



Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Finland

Ville Manninen, University of Jyväskylä

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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 and Candidate Countries of the European Union, and considering both online and offline news environments. This narrative report has been produced within the framework of the implementation of the MPM carried out in 2019, under a project financed by a preparatory action of the European Parliament. The implementation was conducted in 28 EU Member States, Albania and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological note

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

In Finland the CMPF partnered with Ville Manninen (University of Jyväskylä), who conducted the data collection, scored and commented the variables in the questionnaire and interviewed relevant experts. The report was reviewed by 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 Annex II for the list of experts).

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic 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 below).

Basic 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 people with disabilities
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Media literacy

Table 1: Areas and Indicators of the Media Pluralism Monitor

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 allows for an extraction of a digital-specific risk score and the report contains a specific analysis of risks related to the digital news environment.

The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk.

On the level of indicators, scores of 0 were rated 3% and scores of 100 were 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 or the EC, but 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, the MPM2020 scores may not be fully comparable with MPM2017 ones. For more details, see the CMPF report on MPM2020, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

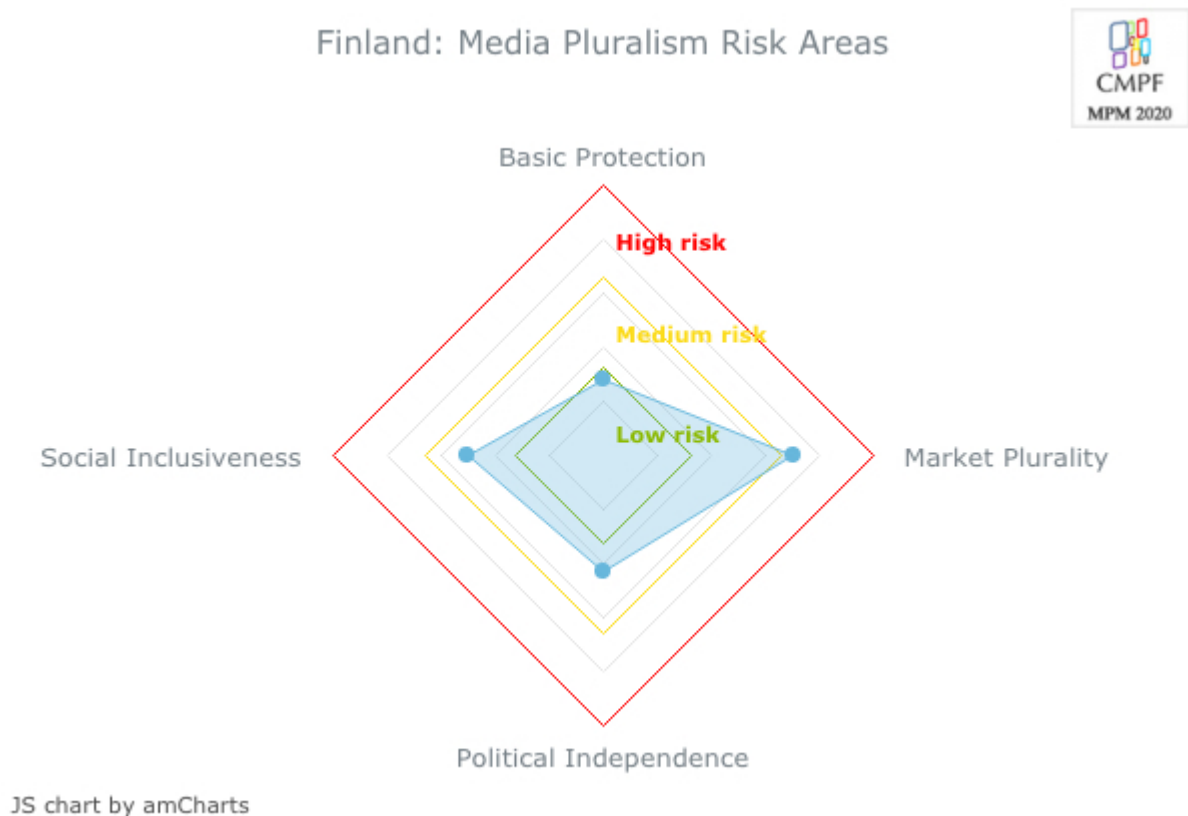
Finland is a relatively large country (approx. 338 000 km²) with a small population (5.5 million). More than one-fifth of Finns (approx. 1.2 million) reside in the Helsinki metropolitan area. Finland has two official languages, Finnish (87.9 per cent of the population) and Swedish (5.2 per cent). The law guarantees public services in both languages. In addition, the language of the native Sámi minority (0.036 per cent of population) enjoys some legal privileges. Other linguistic minorities exist also, the largest of which is Russian (1.4 per cent). Finland's population is still relatively homogenous: only 7 per cent of it was born outside of Finland, and 7.1 per cent speaks as their primary language something other than Finnish, Swedish or Sámi.

