



# 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: Slovakia

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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 Slovakia the CMPF partnered with Zeljko Martin Sampor (Faculty of Law Palacký University Olomouc), 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).*

<b>Basic Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
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/>.

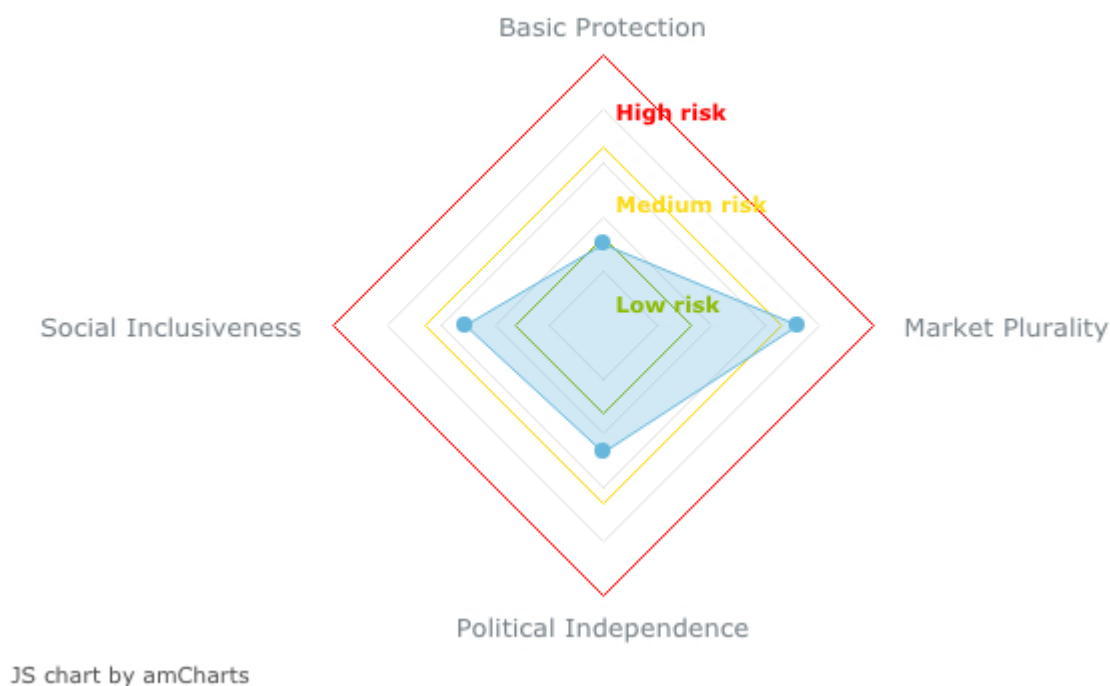
## 2. Introduction

Slovakia is a small European landlocked country with territory of 49,035 square kilometres and population around 5.4 million. The official language is Slovak, however other languages of traditional national minorities are also spoken, mainly Hungarian, Czech, Roma, Croatian, Ruthenian, Ukrainian and Polish. The ethnic structure is made up of the Slovak majority (86%), with the most numerous national minority being Hungarians (8%) followed by Roma (2%). Of the 2,933 settlements only two have over 100,000 inhabitants, capital Bratislava in the west and Košice in the east. Administratively, Slovakia is divided into 8 self-governing regions and 79 administrative districts. The main industry is the automotive industry with major manufacturers being Volkswagen, Peugeot Citroën and KIA. Other industries include metallurgy (mainly U.S. Steel in Košice), chemical industry, agriculture and tourism. The political landscape is characterized by coalition governments due to fragmentation of the political landscape. On average, six to seven parties enter the parliament, majority being center-right parties.

The creative industries, which include the media, form only a fraction of the economy thus far. 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 one hand and two major private players, the TV Markiza Group and the TV JOJ Group, on the other. A similar situation occurs in radio broadcasting, while what is common to both is that the PSM has the advantage of owning both the radio and TV programming service. This is not possible for the private broadcasters. Major private radio stations are Radio Expres and Fun Radio. Various minority and municipal media also exist, but they operate on a much smaller scale. While the digital terrestrial broadcasting transition of television was completed, the terrestrial digital broadcasting of radio is virtually non-existent, with all radio stations still broadcasting via analogue. 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 between Slovakia and Czechia. 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. 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. Main industry co-ordinator 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. Media market is regulated only by the general competition laws with no standing monitoring mechanism in place.

