

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2020

Country report: Slovakia

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Research Project Report

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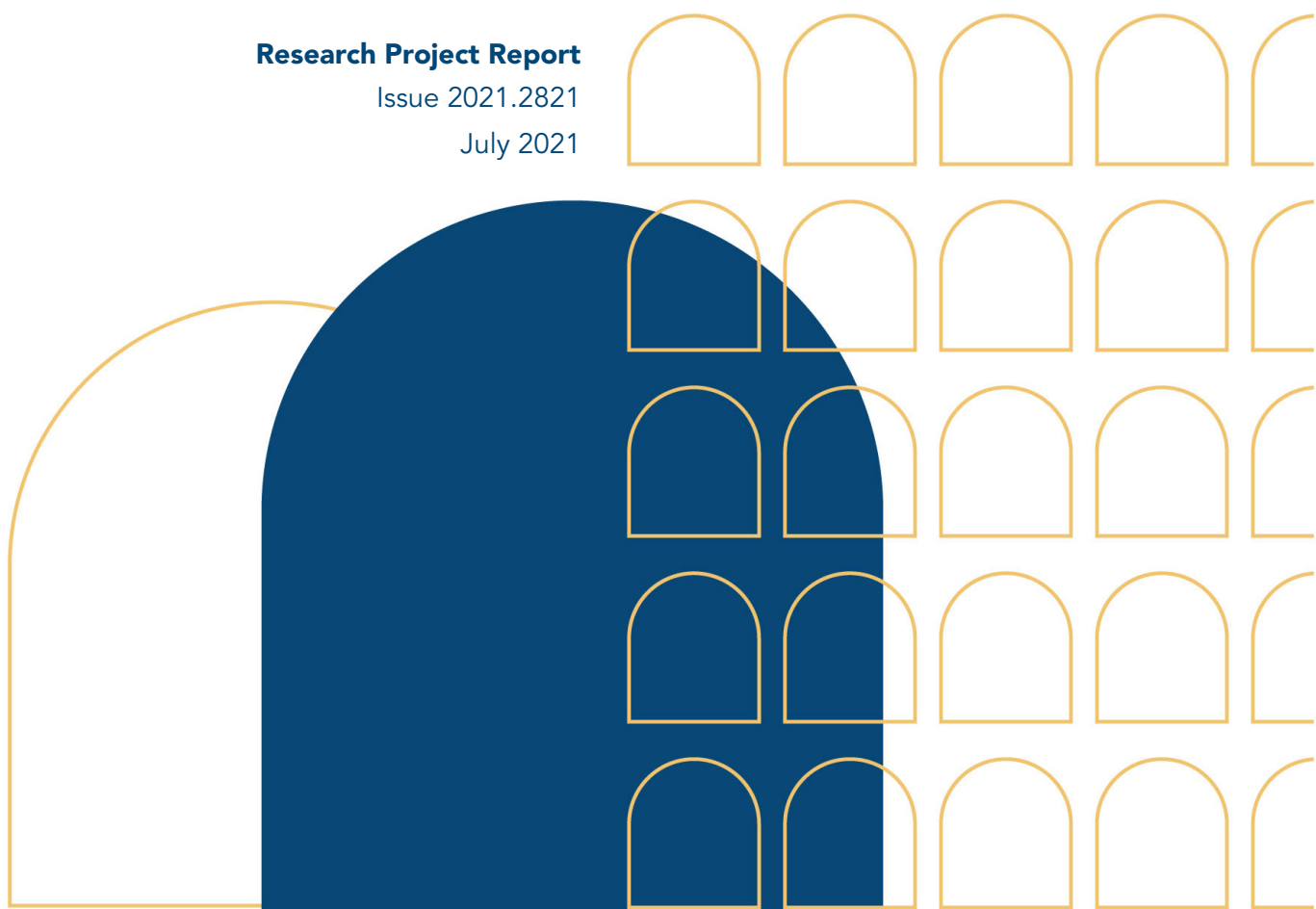


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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 2020. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, the Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological note

Authorship and review

The CMPF partners with experienced, independent national researchers to carry out the data collection and author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire developed by the CMPF.

In Slovakia the CMPF partnered with Željko Martyn Sampor (Faculty of Law Palacký University Olomouc), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

| Fundamental Protection | Market Plurality | Political Independence | Social Inclusiveness |
|---|--|---|--|
| Protection of freedom of expression | Transparency of media ownership | Political independence of media | Access to media for minorities |
| Protection of right to information | News media concentration | Editorial autonomy | Access to media for local/regional communities and for community media |
| Journalistic profession, standards and protection | Online platforms concentration and competition enforcement | Audiovisual media, online platforms and elections | Access to media for women |
| Independence and effectiveness of the media authority | Media viability | State regulation of resources and support to media sector | Media Literacy |
| Universal reach of traditional media and access to the Internet | Commercial & owner influence over editorial content | Independence of PSM governance and funding | Protection against illegal and harmful speech |

Table 1: Areas and Indicators of the Media Pluralism Monitor

The digital dimension

The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digital-specific risk scores and the report contains a specific analysis of risks related to the digital news environment.

The calculation of risk

The results for each thematic area and indicator are presented on a scale from 0 to 100%.

Scores between 0 and 33%: low risk

Scores between 34 to 66%: medium risk

Scores between 67 and 100%: high risk

With regard to indicators, scores of 0 are rated 3% while scores of 100 are rated 97% by default, to avoid an assessment of total absence or certainty of risk.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2021 scores may not be fully comparable with previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2021, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