Finland is among the world's wealthiest nations. Its per capita GDP (43 503 euros in 2018) is slightly above the EU average. Up until 2017, Finland was slowly recovering from the 2008 recession. After a brief respite, projections again suggest Finland's economy will stagnate in the near future, keeping employment and public spending at the center of national politics. For decades the Finnish political field was dominated by a trio of old, large parties. Recently the power difference between "large" and "small" parties has waned, and two of the old hegemons have weakened substantially. The currently ruling five-party coalition holds a parliamentary majority with 117 representatives out of 200. Four parties are in opposition, including the second and third largest parties. The government is in a precarious situation: it comprises a disparate collection of parties, and it is faced with a strong populist and center-right opposition. Failure to reconcile the ruling coalition's differences could easily lead to it losing majority.

The traditional characteristics of Finnish media are subscription-based, regional news dailies and a strong public service broadcaster (Yleisradio). A handful of companies dominate the radio and television markets, and in terms of audience shares Yleisradio remains unparalleled in both. The newspaper market is less concentrated due to a long history of locally owned small-town papers cum regionals. However, even the newspaper market is steadily on a path towards increased ownership concentration.

Finns' media consumption is rapidly shifting online and online streaming services are becoming increasingly popular. The total value of the Finnish mass media market 2018 was slightly over € 3.8 billion. In terms of turnover, the television sector is by far the most important sector, followed by newspapers, books and magazines. Despite its rapid development, the online media industry still accounts for less than 20 per cent of the media market's total volume. Anticipating future increase, media companies have expanded their operations online, but with limited financial success. While Finns are avid internet users, few of them are willing to pay for online-only content – traditional print media, on the other hand, still has a wide readership. While some Finland's most popular news websites are still free, the paywall model has been making a steady progress especially among newspaper brands.

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



Finland's area-level risk scores throughout the MPM instrument hover in and around the medium risk area. Market plurality has most identified risks and Basic protection the least. Generally speaking, the *de facto* situation in Finland is for largely satisfactory, and risk levels are mainly elevated by the lack of compelling regulation. This explains some of the differences between domains: Basic protection, which considers such basic rights as freedom of expression and right to information, is carefully taken into account by Finnish legislation. On the other hand, matters like media ownership concentration, political neutrality and existence of local and minority media are generally unregulated; on many accounts the Finnish state has chosen an overarching policy of non-intervention.

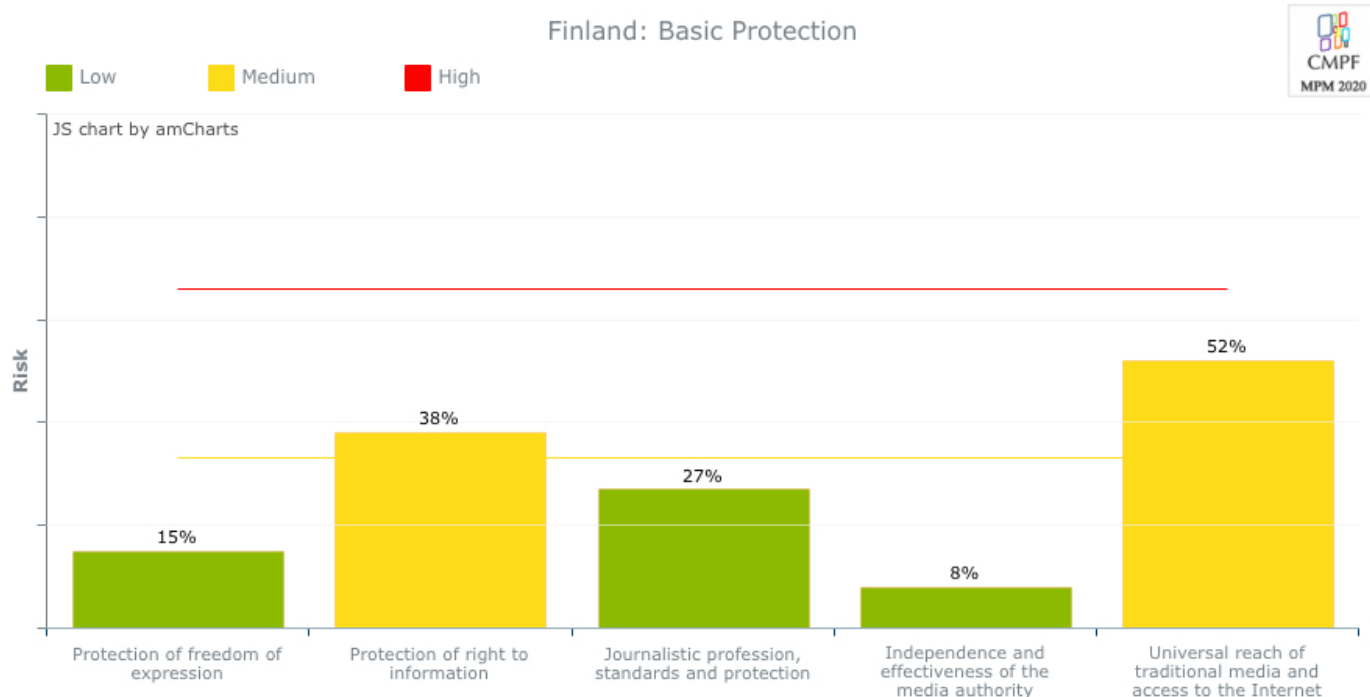
In some regard, the lightly regulated (or alternatively: self-guided) media system has produced desirable results. For example, major media outlets are not owned or controlled by politicians and political parties, even though no law prevents it. Similarly, nothing stops journalists from working in advertising on the side, but majority of journalists dismiss the idea of their work being influenced by commercial interests. On other accounts, weak policy has allowed potentially dangerous developments to proceed unchecked. The ownership of Finnish media is increasingly concentrated, hate speech and threats against journalists (and other public figures) are rampant, and some media -particularly local media- are struggling to survive.