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

#### Slovakia: Media Pluralism Risk Areas



In 2018 journalist Jan Kuciak and his fiancée were murdered by hired hit-men resulting in a major public outcry. Consequently, a Pandora's box of various offenses against journalists in Slovakia was opened. Cases of illegal spying on journalists and threats that were not taken seriously by police were uncovered. An entrepreneur was charged for ordering the hit on Jan Kuciak and his connections with politicians and other high-ranking state officials were unearthed. In addition to these events, out of date media literacy policies, hostile attitudes towards the media expressed by members of the government as well as exertion of government's influence over the public service broadcaster, neglect of policies inclusive of minorities and lack of transparency in media ownership resulted in high risk level in one area (Market Plurality) and medium risk in two (Social Inclusiveness and Political Independence). Low risk in one (Basic Protection) is mainly due to application of the constitutionally enshrined freedom of expression and protection of right to information exercised via long standing Freedom of Information Act. However, even this area is border-line medium risk due to the aforementioned murder.

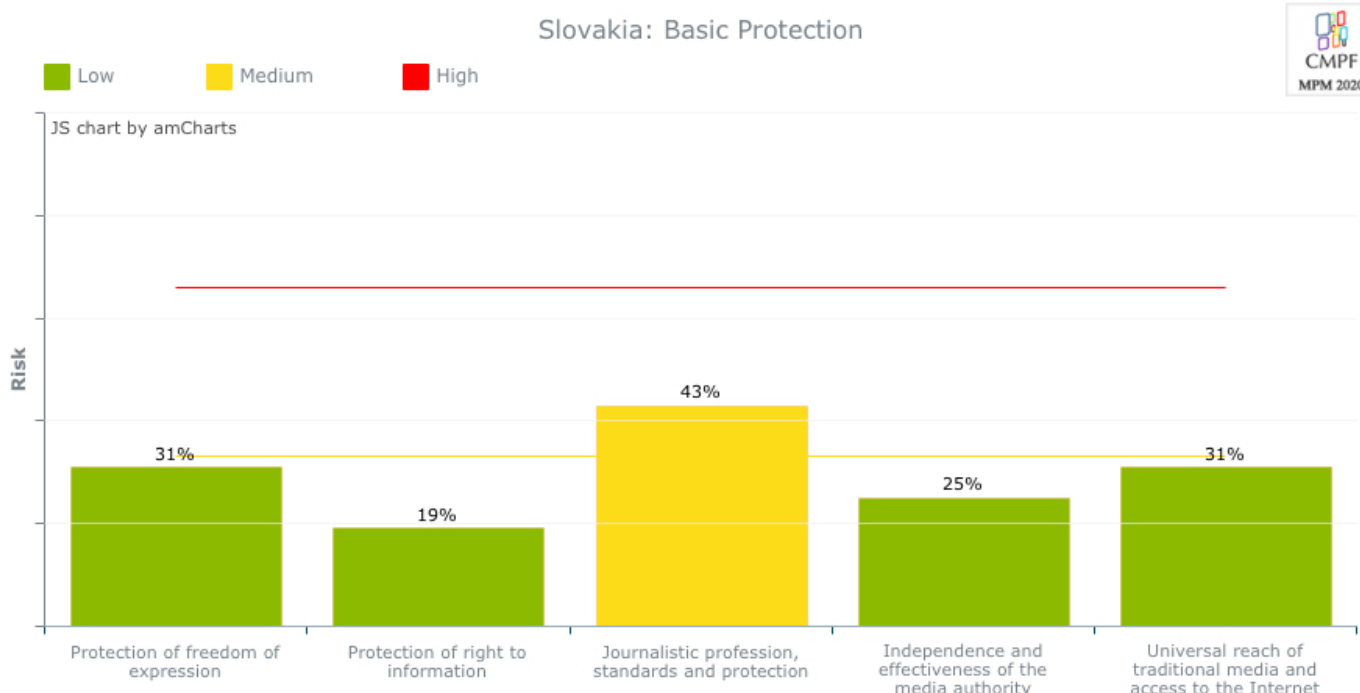
In comparison with MPM2017 the scores of MPM2020 show worsening and worrisome trends. While market plurality and media literacy rely on status quo of measures which are rapidly falling out of date, some older than ten years, social inclusiveness and political independence show signs of active neglect. Only bare legal minimum of space is given to traditional (national) minorities, while no actions are taken to fight gender inequality and stereotypes. At the same time, new minorities, i.e. other than national minorities, are basically excluded from media representation. Political influence is exercised mainly in relation to the PSM and via dubious rules on state advertising, while growth of fake news and hoax media, mainly in online environment is being addressed ineffectively.