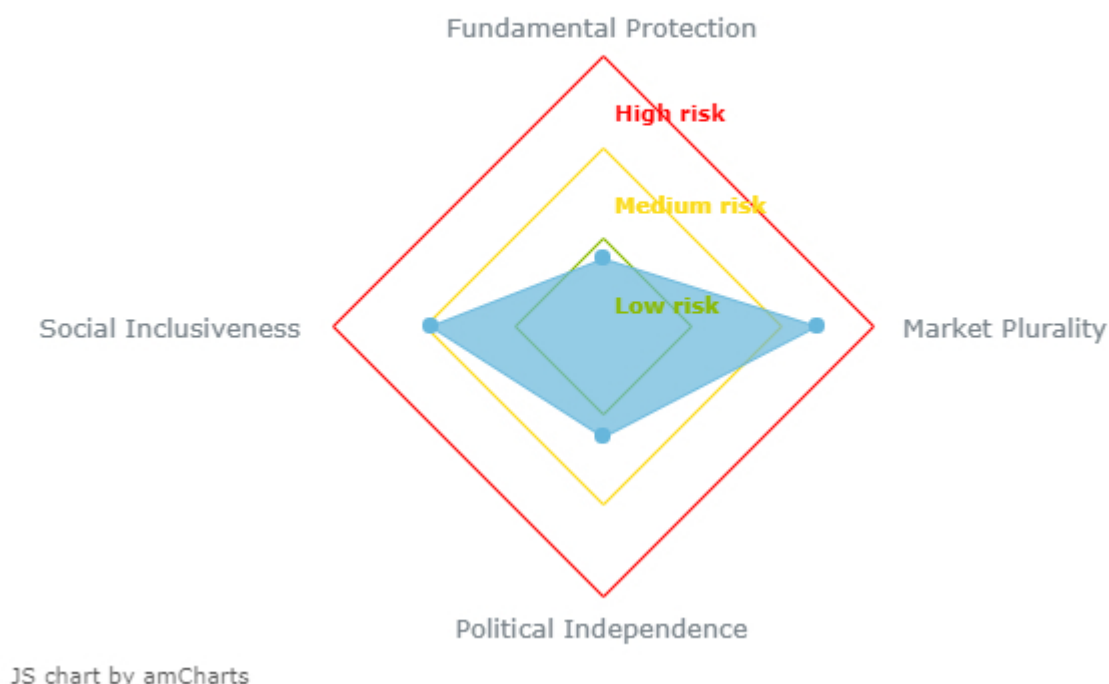
2. Introduction

- **Population:** Slovakia is a landlocked country with a territory of 49,035 square kilometres and a population of around 5.4 million, its capital being Bratislava, with a population of over 400,000.
- **Languages:** The official language is Slovak. However, other languages of traditional national minorities are also spoken, mainly Hungarian, Czech, Roma, Croatian, Ruthenian, Ukrainian and Polish.
- **Minorities:** The ethnic structure is made up of the Slovak majority (86%), with the most numerous national minority being Hungarian (8%), followed by Roma (2%). Hungarian minority is concentrated mainly along the southern border with Hungary, while Ruthenian and Ukrainian are concentrated predominantly in the eastern part of the country. Out of the country's eight regions, the richest one is the Bratislava region in the west with over a double of gross domestic product (GDP) in comparison to Kosice that comes second.
- **Economic situation:** The main industry is the automotive industry, with other major industries including metallurgy, chemical industry, agriculture and tourism. Thanks to a stronger third quarter, the Slovak economy closed 2020 with a decline of 5.8%, which was better than expected in light of the crisis caused by the outbreak of COVID-19. For 2021, the Slovak Ministry of Finance expects GDP growth of 4.3%, which is close to the level of its pre-COVID-19 growth.
- **Political situation:** The politics are characterized by coalition governments due to fragmentation of the political landscape. On average, six to seven parties enter the parliament, the majority being centre-right parties. After general elections in 2020, there was a change of government, and the former main government party ended up in opposition and has consequently split.
- **Media market:** Six dailies, including two tabloids, and two nationwide press agencies, represent the press landscape with various minority prints. As for broadcasting, the dual system is represented by the public service media company on the one hand and two major private players. A similar situation occurs in radio broadcasting. Consumption of foreign-based media, including on-demand services, is limited due to the language barrier. However, Czech-based media still retain their traditional presence on the market because of the shared historical background and language similarities. Digital news consumption is on the rise, both as a result of the expansion of traditional media to online platforms and to the rise of new media platforms. However, TV remains the main media type consumed, with digital coming in second. Due to the common border with Hungary there's a significant overflow of Hungarian media. Although their overall market presence is marginal, their main impact is on the political life of the Hungarian speaking minority.
- **Regulatory environment:** The major regulatory body for content regulation is the Council for Broadcasting and Retransmission, which is also in charge of licensing, with some shared competencies with the Regulatory Authority for Electronic Communications and Postal Services (formerly the Telecommunication Office). Regarding self-regulation, the most important and longest-standing authority is the Slovak Advertising Standards Council. The main industry coordinator in the policy field is the Creative Industry Forum. Ethics in journalism are overseen via self-regulation by the Print-Digital Council of the Slovak Republic. The media market is regulated only by the general competition laws with no standing monitoring mechanism in place.

- **COVID-19:** Main negative impact of the COVID-19 crisis was the economic one - media sector not excluding. No special restrictions upon freedom of expression have been introduced in response to the COVID-19 emergency, and restrictions arising from the state of emergency that impacted fundamental rights and freedoms, mainly freedom of movement and freedom of assembly, were being regularly and publicly scrutinized by ombudswoman, press and prosecution general.

3. Results from the data collection: assessment of the risks to media pluralism

Slovakia: Media Pluralism Risk Areas



State of Media pluralism in Slovakia during the COVID-19 pandemic uncovered both strengths and weaknesses of the current state of affairs. While there were no restrictions on freedom of expression due to the pandemic, the main threat came from the dependency on revenue from advertising, which has dropped rapidly. And while there were no media bankruptcies reported, freelance journalists were among the first economic casualties of the crisis.

The media market as a whole still remains mainly unmapped since there is no regulatory body that would undertake this task. Regulation is focused on content regulation of the traditional media with little attention to the online media. At the same time, these regulatory authorities are still susceptible to political influence, especially when electing their board members. Adaptability to the changing environment is demonstrated by self-regulation, especially in commercial communication. Overall, this resulted in **Market Plurality** having the highest risk score.

While political interference is palpable in the public service media (PSM), private media have shown to be, to a large degree, resilient to political pressure. This is more due to the high sensitivity of both the public and the journalists to any political pressure than due to any kind of state regulation providing safeguards, thus scoring overall medium risk in **Political Independence**. In general, with few exceptions, such as protection of sources, general safeguards protecting journalists are still sparse.

While well-established protection of freedom of speech resulted in low risk for **Fundamental Protection**, it shifted closer to medium risk due to the almost uninhibited proliferation of disinformation media. This, together with hate speech, has proven to be a major rising issue.

