality* is another characteristic of the fsQCA; the same outcome (e.g. democracy or media freedom) can result from a combination of different conditions in different contexts. Thus, we could theorize on which conditions are risks and opportunities, but they will show how they have interacted and where a certain condition contributes positively only in their concrete contexts of states and media systems, including their negative contributions in some cases. *Asymmetry* is the next characteristic of the fsQCA, where a relation between two conditions does not exclude other relations (also, if positive values contribute to an outcome, opposite values do not necessarily produce the opposite outcome, unlike the symmetric analyses of multiple regression and correlation analyses). Conditions that influence the outcome can be either directly related to it (proximate conditions) or be more distant (remote conditions) (Schneider, 2019). In our study, the media system conditions were treated as proximate and contextual conditions, as remote.

The analysis showed us which conditions are necessary and which are sufficient for the outcome to appear. Necessary conditions are always present with the outcome, but alone they will not guarantee that the outcome will actually appear. Sufficient conditions appear with the outcome in different combinations—paths or configurations. The same outcome can be produced, or present with, different sufficient conditions.

Calibration pertains to the assignment of set membership to cases, with values ranging from 0 (non-membership) to 1 (full membership) (Ragin, 2008). Calibration replaces both measurement and theoretical conceptualization in traditional quantitative research. Transparency in calibration is crucial for replication and validity in fsQCA research (Oana et al., 2021). Our process and the key decisions taken are described below. All calibrated values are presented in Table 8.1. The raw quantitative data and the sources used for calibration, as well as the criteria for calibration, are included in Annex 2.

Table 8.1 fsQCA calibrated values of the outcome and conditions in the study

Domain	Condition	Country													
		AT	BG	HR	CZ	EE	DE	GR	HU	IT	LV	PL	RO	SK	SE
Outcome	<i>delcomm</i>	0.55	0.27	0.26	0.47	0.56	0.75	0.56	0.14	0.36	0.41	0.22	0.20	0.22	0.85
Contextual conditions	<i>gdp</i>	0.69	0.04	0.10	0.36	0.40	0.67	0.15	0.12	0.55	0.17	0.10	0.06	0.17	0.74
	<i>qdem</i>	0.73	0.07	0.05	0.44	0.59	0.87	0.23	0.05	0.56	0.18	0.11	0.03	0.11	0.96
	<i>techdev</i>	0.21	0.26	0.08	0.64	0.51	0.91	0.83	0.45	0.27	0.09	0.03	0.21	0.31	0.82
	<i>postmat</i>	0.61	0.05	0.54	0.23	0.31	0.96	0.39	0.48	0.53	0.25	0.85	0.15	0.14	0.75
Legal domain	<i>defamreg</i>	0	0.7	0.7	0.3	0.7	0	0.3	0.3	0.3	0.3	0.3	1	0.3	0
	<i>defamimp</i>	0.3	0.3	0.7	0.7	1	0.7	0.3	0.7	0.7	0.7	0.7	0.7	0.7	1
	<i>dataprotreg</i>	0.7	0.7	0.3	1	1	1	1	0.3	1	1	1	0.7	1	1
	<i>dataprotimp</i>	0.7	0.7	0.3	0.7	0.7	1	0.7	0	1	0.7	0.7	0	1	1
	<i>foiimp</i>	0.3	1	0.3	0.3	0.3	0.7	0.7	0.3	0.3	0.7	0.3	0.3	0.3	0.7
	<i>sourcprotimp</i>	1	0.3	1	0.7	1	1	1	0	0.3	1	1	0.7	1	1
	<i>transparreg</i>	1	0.7	1	0.3	0.3	1	1	0.3	1	1	0.7	0.7	1	0.3
	<i>transparimp</i>	0.7	0.3	0.7	0.3	0.7	1	0.7	0.3	1	0.7	0.3	0.7	0.3	0.7
	<i>medcouncils</i>	0.7	0.7	0.3	0	0.7	1	0.3	0	0	0	0.3	0	0.7	1
	<i>profec</i>	0.7	0.7	0.7	0.7	0.7	1	0.3	0.3	1	0.3	0.3	0.3	1	1
Accountability domain	<i>orgec</i>	0.3	0.3	0.3	0.3	0.7	0.7	0	0.3	1	0.7	0.3	0.3	0.7	1
	<i>profmetadisc</i>	0.7	0.7	0.7	0.3	0.3	1	0.3	0.3	0.7	0.3	0	0.3	0.7	1
	<i>medombud</i>	0.7	0.7	0.3	0.7	0.7	0.7	0	0.3	0	0.3	0	0	0	1
	<i>publicdisc</i>	0.7	0.3	0.3	0.3	0.3	0.7	0	0.3	0.7	0	0.3	0.3	0.7	0.7

(Continued)

Table 8.1 (Continued)

Domain	Condition	Country													
		AT	BG	HR	CZ	EE	DE	GR	HU	IT	LV	PL	RO	SK	SE
Journalism domain	<i>marketstr</i>	0.96	0.11	0.08	0.24	0.12	0.78	0.08	0.11	0.21	0.06	0.09	0.04	0.16	0.90
	<i>marketcon</i>	0.97	0.97	0.98	1	0.42	1	0.49	0.26	0.98	0.32	1	0.7	0.75	1
	<i>psmautonomy</i>	0.81	0.43	0.16	0.88	0.96	0.93	0.24	0.04	0.16	0.84	0.06	0.32	0.74	0.95
	<i>journfull</i>	0.46	0.74	0.57	0.80	0.96	0.41	0.87	0.19	0.21	0.85	0.501	0.86	0.06	0.41
	<i>journmonit</i>	0.52	0.64	0.96	0.17	0.48	0.16	0.75	0.21	0.26	0.499	0.84	0.35	0.17	0.88
	<i>journedu</i>	0.05	0.72	0.12	0.14	0.53	0.10	0.10	0.07	0.16	0.54	0.63	0.31	0.74	0.29
	<i>journskill</i>	0.56	0.10	0.09	0.45	0.74	0.79	0.14	0.04	0.15	0.65	0.17	0.08	0.26	0.90
Media usage domain	<i>legmeduse</i>	0.81	0.06	0.49	0.37	0.58	0.93	0.15	0.15	0.41	0.21	0.31	0.04	0.35	0.91
	<i>digmeduse</i>	0.16	0.10	0.22	0.69	0.83	0.05	0.42	0.30	0.05	0.84	0.06	0.15	0.30	0.87
	<i>legmedtrust</i>	0.65	0.08	0.10	0.51	0.83	0.51	0.05	0.08	0.31	0.57	0.19	0.20	0.30	0.93
	<i>socmedtrust</i>	0.72	0.86	0.70	0.49	0.77	0.16	0.95	0.86	0.76	0.60	0.95	0.67	0.52	0.14
	<i>meddiglit</i>	0.66	0.11	0.61	0.54	0.70	0.48	0.40	0.35	0.37	0.49	0.45	0.12	0.38	0.78

Note: Countries are presented with country abbreviations: AT, Austria; BG, Bulgaria; HR, Croatia; CZ, Czechia; EE, Estonia; DE, Germany; GR, Greece; HU, Hungary; IT, Italy; LV, Latvia; PL, Poland; RO, Romania; SK, Slovakia; SE, Sweden

Paths to deliberative communication: a stepwise analytical strategy

Our main research questions could be restated as follows: What conditions increase or decrease the chance of deliberative communication? Under which conditions and combinations of contexts and conditions is deliberative communication likely to occur?

In the first step, we analysed the role of the context for deliberative communication or identified remote factors that explain the outcome. As noted by [Schneider \(2019, p. 1111\)](#), ‘remote factors originate farther back in time and are often located farther away in space. Mostly because of this, remote factors tend to be stable, cannot be subjected to purposeful changes and are, instead, given to actors. This is why remote factors are often also referred to as the context within which processes unfold and actors act’. Moreover, the two-step fsQCA is advised for the analysis of the role of remote (or contextual) and proximate conditions in explaining the outcome ([Schneider, 2019](#)). The two-step fsQCA can also limit the number of conditions in the analysis (e.g. in an analysis of media systems, see [Büchel et al., 2016](#)).

In the second step, we zoomed in on the contribution of conditions of each of the domains to the outcome, therefore exploring the important recipes for deliberative communication from the legal, accountability, journalism, and media usage and competencies domains. We sought both necessary and sufficient conditions from all the domains. We began the analysis by exploring the necessary conditions, with the inclusion of those with a consistency threshold of at least 0.9 ([Schneider & Wagemann, 2012, p. 143](#)). For the analysis of sufficient conditions, we used the 0.8 threshold of consistency for minimizing the truth table (as the minimum 0.75 was advised by [Ragin, 2008](#)) and 0.7 for the proportional reduction in inconsistency (PRI) score ([Pappas & Woodside, 2021](#)). Solution paths below these levels were not presented in the final solutions. Cases belonging to low-consistency paths did not appear in a final solution.

In the presentation of sufficient conditions, we discussed the intermediate and parsimonious solutions, but following [Ragin \(2008\)](#), we put more emphasis on the interpretation of intermediate solutions. [Ragin \(2008, p. 175\)](#) explained that intermediate solutions are preferred because they ‘are the most interpretable’ and ‘strike a balance between parsimony and complexity, based on a substantive and theoretical knowledge of the researcher’, which includes the remote (contextual) and proximate (media domain) conditions for the explanation of the outcome.

Deliberative communication as the outcome condition

The outcome condition is defined by a deliberative communication index (*delcomm*), which includes macro-/meso- and micro level indicators. The macro dimension refers to the level where collective decision-making occurs, whereas the micro dimension refers to spontaneous deliberation

among citizens. The meso level is also discussed in the theoretical framework and is operationalized by the indicator of engaged society, which refers to the extent of public deliberations on policy issues at non-elite levels (Coppedge et al., 2021, p. 161). The macro/meso dimension is operationalized by the V-Dem deliberative component index (*v2xdl_delib*). At the micro level, deliberative communication is operationalized using indicators of contributors to the quality of discussion: citizen discussion, citizen knowledge (perceived knowledge about environmental issues and politics and knowledge about the EU), level of polarization of society, and level of interpersonal trust. The media have a crucial role in exposing audiences to knowledge and arguments that may help them form opinions and encourage participation (Curran et al., 2009; Van der Wurff et al., 2016; Wessler, 2008). The existence of these conditions is expected to increase the potential for deliberative communication. Chapter 2 contains the details on the conceptualization, operationalization, and calibration of deliberative communication.

Step 1: Contextual conditions

Because the media, media systems, and media use do not happen in a vacuum, but in the states and their societies, analyses must account for the societal context in which our four media system domains exist/manifest. We studied the relation between different remote contextual conditions, the four media system domains, and the outcome of deliberative communication. The analysis aimed to show the contextual dimensions figuring in favourable outcomes, indicating high potential for deliberative communication, and in unfavourable outcomes, indicating low potential for deliberative communication.

The broader context of states in which democracies develop is multifaceted, and the influences are never monocausal. Being mindful of the need for parsimony, we focused on choosing those contextual factors that exert important external influences on the media or democracy. We treated these influences of context as external, or remote, to the analysed outcome of deliberative communication. The four media system domains are closely related, proximate influences.

We also noted a common thread between the contextual variables—they all describe certain key aspects of contemporary societies in high modernity, namely, economic and democratic development, technological development, and cultural values.

Democracy

The relation between the media and democracy is a coin with two faces, where each influences the other. The influence of the media on democracy has always been assumed, in terms of either the latter's expected destruction (the Frankfurt School) or the former's positive (or not) role in the

construction of the public sphere (Chadwick, 2017; Habermas, 1984, 2022). In journalism, communication, and political science literature, the relation between the media and democracy has been normatively described, where the political context is seen to influence the media system (Siebert et al., 1956). Different types of (normative) media roles are linked to various types of democracies (Held, 2006; Strömbäck, 2005). Moreover, the types of relations between roles of the news media and the political realm have been differentiated (Christians et al., 2009). Further analysis of the types of democratic politics has elucidated the characteristics of media systems in the seminal model of Hallin and Mancini (2004). As Curran (2011, p. 1) pointed out, these have been the ‘most intensively ploughed areas in media studies’, although most research has focused on individual countries. In media system studies, the shape of democracy has always been understood as an influencing factor for the shape of the media systems (Hallin & Mancini, 2004; Siebert et al., 1956). International quantitative large-scale analyses have also shown the positive relation of news consumption and democracy in increased support for democratic values in cosmopolitan societies (Norris & Inglehart, 2009).

Compared with other models of democracy, deliberative democracy is harder to achieve. The model is expected to improve the quality of democratic systems with procedures for learning and weighting arguments that would ideally result in informed decision-making (Held, 2006). It can also be understood as an ‘aspirational’ model that can serve as a standard for improving political processes (Bächtiger et al., 2018, p. 3). Deliberative communication and deliberative democracy are seen to comprise a more advanced type of democracy to which societies should aspire. As actual democracy, Dahl’s (1971, p. 1) definition gives the main characteristic of democracy as ‘the continued responsiveness of the government to the preferences of the citizens’. We aimed to demonstrate how deliberative democracy relates to the existing quality of liberal democracy that is expected to be improved by it. Thus, the quality of democracy is an obvious choice for the first contextual condition.

Economy

Economic development, or the transformation of traditional forms of a feudal economy into a market-based one, forms an important part of modernization—the historical process of societal change that is also the context in which communication media developed in European societies. Previous economic transformation facilitated media development in early modern Europe; the strength of the economy in terms of its productive capacity (GDP) is expected to also influence the possibility of the media to develop. Boix and Stokes (2003, p. 545) showed that ‘economic development predicts both transitions to democracy and stability of democratic regimes’. The relation between (economic) development and the communication

media (television and radio) was established empirically by [Schramm \(1964\)](#): lower development is related to a lack of all kinds of aspects of production and dissemination of information ([LaPalombara, 1965](#)). In an extensive global survey, Schramm found a high correlation between economic development and the volume of mass media communication in terms of received news (and for a country being in the news of other countries) and in terms of the technical and organizational means to produce and spread news ([Schramm, 1964](#)). Some 40 years later, [Norris and Zinnbauer \(2002\)](#) showed that higher access to media correlates with higher human development, including higher per capita income. Economic prosperity has thus been demonstrated to play a role in access to media and media affordances, and it can also be assumed to play a role in the specific type of democracy that we investigate.

Technology

Historically, technological development goes hand in hand with economic development. European modernization has also included the transformation of the means of production of goods, as well as new technologies of transport and communication. Technology has been at the forefront of the industrial as well as post-industrial and information revolutions involving automation, information technologies, and networks ([Bell, 1974](#); [Castells, 1996](#); [Touraine, 1971](#)). The recent platform society ([Van Dijck et al., 2018](#)) brings with it the new data economy ([Couldry & Mejias, 2019](#)), demonstrating economic change that is driven by technology and technological innovation enabled by the responding economy. The interface of science, technology, and economy is also recognized by international organizations, including the UN Sustainable Development Agenda, the OECD Science, technology and innovation policy, and the EU's Digital Europe Programme. Strands of communication research have focused on media technology as the driver of social change ([Innis, 1951](#); [McLuhan, 1964](#)); the latest focus in mediatization theory is on the changes in the interface of media technology and communication, in which the media have to transform themselves ([Finnemann, 2011](#)).