#### 3.1. Basic Protection (30% - 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.



Overall score of the Basic protection (30%) is low risk verging on medium risk. Out of the four indicators only one, the **Journalistic profession, standards and protection** reached medium risk score of 43%. Major contributor to this score is the murder of journalist Jan Kuciak and his fiancée. Businessman Marian Kocner was accused of ordering the murder in relation to J. Kuciak's work. Kocner has threatened Kuciak in the past, however police did not take these threats seriously when reported. This was an indication of general safety of journalists in Slovakia where state was shown as not effective in ensuring an enabling environment for journalists. Failing both in ensuring physical safety of journalists as well as digital safety, since during the trial with M. Kocner other information has surfaced, including on ordering of illegal surveillance of various investigative journalists. This included physical and digital intrusion. One of the persons hired to spy on the journalists was a former member of the state secret service. After the collection of data was concluded, further information was made public, including on connections between this criminal group and the head of the Office for Personal Data Protection. What kept this indicator in the medium risk area instead of high, was the dampening effect of freedom to practice journalism without administrative obstacles as well as well-defined protection of journalistic sources explicitly recognised by the law. This was used to fend off the Office for Personal Data Protection that has threatened journalists from the Czech center for investigative journalism with a fine if they don't disclose sources related to a video-recording involving former prosecutor general and M. Kocner accused of ordering the murder of a journalist. Working conditions of journalist and professional associations effectiveness in guaranteeing editorial independence and/or respect for professional standards both came out in medium risk range. Lack of effectiveness of professional associations was described by the head of the Slovak Syndicate of Journalists, Daniel Modrovský, stating that: *“the professional associations can create pressure, so that the majority of them (media owners and publishers) would sign the Journalist’s Code of Ethics and guarantee journalist’s independence, however it is ultimately up to them whether they choose to do so.”*

**Protection of freedom of expression** reached score of 31% still indicating low risk. This is due to the core principles of freedom of expression and its application in accordance with the judicature of the European Court of Human Rights. Where it falls short is in decriminalization of defamation that is still a criminal offense. And while defamation laws provide legal defenses, the mere fact that maximum penalty is eight years of imprisonment makes it the strictest in the EU countries. Even in the civil proceedings, decisions on damages must be moderated by the Constitutional court, especially when involving public official or offices (Slovak Constitutional Court ruling ÚS 288/2017).

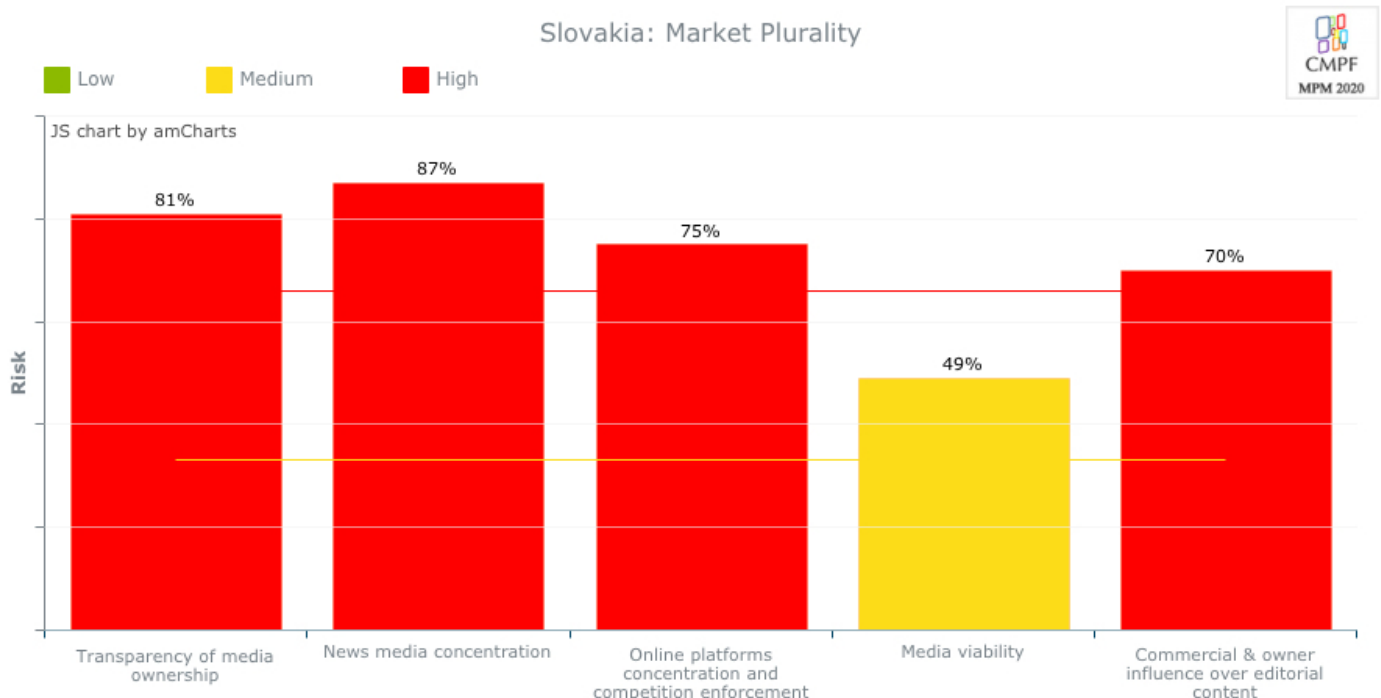
Low risk score of 19% regarding **Protection of right to information** can be attributed mainly application of the Access to Information Act as well as the new Act on Protection of Whistleblowers. Both of these acts owe their success and coming to existence mainly to active civil society organizations and activist groups. A new public authority for protection of whistle-blowers is to be established.