Furthermore, risks regarding online media are poorly understood. Little aggregate data is being collected on online media's audiences, revenues, ownership, employees or affiliations. What we do know is that the internet is the most used medium for Finns - and paying no heed to its developments is both inexcusable and dangerous. This lacuna is especially pertinent to the Political independence and Market plurality indicators. The lack of information is also a significant detriment to Finland's risk scores in both.

3.1. Basic Protection (28% - low risk)

The Basic 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.



The indicator **Protection of freedom of expression** produces a low, 15 per cent risk score for Finland. Finland has ratified the relevant international treaties and generally its legal framework is protective of free expression. There is no indication of violations by either the state or by companies, such as arbitrary or unlawful filtering of digital content or suppression of legitimate expression. Finland's score is weighed down only by two legislative issues: the continued criminalization of blasphemy and the harsh punishments issuable for (aggravated) defamation. Criminalization of blasphemy is contentious as it pursues the ephemeral aim of protecting "what is otherwise held sacred by a church or a religious community." Defamation, if carried out through mass media, is punishable by up to two years imprisonment. This severe punishment can be seen disproportionate both as a punishment and a deterrent - even though it is practically never used. Even standard-form defamation is punishable by fine.

The risk score for the indicator **Protection of right to information** is 38 per cent, which is barely within the "medium" risk range. The risk score comprises two elements, one positive and one negative. On the positive side, the legal framework for supporting citizens' right to information is well developed. Unfortunately, Finnish officials' conduct does not always conform to legislation in this respect, and purposeful obstruction of freedom of information has been reported by journalists. Further, citizens' access to information may be prevented by officials' bad practices and ignorance of the law. Another problem increasing Finland's risk score in this indicator is the absence of legislation to protect whistleblowers. There is no overarching legal framework for whistleblower protection, and specific legislation exists only for enabling anonymous whistleblowing in credit institutions.

Journalistic profession, standards and protection indicates a low, 27 per cent risk score. For the most part, Finland provides journalists with a permissive environment. No journalists have been killed or physically attacked in the line of duty in recent years. For better and worse, male and female journalists suffer equal amounts (but different types) of abuse. There are two legislative shortcomings: courts may compel a journalist to disclose the identity of an anonymous source, and data retained by network operators can be acquired by authorities to solve the seemingly minor crime of (aggravated) defamation. Broader issues originate from beyond the state apparatus. Media businesses are struggling to make end's meet which is reflected in journalists' decreased job security. Most importantly, journalists are increasingly suffering from online abuse, smear campaigns, direct threats and other forms of illegitimate influence. Journalists' professional organisations are unable to counter these developments, and the Finnish state is yet to take decisive action

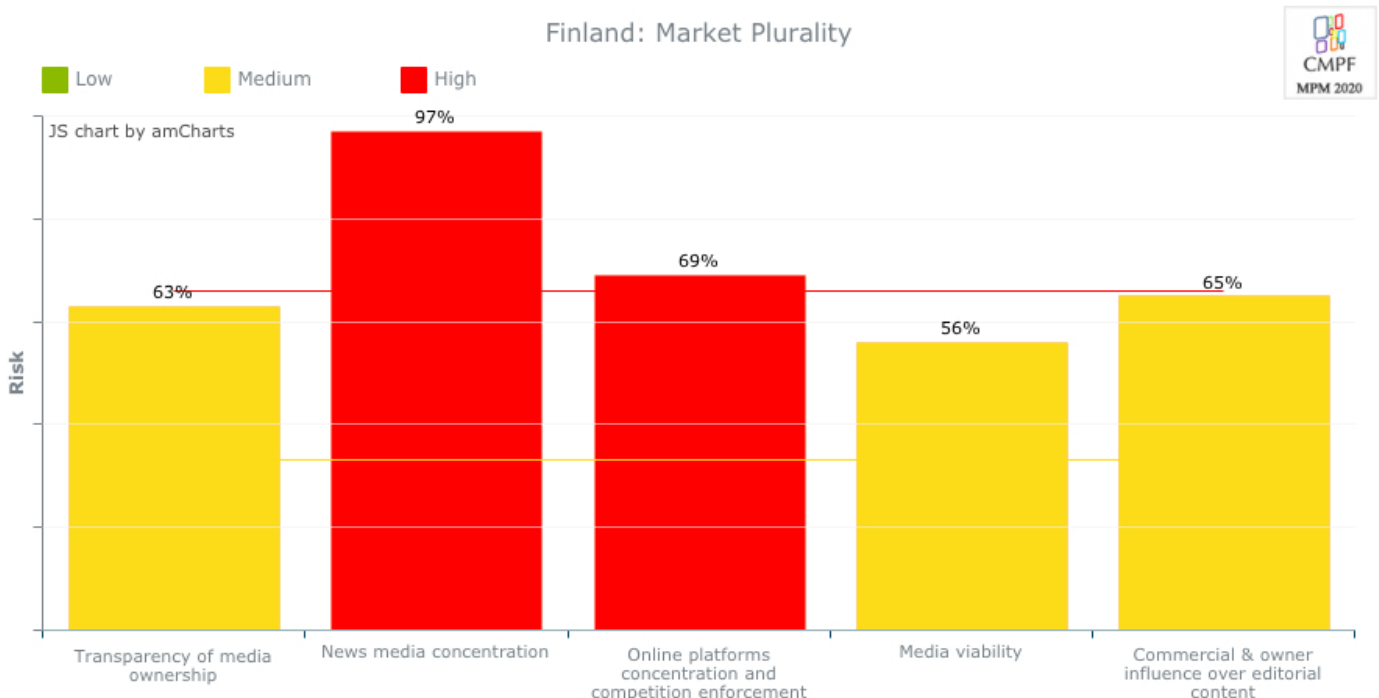
to protect journalists from these modern threats.

