



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: Slovenia

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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 Slovenia the CMPF partnered with Marko Milosavljevic, Romana Biljak Gerjevic (University of Ljubljana), 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

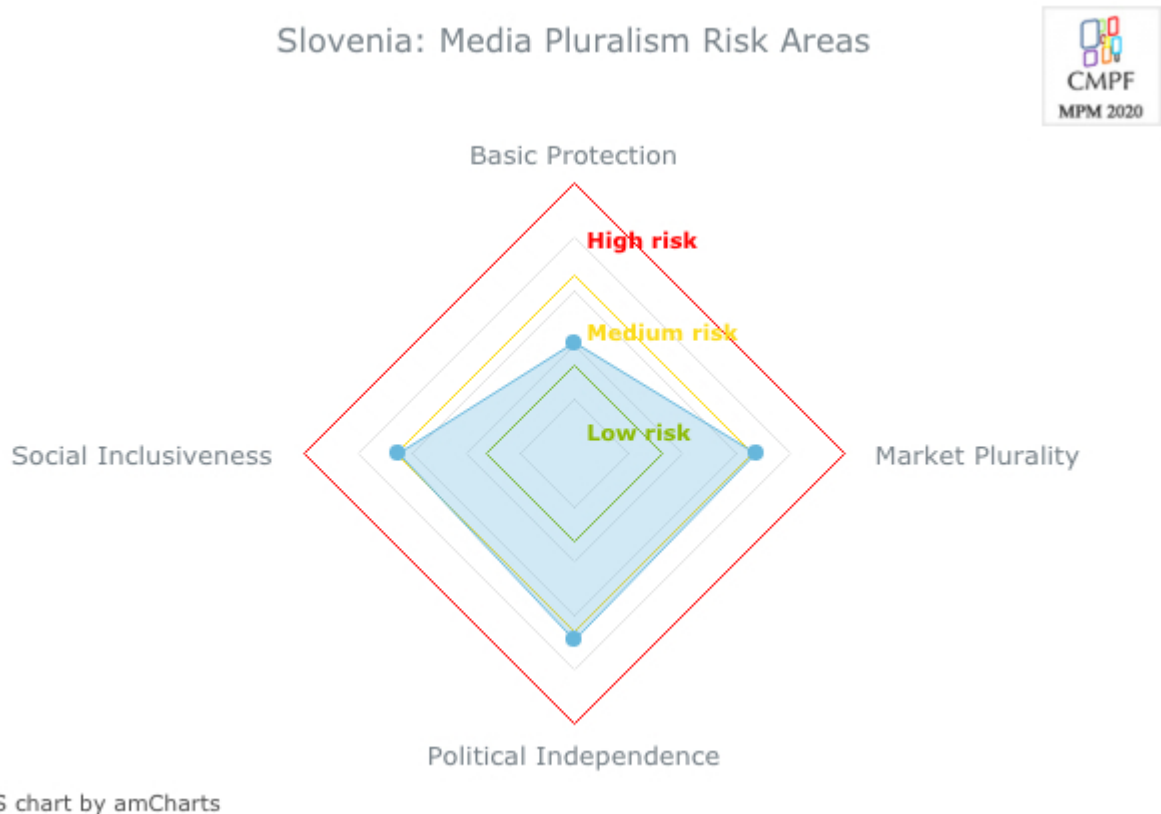
The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor allows for an extraction of a digital-specific risk score and the report contains 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/>.