**Independence and effectiveness of the media authority** remains relatively stable in low risk margins with a score of 25%. However, ever increasing political nominations of the Council for Broadcasting and Retransmission members is an emerging issue. These include e.g. former member of “professional advisory cabinet” in the Slovak national party (SNS) that was chaired by A. Danko, the incumbent President of the parliament.

As for **Universal reach of traditional media and access to the Internet**, in Slovakia almost all citizens are reached with TV and radio channels (PSM Radio 97.8% and TV 95%) with good internet penetration, resulting in low risk score of 31%.

### 3.2. Market Plurality (72% - 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.*



Slovak media market suffers from lack of transparency in online media and insufficient transparency in regard to traditional media. At the same time, 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 can indirectly disclose ultimate owners of major media, since basically all major media companies in Slovakia will fulfill some of the requirements set and therefore are listed in this register. However, media that do not do business with the state or do not receive public funding are not listed. Benefits of this Act, relating to protection against money laundering, are therefore limited with respect to media ownership transparency.

With high risk score of 81%, the **Transparency of media ownership** is one of the highest risking score in the

MPM2020 regarding Slovakia. While both Broadcasting Council and Ministry of Culture collect partial information regarding owners of traditional media, ultimate owners/beneficiaries are not disclosed by these bodies nor do they have legal tools to do so.

**News media concentration** scored high risk (87%), demonstrating 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. Mainly TV, Radio and Television. Since neither the Broadcasting Council in its report, nor the Ministry of Culture did measure 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.

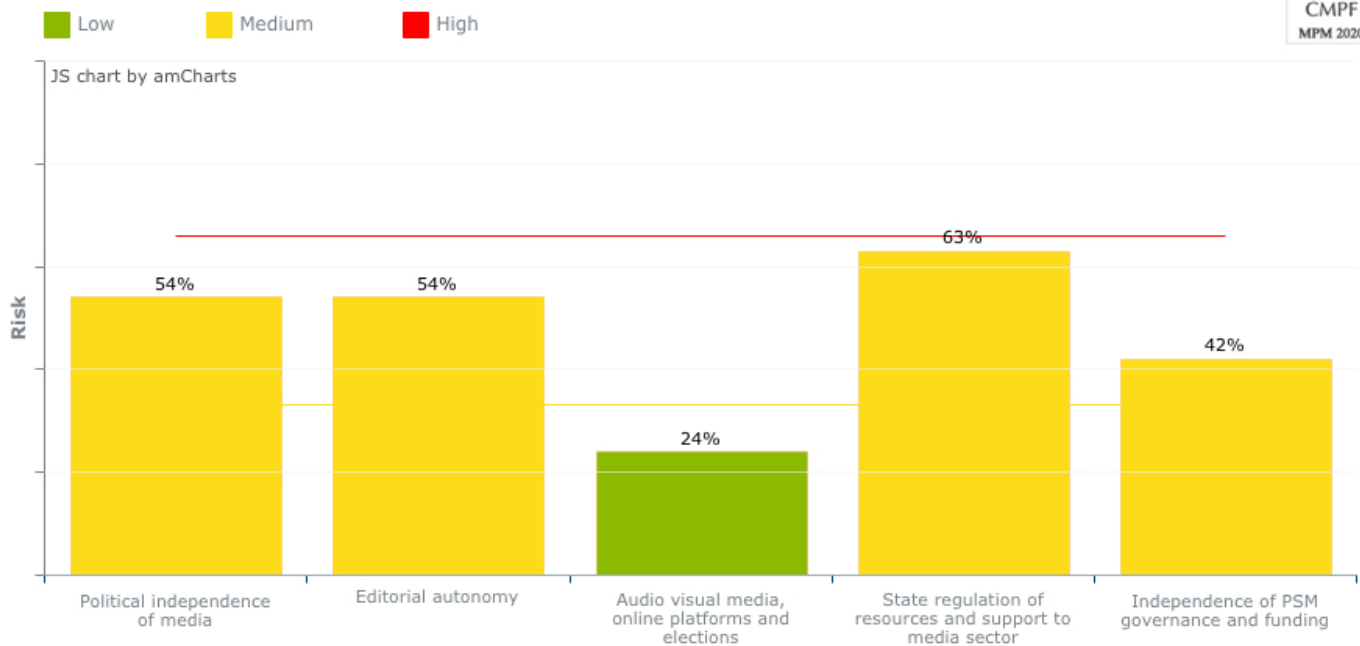
**Online platforms concentration and competition enforcement** have no special rules. They are regulated only via general regulation such as the general Act on Protection of Competition with no special legal provisions. Only data on market are available from industry sector, however these are incomplete since they take into account only national media, often excluding in their calculations major international players present on the market such as Google and Facebook. All this resulted in high risk (75%).