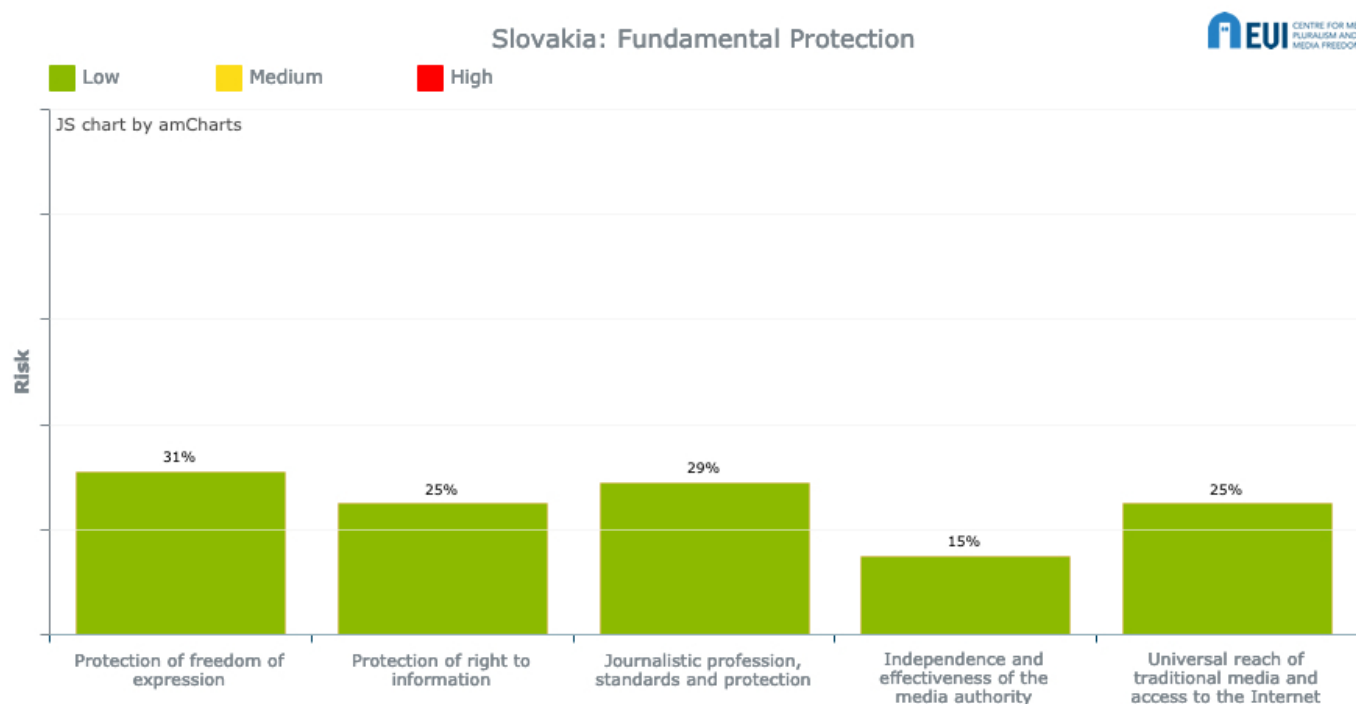
There have been no major changes recorded in relation to the ailments already established, such as no rules for state advertising, lack of transparency in media ownership, gender inequality and access to media for unrecognized minorities. The latter two, together with outdated media literacy policies, contributed to the

fact that **Social Inclusiveness** scored medium to high risk.

Finally it is important to note that lack of formal institutions, laws or policies, is usually interpreted as a risk factor within methodology.

3.1. Fundamental Protection (25% - low risk)

The Fundamental Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have competence to regulate the media sector, and the reach of traditional media and access to the Internet.



Freedom of expression legislative provisions reflect Article 10 of the European Convention on Human Rights in a sufficient manner to adhere to international standards. However, there are still no signs of decriminalization of defamation. Even though there were no criminal charges against journalists for defamation recorded in the monitored period, the legal option to use or abuse this provision of criminal law still remains. On the other hand, no restrictions upon freedom of expression have been enforced in response to the COVID-19 outbreak, also due to the Constitutional court ruling that suspended new provisions in the Act on electronic communications that would have enabled general data collection via telecommunications companies (PL. US 13/2020).

The protection of the right to information scored low risk (25%). There is a well-established practice in connection to the Freedom of Information Act^[2]. One of its main strengths is that if the obliged body does not disclose the information within the statutory period, it will be deemed as issuing a fictitious decision of administration which can be appealed as a real one. Nonetheless, there have been tendencies by public bodies to withhold information by marking it as a “trade secret”, even if it concerns public funds^[3]. Whistleblowers are protected by a special law^[4], and as of 2020, the new Office for the Protection of Whistleblowers has become operational, however regarding its effectiveness, it will be put to the test by time.

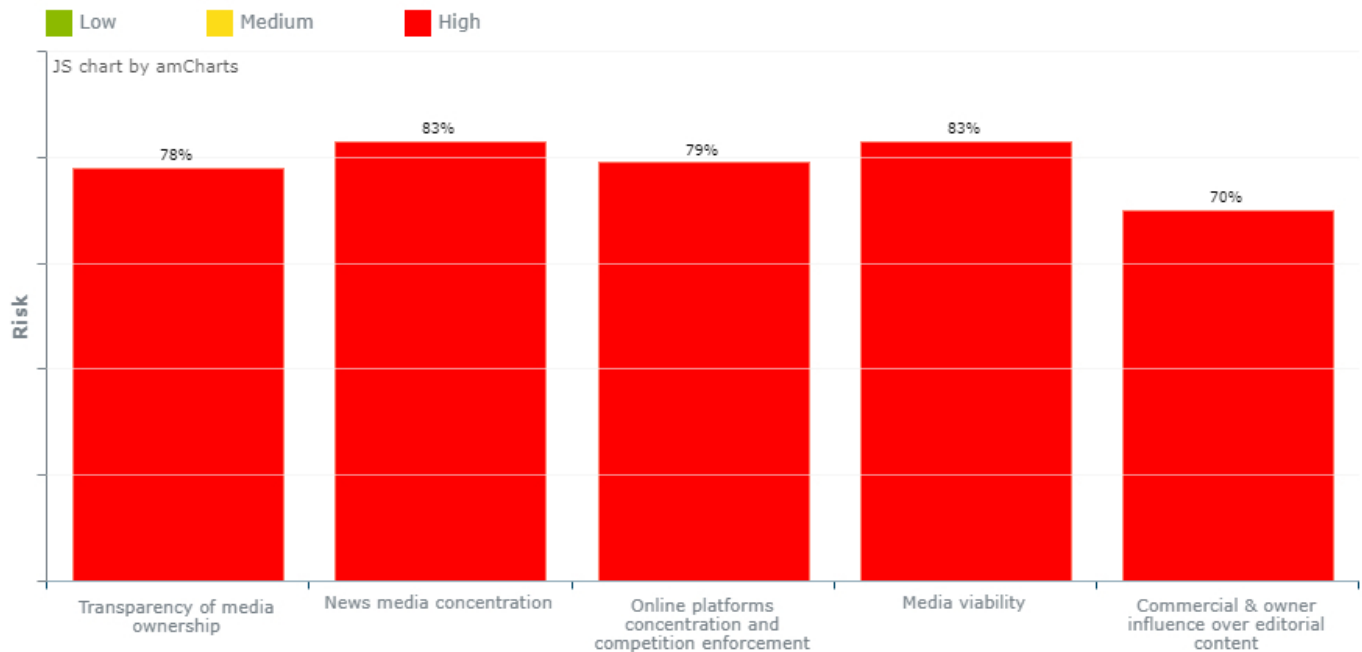
Journalistic profession, standards and protection decreased to low risk (29%) after the spike in the previously monitored period. The investigation of Jan Kuciak's murder raised awareness about the safety of journalists and subjected it to greater public scrutiny. Professional associations are providing advocacy for editorial independence and professional standards, mainly via the Print-Digital Council of the Slovak Republic. A legal provision^[6] on the protection of sources ensures that journalists cannot be forced by the courts to testify on the identity of their source. There were two notable threats made to journalists in the monitored period. One was related to the former Police President that initiated a hate-filled communication campaign aimed at the editor-in-chief of the online news outlet Aktuality.sk. The second also relates to Aktuality.sk with an investigative journalist finding a pistol bullet in his mailbox (the originator and the reason are unknown). Labelling journalists as liars by the Prime Minister was continued even after the change of the government in 2020^[6]. However, this seems to be limited to the Office of the Prime Minister, since other members of the government don't display this kind of behavior and the Ministry of Culture is currently preparing the Constitutional Act on Protection of Journalists. In connection to the COVID-19 outbreak, the biggest impact was felt by freelancers/self-employed journalists who were among the first to be cut off the payroll during the first wave of the pandemic^[7]. The financial strain is apparent, but no major layoffs, nor media going out of business were noted.