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



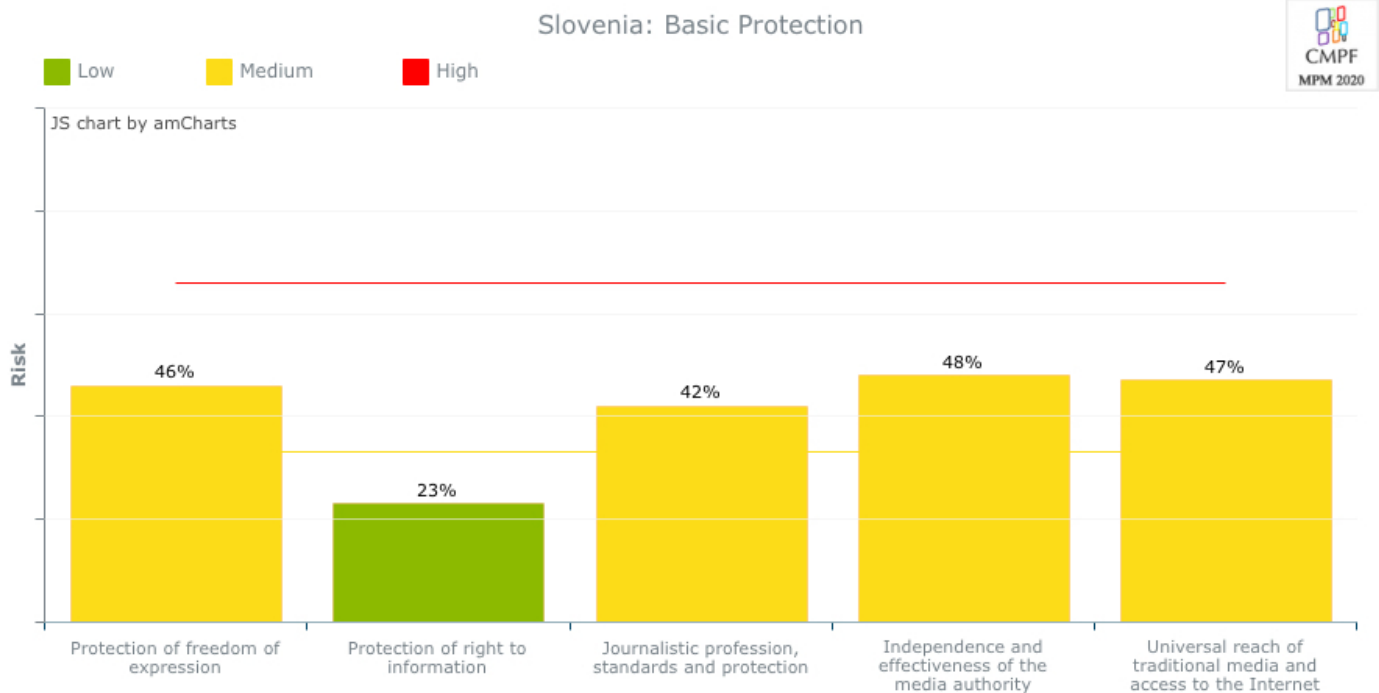
Generally speaking not much has changed in the Slovenian media landscape, considering that long-awaited and necessary amendments to the Mass Media Act are still pending. In quantitative terms media pluralism is in a good state. Regulations for ensuring media pluralism are mostly clearly defined by laws and legal acts, and there are authorities that monitor compliance with the rules. However, implementation is often weak and monitoring and sanctioning is ineffective and slow. Compared to the previous Media Pluralism Monitor this years' findings show either a general stagnation or deterioration in all of the four major areas. A deterioration is shown in the areas of Basic Protection and Market Plurality, while the areas of Political Independence and Social Inclusiveness scored the exact same risks as in the previous monitoring for Slovenia.

Two out of four main areas present a medium risk and two present a high risk. The highest risk is seen in the area of Political Independence, which scored 69 percent, while the specific indicator on Political independence of media scored 91 percent. This is due to a number of media outlets being publicly owned by political parties or (former) members and visible supporters. It is also due to the fact the conflict of interest between media and politics is especially alive in the local and regional areas. The indicators on Editorial autonomy and State regulation of resources and support to media sector also scored high risk. The general Code of Journalism Ethics functions as a self-regulatory mechanism, however it is non-obligatory and there are no effective regulatory safeguards to guarantee autonomy when appointing and dismissing editors-in-chief. There is a regular annual public call for co-financing media content, however the amount is very small compared to the number of (digital, print, radio and audiovisual) outlets, which apply.

Other high risk indicators include the indicator on News media concentration, which shows a need for more decisive control of relevant authorities to prevent controversial takeovers and/or mergers. The indicators on Online platforms concentration and competition enforcement and Commercial & owner influence over editorial content scored a similar high risk, mainly due to a further development of cross-media concentration and a lack of regulatory safeguards, which would ensure editorial content is not influenced by owners or commercial interests. The indicator on Access to media for local/regional communities and for community media and the indicator on Access to media for women also scored high risks.