**Media viability**, with medium risk score of 49%, was the best scoring in this indicator. This was thank to relatively stable employment rates in the sector and slight raise in revenues.

**Commercial & owner influence over editorial content** with high risk of 70% is a reflection of lack of any mechanisms granting social protection to journalists in case of changes of ownership or in the editorial line. Decisions regarding appointments and dismissals of editors-in-chief insuring that these are not influenced by commercial interests relay solely on general provisions of Labor law. On the positive side, self-regulation of commercial content has a long-standing tradition and is fairly effective in respect of prohibiting advertorial disguised advertisement. These rules coexist with legal prohibitive measures stipulating the obligation of journalists and/or media outlets not to be influenced by commercial interests.

### 3.3. Political Independence (47% - 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 Political independence area scored 47% - medium risk. Main issue that has arisen was political independence of the public media service RTVS. The influence of coalition party (SNS), holding the position of the President of parliament, was explicit. The Chairman of this party stated during a radio interview that he will deal with the situation in PSM once he gets them under his “management”. Appointment of a Director General of the RTVS linked to the aforementioned party was obvious and didn't go without notice by the general public as well as international professional organizations such as Reporters without borders. Further contributory factors were no safeguards to guarantee of autonomy when appointing and dismissing editors-in-chief and the rise of conspiracy/hoax media outlets with no clear ownership background that often extensively support certain political parties with extreme views.

Indicator **Political independence of media** as such scored 54% medium risk. Slovakia lacks legal safeguards that would effectively regulate conflict of interests between owners of media and the ruling parties, partisan groups or politicians. Objectivity is a persistent problem as well as balance of news reporting in local media that are published by municipal authorities in the period before election. Most of the local media are financed / co-owned by local/municipal authorities, which makes them dependent on them. Example of this lack of safeguards is that the head of political party Sme Rodina (We are family) Boris Kollar continues to retain ownership of Fun Radio via its parent company. Even after entering parliament he stated that he has no intention of selling the radio. On the other hand, newspapers and press agencies thus far show resistance to political pressure.

**Editorial autonomy** scored identical 54% medium risk. Editorial autonomy in Slovakia depends solely on self-regulatory measures. These self-regulatory measures are usually effective and often exercised in cooperation with the Print-Digital Council of the Slovak Republic. However, adherence to the Journalist's Code of Ethics is voluntary. And while major media do 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 various biased, fake news, misinformation or often extremist propaganda news outlets that give outward appearance of regular media outlets, number and influence of which has been worryingly on the rise in Slovakia.

**Audio-visual media, online platforms and elections** scored low risk of 24%. While both NGO and public monitoring report showed fairly equal representation of political actors during elections in private media, a rising issue is the PSM broadcaster RTVS. Sixty journalists signed the petition pointing out new unfavorable work conditions brought by the new management. In May 2018 another 12 journalists and editors resigned, emphasizing the new management of the news programs as a main reason behind their decision to resign, pointing out that these new managerial positions in the news are being occupied by former spokespersons of state institutions and ministries.