Cultural values

Socioeconomic modernization is linked to the change in cultural values, especially in terms of the increase in postmaterialist values in populations. Inglehart's theory of modernization ([Inglehart, 1995](#); [Inglehart & Welzel, 2005](#)) as value change proposes that the break from traditional to modern to highly modern society includes a change in values relating to self-actualization vis-à-vis survival.

In a meta-analysis of cultivation effects in social media, [Hermann et al. \(2023\)](#) reported that heavier users of social media are inclined to be more

materialistic. This media effect has not been reviewed in relation to the value modernization or socialization hypothesis, but the effects of media usage as socialization agents can be presumed to play a role in value adjustment. We noted lower levels of postmaterialism in the Eastern European countries in which the use of social media for news is higher compared with Western European countries. However, we could not confirm whether this is a consequence of lower economic development (and higher economic insecurity, theorized to generate survival values) or is related to the rising materialism induced by social media use.

Calibrations

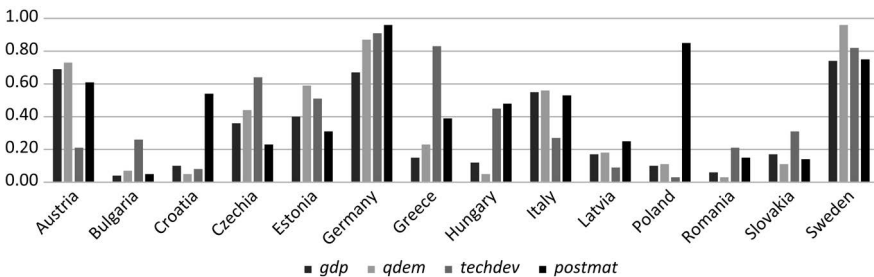
Qdem: A set of countries with *highly consolidated liberal democracy* is calibrated based on the Economist Intelligence Unit Democracy Index which assess the quality of democracy. The 95th percentile is used for the inclusion in the set, the 5th percentile for the exclusion in from the set, and the 50th percentile as a crossover point.² This method is used for all the following statistical calibrations.

Gdp: A set of countries with *high economic development* is operationalized with the World Bank

GDP per capita data expressed in 1,000 US dollars. The GDP distribution in the EU is used in the statistical calibration.

Techdev: A set of countries with *high technological development* is operationalized with the World Bank data on fixed broadband subscription per 100 inhabitants.

Postmat: A set of countries with citizens featuring high levels of *postmaterialism values* is operationalized with the postmaterialism index from the European Values Study. The percentiles from the distribution of the index in the EU were used as thresholds for the calibration process.



Graph 8.1 Calibrated values for the contextual conditions

An updated framework for two-step fsQCA (Schneider, 2019) has suggested that in the first step, only remote conditions are analysed in terms of necessity. The consistency threshold is advised to be extremely high (even higher than usually advised, see Schneider, 2019). As Ragin (2008) advised, the necessity consistency should be at least 0.9. Furthermore, Schneider (2019) recommended including those conditions with at least 0.6 coverage.

In the analysis of remote (contextual) conditions, we identified no necessary conditions for deliberative communication (see Table 8.2). However, lack of economic development and weak quality of democracy tended to induce lower deliberative communication. Thus, deliberative communication does not necessarily develop in the context of higher economic or democratic development. For instance, Italy is an economically and democratically developed country but it has a lower level of deliberative communication. However, a lack of either economic or democratic development impedes the development of deliberative communication. This result shows the difference from the correlational relation, which supposes a linear relation between economic development and quality of democracy, and makes it difficult to explain cases that do not fit the linear trajectory.

Therefore, we included economic development and quality of democracy as remote conditions in the final analysis. We created a macrocondition based on the *logical or* (Ragin, 2008, p. 37) operation of joining these two conditions, referring to either high economic or democratic development (*gdpdem*).

Table 8.2 Analysis of necessary contextual conditions

Condition	Outcome			
	<i>delcomm</i>		<i>~delcomm</i>	
	Consistency	Coverage	Consistency	Coverage
<i>gdp</i>	0.69	0.92	0.38	0.71
<i>~gdp</i>	0.79	0.47	0.96	0.81
<i>qdem</i>	0.75	0.87	0.28	0.51
<i>~qdem</i>	0.68	0.44	1	1
<i>techdev</i>	0.79	0.82	0.45	0.66
<i>~techdev</i>	0.67	0.47	0.88	0.86
<i>postmat</i>	0.78	0.73	0.74	0.55
<i>~postmat</i>	0.57	0.75	0.79	0.83

Step 2: Legal framework conditions

We calibrated the conditions in the legal and accountability domains by applying the indirect method, to account for the various secondary sources,

literature, and case studies. The indirect method ‘relies on the researcher’s broad groupings of cases according to their degree of membership in the target set’ (Ragin, 2008, p. 94). Thus, we included a detailed description of the calibration process and the decisions made. The analysis of the legal framework for freedom of expression and of information is included in [Chapter 3](#), which can provide more context. The following sets were loosely based on the theoretical conceptualizations in [Chapter 3](#). They were operationalized in a separate and parallel process with a view to enable the fsQCA analysis.

Calibrations

Defamation regulation that supports freedom of expression (defamreg). The decision of assigning membership to the set was based on whether defamation was included in the penal code (as an envisaged risk for freedom of expression), the severity of possible punishment (prison as a more severe risk for freedom of expression), and the inequality of protection (where special categories of citizens—politicians, heads of state, and/or other high officials, domestic or foreign—are more protected against alleged defamation than others, which is considered a higher risk for freedom of expression). Countries in which regulation of defamation supports freedom of expression were calibrated as (1) fully in the set. Those countries that have repealed the possibility of a prison sentence, while still retaining defamation in the penal code, were calibrated as (0.7) more in than out of the set. All the countries that criminalized defamation (i.e. defamation as the offence in the penal/criminal code, including a possible prison sentence) were calibrated as (0.3) more out than in the set, and those countries with

additional special protection, as (0) fully out of the set.

Implementation of defamation regulation that supports freedom of expression (defamimp). We sought to identify the main deciding point in evaluating how defamation-related legislature is implemented in protecting freedom of expression. In some countries, the quality of judicial protection in court results is problematic, whereas in others, the number of defamation regulation misuses by politicians is seen to negatively influence freedom of expression, even if they ultimately do not succeed in court. If defamation cases are often overturned, then the country shows a risk in domestic adjudication—this places the country out of the set. This set primarily refers to the legal framework. As such, we gave more coding weight to how the courts operate in defamation cases than to the misuse of the legislation for pressuring journalists and the media (including strategic lawsuits against public participation (SLAPP) cases, which are not fully understood and only recently studied in the EU). The length of judicial processes in general is a contextual element reflected in all

legal proceedings (i.e. not media specific) and therefore should not be calibrated. Countries in which courts impose prison sentences and very high fines, or whose decisions are overturned by the European Court of Human Rights (ECHR), were calibrated as (0.3) more out than in the set or as (0) fully out of the set, depending on the severity of the situation.

Data protection regulation that supports freedom of expression (dataprotreg). To base the evaluation on firmer footing, we calibrated all countries without journalistic exemptions to General Data Protection Regulation (GDPR) as (0.3) more out than in the set. Examples of GDPR implemented without journalistic exemption are Croatia and Hungary (Mediadelcom national teams; see also Rucz, 2022). Countries with journalistic exemption were calibrated as (1) fully in or (0.7) more in than out of the set, depending on the extension of the exemption. In the case of Austria, the calibration is 0.7 because the exemption exists for media organizations but not for journalists, academics, and NGOs.

Implementation of data protection that supports freedom of expression (dataprotimp). As GDPR is a very new law, many countries do not have case law. Moreover, discussions about its implementation have been limited. We thus calibrated implementation as (1) fully in the set, based on the assumption that any problem with the implementation of data

protection in terms of the curtailment of journalistic freedom of expression would be known in the press or courts, if not yet in academic writings. In some countries, to the contrary, there are existing court cases that have shown the use of GDPR as an instrument against press freedom. In our study, examples of such countries are Hungary and Romania, where courts and data protection authorities have directly negatively influenced press freedom by use of the GDPR (on the Hungarian case, see Polyák et al., 2022; Rucz, 2022).

Freedom of information implementation (foiimp) was calibrated on the basis of the effectiveness of the implementation of the regulation. The existence of regulation did not show variability among our cases and was not used in this analysis.

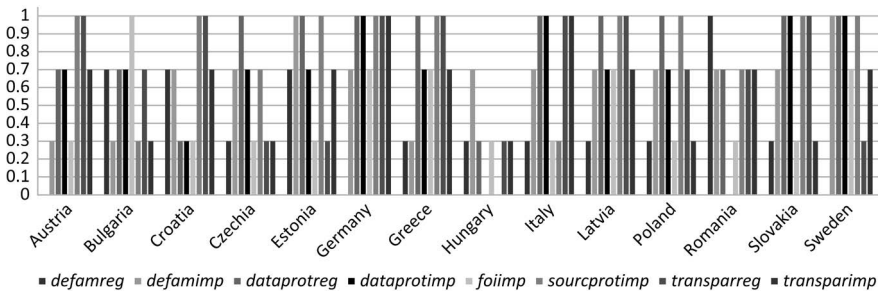
Protection of journalism sources implementation (sourcprotimp) was calibrated on the basis of the effectiveness of the implementation of the regulation. The existence of regulation did not show variability among our cases and was not used in this analysis.

Transparency of media ownership regulation (transparreg) was calibrated as (1) fully in the set for those cases where specific media ownership transparency laws exist for all the media, as (0.7) more in than out of the set for those cases in which transparency of ownership is specified only for some media categories (i.e. broadcasting as in the case of Bulgaria, Poland,

and Romania), and as (0.3) more out than in the set for those that have general business or company registers that require all companies, including the media, to be included and to disclose ownership structure (e.g. Czechia, Estonia, Hungary, and Sweden). Those countries without any legislature

on ownership transparency were calibrated as (0) fully out of the set. Notably, our sample did not have countries belonging in such a set.

Transparency of media ownership implementation (transparimp) was calibrated on the basis of the effectiveness of the implementation of the regulation.



¹ Since they were calibrated as 0, for some countries certain conditions from the Legal domain are not represented in the chart.

Graph 8.2 Calibrated values for the conditions in the Legal domain³

For the analysis of the ways in which conditions from the legal framework form paths that explain deliberative communication, we posed two research questions:

- RQ1: Which legal framework conditions or combination of legal conditions contribute to higher deliberative communication?
- RQ2: Which legal framework conditions or combination of legal conditions contribute to lower deliberative communication?

The analysis of necessary conditions revealed that the implementation of different legal provisions is more important for the deliberative communication system than the legal provisions themselves. As all the cases in the analysis are members of the EU, the transposition of EU regulation and directives in the national legal framework is an obligation with which all countries comply. The same is true with the regulation of freedom of expression. The implementation of defamation regulation, data protection, journalistic source protection, and ownership transparency regulation is

necessary for the systems of deliberative communication. Meanwhile, the lack of defamation regulation that is intended to protect freedom of expression is beneficial for deliberative communication. Older democracies and EU members (Austria and Sweden) have more restrictive regulations (especially defamation), but in practice, they are not misused against freedom of expression. Moreover, this type of regulation seems to be ‘the weakest link’ in the array of regulation that protects freedom of speech. In our analysis, ten cases fall out of the set of countries that protect freedom of expression with such regulation. When we further analysed the necessary conditions for systems with weak deliberative communication, we found no necessary conditions from the legal domain.

In the analysis of sufficiency (see Table 8.3), only one path (L1) was beneficial for the deliberative communication system from the legal conditions. The case of Sweden reported the implementation of defamation regulation, data regulation, freedom of information, journalist source protection, and transparency of media ownership.

Four paths lead to systems of low deliberative communication. Path L2 pertains to the lack of data protection and freedom of information regulation implementation (in Croatia, Hungary, and Romania). Path L3 pertains to the lack of regulation implementation regarding defamation, protection of journalistic sources, and transparency of media ownership (in Bulgaria). Path L4 indicates the lack of regulation implementation regarding defamation, freedom of information, and protection of journalistic sources (in Hungary and Italy). Finally, path L5 is characterized by the lack of regulation implementation regarding defamation, freedom of information, and transparency of ownership, bringing deliberative communication to a lower level in Poland and Slovakia.

Table 8.3 Legal conditions contributing to deliberative communication (intermediate solution)

Solutions	Conditions									Outcome					
	<i>defamreg</i>	<i>defamimp</i>	<i>dataprotreg</i>	<i>dataprotimp</i>	<i>foiimp</i>	<i>sourceprotimp</i>	<i>transparreg</i>	<i>transparimp</i>	<i>delcomm</i>	Cases	Raw coverage	Unique coverage	Consist.	Solution coverage	Solution consistency
L1	•	•	•	•	•	•	•	•	•	SE	0.31	0.31	0.94	0.31	0.94
L2				•	•				•	HR, HU, RO	0.48	0.10	1		
L3		•				•			•	BG	0.20	0.09	1	0.79	0.97
L4	•				•	•			•	HU, IT	0.20	0.08	0.96		
L5	•				•		•	•	•	PL, SK	0.45	0.15	0.96		

Note: Black circles indicate the presence of a condition; grey circles indicate the absence of a condition. Cases are presented with country abbreviations: BG, Bulgaria; HR, Croatia; HU, Hungary; IT, Italy; PL, Poland; RO, Romania; SK, Slovakia; SE, Sweden.

Step 3: Media accountability conditions

The relevant conditions defined from the media accountability domain referred to frames of media accountability (described in [Chapter 4](#)). Again, while the theoretical underpinnings of [Chapter 4](#) make the basis for the following sets, they are constructed according to the fsQCA method.

Calibrations

We defined *highly developed press or media councils (medcouncils)* as those established as voluntary institutions of self-regulation, not by law. Cases were calibrated as (1) fully in the set if the country has a council composed of different groups and is very effective, as (0.7) more in than out of the set if the country has a council with a smaller impact, as (0.3) more out than in the set if the country has minor initiatives or ethics councils in journalism organizations, and as (0) fully out of the set if the country has no press or media councils. For example, Germany and Sweden have a well-established press council with a long tradition and strong impact; they were coded as 1. Austria has a smaller media council responsible for the press and online, but not broadcast, media; it was coded as 0.7. Bulgaria has a voluntary institution for self-regulation, but for a long period, competing ethical commissions existed with some instability in their functioning; the country was also coded as 0.7. Croatia does not have a media council, only a small ethical council in the journalism association; it was coded as 0.3. The media councils in Hungary and Italy are statutory; they were coded as 0.