3.1. Basic Protection (41% - medium 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.



Indicator on **Protection of freedom of expression** scored medium risk with 46%. Freedom of expression is explicitly recognized in article 39 of the Constitution, the state has also ratified the International Covenant on Civil and Political Rights (ICCPR) and the European Convention on Human Rights with no significant reservations. Restrictions upon freedom of expression are quite clearly defined, but not always followed, the Criminal Code also defines a prison sentence for any public dissemination of intolerant ideas, however we can say there have been many examples where intolerant statements in the public sphere have not been sentenced or processed at all. There are no specific legal remedies for those whose freedom of expression has been violated, however the law provides all the regular instances, such as court access to citizens or journalists/media, which can be a long lasting procedure with a higher cost. There are cases of prosecution of journalists who disclose documents or data that is in the public interest. In May 2019 a prosecution of 4 journalists and the newspaper Dnevnik began for publishing wiretaps of a political scandal (Tersek, 2019). There are also many incidents where specifically politicians express negative and hate comments about journalists and specific media. They are condemned by journalists and the Slovene Association of Journalists, but many times repercussions do not follow. Defamation, as well as slander, calumny, malicious false accusation of crime and insult are criminalised. The Mass Media Act also mentions the "right to correction", which can be commonly misused, where "anyone who feels offended or insulted by a newspaper article can demand the publication issue a correction in the same position in the newspaper" as stated by the World Press Freedom Index (2019).

The right to information is recognised in the Constitution and also defined in the Law on Access to Public Information and the indicator on **Protection of right to information** scored low risk with 23%. Restrictions to freedom of information are not clearly enough defined on grounds of protection of privacy. Although appeal mechanisms and procedures for denials of access to information are in place and decided by the Information Commissioner, they have

little effective control, but in general there are not many cases of violations of the right to information in Slovenia. Obtaining information can be quite a long process for journalists or the public though. In addition, the access to the information on public figures and bodies is often prevented with a protection of their privacy quoted by authorities as the reason. The Integrity and Prevention of Corruption Act states that any person may report instances of corruption in a state body, local community to the Commission or any other competent body. There have not been any real cases of whistleblowing in Slovenia.

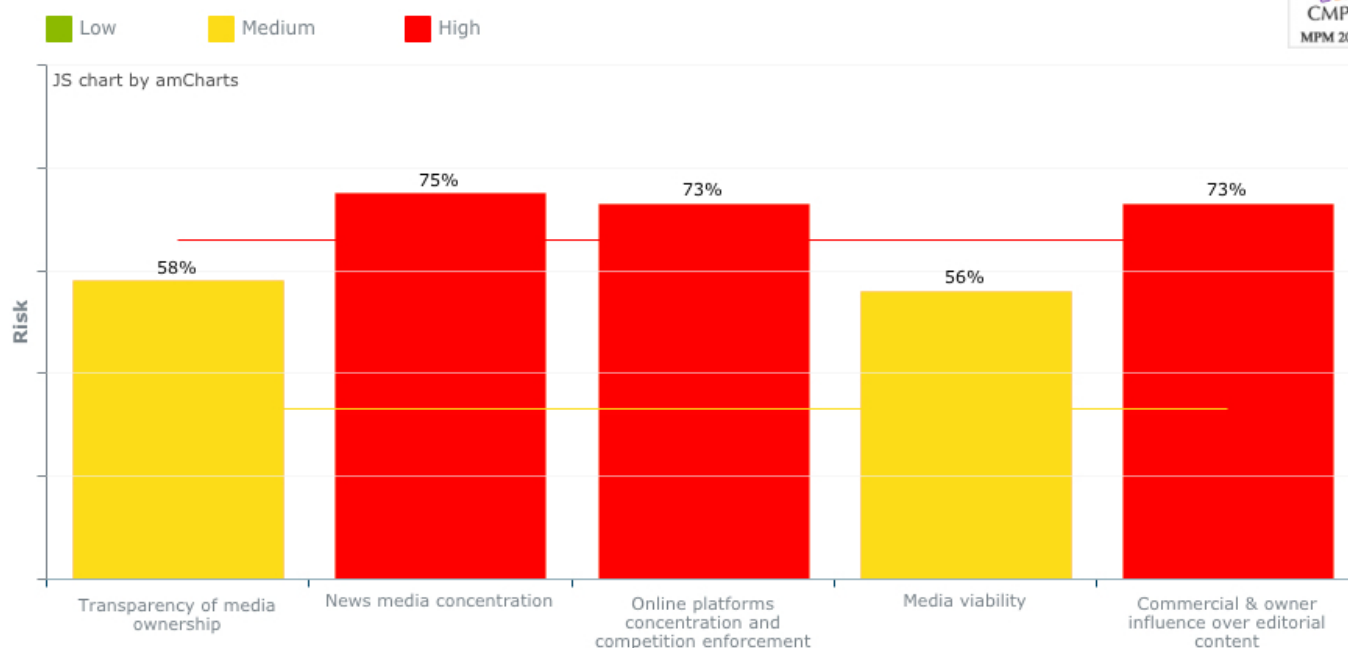
Indicator on **Journalistic profession, standards and protection** scored medium risk with 42%. The journalistic profession is open in practise, there are no conditions on who may practice journalism, there are no licences for becoming a journalist in place. Journalists are represented in three different professional associations, which are partially effective in guaranteeing editorial independence and/or respect for professional standards. They don't have real levers of powers, however they do act as an important voice of journalists (negotiating collective agreements, pointing out irregularities). Owners and managers however frequently ignore their requests regarding editorial independence. Job security has fallen significantly, there is more and more journalists working in precarious (semi-legal or illegal) employed working relations, on short contracts, paying for their own health and social expenses, which is why the working conditions generally present a high risk. There have also been lay-offs and foreseen lay-offs on the biggest daily newspapers. There have been some attacks on the property of journalists, some physical attacks and a few cases of individuals interfering with the journalists job (Šavko, 2019). Also frequent are (usually anonymous) threats via e-mail and public threats or degrading/mocking comments on social media (also from politicians). No journalists have been imprisoned or killed in Slovenia, there are also no known cases of surveillance of searches, hacking or other similar digital attacks.