The indicator **Independence and effectiveness of the media authority** only reaches a minuscule 8 per cent risk score. The competent authority, Finnish Transport and Communications Agency, preforms efficiently, independently and in accordance with legislation. The only detected risk is hypothetical in nature: 40 per cent of the Agency's funding comes directly from the state budget. This discretionary leeway given to the government could theoretically be used to influence the Agency's decisions.

Universal reach of traditional media and access to the Internet reaches a medium risk score of 52 per cent. The legislative framework effectively guarantees Finns equal access to public service media and the internet, and nearly all households have a broadband internet connection. However, a significant segment of the population does not have access to high-speed (30 Mb/s or faster) connections, and Finland's average connection speed (29 Mb/s) is behind many other European countries.

3.2. Market Plurality (70% - high risk)

The Market Plurality indicators examine the existence and effectiveness of provisions on transparency of media ownership and the existence and effectiveness of regulation or self-regulation against commercial & owner influence on editorial content. In addition, they assess the risks related to market concentration in the production as well as in distribution of news: as for production, considering separately horizontal concentration in each sector and cross-media concentration; as for distribution, assessing the role of online platforms as gateways to news, the concentration of online advertising market, and the role of competition enforcement and regulatory safeguards in protecting information pluralism. Moreover, they seek to evaluate the viability of the news media market.



The indicator **Transparency of media ownership** reaches a 63 per cent risk score, just barely within the medium risk range. Finland has general transparency laws pertaining to business ownership, but there are none specifically aimed at making media ownership transparent. As a result, it is possible and legal for media companies to obscure or hide their ultimate, beneficial owners from the public. While all ownership data is at least theoretically obtainable by a layperson, it is practically too cumbersome for the average consumer. Most major media companies voluntarily provide a modicum of transparency, while few are more opaque.

News media concentration in Finland is very high, and this indicator produces a 97 per cent risk score. Legislation sets no *a priori* restrictions to ownership concentration, although the Finnish Competition and Consumer Authority may

intervene in large companies' mergers. However, concentration through outcompetition and small takeovers is unregulated. Currently all Finnish media sectors are either highly or intermediately concentrated. The four largest companies on each sector gather from 56 per cent to 93 per cent of audiences and from 71 to 93 per cent of revenues. Cross-media ownership is also concentrated, although not as severely as within individual sectors. No comparable data is available on the online media market, but there is indication that it, too, is highly concentrated.

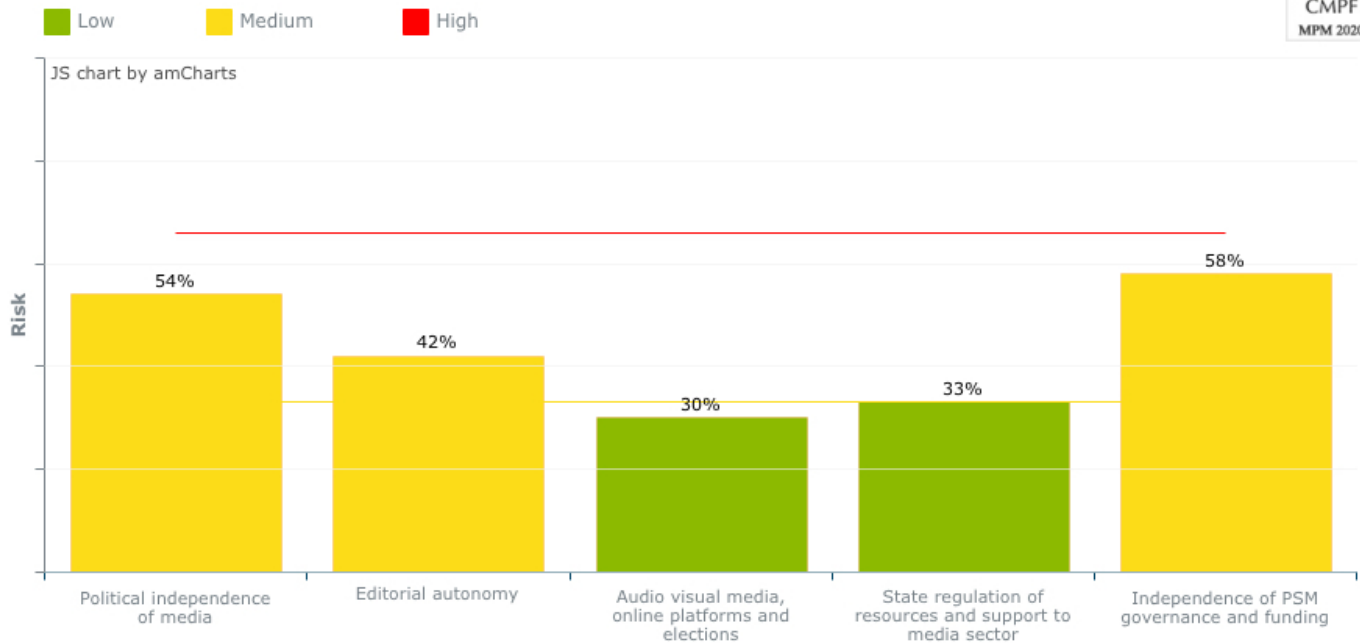
The risk score for indicator **Online platforms concentration and competition enforcement** acquires a high risk assessment, with a score of 69 per cent. On the upside, only a minority of Finns accesses online content through intermediaries, such as social media and news aggregators. This preference limits the intermediaries' power to filter content. Unfortunately, as with traditional media, the online market appears to be highly concentrated with the Finnish Competition and Consumer Authority ill-equipped to curb the concentration. The role of the public service broadcaster Yleisradio is a separate issue: no effective adjustment mechanism exists that would ensure Yleisradio's funding meets public service requirements without causing harmful market disruption.