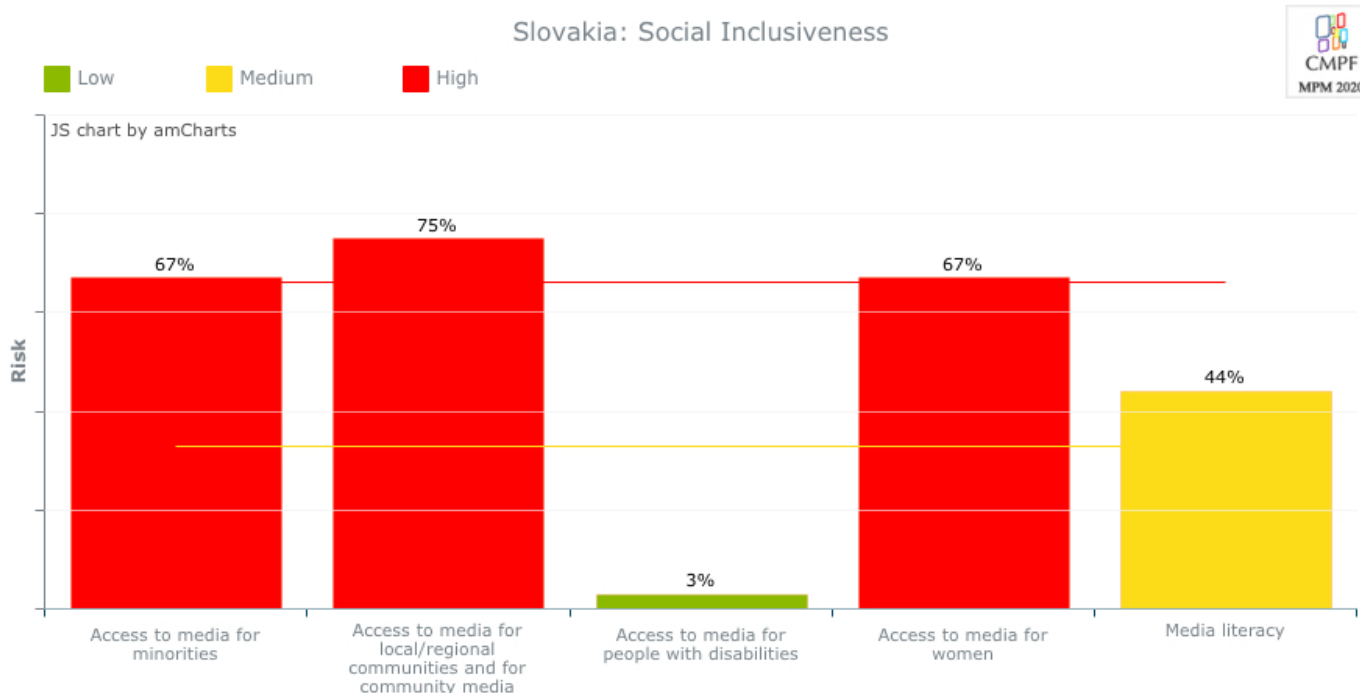
**State regulation of resources and support to the media sector** scored medium risk of 63%, but it is the highest one

in this area. In Slovakia there are no general media subsidies schemes, but state advertising is distributed to media without specific rules enacted and with little transparency in practice. Furthermore, some concerns were raised with regard to the spectrum allocation. The Association of the Independent Radio and Television Stations (ANRTS) warned about the Broadcasting Council granting some frequencies intended for private broadcasters to PSM.

**Independence of PSM governance and funding** scored medium risk of 42%. Part of the PSM funding is dependent on special contract with the state concluded each year and part by license fees (payments for public service broadcasting) that has been long term set on 4,64 EUR. This makes it susceptible to political pressure. The entire management board (The RTVS Council) is nominated (voted in) by the Parliament as well as the General director. Although there is a certain balance in respect of maintaining independence mainly via rotation system, since every two years one third of the council is being voted in.

### 3.4. Social Inclusiveness (51% - 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 Social Inclusiveness area receives, overall, second highest score (51%, medium risk) in assessment for Slovakia. Three indicators scored high risk: Access to media for minorities (67%), Access to media for local/regional communities and for community media (75%) and Access to media for women (67%). Media literacy scored medium risk (44%), and Access to media for people with disabilities low risk (3%).

**Access to media for minorities** that are not recognized by law is basically non-existent in Slovakia according to both data collected and interviews with experts. Lack of representation of these minorities in media and also how are they being portrayed when mentioned, especially in PSM, is especially worrying since according to NGO IVO report (Focus on extremism Slovakia) 79% of respondents would not like to have a Roma for a neighbor, 79% Muslim, 59% refugee, 54% gay person, 48% lesbian, 45% bisexual, 43% Asian, 46% black person and 30% Jewish person. According to the Broadcasting Council report for the year 2018, even legally recognized minorities got very little space in TV broadcasting of the PSM. As for legally recognized minorities RTVS (PSM) Annual Report for 2018 (p. 355)

summarizes these points stating that: *"The television part of national minorities broadcasting is in state of disarray - we have been observing this fact in every annual report for 7 years.... Broadcasting for small national minorities still evokes the 1980s, both visually and in terms of content. As if small national minorities of Slovakia only sing, dance and read, as if they had no social issues for decades, or no social problems."*

In respect of **Access to media for local/regional communities and for community media**, while PSM is obliged to keep its own local/regional correspondents and law grants regional or local media access to media platforms, 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.