For those with *highly developed professional codes of ethics (profec)*, cases were regarded as (1) fully in the set if the country has this institution and its impact on journalistic practice is very strong, as (0.7) more in than out of the set if the country has this institution and its impact on journalistic practice is moderate, as (0.3) more out than in the set if the country has this institution and its impact on journalistic practice is weak or non-existent, and as (0) fully out of the set if the country does not have this institution. The following make the institution wield a weaker impact: if a code is in place but not actively developed further and disregards notable ethical problems (e.g. the lack of institutions or interest to implement); if there are competing codes and journalists are unsure which code to apply; if there is strong political or economic influence on drafting or developing the code; if a code exists but is never used or referred to in discourse on journalistic conduct, or referred to as unsuitable, widely ignored; or if there is a negative outlook/trend (e.g. risk of capture by political or economic interest). None of countries lacked professional codes of ethics. Few countries have the institution but with weak or non-existent impact on journalism (Greece, Hungary, Latvia, Poland,

and Romania). In Romania, for example, several codes exist, but they are rarely used, regarded as unsuitable, or ignored by the profession. In Greece, the professional code does not apply to all journalists (only to unionized journalists, and does not include publishers) and has repeatedly failed to react to breaches of code (Psychogio-poulou & Kandyla, 2022, p. 254). Austria was coded as 0.7, as it has a longer established code of conduct, but it only applies to print journalists. Czechia has a code of ethics by a journalist union, but its effectiveness is evaluated as weak. Germany, Italy, Slovakia, and Sweden were coded as 1. In Italy, the code of ethics is evaluated as being well articulated and binding for all the members of the Association of Journalists (Piacentini et al., 2022, p. 343).

For countries with *highly developed organizational codes of ethics (orgec)*, cases were regarded as (1) fully in the set if all or almost all media companies have this institution, as (0.7) more in than out of the set if most of the media companies have this institution, as (0.3) more out than in the set if some media companies have this institution, but as an exception, and as (0) fully out of the set if no or almost no media companies have this institution. Among the cases in the analysis, eight fell out of this set. Greece was coded as 0—leading private media have not established such codes of conduct (Psychogio-poulou & Kandyla, 2022, p. 254). In Hungary, only a few media outlets have organizational codes of

ethics (Polyák et al., 2022, p. 296). In Slovakia, coded as 0.7, many media companies have their codes of ethics (Školkay, 2018). In Estonia, many journalists adhere to the internal guidelines of their media organizations (Loit et al., 2018, p. 69). In Sweden, coded as 1, codes of ethics are well-established and widely referred to in newsrooms (Berglez et al., 2022, p. 525).

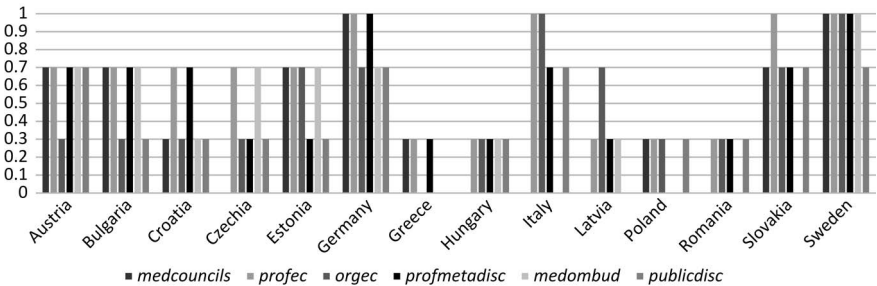
We defined *highly developed professional meta-discourse on journalism conduct (profmetadisc)* as the existence of measures from within the journalistic profession and media companies to foster accountability and transparency, be it through traditional (e.g. trade journals, journalism awards, media journalism, active discourse in associations/trade unions, media accountability as a topic for journalism training) or online instruments (e.g. editorial blogs, streaming editorial meetings). A country was (1) fully in the set if it had both lively discourse within (large parts of) the profession and widespread attempts to safeguard transparency and explain editorial decisions to the audience. A country was (0.7) more in than out of the set if transparency measures and professional meta-discourse exist but a considerable part of the profession and media outlets do not execute such measures. A country was (0.3) more out than in the set if such activities are the exception or only conducted pro forma, without an actual impact on journalistic work. When a country has neither a visible meta-discourse nor transparency measures—when

the media in a country are a ‘closed shop’, not reflecting or explaining their work—then the country was (0) fully out of the set.

We conceptualized *highly developed institutions of media ombudspersons (medombud)* based on the presence of media ombudspersons with an impact on journalistic practice, regardless if they are installed by the profession (for all media or large parts of the market), single media houses (only for their outlets), or prescribed by law. A country was (1) fully in the set if it has an ombudsperson for all or many media (e.g. all print media, all private media) or if most media companies have installed ombudspersons for their outlets. A country was (0.7) more in than out of the set if some ombudspersons exist but only in few media companies or for a small share of the market. A country was (0.3) more out than in the set if the media landscape has no purely media-focused ombudspersons, only ombudsperson positions with a partial mandate for media issues (e.g. human rights ombudspersons), or a

visible process towards installing a media-focused ombudsperson. A country was (0) fully out of the set if ombudspersons do not play any role in media accountability.

We operationalized *highly developed public discourse and media criticism (publicdisc)* based on the existence of measures from outside of the journalistic profession and media companies to critically discuss and evaluate journalistic conduct and media output, both through traditional (e.g. audience associations, media observatories, media-critical NGOs, and media research) and digital instruments (e.g. media blogs by citizens, researchers, and social media discourse). A country was (1) fully in the set if such instruments/activities are well-established; (0.7) more in than out of the set if some instruments/activities exist, but their longevity and impact is dubious; and (0.3) more out than in the set if only traces of these instruments/activities exist or discourse only appears ad-hoc and then disappears. A country without such instruments/activities was (0) fully out of the set.



¹ Since they were calibrated as 0, for some countries certain conditions from the Accountability domain are not represented in the chart.

Graph 8.3 Calibrated values for the conditions in the accountability domain⁴

To explore which conditions from the media accountability dimension form paths that explain deliberative communication, we posed two research questions:

- RQ3: Which accountability system conditions or combination of conditions contribute to higher deliberative communication?
- RQ4: Which accountability system conditions or combination of conditions contribute to lower deliberative communication?

The analysis of necessary conditions showed that professional codes of ethics are a necessary condition for deliberative communication and that there are no necessary conditions contributing to the lack of deliberative communication. The analysis of sufficient conditions (see Table 8.4) identified four solution paths, one contributing to deliberative communication, and the other three to the lack of it. In the first path (A1), all highly developed institutions of media accountability contribute to deliberative communication (in Germany and Sweden).

In the second path (A2), the weakly developed institution of media ombudspersons contributes to the lack of deliberative communication, noted in Croatia, Hungary, Italy, Latvia, Poland, Romania, and Slovakia. The third path (A3) is the combination of developed press or media councils, weakly developed organizational codes of ethics, and weakly developed public discourse and media criticism, as observed in Bulgaria. In the final path (A4), weakly developed organizational codes of ethics and public discourse about media, in combination with developed professional meta-discourse, contribute to the lack of deliberative communication, as seen in Bulgaria and Croatia.

Table 8.4 Accountability conditions contributing to deliberative communication (intermediate solution)

Solutions	Conditions						Outcome						
	medcouncils	profec	orgec	profmetadisc	medombud	publicdisc	delcomm	Cases ^f	Raw coverage	Unique coverage	Consistency	Solution coverage	Solution consistency
A1	•	•	•	•	•	•	•	DE, SE	0.43	0.43	0.97	0.43	0.97
A2					•		•	HR, GR, HU, IT, LV, PL, RO, SK	0.84	0.36	0.80		
A3	•		•			•	•	BG	0.34	0	0.98		
A4			•	•		•	•	BG, HR	0.50	0	0.99		

Note: Black circles indicate the presence of a condition; grey circles indicate the absence of a condition. Cases are presented with country abbreviations: BG, Bulgaria; HR, Croatia; DE, Germany; GR, Greece; HU, Hungary; IT, Italy; LV, Latvia; PL, Poland; RO, Romania; SK, Slovakia; SE, Sweden.

Step 4: Conditions for journalism structures and practices

The journalism and media audiences domains were calibrated based on quantitative aggregate data. Detailed descriptions of data sources for the journalism domain are available in [Table 8.5](#) in [Annex 1](#), and raw data are available in [Annex 2](#). The same relations of the sets exist with [Chapter 5](#)—while it provides the theoretical basis for the following analysis, the sets diverge in accordance with the needs of the fsQCA and availability of international comparative data.

Calibrations

We operationalized *strong market structure for journalism (marketstr)* using variables referring to the revenue of the audiovisual media outlets per capita, number of employees in publishing activities and information services per capita, and advertising expenditures for newspapers, magazines, and the internet per capita. The original values were standardized as z-scores. The z-score of the number of employees in publishing activities and information services was weighted by dividing it by 10 (publishing and information services do not include only the media sector). Next, we calculated the sum of the z-scores. We used the percentiles to calibrate the values for the fsQCA.

We operationalized *high TV market concentration (marketcon)* using the television market concentration of the four largest companies in the industry. To calibrate the values, we took external information to define thresholds of inclusion, a crossover point, and exclusion from the set. According to [Trappel and Meier \(2022, p. 153\)](#), ‘CR4 indicates the concentration ratio of the four largest companies in the industry, with 0–40% representing

low concentration, 40–70% representing medium concentration, and anything above 70% representing high concentration’. Therefore, we used 70% as a threshold of inclusion in the set, 40% for the exclusion from the set, and 55% (in the middle of the 40–70% range) as the crossover point.

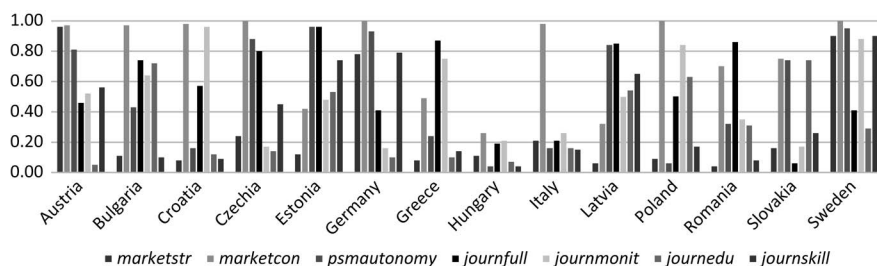
We operationalized *high autonomy of PSM (psmautonomy)* with two variables: freedom of public television from political interference and public trust. The average of these two measures was calculated and the percentiles were then used to calibrate the values for the fsQCA.

Regarding *high share of full-time journalists (journfull)*, we referred to the share of journalists working full-time. According to [Hanitzsch et al. \(2019\)](#), the highest shares of freelance journalists can be found in Western Europe.

Strong monitoring role of journalists (journmonit) was operationalized using the average agreement of journalists with a monitoring role as explained by [Hanitzsch et al. \(2019\)](#). The threshold for the calibration was determined using the percentile method. Regarding *high share of journalists with a university*

education (journedu), we used the share of journalists with a university degree and university degree in journalism. We calculated the average values, which were then calibrated based on the percentiles. As explained by Hanitzsch et al. (2019, p. 93), in some countries, the university education of journalists is not perceived as required, and the field honours a stronger tradition of non-academic traineeships and courses (e.g. Austria, Germany, and Sweden).

We operationalized *high journalistic skills (journskill)* using the evaluation by experts in the European Media Systems Survey if journalists ‘have sufficient training to ensure that basic professional norms like accuracy, relevance, completeness, balance, timeliness, double-checking and source confidentiality are respected in news-making practices’ (Popescu et al., 2017). Percentiles were used to calibrate the values for the fsQCA.



Graph 8.4 Calibrated values for the conditions in the Journalism domain

Thus, we explored how the external and internal structural conditions of journalism, as well as journalistic agency, contribute to deliberative communication. We developed two research questions:

- RQ5: Which journalism conditions or combination of conditions contribute to higher deliberative communication?
- RQ6: Which journalism conditions or combination of conditions contribute to lower deliberative communication?

The analysis of the necessary conditions showed that television market concentration and a lower share of journalists with university education were necessary conditions for high deliberative communication, whereas a weak market and lower share of skilled journalists were necessary conditions for low deliberative communication.

In the analysis of sufficiency (see Table 8.5), we identified five paths: one leading to deliberative communication and four leading to the lack of it. Strong media market, television market concentration, autonomy of PSM,

and higher share of skilled journalists contribute to deliberative communication in Austria, Germany, and Sweden (J1). Weak market, higher television concentration, lower autonomy of PSM, and lower share of skilled journalists contribute to lower deliberative communication in Bulgaria, Croatia, Italy, Poland, and Romania (J2). Weak market, television concentration, lower monitoring role of journalists, and lower share of journalists with university education and weaker skills contribute to lower deliberative communication in Czechia, Italy, and Romania (J3). Another combination (J4) of conditions that contributes to lower deliberative communication is that of weak market, television concentration, lack of monitoring role, lower share of full-time employed journalists, journalists with university education, and weaker skills (covering Italy and Slovakia). Finally (J5), weak market, lack of PSM autonomy, more precarious position of journalists, with weaker monitoring role, weaker skills, and lower share of journalists with university degree contribute to weaker deliberative communication in Hungary and Italy.

In the parsimonious solution (see [Appendix 3](#)), a strong market alone is sufficient for deliberative communication in Austria, Germany, and Sweden. As suggested by both the intermediate and parsimonious solutions, higher journalistic skills are an important condition for deliberative communication, whereas their weaker development is a risk. Meanwhile, a lower share of university-educated journalists might not necessarily pose a risk if coupled with more strongly developed skills.