Media viability in Finland is varied, and this indicator produces a 56 per cent, medium risk score. Revenues in the television and radio sectors have increased from 2015 to 2018, even when compared to general GDP growth. In contrast, the newspaper sector is in a long-continued decline. Conclusive employment data is absent from all sectors, save for newspapers which now employs significantly less journalists than before. It seems likely that this is the trend also in television and radio sectors. Advertisement spending in traditional media is declining, and the increase in online advertisement is not enough to compensate news media's losses. The absence of data regarding digital native and local media sectors is an issue: it is impossible to follow the development (or regression) of these sectors. Yet media companies are actively seeking new revenue streams, and Finland has provided some support to its struggling media industry. However, the state support has been meagre aside from a few temporary schemes.

The indicator **Commercial & owner influence over editorial content** reaches 65 per cent risk score, just barely below the high risk threshold. The risk is elevated mostly by lacking or ambiguous regulation. For example, no laws prohibit commercial or political influence on the hiring of journalists, although general anti-discrimination legislation applies. No guidelines or regulations prohibit journalists from working simultaneously in advertising, nor are advertorials prohibited. While ads that are fully disguised as news are prohibited, this ban is not effectively enforced. On a positive note, the self-regulatory Guidelines for Journalists obliges journalists to dismiss non-editorial influence, and journalists largely respect this duty - even though advertisers and politicians sometimes attempt to pressure them.

3.3. Political Independence (43% - 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 concerns 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.



The indicator **Political independence of media** reaches a 54 per cent risk score, which is in the medium risk area. The risk consists almost entirely from the lack of regulation that would limit or prevent politicized ownership of, or control over media. No such restrictions exist in Finland - but in practice none of the leading media are in political control. An additional issue is the absence of aggregate data on (possible) conflicts of interest between politics and media ownership - especially so in the digital native media.

The indicator **Editorial autonomy**, with a 42 per cent score, indicates medium risk for Finland. Self-regulatory guidelines emphasize journalists' need to maintain editorial autonomy, but there is indication that this autonomy is sometimes (albeit rarely) infringed upon. Editors-in-chief are appointed independently, even though no regulation prohibits political or commercial influence. As a completely separate issue, not all newsrooms have explicit social media guidelines - suggesting effective self-regulation in this area is still nascent.

The indicator **Audio visual media, online platforms and elections** produces a 30 per cent, low risk score. On the positive side, both public service and private media in Finland tend to treat political parties equally around elections - with the logical exception of major parties being given prominence over marginal or newly founded parties. There is also legislation aimed at making political advertising transparent. Unfortunately, political parties and candidates are not very open about their campaigns beyond the legal minimum. The risk score is also elevated by the lack of legislation which would compel media to provide platform to all contenders prior to elections. The public service broadcaster Yleisradio has a limited legal duty to treat political parties evenhanded, but this obligation is difficult to enforce.