The risk is medium (48%) also on the indicator **Independence and effectiveness of the media authority**, mainly because the media authority functions under rules, which prevent the director to get in a conflict of interest with industry (although they can be easily overrun), however there are no rules to prevent conflicts of interest with government, neither rules to prevent conflicts of interest with political parties. The highest function of the authority is named by the government, which may result in a strong political bias at the head of the organisation. Appeal mechanisms can be very slow, inefficient and easily delayed, there are also frequent complaints about the slowness and ineffectiveness of regulatory bodies (Inspectorate for the Media, Agency for the Protection of Competition, Agency for Electronic Communications) and without adequate mechanisms for supervision of these bodies, effectiveness and decisions themselves. There have been many examples in the past where the decisions of the agency were arbitrary, also considering the conflict of interests between the Telecommunications operator Telekom Slovenije and its owner, which is still the Republic of Slovenia. In 2019 there has been a case where the Constitutional Court annulled provisions of a law requiring commercial radio and television stations to dedicate a part of their airtime to Slovenian music, where the law was before that changed on the request of The Ministry of Culture and support of the Agency (Cirman and Vukovic, 2019).

Indicator on **Universal reach of traditional media and access to the Internet** scored 47% and presents a medium risk. The universal coverage of the PSM is guaranteed by law and generally good, however there is a lack of exact data on the percentage of population covered.

3.2. Market Plurality (67% - 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 on **Transparency of media ownership** scored medium risk with 58%. The disclosure of news media ownership is provided in the media register online for public bodies and the public and without an entry into the media register, a media should not be able to function. However the registry does not show the complete ownership structure, for example, if a media company has multiple owners (or so-called paper companies are involved), the highest owners can remain unknown to the public. The owners can for example transfer and hand over a company to foreign owners after being fully indebted and their identity remains unknown. There have been examples in the Slovenian media landscape where the owners have used them to hide the scale of their media monopoly.

The indicator on **News media concentration** scored the highest in the market plurality area with 75%, which presents a high risk. While the approval of Ministry of Culture is needed, if a broadcaster of a radio or television programme service or a publisher of a general informative printed journal wants to gain more than 20 percent of an ownership share, violations still happen as the ownership is easily hidden using paper companies. The radio sector has seen an intense process of concentration and takeovers in the past years, there have also been a number of controversial takeovers in the print sector. There is a need for more decisive control of relevant authorities, as the top four owners almost completely control the audiovisual and print market in Slovenia. There is also a lack of official data on the market share and audience concentration in the main media sectors.