The Independence and effectiveness of the media authority remain relatively stable in low-risk margins (15%). However, occasional political nominations for the Council for Broadcasting and Retransmission are still an issue. These include nominations during the previous as well as the current government. These nominations are so far not dominant, though. One major legal change in 2020 was addressing the concerns voiced regarding frequency allocation. Before, if a frequency that was used by a licensed broadcaster became available, the Council had tendencies to award these to the public media service (PMS scoop-up) instead of keeping them in the pool of licensed broadcasters.

As for the **universal reach of traditional media and access to the Internet**, in Slovakia, almost all citizens have access to TV and radio broadcasting (PSM Radio coverage 97.8% and TV 95%) with good internet penetration, resulting in a low-risk score of 25%.

3.2. Market Plurality (79% - high risk)

The Market Plurality area focuses on the economic risks to media pluralism, deriving from lack of transparency and concentration of ownership, sustainability of the media industry, exposure of journalism to commercial interests. The first indicator examines the existence and effectiveness of provisions on transparency of media ownership. Lack of competition and external pluralism is assessed separately for the news media (production of the news) and for the online platforms (gateways to the news), considering separately horizontal and cross-media concentration; the concentration of online advertising market; and the role of competition enforcement. The indicator on media viability measures the trend of revenues and employment, in relation with GDP trends. The last indicator aims to assess risks to market plurality posed by business interests on production of editorial content, both from commercial and owners influence



The indicator for **Transparency of media ownership** scored high risk (78%). Slovak media market suffers from a long-term lack of transparency both in the traditional media and the online media. Thus far, there is no public body that would create an in-depth map of the Slovak media market. Act on the Register of Public Sector Partners^[8] can indirectly disclose ultimate owners of major media. However, media that do not do business with the state or do not receive public funding are not listed. The benefits of this Act, relating to protection against money laundering, are therefore limited with respect to media ownership transparency. The new Media Act prepared by the Ministry of Culture as well as the Constitutional Act on Protection of Journalists is promising to bring some changes to the status quo. However, these are still in the preparation phase.

News media concentration scored high risk (83%), demonstrating a lack of clarity in the media market as such in Slovakia. While media legislation contains specific thresholds and/or other limitations in order to prevent a high degree of horizontal concentration of ownership, this concerns mainly traditional media, such as TV, Radio and Television^[9]. Since neither the Broadcasting Council in its report nor did the Ministry of Culture measure the media market, both in respect of revenues and audience market share, it's difficult to assess efficiency even of the measures that are in place.

Online platforms concentration and competition enforcement have no special rules. They are regulated only via general regulation such as the general Act on Protection of Competition with no special legal provisions. The only available data on the market are from the industry sector. However, these are incomplete since they only take into account the national media, often excluding in their calculations major international players present on the market such as Google and Facebook. This resulted in high risk (79%). This corresponds with the findings from the previously monitored period.

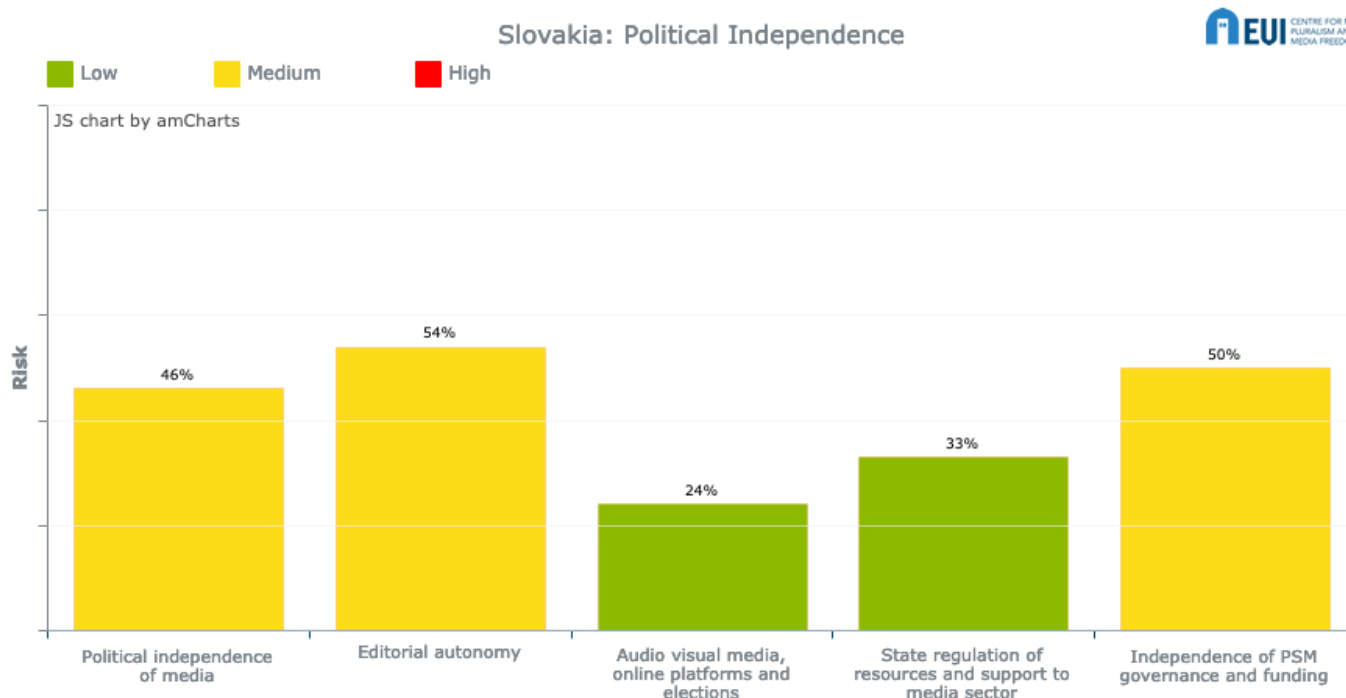
Media viability went down from medium risk to a high-risk score of (83%) mainly due to the effects of the COVID-19 pandemic. While in the past, this sector had relatively stable employment rates, with slight but continuous rise in revenues, all this already came to a halt during the first wave of COVID-19. According to the Statistical Office of the Slovak Republic, in the 2nd quarter of 2020, GDP decreased by 12.1%, and the Slovak economy saw its highest historical decline since 1996. According to data provided by the Ministry of Culture for the purpose of MPM, the loss of advertising revenues only among publishers was in the margin

of 40-50% (20-25 million euros), sales revenues dropped 30-95%. Online media became more dependent on their subscribers as revenues from advertising drooped. COVID-19 support schemes were also accessible to the media; however, there's no consensus regarding their efficacy.