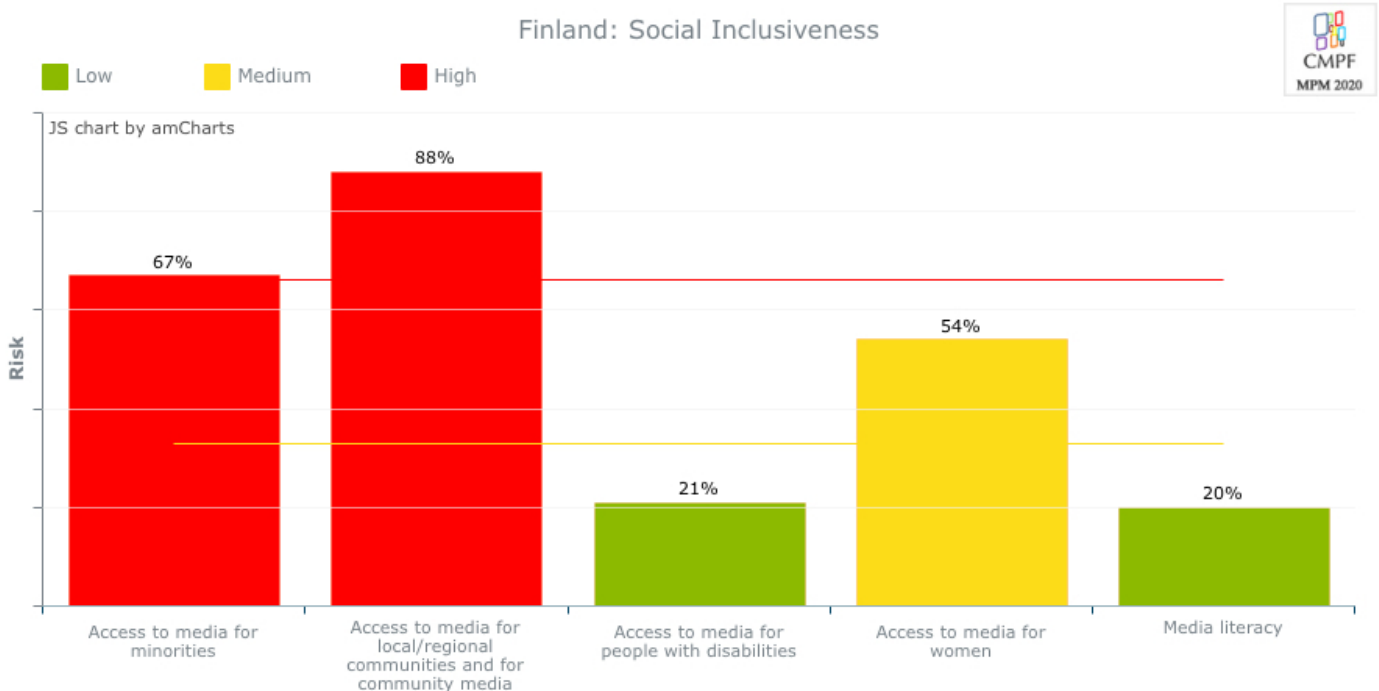
State regulation of resources and support to media sector acquires a 33 per cent risk score, which is exactly between the low and medium risk areas. Finland's regulatory framework regarding state intervention in media is by and large neutral and well developed. The only major shortcoming in this respect is the absence of regulation of, and systematic data collection on the allocation of state advertising. As a separate issue, it is unclear whether the (measly) direct media subsidies are distributed fairly: the extant criteria could be seen as exclusionary, for example against certain languages.

The risk score for the indicator **Independence of PSM governance and funding** reaches a 58 per cent, medium risk score. This assessment comprises two elements. First, the public service broadcaster Yleisradio enjoys sufficient and stable funding, as the amount of its annual funding is effectively set by law. The risk score is elevated by the appointment procedures of Yleisradio's upper echelons of power: its Administrative Council is appointed by the national parliament, and the appointees are traditionally members of the parliament themselves. This makes political considerations impossible to avoid. However, the public service broadcaster insists that an effective "firewall" exists between the politician-run Council and Yleisradio's effective management. This indeed appears to be the case, and the

long tradition of political Director General appointments appears to have ended.

3.4. Social Inclusiveness (50% - medium risk)

The Social Inclusiveness indicators are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country's media literacy environment, as well as the digital skills of the overall population.



The indicator on **Access to media for minorities** produces a risk score of 67 per cent, which just barely crosses the high risk threshold. In Finland, a sharp division exists between different categories of minorities. The national minorities recognized by law, the Swedish speaking Finns and the native Sámi, are in a fairly good position compared to, for example the Russian or Roma minorities. National minorities are covered by public service media and the amount of available media content is proportionate to the minorities' population sizes. Private minority-targeted media practically exists only for Swedish speaking Finns. Other minority groups are not effectively served by either public service or private media. However, this matter is contentious as the definition of a "minority" is not clear-cut. Above calculations are based on the size of the smallest legally recognized minority - according to this criterion all language groups at least the size of the Sámi (approx. 10 000) are considered as minorities.

Access to media for local/regional communities and for community media in Finland is in high risk: this indicator reaches a 88 per cent risk score. The overarching issue is the non-recognition of local, regional or community media as distinct media categories. As such, no state-sponsored support schemes or protective regulation exist - or even can exist. The coverage of these types of media is patchy, and existing media organisations are struggling to survive. The only upside in this situation is the fact that at least some local, regional and community media exist, and they appear free from repression by authorities.