Table 8.5 Journalism conditions contributing to deliberative communication (intermediate solution)

Solutions	Conditions							Outcome							
	marketstr	marketcon	psmautonomy	journfull	jourmonit	jourmedu	journalsskill	delcomm	Cases	Raw coverage	Unique coverage	Consistency	Solution coverage	Solution consistency	
J1	•	•	•					•	•	AT, DE, SE	0.56	0.56	0.97	0.56	0.97
J2	•	•	•					•	•	HR, PL, IT, RO, BG	0.59	0.22	0.93		
J3	•	•			•	•	•	•	•	IT, RO, CZ	0.49	0.09	0.97	0.84	0.95
J4	•	•		•	•	•	•	•	•	IT, SK	0.38	0.06	0.97		
J5	•		•	•	•	•	•	•	•	HU, IT	0.35	0.06	0.97		

Note: Black circles indicate the presence of a condition; grey circles indicate the absence of a condition. Cases are presented with country abbreviations: AT, Austria; BG, Bulgaria; HR, Croatia; CZ, Czechia; DE, Germany; HU, Hungary; IT, Italy; PL, Poland; RO, Romania; SK, Slovakia; SE, Sweden

Step 5: Media usage conditions

The conditions were derived from the conceptualization of media use and media users' competencies explained in [Chapters 6](#) and [7](#). From the media

Table 8.6 Media usage and competencies conditions contributing to deliberative communication (intermediate solution)

Solutions	Conditions					Outcome		Raw coverage	Unique coverage	Consistency	Solution coverage	Solution consistency
	<i>legmeduse</i>	<i>digmeduse</i>	<i>legmedtrust</i>	<i>socmedtrust</i>	<i>meddiglit</i>	<i>delcomm</i>	Cases ⁶					
M1	•	•	•	•		•	DE	0.41	0.003	0.97		
M2	•		•	•	•	•	SE	0.55	0.14	0.98	0.55	0.98
M3	•	•				•	CZ, LV	0.42	0.06	0.92		
M4	•		•	•		•	BG, HR, GR, HU, IT, PL, RO, SK	0.78	0.42	0.92	0.84	0.89

Note: Black circles indicate the presence of a condition; grey circles indicate the absence of a condition. Cases are presented with country abbreviations: BG, Bulgaria; HR, Croatia; CZ, Czechia; DE, Germany; GR, Greece; HU, Hungary; IT, Italy; LV, Latvia; PL, Poland; RO, Romania; SK, Slovakia; SE, Sweden.

usage domain, the analysis drew on the dimension of media access (legacy and digital media repertoires) and trust in media (trust in legacy and trust in social media). We excluded relevance in news media because of the low variability among the cases in the study; relevance was similarly important across all the analysed cases. Drawing on Chapter 7, we operationalized the competencies dimension using media and digital literacy, which encompass both structural elements (media literacy education) and agency of media users (reading literacy and digital skills). Detailed descriptions of data sources for the media use and competencies domains are available in Table 8.6 in Annex 1, and raw data are available in Annex 2.

Calibrations

Belonging to legacy media repertoire (legmeduse) and belonging to digital media repertoire (digmeduse) were two conditions operationalized in several steps. First, the goal was to determine the different media repertoires of audiences. We used variables referring to media use to determine media repertoires: the share of users of the press, television, radio,

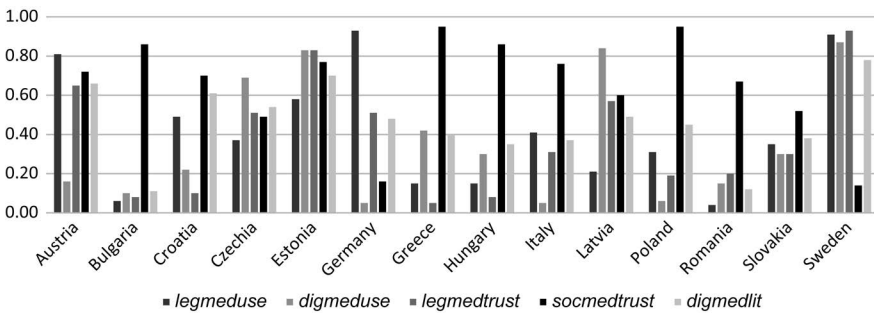
and internet users; participation in online social networks; and the share of public television media audiences. To distinguish the different repertoires of media use in the EU, we performed factor analysis, which allowed us to explore if different dimensions of media use could be described. The factor analysis (see Annex 3) revealed two main dimensions of media use. The first factor consisted of the use of legacy media—the

press, public television, and radio. The second factor consisted of the use of digital media—the internet and social networks. For calibrating the set of countries with a high use of legacy media and those with a high use of digital media, we used the average values of shares of media use and calculated the percentiles. The percentile method was used.

We operationalized *high trust in legacy media* (*legmedtrust*) using an average of the share of trust in the press, radio, and television, and *high trust in social media* (*socmedtrust*) using an average of the share of trust in the internet and online social networks. The percentiles were used to calibrate the values for the fsQCA.

We referred to *high media and digital literacy* (*meddiglit*) as a

‘macrocondition’ consisting of measures of digital skills and media literacy. The condition of a set of countries with high digital skills was operationalized using the share of audiences with above-level digital skills. That condition of countries with high media literacy was operationalized using two measures: one derived by qualitative calibrations of media literacy education development by country teams, and the other was the latest PISA measure of reading performance. Before combining these two measures, we calibrated the PISA values using the 95th, 50th, and 5th percentiles with respect to EU data. Subsequently, these two calibrations were merged by calculating their average.



Graph 8.5 Calibrated values for the conditions in the Media usage and competencies domain

For the analysis of the ways in which conditions from the media usage and media users’ competencies domains form paths that explain deliberative communication, we formulated two research questions:

- RQ7: Which media usage conditions or combination of conditions contribute to higher deliberative communication?

- RQ8: Which media usage conditions or combination of conditions contribute to lower deliberative communication?

We found no necessary conditions for belonging to the set of countries with high deliberation, only those for not belonging to the set: low trust in legacy media and high trust in social media.

In the sufficiency analysis (see [Table 8.6](#)), four paths emerged: two leading to deliberative communication, and two leading to the lack of it. In the first path (M1), higher use of both legacy and digital media and higher trust in legacy but distrust towards social media lead to higher deliberative communication in Germany. In the second path (M2), higher use of and trust in legacy media, higher media and digital literacy, but lower trust in social media, produce an outcome of deliberative communication in Sweden.

In the third path (M3), lower use of legacy and higher use of digital media lead to lower deliberative communication in Czechia and Latvia. This is in line with the conclusion of Castro et al. (2022)—digital media are often a weak substitute for legacy media when it comes to acquiring information and knowledge, but in some media systems (democratic–corporatist), they have a more positive effect. In the final path (M4), lower use and lack of trust in legacy media and trust in social media lead to lower deliberative communication (covering Bulgaria, Croatia, Hungary, Italy, Poland, Romania, and Slovakia). In the parsimonious solution (see [Annex 3](#)), a combination of the higher use of legacy media and a lack of trust in social media is sufficient for deliberative communication, whereas a lower use of legacy media is sufficient for lower deliberative communication. The analysis identified that the largest risks to deliberative communication from the patterns of media use and media competencies were the lower use of legacy media and uncritical trust towards social media. This finding is not surprising given the previous research, which will be further discussed in the conclusion.

Overall analysis: contextual and media systems conditions that explain deliberative communication

In the final analysis, we treated the contextual conditions as remote and conditions from the media domains as proximate. Proximate conditions ‘originate closer to the outcome, both in time and space, are more volatile and are often subject to conscious manipulations by actors’ ([Schneider, 2019](#), p. 3). The final step of the analysis consisted of a sufficiency analysis of all the remote conditions identified in the first step and all the proximate conditions that were determined as theoretically relevant ([Schneider, 2019](#)).

In the final analysis (see [Table 8.7](#)), we examined how an interplay between contextual conditions and conditions from the four domains relates to deliberative communication. The analysis identified three paths explaining

Table 8.7 Contextual and media system conditions for deliberative communication (intermediate solution)

Solutions	Conditions								Outcome						
	<i>gdpdem</i>	<i>foemp</i>	<i>profaccount</i>	<i>marketstr</i>	<i>psnautonomy</i>	<i>journskill</i>	<i>legmeduse</i>	<i>meddigit</i>	<i>delcomm</i>	Cases	Raw coverage	Unique coverage	Consistency	Solution coverage	Solution consistency
F1	•	•			•	•	•	•	•	EE, SE	0.57	0.22	0.99	0.67	0.98
F2	•	•	•	•	•	•	•		•	DE, SE	0.40	0.05	0.98		
F3	•		•	•	•	•	•	•	•	AT, SE	0.40	0.04	0.99		
F4	•			•		•	•	•	•	BG, GR, HU, PL, RO, SK	0.71	0.11	0.94	0.82	0.92
F5	•		•	•			•	•	•	GR, HU, LV, PL, RO	0.63	0.02	0.95		
F6	•		•	•		•	•		•	HR, CZ, GR, HU, PL, RO	0.67	0.06	0.93		
F7			•	•	•	•	•	•	•	GR, HU, IT, PL, RO	0.52	0.02	0.96		

Note: Black circles indicate the presence of a condition; grey circles indicate the absence of a condition. Cases are presented with country abbreviations: AT, Austria; BG, Bulgaria; HR, Croatia; CZ, Czechia; EE, Estonia; GR, Greece; DE, Germany; HU, Hungary; IT, Italy; LV, Latvia; PL, Poland; RO, Romania; SK, Slovakia; SE, Sweden.

the outcome. In all the paths, economic or democracy development, autonomy of PSM, higher journalistic skills, and higher use of legacy media are present as conditions. In the first path (F1), apart from these conditions, implementation of freedom of expression and digital and media literacy are also present (Estonia and Sweden). In the second path (F2), all the conditions except digital and media literacy are present in Germany and Sweden. In the third path, all the conditions except freedom of expression implementation are present in Austria and Sweden.

We also found four solutions explaining the negation of the outcome. All of them share a weakly developed media market and lower use of legacy media. Apart from these conditions, the first path explaining the negation of the outcome (F4) shows the presence of lower economic or democratic development, lower journalistic skills, and lower levels of digital and media literacy (covering Bulgaria, Greece, Hungary, Poland, Romania, and Slovakia). In the second path (F5), lack of economic and democracy development, lower professional accountability, and lower digital and media literacy are also present (in Hungary, Latvia, Poland, Romania). In the third path, lower economic or democratic development, lower professional accountability, and lower journalistic skills lead to low deliberative communication in Croatia, Czechia, Greece, Hungary, Poland, and Romania. In the final path, lack

of professional accountability, lack of autonomy of public service media, lower journalistic skills, and lower levels of digital and media literacy lead to lower deliberative communication (in Greece, Hungary, Italy, Poland, and Romania).

In the parsimonious solution explaining the outcome, legacy media appeared in one of the solutions, and only legacy media repertoires appeared as explaining the negation of the outcome. Therefore, legacy media repertoire is a ‘core’ condition that explains the outcome (Pappas & Woodside, 2021).

Conclusion

Our interpretation started from the contextual conditions and ended with the final overall analysis. The analysis provided arguments for the importance of the context in which media systems operate, albeit not in a linear manner. Economic or democratic developments are necessary factors but are not always sufficient for deliberative communication. For example, Italy belongs to the set of countries with higher economic and democratic development but has less developed deliberative communication.

When ‘zooming in’ on the domains and observing the interplay of conditions from the legal framework domain with deliberative communication, the analysis revealed that the implementation of different legal provisions is more important for deliberative communication than the legal provisions themselves. This finding strengthens the assumptions presented in [Chapter 3](#)—although rulemaking provides an environment for freedom of expression and of information, the ineffective implementation of well-defined rules may erode the beneficial environment. Moreover, the opposite is also possible—where restrictive laws are present, the lack of implementation of such restrictive rules may benefit freedom of expression and its implementation.

The results of the analysis regarding the role of media accountability in explaining deliberative communication pointed to the importance of the professional accountability frame. The development of professional codes of ethics is a necessary condition for deliberative communication. Thus, deliberative communication does not occur without higher developed professional accountability in this aspect. The findings in this analysis also corroborate some of the conclusions from [Chapter 4](#). In the analysis of sufficiency, all highly developed institutions of media accountability contribute to deliberative communication, covering Germany and Sweden. This is also the point taken in [Chapter 4](#), in which Germany and Sweden are taken as examples of well-developed accountability systems. In this analysis, Austria did not appear as a case, suggesting that it does not ‘cluster’ with Germany and Sweden in terms of media accountability. This could be explained by some challenges of the Austrian media accountability institutions mentioned in [Chapter 4](#), such as the impact of business–political parallelism on the efficiency of media accountability. The findings also demonstrate that among the countries

with less developed deliberative communication, the paths leading to this are mostly constructed with less developed media accountability institutions. However, we also found some positive trends in the stronger development of professional meta-discourse in Bulgaria and Croatia, which by itself is not sufficient to have a stronger impact. The lack of development of media ombudspersons appears as a single condition in one of the parsimonious paths, which also confirms the conclusion from [Chapter 4](#) that political accountability might be especially problematic in the Central and Eastern European region.

This analysis also explored the ways that the external and internal structural conditions of journalism, as well as journalistic agency, contribute to deliberative communication. Regarding the analysis of necessary conditions, the findings suggest the strong role of the external structural conditions (media market and television market concentration) and journalistic agency (journalistic skills) for promoting deliberative communication. A strong media market, with higher revenues for media organizations, provides more resources for quality journalism.

Market concentration in media systems is perceived as a threat to media pluralism ([Trappel & Meier, 2022](#), p. 151) as fewer media companies holding the largest part of the market share might diminish the diversity of media content provided to audiences. However, media concentration could also have some positive potential, such as in enhancing internal pluralism ([Stühmeier, 2019](#)). Additionally, media markets with more concentration might indicate less audience fragmentation, which is linked to inequality to news access and news avoidance ([Van Aelst et al., 2017](#)). This is also linked with polarization in media systems. As [Hallin \(2020, p. 5779\)](#) explained, ‘highly concentrated markets tend to produce nonaligned media, but fragmented markets produce partisan media, as news organizations use political identity to capture market niches’.

There are also some unexpected results—lower share of university educated journalists and more precarious position of journalists have not been shown as risks in cases in this analysis. As explained by [Hanitzsch et al. \(2019, p. 93\)](#), some countries have a higher share of freelance journalists, and a university education is not perceived as required for journalists; for example, Austria, Germany, and Sweden have a stronger tradition of non-academic traineeships and courses. In [Hallin and Mancini’s \(2004, p. 33\)](#) discussion on the degree of professionalization of journalism, degree or training might not lead to higher professionalization. The relation could indeed also work in the opposite direction, considering the historical development of the profession. For example, in Mediterranean media systems with later development of journalistic profession, journalists with university degrees (from other social sciences and humanities) are more prevalent in the elite-oriented press ([Hallin & Mancini, 2004](#)). However, journalism education is also a place in which ‘professional ideology’ is acquired, consisting

of values of public service, objectivity, autonomy, immediacy, and ethics (Deuze, 2005, p. 447).

Meanwhile, we also observed the great importance of journalistic skills. In terms of the debate on the significance of theory and practice in journalism (Örnebring & Mellado, 2018), practice trumps theory, as far as the conditions for deliberative communication are concerned. Higher journalistic skills are clearly an important condition for deliberative communication, and their weaker development is a risk, whereas a lower share of university-educated journalists might not necessarily pose a risk if coupled with more strongly developed skills. However, what is considered journalistic skills is not universal. For example, while more ‘craft’-based skills are valued in the US, a greater emphasis is placed on ethics in Italy (Örnebring & Mellado, 2018).