Commercial & owner influence over editorial content with high risk (70%) is a reflection of the continuous lack of any mechanisms granting social protection to journalists in case of changes of ownership or in the editorial line, and the only protection is via general provisions of Labor law. On the positive side, self-regulation of commercial content has a longstanding tradition and is fairly effective in respect of prohibiting advertorial disguised advertisement. These rules coexist with prohibitive legal measures stipulating the obligation of journalists and/or media outlets not to be influenced by commercial interests.

3.3. Political Independence (41% - medium risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.



Issues with political independence of the public media service RTVS was noted during the previous monitored period and it has continued in this one. In the past, sixty journalists signed the petition pointing out unfavorable work conditions brought by the PSM management. In the meanwhile, none of these grievances were addressed by the management. Ongoing issue with political independence was most notable during the general elections campaign of 2020, especially in connection with one political party, which was part of the governmental coalition at the time (SNS) and held the position of the President of parliament and strongly favored the general director of the PSM (RTVS). Problems with political representation during elections in PSM were also noted by the OSCE in its election report (ODIHR Election Assessment Mission Final Report, 2020). Other persisting ailments are the absence of safeguards to guarantee autonomy when appointing and dismissing editors-in-chief and the alarming rise of

conspiracy/hoax media outlets with no clear ownership background that often extensively support certain political parties with extreme views. On the other side of the scales is the tradition of strong independent media and close scrutiny of any attempted interference with this independence by the government. In line with this, no restrictions upon freedom of expression have been introduced in response to the COVID-19 emergency, and there has been no new legislation or prescriptive governmental actions that would introduce restrictions on media or informing about COVID-19, nor otherwise curb media information or limit freedom of media.

The political independence of media scored medium risk (46%). Slovakia still lacks legal safeguards that would effectively regulate conflicts of interest between owners of media and the ruling parties, partisan groups or politicians. Objectivity is a persistent problem, as well as the balance of news reporting in local media that are published by municipal authorities in the period before the election. Most of the local media are financed/co-owned by local/municipal authorities, which makes them dependent on them. On the other hand, newspapers and press agencies thus far show resistance to political pressure.

Editorial autonomy scored medium risk (54%). Editorial autonomy in Slovakia depends solely on self-regulatory measures. These self-regulatory measures are usually exercised in cooperation with the Print-Digital Council of the Slovak Republic. However, adherence to the Journalist's Code of Ethics (2001) is voluntary. While major media formally accede to the Code, and in addition, often have their own ethical codes, this is not the rule for all media. It is especially the case of producers of dis- or misinformation, as well as various biased or often extremist propaganda news outlets that give outward appearance of regular media outlets. Their number and influence have been worryingly on the rise in Slovakia, especially during the COVID-19 outbreak.

Audio-visual media, online platforms and elections are scoring long-term low risk (24%). While both NGO and public monitoring reports showed a fairly equal representation of political actors during elections in private media, issues with the PSM broadcaster RTVS, noted in the previous report, persist.

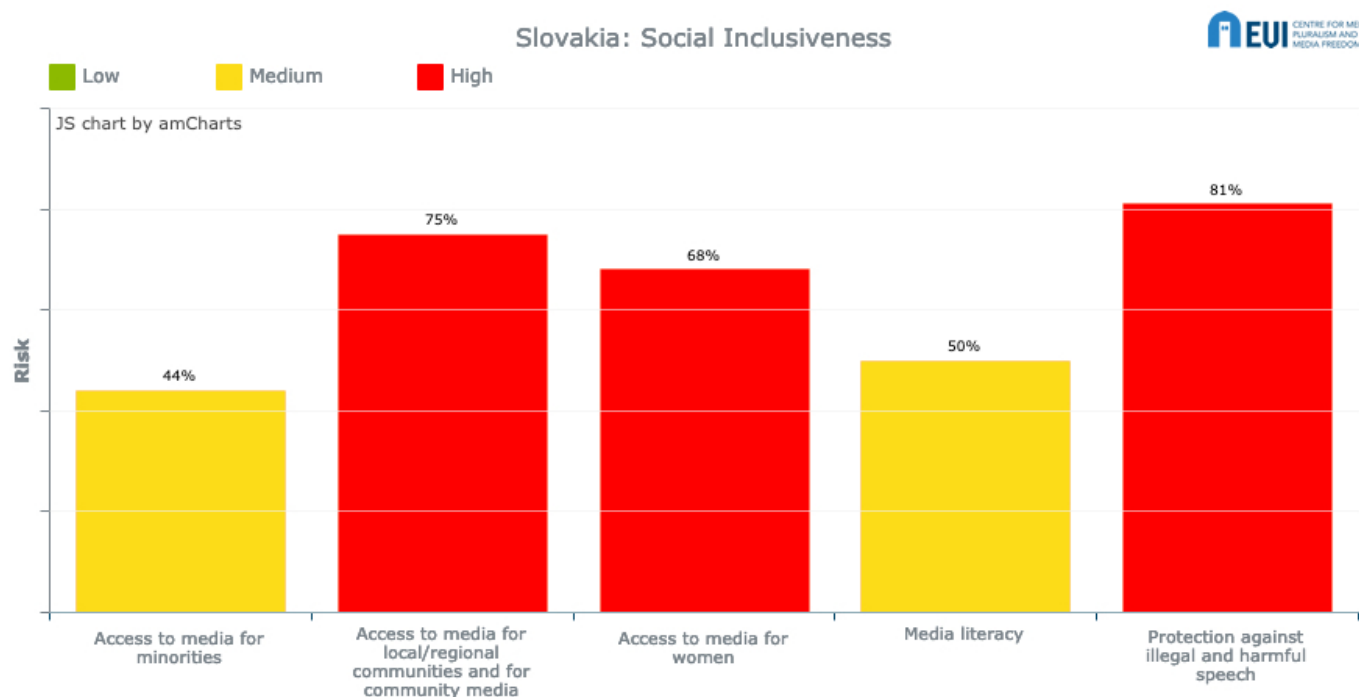
State regulation of resources and support to the media sector scored low risk (33%). Nonetheless, state advertising that is distributed to media without specific rules enacted and with little transparency in practice remains problematic. Concerns raised in the previous report regarding spectrum allocation, granting some frequencies intended for private broadcasters to PSM, were addressed by the government by changes to the broadcasting Act and contributed to keeping the overall risk level low.

Independence of PSM governance and funding scored medium risk of (50%). Part of the PSM funding is dependent on a special contract with the state concluded each year and part by license fees (payments for public service broadcasting) which have been set at 4.64 euro per month for the long term. This makes PSM funding susceptible to political pressure. The entire management board (The RTVS Council) is nominated (voted in) by the Parliament as well as the General director.