The indicator on **Online platforms concentration and competition enforcement** also scored a similar high risk with 73%. There is a lack of official data on the advertising market share in the online environment, which would also include Google, Facebook and similar digital intermediaries. There are no specific rules on merger control or prevention of concentration that would take into account the specificities of the media sector, individual sectors are not mentioned. Media legislation contains measures to prevent a high degree of cross-ownership between different media and there are monitoring bodies designated to monitor those provisions. They can refuse giving a license, although these powers are not always used. Specifically some recent cases show that cross-media concentration is developing more, although it is officially prohibited by the Mass Media Act, showing inefficiencies or passive (on purpose?) behaviour of regulatory bodies. The issue was particularly raised when the telecommunications company Telekom Slovenije was allowed to establish a TV station Planet TV in 2012 and there are a lot of other companies that practise multiple media activities at the same time and continue to gain licences without being in accordance with the law. A number of cases in the past are still debated whether the competition authority decided appropriately and whether its powers were not used in the interest of the consumers (see for example the merger of broadcasters Pop TV and Kanal A, the acquisition of Pro Plus

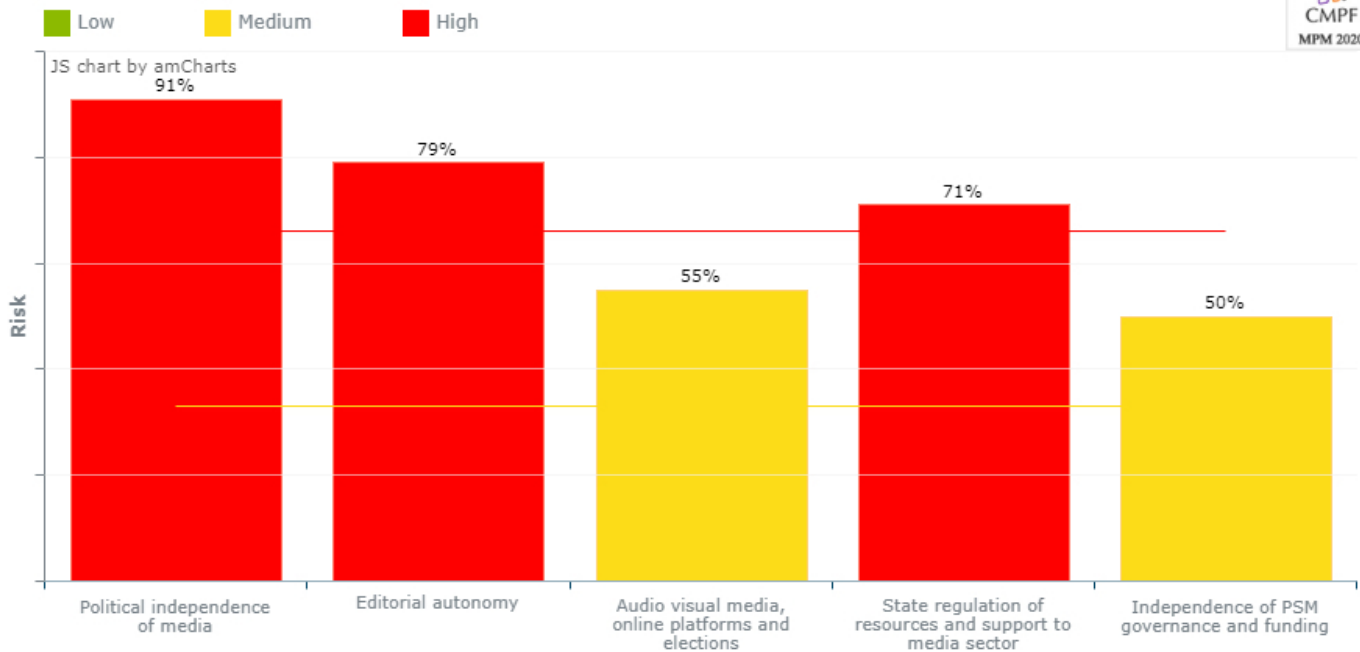
by the United Group, which also owns second-largest telecommunications and cable operator, Telemach) or the merger of Dnevnik and Večer. "The high concentration of media ownership is weakening pluralism and encouraging self-censorship among journalists," was noted also by the 2019 World Press Freedom [Index](#).