When analysing the role of media usage and user competencies in engendering deliberative communication, we found that low trust in legacy media and high trust in social media are the necessary conditions for the ‘underdevelopment’ of deliberative communication. Media trust is important for deliberative communication from two major aspects: people need reliable information and different content providers and content users must have a minimum amount of trust to create the preconditions for deliberative communication (Nord & Harro-Loit in Mediadelcom, 2023). A well-informed public is crucial to the functioning of democracy; citizens depend on accurate and reliable information from the media to gain knowledge about current developments and make informed political decisions (Tsfati & Cohen, 2005). However, over the past decades, media criticism has been on the rise and declining levels of media trust can be observed in many countries (Fawzi et al., 2021; Hanitzsch et al., 2019). There are several potential explanations for this state of affairs (e.g. a persistent pattern of negativity and cynicism in the news, reporting in favour of the political and economic establishment), the unifying one being the *trust nexus* (Hanitzsch et al., 2018): the idea that the erosion of trust in (legacy) media is strongly correlated with the decline of political trust or even a more general disenchantment with social institutions. People who, by tradition, find legacy media trustworthy and important may continue to be loyal users, whereas others might migrate to more entertainment-oriented or ‘soft news’ media content offered on a variety of platforms and channels (Nord & Harro-Loit, 2023). The turmoil in and distrust of legacy media sources have given rise to the popularity of social media, which, operating on the principles of protective filter algorithms and echo chambers, gather like-minded individuals and screen out information and views that do not sit well with the group consensus (Sunstein, 2018). This is contributing to discursive divides, political gridlocks, and the atrophy of public spheres (Dahlgren, 2018, p. 6), all of which run counter to the idea of deliberative communication.

In the final analysis, legacy media repertoires appeared in both intermediate and parsimonious solutions, thus serving as a ‘core’ condition in

explaining the outcome (Pappas & Woodside, 2021). This confirms studies that prove the difficulty for digital media alone to substitute the lack of legacy media use (Castro et al., 2022).

Digital media, including social media, are on the rise as sources of news in most media markets, whereas traditional news sources are showing a decline (Newman et al., 2023). Systemic and structural media elements contribute to greater reliance to online news in some countries. For example, where traditional media sources are less trusted or are perceived as being politically partisan, audiences are more inclined to online and social media as sources of news (e.g. in some southern and eastern European countries, Castro et al., 2022).

Digital media use could be beneficial for deliberative communication for several reasons but also has many drawbacks. Digital platforms have been praised as tools that will democratize communication, especially in early 2010s. However, since 2016, the narrative has turned, as illiberal and authoritarian political actors started using the same tools to manipulate and polarize political discourse (Tucker et al., 2017). Some authors argue that digital media lowers the costs to news access (Fletcher & Park, 2017) and, therefore, lowers the knowledge gap between news users. Despite concerns that social media contribute to selective exposure to news and polarization (e.g. Bakshy et al., 2015; Kubin & Von Sikorski, 2021), growing evidence also points that social media users are incidentally exposed to news from a diversity of sources (Fletcher & Nielsen, 2018). Therefore, there are mixed results in whether social media contribute to cross-cutting news exposure. Several studies indicate that some forms of digital and especially social media use might not be as beneficial to political learning and knowledge about news and politics in the way that traditional news sources are (Dimitrova et al., 2014; Shehata & Strömbäck, 2021). This can also differ between media systems; for example, while online news seekers in affluent ‘welfare’ countries (e.g. Norway, Sweden, Denmark, and Austria) learn about politics this way, the same does not hold for polarized–pluralist countries (e.g. Greece and Italy) (Castro et al., 2022). Although deliberation theorists are sceptic of the role of mass media for deliberation (e.g. the idea that they are enhancing consumerist, not deliberative, values, see Maia, 2018), the analysis shows that the use of traditional, legacy media is one of the most important conditions for deliberative communication.

Notably, Estonia is the only CEE country that belongs to the high deliberative communication set of countries. Previous studies have placed Estonia in a hybrid (Humprecht et al., 2022) or ‘mainstream’ model (Peruško et al., 2013), sharing characteristics with countries found between the polarized–pluralist and democratic–corporatist models. Estonia is also a small media market, which in theory poses a risk for media diversity. However, it has been influenced extensively by Scandinavian media systems, either in the transfer of media policies, institutions, and practices of journalistic self-regulation or

the influence of investment from Scandinavian media markets (see an overview by [Balčytienė, 2009](#)).

We also note several limitations of this study. First, our case selection was limited by countries participating in the Mediadecom project, and the results should not be generalized outside of the cases in this study. Although the inclusion of 14 countries was meant to represent diversity in European media systems, perhaps the inclusion of more countries from the democratic–corporatist, polarized–pluralist, and liberal (e.g. Ireland) models might provide findings with higher consistency and coverage. Second, the analysis method also had drawbacks. Our results are highly sensitive to the decisions taken in the study design (e.g. thresholds in defining membership), and fsQCA often merely finds associations rather than causal relations between conditions and the outcome.

Notes

- 1 The research process included the theoretical conceptualization phase where the four media system domains were operationalized, 14 country case studies performed by national experts based on a common research matrix to study the four media system domains, a parallel process in which the sets for the fsQCA were defined, and the calibration process that followed. All of these preceded the analysis presented in this chapter.
- 2 Conditions with quantitative indicators were mainly calibrated by applying the direct method. External information was used to determine thresholds of belonging and exclusion from the set ([Schneider & Wagemann, 2012](#), p. 33). The context of our study is the EU, both for reasons of theoretical and normative expectations, as well as the country cases, and the data are calibrated based on the variability of data in the EU. For example, Croatia belongs to the set of wealthy countries on a world scale but is in the set of not wealthy countries in the EU. The outcome and most of the conditions based on the quantitative data were calibrated with the percentile method (the exception is TV market concentration for which we used thresholds defined by [Trappel & Meier, 2022](#), see in the text below). As [Pappas and Woodside \(2021, p. 7\)](#) explain, ‘To find which values in our dataset correspond to the 0,95, 0,50, and 0,05, we use percentiles. The percentiles allow the calibration of any measure regardless of its original values’. We used the direct method of calibrating interval scales to fuzzy set values, which means three values from the interval scale were chosen to represent full membership, full non-membership, and the crossover point, which were later used as benchmarks to transform the values ([Ragin, 2008](#), p. 85).
- 3 Since they were calibrated as 0, for some countries certain conditions from the Legal domain are not represented in the chart.
- 4 Since they were calibrated as 0, for some countries certain conditions from the Accountability domain are not represented in the chart.
- 5 Greece appears as a deviant case, as it shares all of all the conditions leading to lower deliberative communication but belongs (although to a far lesser degree in fuzzy set terms) to the set of high deliberative communication. Comparatively, Greece has exceptionally high scores in international hard news knowledge ([Aalberg et al., 2013](#)). Its high political sophistication and knowledge could be explained by specifics of its political system ([Vasilopoulos, 2012](#)).
- 6 Greece appears as a deviant case in this analysis as well; see the explanation in 1.

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9 Conclusion

From risks to opportunities

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The thoroughly altered global mediascape of the early 21st century has changed public communication and deprived journalism of its monopoly on the public sphere. Rapidly multiplying platforms with no accountability to societies pervade their economic interests and do not pervade societies' democratic needs. In today's hybrid media systems, democratic polities continue to depend on news media and their ability to provide truthful information for argument-based discussions and decision-making. However, the question remains as to how the present condition of media systems affects the possibility of deliberative communication. This book answers this question that we find crucial for understanding the role that the media now plays in facilitating or impeding democracy.

The study presented several challenges. The first was to operationalize deliberative democracy empirically as a predominantly normative concept for cross-country comparisons at the European level. This has not been performed previously, and our proposal is open to discussion and criticism. Focusing on communication as a crucial aspect of deliberative democracy, we introduce the concept of deliberative communication. As deliberative communication occurs at the micro-, meso-, and macro levels of society, our operationalization also addresses these levels (see [Nord et al., this volume](#)).

The second challenge was to delineate the media system – that is, to determine which areas of the media system play a crucial role in enabling or hindering deliberative democracy/deliberative communication. The study is based on case studies conducted in 14 selected countries, which contributed rich qualitative knowledge towards the chapters on the legal framework for freedom of expression and information ([Psychogiopoulou et al., this volume](#)), media accountability ([Kreutler et al., this volume](#)), journalism structures and practices ([Berglez et al., this volume](#)), media audiences usage practices ([Jansová et al., this volume](#)), and media users' competencies ([Gálik et al., this volume](#)). In addition to sharing insights into specific developments and similarities across the examined countries, these five chapters advance the theoretical rationale for selecting specific dimensions of the media system as the most important for enabling deliberative democracy. In effect, the five dimensions describe the media system as related to the success of deliberative communication and democracy.

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Researchers in comparative media systems are used to the well-known model of the media systems developed by [Hallin and Mancini \(2004\)](#) in their seminal book *Comparing Media Systems*. In addition to the political system dimension (most often forgotten in analyses based on their study), the media system is described by four dimensions: the media market, journalistic autonomy, political parallelism, and the role of the state in the media system. The media market dimension includes some aspects of the audience's practices or characteristics (i.e. literacy as audience competence); however, the focus is on structural factors. Political parallelism and the role of the state are similar to our dimensions of legal framework and media accountability, and journalistic autonomy is included in our dimensions of journalist structures and practices. Our model focuses more on the audience because the hybrid media system ([Chadwick, 2013](#)) affords a more significant role for the prosumer and, thus, also for their competencies. The difference from [Hallin and Mancini's \(2004\)](#) theoretical model is our additional attention to the aspects of agency and structure in media systems. Actors – journalists, media users, media organizations, policy-makers – and their competencies, motivation, and interactions influence the conditions of deliberative communication, acting within the limits of the possibilities framed by the structure (e.g. political system, media market, and legislation).

The key difference in our model is that it relates empirically to the normative outcomes of deliberative democracy. Unlike [Hallin and Mancini \(2004\)](#), this study does not group media systems into specific models. Although grouping countries in this way has proven to be helpful in reducing complexities and enables us to more easily grasp similarities and differences between groups of countries, we were interested in determining which variables in the defined dimensions support deliberative communication and which detract from it. To achieve this goal, the study was designed to relate specific media system variables to deliberative democracy ([Vozab et al., this volume](#)).

Deliberative communication index

The deliberative communication index created for this study combines the macro-, meso- and micro levels of societal discussion. The macro level is covered by the V-Dem Deliberative component index, while the meso- and micro levels include data on citizens' discussions and knowledge, combined with interpersonal trust and the level of polarization of society (see [Nord et al., this volume](#), for details). As [Nord et al. \(this volume\)](#) indicate, most of the factors supporting deliberative communication are present in countries of the democratic-corporatist type (according to the classification by [Hallin and Mancini, 2004](#)), such as Germany, Austria, and Sweden, albeit to different degrees. Estonia has also created a political culture that favours deliberative communication in many ways, although some potential risks also exist. The growing pressure on freedom of speech is palpable; however, it has not been realized as a risk owing to the critical mass of journalists

who are able to withstand this pressure. The results of the current study place Greece barely over the threshold in the set of country with high deliberative communication, although its media system conditions are often similar to those of countries not belonging to this set. Although we can explain a significant degree of deliberative communication using media system structures and practices, the success of deliberative communication has other supporting conditions that were not necessarily included in this study.

The eight Central and Eastern European (CEE) countries in our sample – Romania, Croatia, Slovakia, Hungary, Poland, Bulgaria, Czechia, and Latvia – belong to a set of countries with lower deliberative communication. The following section highlights the most important variables that play a role in deliberative communication.

Media systems and deliberative communication

The fuzzy set qualitative comparative analysis (fsQCA) method was used to establish the configurations of conditions that led to similar outcomes for deliberative communication (see [Vozab et al., this volume](#)). [Vozab et al. \(this volume\)](#) in analysis of *contextual conditions* found that either lower GDP, as a measure we used for economic prosperity, or lower rank on the index of the quality of democracy must always be present in the case of low deliberative communication. Thus, although high economic or democratic development does not guarantee high deliberative communication, if a country has a deficit in democracy and economic development, deliberative communication will stop from developing. Moreover, this finding has policy implications at the EU level and clearly demonstrates two avenues of support and opportunities for deliberative democracy.

The fsQCA method is expected to demonstrate causality; however, the results of any solution are related to all contextual and other occurring (or missing) conditions in specific instances. What are called the ‘necessary’ conditions in the fsQCA are not enough on their own to guarantee the outcome. In our sample, the case in point is Italy, which is a highly developed European economy and has a higher position on democracy indexes, however, does not have high deliberative communication. The additional sufficient conditions found in different combinations of solutions together explain the relationship between media systems and deliberative communication.

In the media system, we begin with a *legal framework* for freedom of expression and information. The analysis revealed that several conditions must always be present for deliberative communication. These necessary conditions are the implementation of defamation regulations, implementation of data protection regulations to protect freedom of expression, implementation of journalistic source protection, and implementation of ownership transparency regulations. This finding has important policy implications for EU and national governments. We found that it is insufficient to pass appropriate legislation, which member states of the EU do as a matter of course, after the legislature is agreed upon, but to actually implement

it correctly. Further, this study demonstrates that restrictive legislation in long-established European democracies does not decrease deliberative communication because it is implemented in such a manner as not to hinder freedom of expression. This finding should be headed by younger member states which often point as a justification for strict regulation (e.g. in the case of defamation) which exists in, for instance, Germany or Sweden; however, they do not consider that the legislation is implemented in a different manner.

There are several combinations of conditions in the legal domain which explain the absence of deliberative communication; however, they can all be summarized as a lack of implementation of freedom of expression and information regulation. One solution includes the lack of data protection and freedom of information implementations; another is the lack of defamation, protection of journalistic sources, and transparency of media ownership implementations. One outcome is explained by the lack of defamation regulation, freedom of information, and protection of journalistic source implementations; whereas the fourth demonstrates the lack of defamation regulation, freedom of information implementation, regulation, and implementation of transparency of ownership. This point to the importance of improving these areas of media policy in countries with the goal of increasing deliberative communication.

In the domain of media accountability, the analysis reveals that the existence of professional codes of ethics is a condition without which highly deliberative communication does not appear. Additionally, all of the included conditions which define media accountability – the existence and activity of media councils, the existence of media ombudsperson institutions, professional codes of ethics, organizational codes of ethics, and professional and public discourse about the media – are present in Germany and Sweden. The lack of various combinations of conditions, together with a lack of necessary condition (professional codes of ethics), appear in countries with lower deliberative communication. The lack of media ombudspersons is sufficient in several countries. The analysis reveals that in some countries in this set, the presence of certain conditions, such as the existence of media councils in Bulgaria, or of professional media critical discourse in Bulgaria and Croatia, is a step towards better deliberative communication, however, insufficient to contribute on its own.

The journalism domain conditions that always appear with high deliberative communication in our study are high media market concentration and a lower share of journalists with university degrees. As we have a small number of countries in this set, the characteristics of their markets appear to dominate. Weak markets and less skilled journalists always appear with less deliberate communication. These two conditions appear in all configurations, with sufficient conditions for low deliberative communication. We find that journalists' skills are more important than formal university education, leading to the conclusion that more skills related to training should be included in universities and in media companies' training programmes.

Media usage practices of audiences play a role in explaining the low deliberative communication which occurs in countries where audiences have a high level of trust in social media and low trust in legacy media, supplemented by a higher use of social or digital media at the expense of legacy media. Moreover, this is an important finding in terms of policy implications, because it demonstrates that if we wish to support and promote deliberative communication, we need to support legacy media and work to increase their trustworthiness. Legacy media repertoire is found to be the ‘core’ condition from the media system that relates to high deliberative communication (Vozab et al., *this volume*).