3.4. Social Inclusiveness (64% - medium risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. In addition, for the 2021 edition of the MPM, a new indicator has been added to the Social Inclusiveness area in order to assess new challenges raising from the uses of digital technologies: Protection against illegal and harmful speech. Due to this modification of the indicators, comparison with previous editions of the MPM should be handled with

extreme care.



While in general, the Social Inclusiveness area is slightly augmented in comparison to the previous year, this was mainly due to the addition of the Protection against illegal and harmful speech indicator that scored high risk.

Access to media for minorities scored medium risk (44%). There are large discrepancies between legally recognized minorities and minorities that are explicitly not recognized by law. Legally recognized (ethnic) minorities' access to media is predominately concentrated in PMS broadcasting supplemented by occasional local media. However, even in PSM broadcasting, there are issues both in quality and quantity of content. PSM 2019 annual audit report states that: "National broadcasting of public television needs an absolutely new concept, new internal and external collaborators, as well as a fixed broadcasting time" (p. 350)^[10]. Overall, there is a low focus on social issues of national minorities in broadcasting. On the other hand, representation of minorities that are not explicitly recognized by law is basically non-existent in Slovakia, according to both data collection and interviews with experts. Broadcasting for people with sight and hearing disabilities is a rare exception that has a well-established legal framework^[11]. Broadcasters have an obligation to provide multimodal access so that at least 10% of all broadcast programs are accessible via subtitles for the hearing impaired or interpreted in sign language. In addition, 3% of all broadcast programs should be accompanied by voice commentary for the blind.

Access to media for local/regional communities and for community media scored high risk (75%). There have been no substantial changes, in respect to these media, in the past decade. While PSM is obliged to keep its own local/regional correspondents (Act on Radio and Television Slovakia 532/2010 of 15 December 2010, Section 5, letter f^[12]) and law grants regional or local media access to media platforms (Section 17 letter b^[13]), there are no support schemes for local media. As for community media, there is no legal framework. In general, community media are a non-existing subject in Slovakia. Currently, the Ministry of Culture announced plans to include community media in its new media legislation, which was the first time that the public body acknowledged its existence.

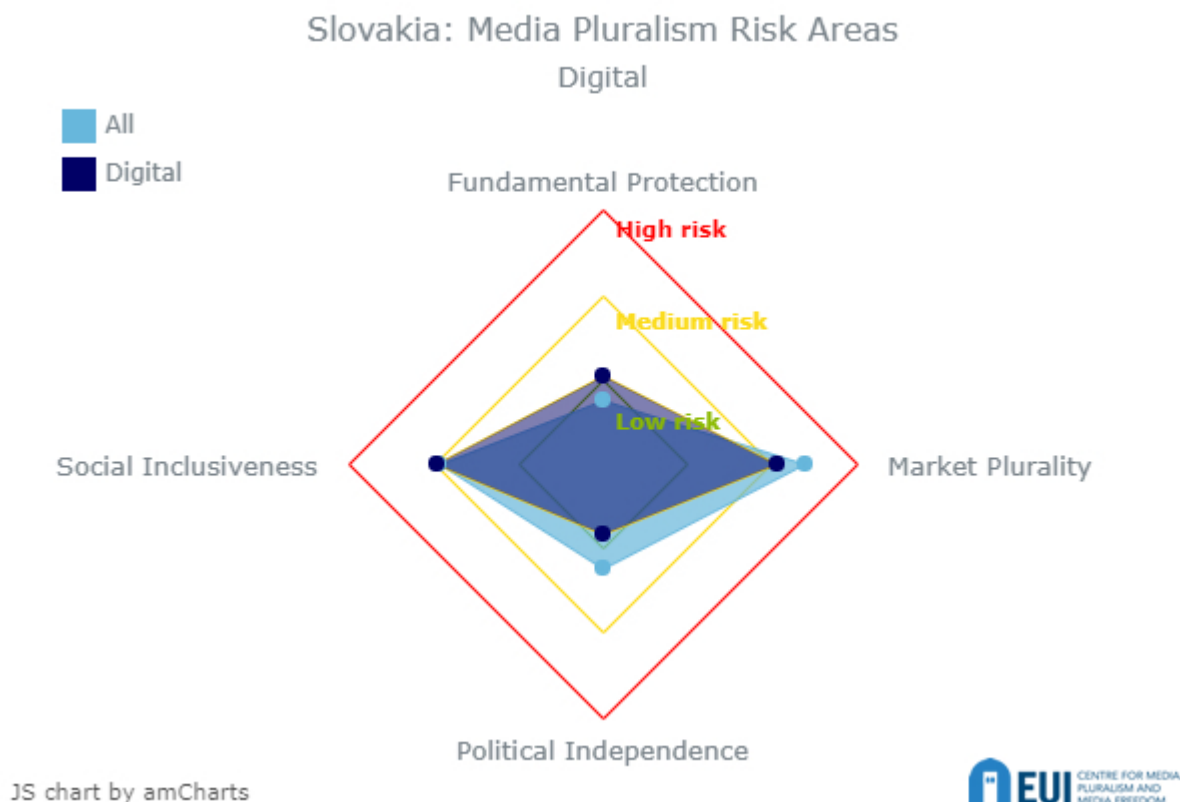
Access to media for women also scored high risk (68%). The low representation of women in managerial

boards in both private and public media, as well as a lack of comprehensive gender equality policies, are long-term issue. Neither Broadcasting Council nor other state authority monitors how women are represented in news and current affairs.

Media literacy scored medium risk (50%) and can be described as stagnant and out of date with no new emerging activities or policies from the public sector. Some school curricula haven't been updated for over ten years. Main activities are done by civic and academic organizations attempting to promote media literacy.

Protection against illegal and harmful speech scored the highest risk for Slovakia overall (81%). The laws or policies that aim at countering disinformation are non-existent. Initiatives to curb these are fragmented and primarily promoted by private media and NGO sector, and occasional public body via their website or social media account. There are also no laws or policies that aim at specifically countering online hate speech. Hate speech is criminalized by the Criminal Code through provisions against defamation of race, ethnicity, nationality, origin or religion and through provisions regarding incitement to hatred or violence against individuals or groups of people ^[14]. Self-regulation remains the main tool. In the case of advertising via the Advertising Standards Council (ASC) or autoregulation in the majority of other cases, the latter being more successful. Disinformation and hate speech were also areas that were most affected by the COVID-19 pandemic in Slovakia. According to the survey done by Focus agency in October 2020, more than half of the teachers believed that the COVID-19 did not originate naturally; one-third thought that vaccination is preparation for chipping.

4. Pluralism in the online environment: assessment of the risks



Scored indicators show shifts in risk in the online environment in half of the areas. Social Inclusiveness remained a medium-risk area, with a slight increase from 64% last year to 65%. Market Plurality remains in the high-risk zone; however, it dropped from 76% to 68%. The biggest change occurred in the area of Fundamental Protection, where the risk increased from 25% to 35%, shifting it to medium from low risk and Political Independence that dropped from 41% medium risk to 27% low risk in the digital environment.