In Finland, **Access to media for people with disabilities** is on a good level, indicated by the low risk score of 21 per cent. Finland has legislation aimed at providing access to media for people with various disabilities, and the extant provisions are thoroughly implemented. However, there are still some shortcomings in the availability and usability of said services. For example, subtitles are not as readily and extensively available as demand would have it, and availability of audio descriptions in general is quite low. Services may also be unavailable on mobile devices, or accessing them

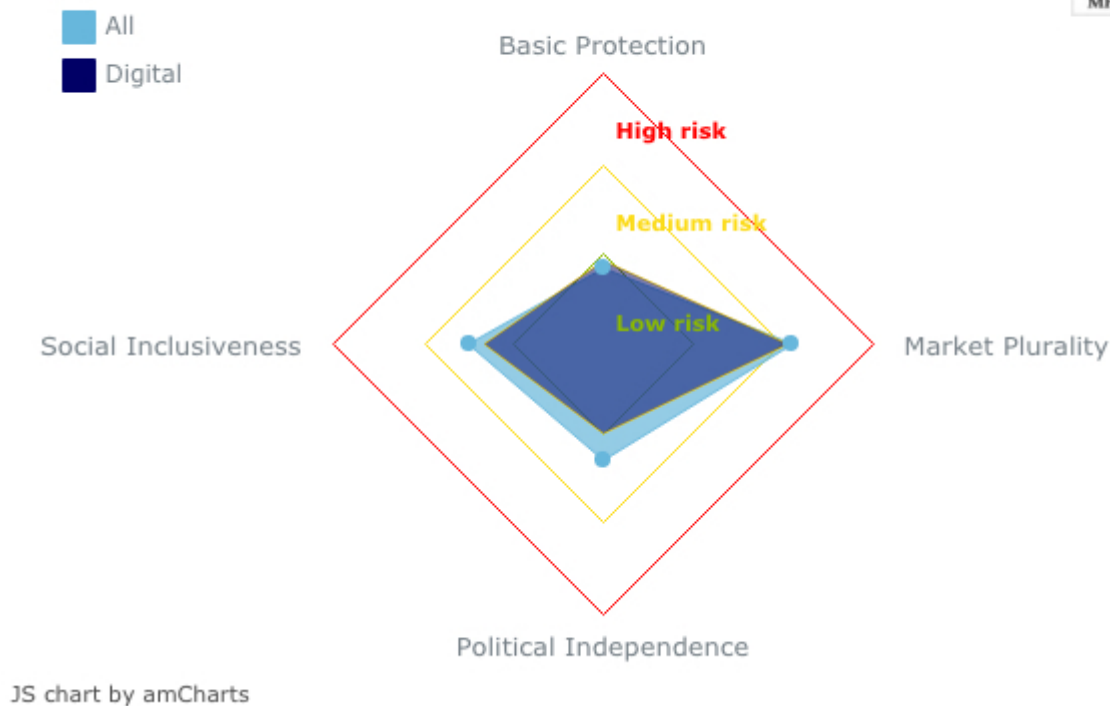
difficult for people with disabilities due to poor user interface design. Still, the development has been positive in recent years, and people with disabilities expect upcoming legislative changes to further improve the situation.

The indicator **Access to media for women** reaches a medium, 54 per cent risk score. The risk consists of the overarching issue of women being underrepresented in most media companies' leading positions and as interviewed experts on the news. On a positive note, the public service broadcaster Yleisradio does have a comprehensive gender equality policy - and its Administrative Council and Board of Directors have relatively equal gender distributions compared to most other media organisations (both have 43 per cent women).

The indicator for **Media literacy** acquires a low, 20 per cent risk score. Finland has a long history of promoting media literacy throughout the society, and the current media literacy policy is extensive as well. The only major shortcoming in this respect is the inconsistently available pedagogical training for media literacy education. Newly graduated teachers' skills in media literacy education may vary depending on their personal interest and the university they graduated from. A different and much larger issue is hate speech and the ineffective response to it. There are initiatives that aim to counter hate speech, but they are few, uncoordinated and insubstantial compared to the magnitude of the issue.

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

Finland: Media Pluralism Risk Areas - Digital



The area of **Basic protection** contains six sub-indicators that measure digital risks, and their results are mixed. On the upside, Finland has effectively transposed the European Union General Data Protection Regulation and the regulation on so-called Net Neutrality. In general, Finnish legislation and regulation regarding digital media are up to date.

Most Finnish household use a broadband internet connection, and they are available to almost all households. On the downside, average connection speeds are still modest, and high-speed connections (30 Mb/s and up) are unavailable to almost a quarter of Finnish households. The situation is the result of a historical trajectory, in which policy has favoured mobile internet connections over landlines. This has expanded the availability of affordable broadband connections, but undercut the availability of high-speed connections.

Journalists are increasingly targeted by online abuse, mostly in the form of threats and smear campaigns. So far, more sophisticated attacks against journalists' digital safety, such as hacking, have not been documented. Freedom of expression is treated online same as offline - including the controversial bans on, and potentially harsh punishments for, defamation and blasphemy. Another legislative issue is the possibility of authorities to acquire citizens' internet traffic data from service providers for a variety of criminal investigations. Most of these purposes are acceptable in the context of their goal, e.g. thwarting terrorism, stopping paedophiles from preying on children, or catching hackers after a data breach. More questionably, this data can also be obtained for investigating aggravated defamation - a seemingly minor offence compared to other crimes that allow this method.