When the most important conditions from the four domains are examined together with contextual conditions, the study finds different paths to higher deliberative communication. However, several conditions are always present: economic development and developed democracy, autonomy of PSM, higher journalistic skills, and higher use of legacy media. Important conditions leading to higher deliberative communication in Estonia, Sweden, and Germany are the implementation of freedom of expression legislation, professional accountability of the media, a strong market structure for journalism, and digital media literacy in different combinations (Vozab et al., *this volume*). Countries with lower deliberative communication share weakly developed media markets, lower legacy media use, and lower digital and media literacy levels. Lower professional accountability of the media and journalistic skills are important conditions that should be increased to better support deliberative communication.

Structure and agency

We have focused on the structural factors of the media system alongside the aspects of agency, which are related to practices and actions of groups or individuals. This study demonstrates that a combination of these factors is found in the configurations of conditions that explain the role of media systems in countries with weak or strong deliberative communication. Strong stress on agency is found in the domain of legal infrastructure, where the analysis reveals the more important role of implementation than the structure of the legal framework. As EU countries, the majority of the analysed countries have largely unproblematic laws in this area. In journalism, the structure enables agency – developed media markets provide opportunities for journalists to develop their skills (agency). Agency can also be highlighted in relation to media literacy, which is an important quality. When it is low or high, it relates to similarly low or high deliberative communication.

One structural factor from the same domain is usually considered a risk to the public sphere: high media market concentration. However, contrarily, we find that countries with a higher market concentration in the media also have higher deliberative communication. Thus, it is essential that expectations about the effects of media structures be tested in

empirical research. Strong market development as a structural condition is important and points to risks for small countries with small media markets. This result is undoubtedly influenced by our sample where high deliberative communication is found in democratic-corporatist model media systems, so a broader analysis is called for in order to confirm or restrict this finding.

This study highlights the importance of contextual structural conditions. Economic development and the adequate development of democracy are important prerequisites for the development of deliberative communication, which is itself better understood by its characteristics of active agency.

Media use practices and the skills of both users and producers of media content are important ingredients. As conditions which primarily indicate practice in a structural context, these are perhaps conditions that can be influenced in the short term.

The autonomy of the PSM, which is an important condition, must be viewed as a combination of structural and agency factors. The editorial autonomy of PSM can be improved even in structural circumstances (i.e. the legal framework) which are not perfect, but it also works vice versa, when a good legal framework is perverted by political pressure and lack of protection of editorial autonomy.

Opportunities

One of the findings of this study that we would like to highlight is the combination of both structural conditions and conditions in which the agency of actors plays a role. In future studies of media systems, both agency and structural variables should be observed to provide a fuller picture of the developments and changes in their relationship.

Several critical junctures that have emerged over the past two decades offer risks and opportunities for media systems. Hybrid media systems enabled by the digital shift, the Internet, and the proliferation of media platforms have increased in the past decade. However, it is uncertain where it is going and how society will change as the media changes (Lundby, 2014). The economic crisis of 2008 influenced the countries in our sample differently; in some of them, new media appeared and some old media perished, and the position of journalists became increasingly precarious. Moreover, the economic crisis had some political ramifications which influenced the situation in the media – the populist turn, particularly in Hungary and Poland. However, political change can also present opportunities, as in the latest turn of the parliamentary election in Poland, where we see (for the moment) a re-democratization with positive influences on the media.

Further, we highlighted that the grouping of countries along the path to deliberative democracy includes Eastern and Western European countries. This finding supports the findings from previous comparative media studies (Peruško et al., 2013).

Many efforts have been made at national and EU levels to support media systems, develop media literacy, and strengthen media diversity. Our study demonstrates the importance of legacy media as a core condition for deliberative communication. Countries in which audiences have higher trust in legacy media and where they use legacy media as their primary source of news have higher deliberative democracy. This is a clear point for policy intervention: if deliberative democracy is a goal, support for legacy media is crucial in the hybrid media system.

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Annex 1

Descriptions of sets, conditions,
and data sources

Table A1 Deliberative communication index (outcome – quantitative)

<i>Outcome variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Deliberative communication index (<i>delcomm</i>)	A set of countries with highly developed deliberative communication	The indicators for macro-, meso-, and micro-level of deliberative communication are combined by calculating the average of macro- and micro-level dimensions	See below
Macro-level deliberative communication index	A set of countries with highly developed deliberative democracy at the institutional level	Description: Indicator for the macro and meso dimension is the deliberative component index for 2020. To measure these features of a polity, we try to determine the extent to which political elites give public justifications for their positions on matters of public policy, justify their positions in terms of the public good, acknowledge, and respect counterarguments, and how wide the range of consultation is at elite and civil society levels. Therefore, the index is based on these elements: common good, engaged society, range of consultation, reasoned justification, and respect for counterarguments	Source: V-Dem Dataset (https://www.v-dem.net/data/the-v-dem-dataset/) Data collected: December 2020 Dataset variable: <i>v2xdl_delib</i>
Micro-level deliberative communication index	A set of countries with highly developed deliberation at the citizen level	a) Citizen discussions Question: “When you get together with friends or relatives, would you say you discuss frequently, occasionally or never about national / European / local political matters?” Description: Average % of all three levels for individuals who discuss frequently	Source: Eurobarometer 93.1 (https://search.gesis.org/researchdata/ZA7649) Data collected: July–August 2020 Dataset variables: <i>D71a1, D71a2, D71a3</i>

(Continued)

Table A1 (Continued)

Outcome variable	fsQCA dimension	Indicator	Data source
		<p>b.1) Citizen knowledge Question: “In everyday life, we have to deal with many different issues, where we feel more or less informed. For each of the following (politics and environmental problems including climate change), please indicate whether you are...” Description: % of individuals claiming to be very well informed about politics and environment</p>	<p>Source: Eurobarometer 95.2 (https://search.gesis.org/researchdata/ZA7782) Data collected: April–May 2021 Dataset variables: <i>qa3.5, qa3.6</i></p>
		<p>b.2) Knowledge on EU politics Questions: “The Euro area currently consists of 19 Member States”; “The members of the European Parliament are directly elected by the citizens of each Member State”; “Switzerland is a Member State of the EU” Description: % of individuals who had three correct answers</p>	<p>Source: Eurobarometer 93.1 (https://search.gesis.org/researchdata/ZA7649) Data collected: July–August 2020 Dataset variable: <i>sd20t5</i></p>
		<p>c) Level of interpersonal trust Question: “How much do you trust people in your country?” Description: % of responses <i>Totally trust</i> and <i>Tend to trust</i> are combined</p>	<p>Source: Eurobarometer 93.1 (https://search.gesis.org/researchdata/ZA7649) Data collected: July–August 2020 Dataset variable: <i>qa6c</i></p>
		<p>d) Polarization of society Description: While plurality of views exists in all societies, we are interested in knowing the extent to which these differences in opinions result in major clashes of views and polarization or, alternatively, whether there is general agreement on the general direction this society should develop (Coppedge et al., 2021)</p>	<p>Source: V-Dem Dataset (https://www.v-dem.net/data/the-v-dem-dataset/) Data collected: December 2020 Dataset variable: <i>v2smpolsoc</i></p>

Table A2 Contextual conditions (quantitative)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Economic development (<i>gdp</i>)	A set of countries with high economic development	Description: GDP data expressed in 1.000 of \$ per capita	Source: World Bank (https://data.worldbank.org/indicator/NY.GDP.PCAP.CD) Data collected: 2021 Dataset variable: <i>NY.GDP.PCAP.CD</i>
Quality of democracy (<i>qdem</i>)	A set of countries with high democratic development	Description: Economist Intelligence Unit expert's assessments of four democratic rights and institutions categories: (1) Electoral process and pluralism; (2) Functioning of government; (3) Political participation; and (4) Political culture	Source: Economist Intelligence Unit (https://www.eiu.com/n/campaigns/democracy-index-2020/) Data collected: 2020 Dataset variables: <i>I, II, III, IV</i>
Technological development (<i>techdev</i>)	A set of countries with high technological development	Description: Fixed broadband subscription per 100	Source: World Bank (https://data.worldbank.org/indicator/IT.NET.BBND.P2) Data collected: 2020 Dataset variable: <i>IT.NET.BBND.P2</i>
Postmaterialism (<i>postmat</i>)	A set of countries with citizens featuring high levels of postmaterialist values	Question: "If you had to choose, which one of the things on this card would you say is most / second most important?" Description: % of individuals who chose two postmaterialism answers – <i>Giving people more say in important government decisions</i> and <i>Protecting freedom of speech</i>	Source: European Values Study (https://search.gesis.org/research_data/ZA7503) Data collected: 2017 Dataset variable: <i>Y002</i>

Table A3 Legal domain conditions (qualitative)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Defamation regulation (<i>defamreg</i>)	A set of countries which regulate and implement defamation and data protection in support of freedom of expression	Description: Existence and extent of criminalization of defamation in relation to freedom of expression Calibration: 1 – Fully in the set (the defamation is not criminalized) 0,7 – More in than out of the set (the defamation is criminalized but without possible prison sentence) 0,3 – More out than in the set (the defamation is criminalized with possible prison sentence) 0 – Fully out of the set (the defamation is criminalized with possible prison sentence and additional special protection)	Calibrations are based on informed and source-corroborated assessments made by national teams, and revised in coordination with the Croatian team
Defamation implementation (<i>defamimp</i>)	A set of countries which regulate and implement defamation and data protection in support of freedom of expression	Description: Effective implementation of the regulation of defamation that supports freedom of expression Calibration: 1 – Fully in the set (the defamation regulation is fully effective in supporting freedom of expression) 0,7 – More in than out of the set (the defamation regulation is mostly effective in supporting freedom of expression) 0,3 – More out than in the set (the defamation regulation is mostly ineffective in supporting freedom of expression) 0 – Fully out of the set (the defamation regulation is completely ineffective in supporting freedom of expression)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team

(Continued)

Table A3 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Data protection regulation <i>(dataprotreg)</i>	A set of countries which regulate and implement defamation and data protection in support of freedom of expression	Description: Existence and extent of the journalistic exemptions that support freedom of expression Calibration: 1 – Fully in the set (the journalistic exemptions exist with full extension) 0,7 – More in than out of the set (the journalistic exemptions exist with limited extension) 0,3 – More out than in the set (the journalistic exemptions do not exist) 0 – Fully out of the set (data protection regulation not effective in protecting freedom of expression)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team
Data protection implementation <i>(dataprotimp)</i>	A set of countries which regulate and implement defamation and data protection in support of freedom of expression	Description: Effective implementation of the data protection regulation that supports freedom of expression Calibration: 1 – Fully in the set (the data protection regulation is fully effective in supporting freedom of expression) 0,7 – More in than out of the set (the data protection regulation is mostly effective in supporting freedom of expression) 0,3 – More out than in the set (the data protection regulation is mostly ineffective in supporting freedom of expression) 0 – Fully out of the set (the data protection regulation is completely ineffective in supporting freedom of expression)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team

(Continued)

Table A3 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
<p>Freedom of information implementation (<i>foiimp</i>)</p>	<p>A set of countries which regulate and implement access to information in support of freedom of information</p>	<p>Description: Effective implementation of the freedom of information regulation that supports freedom of information Calibration: 1 – Fully in the set (the freedom of information regulation is fully effective in supporting freedom of information) 0,7 – More in than out of the set (the freedom of information regulation is mostly effective in supporting freedom of information) 0,3 – More out than in the set (the freedom of information regulation is mostly ineffective in supporting freedom of information) 0 – Fully out of the set (the freedom of information regulation is completely ineffective in supporting freedom of information)</p>	<p>Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team</p>
<p>Protection of journalism sources implementation (<i>sourceprotimp</i>)</p>	<p>A set of countries with protection in law and through implementation of journalistic sources, whistleblowing through the media, and transparency of media ownership in support of freedom of information</p>	<p>Description: Effective implementation of the protection of journalism sources regulation that supports freedom of information Calibration: 1 – Fully in the set (the protection of journalism sources is fully effective in supporting freedom of information) 0,7 – More in than out of the set (the protection of journalism sources is mostly effective in supporting freedom of information) 0,3 – More out than in the set (the protection of journalism sources is mostly ineffective in supporting freedom of information) 0 – Fully out of the set (the protection of journalism sources is completely ineffective in supporting freedom of information)</p>	<p>Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team</p>

(Continued)

Table A3 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Transparency of media ownership regulation <i>(transparreg)</i>	A set of countries with protection in law and through implementation of journalistic sources, whistleblowing through the media, and transparency of media ownership in support of freedom of information	Description: Extent of regulation of transparency of media ownership that supports freedom of information Calibration: 1 – Fully in the set (specific media ownership transparency laws exist for all the media) 0,7 – More in than out of the set (transparency of ownership is specified only for some media categories) 0,3 – More out than in the set (have general business registers or company registers which require all companies, including the media, to be included and to disclose ownership structure) 0 – Fully out of the set (countries without any legislature on ownership transparency)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team
Transparency of media ownership implementation <i>(transparimp)</i>	A set of countries with protection in law and through implementation of journalistic sources, whistleblowing through the media, and transparency of media ownership in support of freedom of information	Description: Effective implementation of the transparency of media ownership regulation that supports freedom of information Calibration: 1 – Fully in the set (the support for the transparency of media ownership and freedom of information is fully effective) 0,7 – More in than out of the set (the support for the transparency of media ownership and freedom of information is mostly effective) 0,3 – More out than in the set (the support for the transparency of media ownership and freedom of information is mostly ineffective) 0 – Fully out of the set (the support for the transparency of media ownership and freedom of information is completely ineffective)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team

Table A4 Accountability domain conditions (qualitative)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Non-statutory press/media councils (<i>medcouncils</i>)	A set of countries with high professional accountability of journalists	Description: Existence and impact of the press/media councils on journalistic practice Calibration: 1 – Fully in the set (council is composed by different groups and very effective) 0,7 – More in than out of the set (there is a council with smaller impact) 0,3 – More out than in the set (there are small initiatives or ethics councils in journalism organizations) 0 – Fully out of the set (there are no press/media councils)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team
Professional codes of ethics (<i>profec</i>)	A set of countries with high professional accountability of journalists	Description: Existence and impact of the professional codes of ethics on journalistic practice Calibration: 1 – Fully in the set (country has this institution and it has a very strong impact on journalistic practice) 0,7 – More in than out of the set (country has this institution and it has an impact on journalistic practice) 0,3 – More out than in the set (country has this institution, but its impact on journalistic practice is weak or non-existent) 0 – Fully out of the set (country does not have this institution)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team
Organizational codes of ethics (<i>orgec</i>)	A set of countries with high market accountability of the media	Description: Existence and impact of media companies codes of ethics on journalistic practice Calibration: 1 – Fully in the set (all or almost all media companies have this institution) 0,7 – More in than out of the set (most of the media companies have this institution) 0,3 – More out than in the set (some media companies have this institution, but this is an exception) 0 – Fully out of the set (no or almost no media companies have this institution)	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team