The online environment in Slovakia lacks comprehensive policies. In many cases, these are completely absent. Accessible data are only partial and come from market research agencies with minimal or no data available from the public bodies. Since there haven't been any regulatory changes in comparison to the previously monitored period, the COVID-19 outbreak has had the main impact on the online environment, which was reflected primarily in the decline of revenues of main online media and increase of disinformation outlets. COVID-19 related disinformation has taken centre stage and was equally utilised both by the far-right and the far-left.

Fundamental Protection benefited most from the fact that freedom of expression is clearly defined in law, and online freedom of expression rules adhere to the same international and regional human rights standards as in the “offline” environment. State emergency was declared for the second wave of COVID-19 and affected some fundamental rights and freedoms, mainly freedom of movement and freedom of gathering, but did not affect the freedom of expression and workflow of media, including the online ones. Currently, the only state-sanctioned filtering is based on a list of websites that are related to illegal gambling. The list is made by the Ministry of Finance in accordance with the relevant legal regulation. In addition to that, the State does not engage directly in filtering or/and removals of websites, ISPs, and online platforms generally refrain from filtering online content in an arbitrary way. On the flip side, lack of specific regulation extends basic safeguards to the online environment but does not protect them from threats specific to the online environment, such as digital safety. The derogation provided for the GDPR on freedom of expression and journalistic activities still does not properly ensure an appropriate balance between data protection and freedom of expression.

In respect of access to the internet, Slovakia is in the medium-risk area, both in the percentage of the population that is covered by broadband and speed. Net neutrality and abstinence by ISPs from discriminating against particular types of content, or content from particular sources, is good and shows low risk. Lack of a comprehensive market assessment from the Regulatory Authority for Electronic Communications and Postal Services is an issue.

Market Plurality still hasn't received its sector-specific regulation. Traditional media that have their online version are covered by the provisions regulating their “traditional” outlet. However, there is no transparency in ownership regarding the native digital media. It can be next to impossible for the general public to discern beneficiaries and ultimate owners of native digital media outlets. The regulation about concentration in the media sector does not apply to the native digital news media, and neither are they taken into consideration when evaluating thresholds or other limitations. Information on advertising expenditures is occasionally made public by Interactive Advertising Bureau Slovakia (IAB Slovakia). It is an association for online advertising that currently has 43 members, including the biggest Slovak publishers, media agencies and other important online market subjects, and it was one of the main sources for revenue and market estimates since no official authority collects or publishes these data in Slovakia.

Currently, there is an attempt to modernize or create specialized framework or monitoring mechanisms for this area as well as for the media market. The Ministry of Culture is looking into the possibility to include media pluralism and media market monitoring in their work in a way not dissimilar to that done by the Electronic Communications and Postal Services in respect to the telecommunications market in the new media legislation. This should theoretically include also online media and native online media. However, this is still a work in progress, and currently, the market regulation is relying only on general rules of the Act on Protection of Competition and The Antimonopoly Office of the Slovak Republic that has shown little to no initiative in this area.

Despite the absence of comprehensive state policies, online media in Slovakia have shown to be very viable, and revenues of digital-native news media have been increasing before the COVID-19 crisis.

However, overall expenditures for online advertising have dropped during the pandemic, causing the online media to focus on boosting their subscription revenues. Although not dramatically, access via subscription has been growing during the pandemic due to various campaigns and incentives of the media to increase their number of subscribers. Self-regulatory bodies and measures have likewise proven to be very adaptive. The Advertising Standards Council also covers the online environment as well as The Print-Digital Council of the Slovak Republic.

Political Independence relates closely to the traditional media since a large chunk of the digital media market is held by the online versions of mainly print and audiovisual media. A prime example of native-digital media is aktuality.sk, that killed journalist Jan Kuciak worked for, and that is active in investigative journalism on par with traditional media. However, this is still more of an exception than a rule. Despite issues with transparency of media ownership, there have been no reports regarding political control of the major market leaders in the digital media sector, nor any presence or extortion of political control over these media outlets (major market leaders). Transparency in reporting on the spending of political parties in the online environment is an ongoing problem and continued to be during the general elections in 2020.

Facebook's Ad Library and info on the YouTube ads were functional during election campaigning; however, tracing overall spending has proven to be difficult even for Transparency International Slovakia. Election law (Election Campaign Act, 2014) does not provide for an obligation of parties to declare how much they spent on online campaigning, nor do the majority of parties report this voluntarily. “Online media” that are posing as independent or as owned by NGOs or that have otherwise untraceable sources of financing and affiliation is a growing concern. These are often purveyors of mis- and disinformation, biased or often

extremist propaganda news outlets that give the outward appearance of regular media outlets. These do not adhere to any journalistic standards nor codes of ethics. Articles often have no identifiable author, and their affiliation is with extreme right/left and/or pro-Russian political parties. They have no major market share to be included in the top 4 or 5; however, their influence and audience reach have been growing, especially during the COVID-19 crisis, and some political parties have used them as a platform, thus giving them legitimacy.

Since there is no specific regulation for the online environment regarding hate speech, the situation is the same as described in the 3.4 **Social Inclusiveness** part of this report; meaning that there are no laws or policies that aim at countering online hate speech specifically. This is done mainly via the Criminal code through general provisions such as incitement to hatred (Art. 337) or the Act on Misdemeanors (non-indictable offences). Based on the number of reported cases published by the General Prosecution, the impact of this kind of “regulation” on the online environment is minimal. Since there is a lack of common standards the auto-regulation, of both social media and general media platforms differ considerably. Advertising Standards Council is an exception, a self-regulatory body that seems to be also effective in the online environment. However, this body deals only with hate speech within commercial communication. Same as the Media literacy, digital skills in Slovakia scored medium risk according to the Eurostat data.

5. Conclusions

Results of the MPM2021 for Slovakia show no major changes in comparison to MPM2020 with regard to risk assessment; however, there are slight increases in risks in all areas. This was also in part influenced by the COVID-19 pandemic, but also by issues inherited from the past that are not being addressed. Outdated or missing policies have a deteriorating effect on the state of media pluralism in Slovakia.

In the **Fundamental Protection** area, the public outcry after the murder of journalist Jan Kuciak in 2018 thus far didn't result in any changes regarding state policies on the safety of journalists. In 2020, works started on a Constitutional Act that would address this issue; however, it has not yet been presented to the public. While protection of journalistic sources, access to information and protection of whistle-blowers show positive tendencies, the rise and impact of disinformation are alarming.

Recommendations for the Government:

- Develop a comprehensive action plan to tackle the rise of disinformation in media and hate speech.
- Decriminalize defamation.