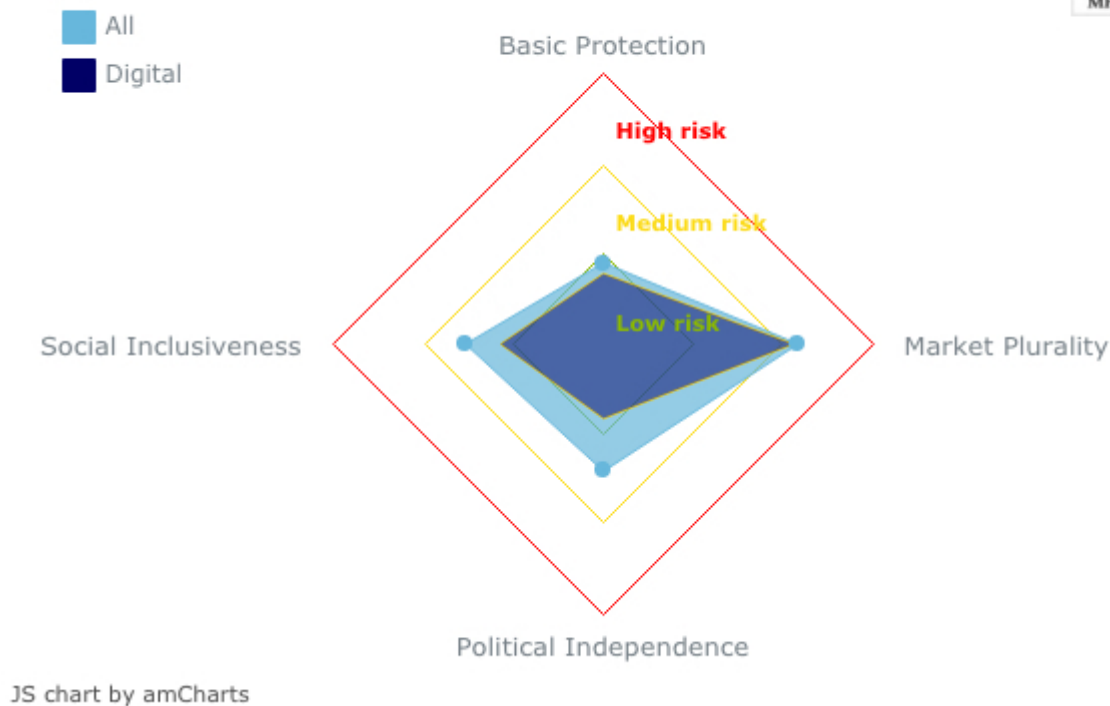
**Access to media for people with disabilities** is based in Broadcasting Council's supervision of the obligation for the licensed broadcaster to provide multimodal access so that at least 10% of all broadcast programs is accessible. These should be accompanied by subtitles for the hearing impaired or interpreted in sign language and 3% of all broadcast programs should be accompanied by voice commentary for the blind. Council's supervision and well-defined legal provisions contributed to lowest scoring indicator for Slovakia in the MPM2020 monitor.

There is low representation of women in managerial boards in both private and public media as well as lack of comprehensive gender equality policies. Neither Broadcasting Council no other state authority monitors how are women represented in news and current affairs. What stood out from the experts'interviews is that in media, women are still often interviewed as an object rather than subject of the reporting while at the same time even women often view presentations of stereotypes and degrading talk about women as a part of freedom of speech. This resulted in high risk in **Access to media for women**.

**Media literacy** scored medium risk and can be described as stagnant and out of date with no new emerging activities or policies from public sector. Some school curricula haven't been updated for over 10 years. What kept it from the high risk zone are activities of civic and academic organizations attempting to promote media literacy and few initiatives that aim to prevent or counteract hate speech in Slovakia.

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

### Slovakia: Media Pluralism Risk Areas - Digital



Indicators scored in online environment show better results than in overall scores. Closest is market plurality scoring 70.2% in online in comparison with overall 72%, both demonstrating high risk. Social inclusiveness in online environment scored 38% comparing to 51% overall keeping both areas in medium risk range. Basic protection also scored relatively close with 26% online and 30% overall still keeping both in margins of low risk. Most significant difference is in the Political independence, which is at 47% overall medium risk and 27,5% in online environment shifting it to low risk. In general, the online environment can be characterized by lack of modern and comprehensive policies. In many cases these policies are completely absent and consequently no data could be gathered.

**Basic Protection** scoring benefited most from the fact that freedom of expression is clearly defined in law and online freedom of expression rules adhere to same international and regional human rights standards. 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 online environment, but does not protect them from threats specific to online environment, such as digital safety. The derogation provided for the GDPR on freedom of expression and journalistic activities also does not properly ensure an appropriate balance between data protection and freedom of expression. An example of this issue is provided in the Basic protection chapter in relation to the Office for Personal Data Protection of the Slovak Republic and its attempt to extort a source from the Center for investigative journalism.

In respect of access to internet, Slovakia is in the medium risk area both in percentage of the population that is covered by broadband (between 76% and 92% of 30MBps) 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. A common problem is lacking market assessment since Regulatory Authority for Electronic Communications and Postal Services did not conduct any market analysis of the market in question in the monitored period.