(Continued)

Table A4 (Continued)

Condition variable	fsQCA dimension	Indicator	Data source
<p>Professional meta-discourse on journalistic conduct (<i>profmetadisc</i>)</p>	<p>A set of countries with high professional accountability of journalists and with high market accountability of the media</p>	<p>a) Meta-discourse on professional conduct Description: Existence and impact of meta-discourse on professional conduct on journalistic practice</p> <p style="text-align: center;">+</p> <p>b) Online transparency tools Description: Existence and impact of online transparency tools on journalistic practice</p> <p>Combined description: The existence of measures from within the journalistic profession and media companies to foster accountability and transparency, be it through traditional (trade journals, journalism awards, media journalism, active discourse in associations/trade unions, media accountability as a topic for journalism training, etc.) or online instruments (editorial blogs, streaming editorial meetings, etc.)</p> <p>Calibration: 1 – Fully in the set (there are both lively discourse within [large parts of] the profession and widespread attempts to safeguard transparency and explain editorial decisions to the audience) 0,7 – More in than out of the set (transparency measures and professional meta-discourse exist, but a considerable part of the profession and media outlets do not execute such measures) 0,3 – More out than in the set (such activities are the exception or only conducted pro forma, without actual impact on journalistic work) 0 – Fully out of the set (there is neither a visible meta-discourse nor transparency measures – when the media in a country are a “closed shop” not reflecting or explaining their work)</p>	<p>Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team</p>

(Continued)

Table A4 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Media ombudspersons (<i>medombud</i>)	A set of countries with high political accountability	<p>a) Statutory media ombudspersons Description: Existence and impact of statutory media ombudspersons on journalistic practice</p> <p style="text-align: center;">+</p> <p>b) Non-statutory media ombudspersons Description: Existence and impact of non-statutory media ombudspersons on journalistic practice</p> <p style="text-align: center;">+</p> <p>c) Media organization or newsroom ombudspersons Description: Existence and impact of media ombudspersons on journalistic practice Combined description: Media ombudspersons who have an impact on journalistic practice, notwithstanding the question if they are installed by the profession Calibration: 1 – Fully in the set (it is very likely that there is an ombudsperson for the case. Either there is one for all or many media [e.g., all print media, all private media], or most media companies have installed ombudspersons for their outlets) 0,7 – More in than out of the set (some ombudspersons exist, but only in a few media companies or for a small share of the market) 0,3 – More out than in the set (there are no purely media-focused ombudspersons, but ombudsperson positions with a partial mandate for media issues [e.g., human rights ombudspersons], or a visible process towards installing a media-focused ombudsperson) 0 – Fully out of the set (ombudspersons do not play any role in media accountability)</p>	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team

(Continued)

Table A4 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Public discourse and media criticism (<i>publicdisc</i>)	A set of countries with high public accountability	<p>a) Media critical initiatives Description: Existence and impact of media critical initiatives on journalistic practice</p> <p style="text-align: center;">+</p> <p>b) Web-based media criticism by civil society actors Description: Existence and impact of web-based media criticism by civil society actors on journalistic practice</p> <p>Combined description: As existence of measures from outside of the journalistic profession and media companies to critically discuss and evaluate journalistic conduct and media output, both through traditional (audience associations, media observatories, media-critical NGOs, media research) and digital instruments (media blogs by citizens, researchers, or social media discourse)</p> <p>Calibration: 1 – Fully in the set (such instruments/activities are well established) 0,7 – More in than out of the set (some instruments/activities exist, but their longevity and impact are dubious) 0,3 – More out than in the set (only traces of these instruments/activities exist, discourse only appears ad-hoc and then disappears, etc.) 0 – Fully out of the set (such instruments/activities do not exist)</p>	Calibrations are based on informed and source-corroborated assessments made by national teams and revised in coordination with the Croatian team

Table A5 Journalism domain conditions (quantitative)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Strong market structure for journalism (<i>marketstr</i>)	A set of countries with a strong market structure for journalism	a) Revenue for audiovisual media per capita (€) Description: Sum of public funding, TV and radio advertising, pay-TV revenues, on-demand revenues, cinema box office, and physical video, divided by total population; amount of € spent for media outlets in one year per capita +	Source: European Audiovisual Observatory Yearbook Data collected: 2020 Dataset variable: <i>MAR-EU</i>
		b) Advertising expenditures per capita (€) Description: Sum of newspapers, magazines, and Internet advertising, divided by total population; amount of € spent for advertising in one year per capita +	Source: European Audiovisual Observatory Yearbook Data collected: 2020 Dataset variable: <i>MAR-AD</i>
		c) Employees in publishing and information services per capita Description: Sum of people employed in publishing activities and information service activities, divided by total population	Source: Eurostat (https://appsso.eurostat.ec.europa.eu/nui/submitViewTableAction.do) Data collected: 2020 Dataset variables: <i>J58, J63</i>
TV market concentration (<i>marketcon</i>)	A set of countries with high TV market concentration	Description: Daily audience market shares (%) of the four leading TV groups	Source: European Audiovisual Observatory Yearbook Data collected: 2020 Dataset variable: <i>TV-AUD</i>

(Continued)

Table A5 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Autonomy and trust in public service media (<i>psmautonomy</i>)	A set of countries with high autonomy and trust in public service media	a) Perception of public TV content as free from political interference Question: “The journalistic content of public TV in [COUNTRY] is entirely free from governmental political interference” Description: Average of the opinion of scores (scale 0–10) by experts about each national media system +	Source: European Media Systems Survey (https://www.mediasystemsineurope.org/overview.htm) Data collected: 2017 Dataset variable: <i>mean_v23d</i>
		b) Trust in public TV media Question: “Do you think it is true that public TV in [COUNTRY], compared to private television channels, provides more trustworthy information?” Description: Average of the opinion of scores (scale 0–10) by experts about each national media system	Source: European Media Systems Survey (https://www.mediasystemsineurope.org/overview.htm) Data collected: 2017 Dataset variable: <i>mean_v22g</i>
Share of full-time journalists (<i>journalfull</i>)	A set of countries where organization conditions of media production (including technology, infrastructure, and human resources) support the development and practice of journalism	Question: “Which of the following categories best describes your current employment: full-time, part-time, freelancer, or other?” Description: % of journalists with full-time contracts	Source: Worlds of Journalism Study (2nd wave) (https://worldsofjournalism.org/data-d79/data-and-key-tables-2012-2016/); Worlds of Journalism Study (3rd wave) for Slovakia; Głowacki (2015) for Poland Data collected: 2012–2016; 2021–2023; 2015 Dataset variable: C2

(Continued)

Table A5 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Share of journalists with higher education degree (<i>journedu</i>)	A set of countries with journalists having high knowledge and capabilities	<p>a) Share of journalists with university degree Question: “What is the highest grade of school or level of education you have completed?” Description: Sum of % of journalists with <i>College/Bachelor’s degree or equivalent, Master’s degree or equivalent, or Doctorate</i></p> <p style="text-align: center;">+</p>	<p>Source: Worlds of Journalism Study (2nd wave) (https://worldsofjournalism.org/data-d79/data-and-key-tables-2012-2016/); Worlds of Journalism Study (3rd wave) for Slovakia; Głowacki (2015) for Poland Data collected: 2012-2016; 2021-2023; 2015 Dataset variable: C20</p>
		<p>b) Share of journalists with journalism university degree Question: “During your studies, did you specialize in journalism or another communication field?” Description: % of journalists who specialized in journalism</p>	<p>Source: Worlds of Journalism Study (2nd wave) (https://worldsofjournalism.org/data-d79/data-and-key-tables-2012-2016/); Worlds of Journalism Study (3rd wave) for Slovakia; Głowacki (2015) for Poland Data collected: 2012-2016; 2021-2023; 2015 Dataset variable: C20</p>
Skilled journalists (<i>journskill</i>)	A set of countries with journalists with saturated set of skills and practices	<p>Question: “Journalists have sufficient training to ensure that basic professional norms like accuracy, relevance, completeness, balance, timeliness, double-checking and source confidentiality are respected in news-making practices” Description: Average of the opinion of scores (scale 0–10) by experts about each national media system</p>	<p>Source: European Media Systems Survey (https://www.mediasystemsineurope.org/overview.htm) Data collected: 2017 Dataset variable: <i>mean_v23c</i></p>

(Continued)

Table A5 (Continued)

Condition variable	fsQCA dimension	Indicator	Data source
Strong monitorial role of journalists <i>(journalmonit)</i>	A set of countries with high journalists' tendency towards monitorial role	<p>Question: “Please tell me how important each of these things is in your work: provide information people need to make political decisions, monitor and scrutinize political leaders, monitor and scrutinize business, motivate people to participate in political activity?”</p> <p>Description: Based on Hanitzsch et al. (2019) operationalization, averages of answers on four items (scale 5–1) were used to create a monitorial role index</p>	<p>Source: Worlds of Journalism Study (2nd wave) (https://worldsofjournalism.org/data-d79/data-and-key-tables-2012-2016/); Worlds of Journalism Study (3rd wave) for Slovakia; Worlds of Journalism Study (2nd wave) average of Greece and Spain for Poland, based on Power relation domain clustering from Mellado et al. (2017)</p> <p>Data collected: 2012-2016; 2021-2023; 2013-2015</p> <p>Dataset variables: C12S, C12D, C12E, C12T, C12M, C12L, C12H, C12G, C12F, C12K, C12O, C12P, C12R</p>

Table A6 Media usage and competencies domain conditions (quantitative)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Legacy media repertoires (<i>legmeduse</i>)	A set of countries with high use of legacy media	a) Share of press users Question: “Could you tell to what extent you read the written press?” Description: % of responses <i>Every day</i> and <i>Almost every day</i>	Source: Eurobarometer 94.3 (https://search.gesis.org/research_data/ZA7780) Data collected: February–March 2021 Dataset variable: <i>qd3_4</i>
		+ b) Share of radio users Question: “Could you tell to what extent you listen to the radio?” Description: % of responses <i>Every day</i> and <i>Almost every day</i>	Source: Eurobarometer 94.3 (https://search.gesis.org/research_data/ZA7780) Data collected: February–March 2021 Dataset variable: <i>qd3_3</i>
		+ c) Share of public TV media audiences Question: Public service TV market share Description: % of individuals who watch PSM TV	Source: EBU PSM Barometer Data collected: 2017 Dataset variable: <i>PSM TV: Market share</i>
Digital media repertoires (<i>digmeduse</i>)	A set of countries with high use of digital media	a) Share of Internet users Question: “Could you tell to what extent you use the Internet?” Description: % of responses <i>Every day</i> and <i>Almost every day</i>	Source: Eurobarometer 94.3 (https://search.gesis.org/research_data/ZA7780) Data collected: February–March 2021 Dataset variable: <i>qd3_5</i>
		+ b) Participation in online social networks Question: “Internet use: participating in social networks (creating user profile, posting messages or other contributions to Facebook, Twitter, etc.)” Description: % of individuals who participated on annual basis	Source: Eurostat (https://ec.europa.eu/eurostat/databrowser/view/ISOC_CI_AC_I_custom_3909689/default/table?lang=en) Data collected: 2021 Dataset variable: <i>I_IUSNET</i>

(Continued)

Table A6 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
Share of trust in legacy media (<i>legmedtrust</i>)	A set of countries with high trust in legacy media	Question: “How much trust do you have in certain media? For each of the following media, do you tend to trust it or tend not to trust it” Description: Average % of responses <i>Tend to trust</i> written press, radio, and TV	Source: Eurobarometer 94.3 (https://search.gesis.org/research_data/ZA7780) Data collected: February–March 2021 Dataset variable: <i>qa6a_1, 1a6a_2, qa6a_3</i>
Share of trust in social media (<i>digmedtrust</i>)	A set of countries with high trust in social media	Question: “How much trust do you have in certain media? For each of the following media, do you tend to trust it or tend not to trust it” Description: Average % of responses <i>Tend to trust</i> Internet and online social networks	Source: Eurobarometer 94.3 (https://search.gesis.org/research_data/ZA7780) Data collected: February–March 2021 Dataset variable: <i>qa6a_4, 1a6a_5</i>
Media and digital literacy (<i>meddiglit</i>)	A set of countries with high levels of media and digital literacy	a) Reading performance Question: 15-year-old school pupils’ scholastic performance in reading Description: Mean score in reading +	Source: OECD (PISA Results) (https://www.oecd.org/pisa/Combined_Executive_Summaries_PISA_2018.pdf) Data collected: 2018
		b) Share of audience with above-level digital skills Question: “Individuals with above basic overall digital skills (all five component indicators are at above basic level)” Description: % of individuals	Source: Eurostat (https://ec.europa.eu/eurostat/databrowser/view/ISOC_SK_DSKL_I21/default/table?lang=en&category=isoc.isoc_sk.isoc_sku) Data collected: 2021 Dataset variable: <i>I_DSK2_AB</i>

(Continued)

Table A6 (Continued)

<i>Condition variable</i>	<i>fsQCA dimension</i>	<i>Indicator</i>	<i>Data source</i>
		<p>c) Development of media literacy in formal education Calibration: 1 – Fully in the set (country has widely and fully applied quality media literacy programs in formal education) 0,7 – More in than out of the set (country has media literacy programs in formal education, but they are not widely applied or they are not in highest quality) 0,3 – More out than in the set (media literacy programs in formal education are rare or an exception, or quality is considered to be extremely low) 0 – Fully out of the set (country does not have any of the media literacy programs in formal education)</p>	<p>Calibrations are based on informed and source corroborated assessments made by national teams and revised in coordination with the Croatian team</p>

Annex 2

Raw quantitative data values
in the EU countries

		<i>Austria</i>	<i>Belgium</i>	<i>Bulgaria</i>	<i>Croatia</i>	<i>Cyprus</i>	<i>Czechia</i>	<i>Denmark</i>	<i>Estonia</i>	<i>Finland</i>	
Contextual conditions	Economic development (<i>gdp</i>) (GDP per capita in \$)	53,637	51,247	12,221	17,685	31,551	26,821	68,007	27,943	53,654	
	Quality of democracy (<i>qdem</i>) (index)	8,073	7,330	6,620	6,433	7,313	7,455	9,160	7,748	9,143	
	Technol. development (<i>techdev</i>) (fixed broadband subs. per 100)	29,255	40,947	30,305	25,165	37,396	36,515	44,463	34,276	33,385	
	Postmaterialism (<i>postmat</i>) (index)	0.213	N/A	0.017	0.198	N/A	0.121	0.131	0.144	0.251	
Journalism conditions	Strong market structure for journalism (<i>marketstr</i>)	Revenue for audiovisual media (per capita in €)	322,188	248,902	143,569	100,834	129,463	111,102	366,093	121,798	318,227
		Advertising expenditures (per capita in €)	338,343	89,781	11,913	26,014	11,830	124,480	249,467	29,923	152,283
		Employees in publishing and information services (per capita)	0.0034	0.0019	0.0018	0.0018	0.0021	0.0029	0.0046	0.0032	0.0047
	TV market concentration (<i>marketcon</i>) (% of C4)		0.731	0.782	0.732	0.750	0.470	0.872	0.949	0.533	0.851
	Autonomy and trust in public service media (<i>psmautonomy</i>)	Perception of public TV content as free from polit. interference (\bar{x})	0.686	0.668	0.418	0.250	0.300	0.663	0.725	0.792	0.733