Of particular note is the recent overhaul of a number of laws pertaining to data protection and privacy. These changes expanded authorities' (most importantly the police's) powers in criminal investigations and pre-emptive operations. As some of these changes came into effect only mid-2019, it is too soon to assess their practical implications.

Market plurality includes 11 digital risk-related sub-indicators. Much of the requisite data does not exist, which is an issue on its own and has been interpreted as a detriment to Finland's risk score. Where data is available, it unveils mostly risks, but also a few encouraging highlights.

First, Finns still prefer to access their online news media directly, which gives intermediaries such as Google and Facebook less control over which news are given prominence. Second, it is within the Finnish Competition and Consumer Authority's remit to intervene in advertising malpractices and monopolistic development also in the online environment. Unfortunately, this competence is partly theoretical, as the FCCA has little recourse against global digital

monopolies like Google and Facebook.

Other negative signals include insufficient ownership transparency in online news media and the stagnation of news media's online advertising revenues. Conclusive data is largely absent on two crucial aspects: audience and revenue shares of digital native media. The little available evidence points towards high concentration on both accounts - a significant risk just as lacking data is.

The **Political independence** domain contains four sub-indicators on digital risks to media pluralism. Legislation on electoral campaigning and political advertisements extends to online media, and all political ads must be clearly marked as such and identify their funders. These rules are generally well respected. The vast majority of political Facebook ads connected to the 2019 parliamentary elections, stored in the Facebook Ad Library, were correctly labelled as such. None of the electees from the 2019 parliamentary elections neglected to disclose the sources and uses of their campaign funding in accordance with the law.

However, the law only demands for a superficial level of transparency: for example, various online campaign spending can be filed simply as spending on "information networks." None of the 277 newly elected members of parliament or their substitutes provided any additional disclosure on their personal websites. The office of the Data Protection Ombudsman has the authority to investigate suspected misuse of personal data, including in electoral campaigning. The Ombudsman regularly advises political parties on how to campaign in accordance with the law, but so far no investigations into political campaigns' use of personal data has been launched. No routine monitoring exists either.

The public service broadcaster Yleisradio has sufficient funds and mandate to offer also digital services to Finnish citizens. There is also a mechanism through which Yleisradio's funding and functioning could be limited, if it was deemed a threat to private online media. This mechanism, however, has practically gone unused, and privately owned media have for long criticized Yleisradio's online services for undercutting the market viability of commercial online media.

Lacking data is also an issue here: without market data it is impossible to indicate whether major digital native news outlets are politically controlled. However, most popular Finnish news websites are affiliated with legacy media, and the (possible) politicization of digital native outlets is likely a marginal issue. A separate risk-increasing factor is the newsrooms' patchy introduction of social media guidelines. The absence of guidelines is a risk, as it increases the possibility of journalists unwittingly overstepping their boundaries and damaging their employers' credibility.

The **Social inclusiveness** domain has two sub-indicators that measure digital risks. One produces positive, one negative results: the majority of Finns (76 per cent) have at least basic digital literacy skills, leaving relatively few with low digital literacy skills - or completely without them. On the other hand, hate speech against ethnic minorities, people with disabilities and women is prevalent online, and efforts to counteract hate speech have thus far been fragmented and ineffective.

5. Conclusions

The factual state of media pluralism in Finland is relatively good. Journalists need not fear physical attacks, arbitrary detainment or invasion of privacy. Media businesses are lightly regulated and media owners rarely intervene in editorial processes. The extant regulatory frameworks are well devised and by most parts dutifully enforced.

However, some risks for Finnish media's plurality also exist. Regulation is absent in some parts, which leaves room for potentially dangerous development. The concentration of media ownership is a prime example: legislation sets no *a priori* limits to it, and Finnish media on all sectors are in the hands of only few companies. Media serving minority and local audiences are either nonexistent or struggling to survive without state support. The lack of regulation is also reflected in the absence of pertinent data. Especially the online media market is poorly understood, as no authority is tasked with collecting comprehensive data on it.

There are also some issues in which overzealous regulation forms a risk. Namely, Finland has yet to decriminalize blasphemy and defamation. The 'aggravated' form of defamation even carries the maximum penalty of two years imprisonment. Coincidentally, this severity also makes it possible for the police to use a citizen's personal internet access data to investigate aggravated defamation offences.

Finally, the surge of online abuse is a risk. It affects not only public professions, such as journalists, but also women, minorities and people with disabilities. To an extent, this has already begun to affect public discourse. So far institutional responses to hate speech and threats have been insufficient

Overall, the main problem for plurality in Finnish media is not how things currently are - but how they might become, if current developments are allowed to proceed unchecked.

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Ville	Manninen		University of Jyväskylä	X

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
Juha	Rekola	International ombudsman	Union of Finnish Journalists
Mikko	Hoikka	CEO; Legal advisor	Finnish Periodical Publishers Association; Finnmedia
Marko	Ala-Fossi	Lecturer, adjunct professor, docent	University of Tampere
Petteri	Gynther	Legal Counsel	Elisa Corporation
Ismo	Siikaluoma	A lay representative and the 3rd vice president of the Council for Mass Media	Council for Mass Media
Merja	Saari	Deputy director (Media Markets branch)	Finnish Transport and Communications Agency (Traficom)