The **Market Plurality** area lacks transparency rules both regarding disclosure of ultimate owners as well as financing sources. Furthermore, there is a general lack of data about the market, and the online environment is taken into consideration solely through the online presence of traditional media whilst ignoring the native online media. Where market measurements are being made, it is often without taking into account international players, such as Facebook and Google, thus providing a distorted picture. New Media Act that is in preparation should address at least some of these issues, but to what degree is, at the time, unknown.

The **Political Independence** area shows a large discrepancy between the private sector and the public service media. For the most part, private media have shown to be surprisingly resilient to political influence. On the other hand, the PSM again drew the attention of national NGOs and the OSCE with its questionable decisions during the election campaigns and its news programs. Furthermore, the placement of state-funded advertising is still without clear and transparent rules.

Recommendations for the Government:

- Create safeguards for secure and transparent funding of the PSM and for the political independence of its Director-general.
- Adopt measures for transparent and fair placement of state-funded advertising.

When it comes to **Social Inclusiveness**, the situation is still critical with no signs of improvement, with the exception of access to media for people with disabilities. Media literacy programs are outdated, gender equality measures are not monitored or enforced, and access to media for other than traditional minorities is minimal, while community media legally do not exist.

Recommendation for the Broadcasting Council:

- Expand monitoring of minorities media representation to the presentation of women and disadvantaged groups (nontraditional minorities) in media.

6. Notes

- [1] Nekážte mi, čo mám odpovedať, osopil sa Matovič na novinára. Denník N obvinil z podlej lži, hnonline.sk, accessed 2 October 2020, <https://strategie.hnonline.sk/2183743-nekazte-mi-co-mam-odpovedat-osopil-sa-matovic-na-novinara-dennik-n-obvinil-z-podlej-lzi>
- [2] Law no. 211/2000 on Free Access to Information, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2000/211/20210101>
- [3] Žiadame zverejniť zmluvu o nákupe Sputnika V, Transparency International Slovakia, accessed 3 March 2021, <https://transparency.sk/sk/ziadame-zverejnit-zmluvu-o-nakupe-sputnika-v/>
- [4] Whistleblower Protection Act no. 54/2019, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2019/54/20190301>
- [5] The legal protection of journalistic sources is recognised in and governed by the following legislation: Press Act no. 167/2008, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2008/167/20191101> and Act on Broadcasting and Retransmission no. 308/2000, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2000/308/20210101>
- [6] Nekážte mi, čo mám odpovedať, osopil sa Matovič na novinára. Denník N obvinil z podlej lži, hnonline.sk, accessed 2 October 2020, <https://strategie.hnonline.sk/2183743-nekazte-mi-co-mam-odpovedat-osopil-sa-matovic-na-novinara-dennik-n-obvinil-z-podlej-lzi>
- [7] Ako zasiahla pandémia COVID-19 kreatívny priemysel a čo s tým?, Creative Industry Forum, accessed 14 October 2020, <http://www.ciforum.sk/ako-zasiahla-pandemia-covid-19-kreativny-priemysel-a-co-s-tym/>
- [8] Act 315/2016, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2016/315/20191101#paragraf-17>
- [9] Act on Broadcasting and Retransmission, No. 308/2000, http://archiv.rvr.sk/_cms/data/modules/download/1462523380_act_on_broadcasting_and_retransmission.pdf Act on Digital Broadcasting, No. 220/2007, <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2007/220/20191201>
- [10] http://documents.rvr.sk/_file_system/vyroczna_sprava_2019_rozne_3.pdf
- [11] The foundation for access to media content by people with disabilities is set in the Article 14 (non discrimination) and Article 26 (right to information) of the Constitution of the Slovak Republic. In addition, the Digital Broadcasting Act (220/2007 Z.z.), section 4, paragraph 7 states that: 'multi-modal access to the program service is a supplementary content service, which is broadcast in parallel with the respective television program service, and enables access to the programs or other parts of the broadcasting service for deaf and blind people, primarily through subtitles and sign language for deaf persons, and audio commentary for blind persons'. The Broadcasting council also performs supervision on fulfilling this obligation by broadcasters (including PBS broadcaster) with right to impose sanctions (sections: 18 (PBS), 18a (licensed broadcaster obligation), 18b (identification of programs with multi-modal access, including on-demand audiovisual media services), 18c (share of programs with multi-modal access), Section 67 paragraph 6 (fines) and paragraph 10 letter g (fines regarding Internet broadcaster), of the Broadcasting Act). Further obligations relate to the providers/operators of retransmission as set in the section 17, paragraph 1, letter i) of the Broadcasting Act according to which the retransmission must include multi-modal approach. While according to the section 8 of this Act, if the technical device of the end user of the retransmission service does not enable decryption of the multi-modal approach, the operator of the service must exchange this device so that the access would be enabled. This obligation is also tied to provision on sanctions if neglected (section 67, paragraph 1, letter a) of the Broadcasting Act.).
- [12] https://www.culture.gov.sk/wp-content/uploads/2020/02/act_RTVS_340-2.pdf
- [13] This applies also to terrestrial multiplex in accordance with the section 49(local TV and Radio

broadcasting), 42 (TV regional broadcasting), 45 (Radio regional broadcasting) of the Act on Digital broadcasting, available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2007/220/20160701>

- [14] For example, the following provisions of the Criminal code can be used to criminalise hate speech : - 1) Art. 337 “Incitement: Who publicly incites to a criminal offense or publicly calls for the mass non-fulfillment of an important obligation imposed by or on the basis of the law, or calls for a serious violation of public order... “ - 2) Art. 421 “Who establishes, supports or promotes a group, movement or ideology which seeks to suppress the fundamental rights and freedoms of persons, or which promotes racial, ethnic, national or religious hatred, or who promotes a group, movement or ideology which has in the past the suppressed fundamental rights and freedoms, ...” - 3) Title 12 of the Criminal Code. Criminal code available at <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2005/300/20200101>

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Annexe I. Country Team

| First name | Last name | Position | Institution | MPM2021 CT Leader |
|----------------------|---------------|----------|--|-------------------|
| <i>Željko Martyn</i> | <i>Sampor</i> | | <i>Faculty of Law Palacký University Olomouc</i> | X |

Annexe II. Group of Experts

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 composing the MPM2021. Consulting the point of view of recognized experts aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as subjective, and therefore to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflects the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

| First name | Last name | Position | Institution |
|------------------|------------------|---|---|
| <i>Tomáš</i> | <i>Kamenec</i> | <i>Member of the Council</i> | <i>The Print-Digital Council of the Slovak Republic</i> |
| <i>Eva</i> | <i>Rajcakova</i> | <i>The Executive Director</i> | <i>The Advertising Standards Council (ASC)</i> |
| <i>Ivan</i> | <i>Antala</i> | <i>Chairman</i> | <i>ARS</i> |
| <i>Slavomíra</i> | <i>Salajová</i> | <i>NGO Media Analytic / University Lecturer</i> | <i>Creative Industry Forum (NGO) / The Academy of Performing Arts</i> |
| <i>Luboš</i> | <i>Kukliš</i> | <i>Director of the office</i> | <i>The Council for Broadcasting and Retransmission</i> |

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