(Continued)

			<i>Austria</i>	<i>Belgium</i>	<i>Bulgaria</i>	<i>Croatia</i>	<i>Cyprus</i>	<i>Czechia</i>	<i>Denmark</i>	<i>Estonia</i>	<i>Finland</i>
	Trust in public TV media (\bar{x})		0.780	0.756	0.750	0.400	0.467	0.871	0.571	0.892	0.818
	Share of full-time journalists (<i>journfull</i>) (%)		0.770	0.745	0.840	0.803	0.922	0.856	0.711	0.934	0.781
	Share of journalists with higher education degree (<i>journedu</i>)	Share of journalists with university degree (%)	0.593	0.956	0.966	0.692	0.990	0.670	0.880	0.814	0.746
		Share of journalists with journalism university degree (%)	0.183	0.465	0.388	0.232	0.583	0.278	0.696	0.405	0.393
	Skilled journalists (<i>journskill</i>) (\bar{x})		0.614	0.715	0.380	0.379	0.500	0.571	0.800	0.692	0.900
	Strong monitorial role of journalists (<i>journmonit</i>) (\bar{x})		3,300	3,145	3,465	4,320	3,225	3,018	3,893	3,255	3,365

(Continued)

			<i>Austria</i>	<i>Belgium</i>	<i>Bulgaria</i>	<i>Croatia</i>	<i>Cyprus</i>	<i>Czechia</i>	<i>Denmark</i>	<i>Estonia</i>	<i>Finland</i>
Media usage and competencies conditions	Legacy media repertoires (<i>legmeduse</i>)	Share of press users (%)	0.429	0.470	0.046	0.199	0.101	0.127	0.473	0.324	0.700
		Share of radio users (%)	0.557	0.657	0.266	0.481	0.469	0.432	0.554	0.537	0.538
		Share of public TV media audiences (%)	0.313	0.304	0.085	0.274	0.126	0.294	0.361	0.172	0.433
	Digital media repertoires (<i>digmeduse</i>)	Share of Internet users (%)	0.741	0.940	0.653	0.749	0.586	0.960	0.962	0.976	0.962
		Participation in online social networks (%)	0.571	0.628	0.601	0.609	0.786	0.615	0.854	0.673	0.751
	Share of trust in legacy media (<i>legmedtrust</i>) (%)		0.631	0.721	0.419	0.433	0.421	0.582	0.830	0.705	0.796
	Share of trust in social media (<i>digmedtrust</i>) (%)		0.351	0.194	0.407	0.345	0.300	0.289	0.265	0.367	0.191
	Media and digital literacy (<i>meddiglit</i>)	Reading performance (\bar{x})	484	493	420	479	424	490	501	523	520
		Share of audience with above-level digital skills (%)	0.330	0.260	0.080	0.310	0.210	0.240	0.370	0.280	0.480

(Continued)

		<i>France</i>	<i>Germany</i>	<i>Greece</i>	<i>Hungary</i>	<i>Ireland</i>	<i>Italy</i>	<i>Latvia</i>	<i>Lithuania</i>	<i>Luxemb.</i>	
Contextual conditions	Economic development (<i>gdp</i>) (GDP per capita in \$)	43659	51203	20192	18728	100172	35657	21148	23723	133590	
	Quality of democracy (<i>qdem</i>) (index)	7,935	8,563	7,100	6,503	8,893	7,683	6,988	6,710	8,498	
	Technol. development (<i>techdev</i>) (fixed broadband subs. per 100)	47,498	43,461	40,496	33,488	30,660	30,468	25,860	28,251	37,303	
	Postmaterialism (<i>postmat</i>) (index)	0.255	0.354	0.164	0.186	N/A	0.197	0.128	0.051	N/A	
Journalism conditions	Strong market structure for journalism (<i>marketstr</i>)	Revenue for audiovisual media (per capita in €)	219,963	273,766	100,387	97,012	254,678	156,019	70,251	70,108	181,179
		Advertising expenditures (per capita in €)	119,740	183,216	31,998	49,215	187,723	68,960	11,673	12,090	106,975
		Employees in publishing and information services (per capita)	0.0030	0.0046	0.0018	0.0032	0.0029	0.0020	0.0043	0.0037	0.0032
	TV market concentration (<i>marketcon</i>) (% of C4)	0.818	0.839	0.547	0.497	0.579	0.753	0.513	0.639	N/A	

(Continued)

			<i>France</i>	<i>Germany</i>	<i>Greece</i>	<i>Hungary</i>	<i>Ireland</i>	<i>Italy</i>	<i>Latvia</i>	<i>Lithuania</i>	<i>Luxemb.</i>
	Autonomy and trust in public service media (<i>psmautonomy</i>)	Perception of public TV content as free from polit. interference (\bar{x})	0.688	0.721	0.308	0.005	0.513	0.211	0.688	0.638	N/A
		Trust in public TV media (\bar{x})	0.700	0.879	0.517	0.067	0.643	0.428	0.800	0.717	N/A
Share of full-time journalists (<i>journfull</i>) (%)			0.789	0.745	0.879	0.614	0.815	0.629	0.871	N/A	N/A
	Share of journalists with higher education degree (<i>journedu</i>)	Share of journalists with university degree (%)	0.947	0.729	0.603	0.658	0.490	0.727	0.791	N/A	N/A
		Share of journalists with journalism university degree (%)	0.561	0.164	0.294	0.188	0.289	0.237	0.435	N/A	N/A
Skilled journalists (<i>journskill</i>) (\bar{x})			0.563	0.717	0.423	0.289	0.575	0.430	0.650	0.600	N/A
Strong monitorial role of journalists (<i>journmonit</i>) (\bar{x})			3,498	3,013	3,638	3,060	3,253	3,110	3,268	N/A	N/A

(Continued)

			<i>France</i>	<i>Germany</i>	<i>Greece</i>	<i>Hungary</i>	<i>Ireland</i>	<i>Italy</i>	<i>Latvia</i>	<i>Lithuania</i>	<i>Luxemb.</i>
Media usage and competencies conditions	Legacy media repertoires (<i>legmeduse</i>)	Share of press users (%)	0.241	0.442	0.101	0.111	0.334	0.201	0.101	0.308	0.503
		Share of radio users (%)	0.506	0.676	0.431	0.350	0.664	0.318	0.482	0.445	0.623
		Share of public TV media audiences (%)	0.303	0.468	0.079	0.154	0.279	0.365	0.114	0.116	N/A
	Digital media repertoires (<i>digmeduse</i>)	Share of Internet users (%)	0.738	0.709	0.841	0.633	0.944	0.657	0.960	0.932	0.958
		Participation in online social networks (%)	0.448	0.466	0.621	0.772	0.691	0.502	0.698	0.652	0.620
	Share of trust in legacy media (<i>legmedtrust</i>) (%)		0.445	0.580	0.378	0.418	0.766	0.526	0.602	0.582	0.712
	Share of trust in social media (<i>digmedtrust</i>) (%)		0.127	0.207	0.482	0.405	0.150	0.362	0.316	0.388	0.196
	Media and digital literacy (<i>meddiglit</i>)	Reading performance (\bar{x})	493	498	457	476	518	476	479	476	470
		Share of audience with above-level digital skills (%)	0.310	0.190	0.220	0.220	0.400	0.230	0.240	0.230	0.320

(Continued)

		<i>Malta</i>	<i>Netherl.</i>	<i>Poland</i>	<i>Portugal</i>	<i>Romania</i>	<i>Slovakia</i>	<i>Slovenia</i>	<i>Spain</i>	<i>Sweden</i>	
Contextual conditions	Economic development (<i>gdp</i>) (GDP per capita in \$)	33486	57767	17999	24567	14858	21391	29291	30103	61028	
	Quality of democracy (<i>qdem</i>) (index)	7,550	8,988	6,795	7,673	6,238	6,800	7,370	8,018	9,300	
	Technol. development (<i>techdev</i>) (fixed broadband subs. per 100)	41,412	43,161	21,779	40,403	29,240	31,183	30,770	34,179	40,308	
	Postmaterialism (<i>postmat</i>) (index)	N/A	0.193	0.275	0.122	0.092	0.086	0.262	0.279	0.244	
Journalism conditions	Strong market structure for journalism (<i>marketstr</i>)	Revenue for audiovisual media (per capita in €)	118,194	239,651	100,899	144,879	55,464	154,219	155,526	138,147	280,559
		Advertising expenditures (per capita in €)	20,732	164,872	33,935	12,361	5,224	39,489	37,032	78,072	266,849
		Employees in publishing and information services (per capita)	0.0031	0.0024	0.0018	0.0016	0.0021	0.0018	0.0023	0.0014	0.0054
	TV market concentration (<i>marketcon</i>) (% of C4)	0.656	0.806	0.901	0.648	0.593	0.604	0.607	0.718	0.945	

(Continued)

			<i>Malta</i>	<i>Netherl.</i>	<i>Poland</i>	<i>Portugal</i>	<i>Romania</i>	<i>Slovakia</i>	<i>Slovenia</i>	<i>Spain</i>	<i>Sweden</i>
Autonomy and trust in public service media (<i>psmautonomy</i>)	Perception of public TV content as free from polit. interference (\bar{x})	0.471	0.871	0.100	0.533	0.403	0.646	0.550	0.250	0.893	
	Trust in public TV media (\bar{x})	0.700	0.636	0.111	0.565	0.591	0.767	0.700	0.333	0.758	
Share of full-time journalists (<i>journfull</i>) (%)		N/A	0.417	0.790	0.916	0.874	0.467	N/A	0.856	0.744	
Share of journalists with higher education degree (<i>journedu</i>)	Share of journalists with university degree (%)	N/A	0.818	0.890	0.857	0.707	0.840	N/A	0.967	0.573	
	Share of journalists with journalism university degree (%)	N/A	0.385	0.400	0.555	0.381	0.533	N/A	0.772	0.501	
Skilled journalists (<i>journskill</i>) (\bar{x})		0.500	0.729	0.445	0.595	0.362	0.492	0.850	0.646	0.800	
Strong monitorial role of journalists (<i>journmonit</i>) (\bar{x})		N/A	2,753	3,820	3,705	3,175	3,020	N/A	3,998	3,925	

(Continued)

			<i>Malta</i>	<i>Netherl.</i>	<i>Poland</i>	<i>Portugal</i>	<i>Romania</i>	<i>Slovakia</i>	<i>Slovenia</i>	<i>Spain</i>	<i>Sweden</i>
Media usage and competencies conditions	Legacy media repertoires (<i>legmeduse</i>)	Share of press users (%)	0.258	0.571	0.083	0.219	0.081	0.164	0.260	0.125	0.577
		Share of radio users (%)	0.480	0.517	0.435	0.510	0.227	0.532	0.599	0.287	0.556
		Share of public TV media audiences (%)	N/A	0.337	0.280	0.171	0.039	0.139	0.221	0.244	0.371
	Digital media repertoires (<i>digmeduse</i>)	Share of Internet users (%)	0.750	0.940	0.613	0.985	0.614	0.759	0.933	0.676	0.964
		Participation in online social networks (%)	0.756	0.733	0.568	0.655	0.686	0.646	0.636	0.647	0.715
	Share of trust in legacy media (<i>legmedtrust</i>) (%)		0.460	0.773	0.482	0.687	0.488	0.523	0.518	0.379	0.787
	Share of trust in social media (<i>digmedtrust</i>) (%)		0.276	0.209	0.481	0.220	0.335	0.294	0.230	0.195	0.200
	Media and digital literacy (<i>meddiglit</i>)	Reading performance (\bar{x})	448	485	512	492	428	458	495	483	506
		Share of audience with above-level digital skills (%)	0.350	0.520	0.210	0.290	0.090	0.210	0.200	0.380	0.360

Annex 3

Factor analysis of media use

The factor analysis (Principal component analysis, Varimax rotation with Keiser Normalization) resulted with two main dimensions of media use. The first factor/dimension consists of the use of legacy media: press, public television, and radio. The second factor dimension consists of the use of digital media: Internet and social networks.

Rotated component matrix, factor analysis of media use in the EU

	<i>First factor</i>	<i>Second factor</i>
Press media	.929	
Public television	.845	-.385
Radio	.808	.250
Television	.148	-.835
Internet	.580	.726
Online social networks		.534

Annex 4

Parsimonious solutions from the fsQCA

Parsimonious solution with conditions from the legal domain, and the outcome delcomm (deliberative communication) (coverage: 0.37, consistency: 0.85)

foiimp*~transparreg
~defamreg*~transparreg*transparimp

Parsimonious solution with conditions from the legal domain, and the outcome ~delcomm (negation of deliberative communication) (coverage: 0.86, consistency: 0.92)

~sourcprotimp
~dataprotimp
transparreg*~transparimp
defamreg*transparreg
defaimp*~foiimp*transparreg

Parsimonious solution with conditions from the media accountability domain, and the outcome delcomm (deliberative communication) (coverage: 0.59; consistency: 0.9)

orgec*profmetadisc*medombud
orgec*medombud*publdisc

Parsimonious solution with conditions from the media accountability domain, and the outcome ~delcomm (negation of deliberative communication) (coverage: 0.91; consistency: 0.8)

~medombud
profmetadisc*~publdisc
medcouncils*~orgec*~publdisc

Parsimonious solution with conditions from the journalism domain, and the outcome delcomm (deliberative communication) (coverage: 0.84; consistency: 0.89)

marketstr
 ~journedu*journskill
 ~journalfull*journskill
 marketcon*journskill
 psmautonom*~journalfull*~journedu

Parsimonious solution with conditions from the journalism domain, and the outcome ~delcomm (negation of deliberative communication) (coverage: 0.93; consistency: 0.89)

~journalmonit*~journskill
 marketcon*~journskill
 ~marketstr*marketcon

Parsimonious solution with conditions from the media usage domain, and the outcome delcomm (deliberative communication) (coverage: 0.64; consistency: 0.93)

legmeduse*~socmedtrust

Parsimonious solution with conditions from the media usage domain, and the outcome ~delcomm (negation of deliberative communication) (coverage: 0.87; consistency: 0.87)

~legmeduse

Parsimonious solution in the overall analysis, and the outcome delcomm (deliberative communication) (coverage: 0.85; consistency: 0.82)

legmeduse
 gdpdem*psmautonom
 gdpdem*journskill

Parsimonious solution in the overall analysis, and the outcome ~delcomm (negation of deliberative communication) (coverage: 0.87; consistency: 0.87)

~legmeduse

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