**Market Plurality** displays lack of 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 general public to discern beneficiaries and ultimate owners of native

digital media outlets. 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 are occasionally made public by IAB (IAB Slovakia – Interactive Advertising Bureau). 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 no attempt to modernize or create specialized framework or monitoring mechanisms in this area, relying only on general rules of the Act on Protection of Competition and The Antimonopoly Office of the Slovak Republic.

On a positive note, online media in Slovakia have shown to be very viable and revenues of digital native news media have increased over the past two years. In relation to this, overall expenditures for online advertising have been growing. The main source of revenue for online remains advertising and payed access via subscription. Self-regulatory bodies and measures have likewise proven to be very adaptive. The Advertising Standards Council covers also online environment as well as the The Print-Digital Council of the Slovak Republic.

**Political Independence** relates closely to traditional media since large chunk of the digital media market is held by the online versions of mainly print and audiovisual media. Currently, there are no reports regarding political control of the major market leaders in the digital media sector. Civil society reports in the monitored period 2018/2019 did not confirm presence or extortion of political control over these media outlets (major market leaders).

Transparency in reporting on spending of political parties in online environment is a continuous problem. Ad Library and info on YouTube ads were functional during election campaigning 2019/2020. However, tracing overall spending can be difficult. Neither election law states obligation for parties to declare how much they spent on online campaigning, nor do majority of parties report this voluntarily.

Hate speech is a growing problem in Slovakia. In 2019 The Supreme Court confirmed a sentence in the case of racist speech about the Roma in Radio Frontinus in Žilina to the accused member of parliament M. Mazurek. He was fined 10 000 Euros. Also, in 2019, an editor in chief of the hoax print and online Earth and Age (Zem a Vek) magazine was sentenced by the Criminal court for defaming the nation, race and beliefs. Fine was 4 000 Euro. These are extremely worrying developments, showing that some “online media” that are posing as independent or as owned by NGOs, or that have otherwise untraceable source of financing and affiliation, provide space for hate speech. These are often bias, fake news, misinformation or often extremist propaganda news outlets that give outward appearance of regular media outlet, but do not adhere to any journalistic standards nor codes or ethics, with articles often having no identifiable author. They have no major market share to be included in top 4 or 5, however, according to the survey by the FOCUS agency in 2019; 57% of teachers would recommend to their students one of the main such outlets (hlavnespravy.sk) as a reliable source of information. 53% teachers would recommend zemavek.sk as a reliable source, while slobodnyvysielac.sk and infovojna.sk would be recommended by 20% of teachers. All of them had high recognizability among the teachers ranging from 68% to 91%. In addition, there are very few activities directed to fight hate speech. There have been couple of educational websites launched by non governmental organizations with help of various (including EU) fund.



## 5. Conclusions

Based on the results of the MPM2020 the state of media pluralism in Slovakia in comparison to MPM2016 and MPM2017 demonstrates a worsening situation in all areas.

Most visible being in safety of journalist. Starting from the worst, the murder of journalist, to evidence pointing to illegal monitoring and threats to journalists all the way to lacking safeguards regarding editorial independence of journalists in both online and traditional media. Positives persist in form of legal protection of journalistic sources, adherence to international standards of freedom of speech and access to information Act.

There are clear deficiencies in market plurality, ranging from lack of transparency in media ownership to non-existing policies or schemes to promote media pluralism. Majority of work related to market mapping and transparency is done by journalists, industry and NGOs.

Political independence, it seems, is maintained through resilience of media rather than legal safeguards. Those fragile safeguards that are in place seem not to be functioning optimally in relation to the PSM and might pose a threat even to a body that has in previous monitors shown low risk - the Broadcasting Council.

When it comes to social inclusiveness, with exception of access to media for people with disabilities, situation is critical with no signs of improvement.

Glimmer of hope is in the announced preparation of a new media Act that would hopefully reflect on some of these deficiencies. This should include updated rules on transparency of media ownership, market mapping powers for broadcasting council that would include also online native media and introducing safeguards for editorial independence of editors both from political and commercial influence.

Simplest recommendation regarding minorities was given by Oľga Gyárfášová, a sociologist and assistant professor at the Comenius University, in her interview: *“make some effort for informal measures – like a host from Roma minority, make a signal of tolerance to the LGBTI community – or any other measures or incentives which would steer the public to more tolerance and to diversity.”*

## ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2020 CT Leader
Zeljko Martin	Sampor		Faculty of Law Palacký University Olomouc	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
Eva	Rajcakova	The Executive Director	The Advertising Standards Council (ASC)
Ivan	Antala	Vice-chairman	Independent Broadcasting Association
Radoslav	Kutaš	Senior Analytic / University Lecturer in Media and Intellectual Property Law	Media Institut / The Film and Television Faculty
Luboš	Kukliš	Director of the office	The Council for Broadcasting and Retransmission