The revenues in the audiovisual sector have been increasing in the past years, although there is no official and regular data being collected, analyses show that revenues in the radio and newspaper sector have been decreasing. There is also no official data being collected to show, if the number of journalists employed in any media sector (local or national) has increased or decreased, which is a problem in showing the real employment structure in the media landscape. It is known however, that not many media companies are employing new journalists for full time positions, mainly they practise journalism through establishing private companies, so the media companies don't have to cover their health and pension expenses. There is also a lack of data showing the media advertising expenditures. The Slovenian Ministry of Finance announced in June 2019 a government proposal to submit a draft bill to the National Assembly introducing a digital services tax, which should come in place in 2020. The support schemes provided by the state are failing to facilitate market entry or to enable media organizations to overcome financial difficulties. The indicator on **Media viability** therefore scored medium risk with 56%.

The indicator on **Commercial & owner influence over editorial content** scored 72%, which presents a high risk, mainly because there are no regulatory safeguards, which seek to ensure that decisions regarding appointments and dismissals of editors-in-chief are not influenced by commercial interests. There are also a lot of cases of advertorials and subliminal advertising, mostly in print and online media, even though hidden advertising is prohibited with the Mass Media Act. There were few times that covers of the biggest daily newspapers were in its entirety an advertorial, there are also examples that the commercial content isn't graphically enough different from the editorial content (especially online and print). The Union of Slovenian Journalists offers free legal support and professional associations also offer support, however membership is voluntary.

3.3. Political Independence (69% - high 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 on **Political independence of media** scored the highest risk of all indicators with 91 percent. The Mass Media Act or other laws do not regulate the conflict of interests between owners of media and the ruling parties, partisan groups or politicians, there is only a general Integrity and Prevention of Corruption Act, which does not mention media companies or media in specific terms. Right winged party SDS also very openly and publicly manages (members are co-owners) a TV station Nova24TV, and has or had very close ties with at least two print and online political magazines (Reporter, Demokracija). As of 2017, the three biggest owners of Nova24TV are Hungarian companies, known to be in close ties with the Fidesz party. The already politically controlled newspaper Demokracija was also sold to the company Repost, which is one of the co-owners of the Hungarian web tabloid Repost, known to be a political project of the same Hungarian party (described in [article](#) "SDS Media (Part 3): Hungarian takeover of the right media pillar"). In 2019 there was some information that the prime minister with his consultants has an influence on the content of one of the biggest web pages in Slovenia (Siol) which has the same owner as the television Planet TV. This conflict is very present in the local areas (f.e. municipalities) as well; a lot of local small newspapers and local publications (which at the same time act as the only local media outlets which carry any amount of news) are connected with major political parties (for example a number of regional online media that are not officially part of the SDS media system, but many are regulated by individuals affiliated with the SDS) and/or published by the municipality, financed from the state budget and reflecting the ideas of the local government (mayor, party), as explained in the [article](#) "Municipal newsletters: millions of euros in public money to promote mayors". There were many examples of political control in daily newspapers in the past, changing laws and placing politically connected people in the supervisory boards, as chairmen and later changing the editors-in-chief. The only owner of the leading news agency is the Republic of Slovenia and it had some political affiliations in the past, however no (direct) influence in the last years.

The indicator on **Editorial autonomy** also scored high risk with 79 percent. There are no common and effective regulatory safeguards to guarantee autonomy when appointing and dismissing editors-in-chief. The Mass Media Act only states that a person, who by the constitution or by law enjoys immunity, can not be editor-in-chief. The Mass Media Act also stipulates that media owner must seek the opinion of the editorial office, however this has no real effect. Many owners simply appoint 'temporary' editor-in-chief (so-called "vršilec dolžnosti"), which has been a situation at main daily newspapers for a number of years. The journalists therefore don't have a say in the changes, the role of (the many) freelancers or permanent contributors is also not defined and it is not known who actually is "the editorial office". There have been some cases where political influences on editorial content were present in practise. It mostly

happens on the public broadcaster and with content on web pages, especially on "onemanband" online media. The general Code of Journalism Ethics functions as a self-regulatory mechanism, however it is non-obligatory. There are no sanctions following incorrect usage of the code, there is no control body, which would have real powers, therefore it is not efficient as a self-regulatory measure.

The indicator on **Audio visual media, online platforms and elections** scored 55%, which is a medium risk. Not much has changed in this area. The media law does impose rules aiming at fair representation of political viewpoints in news and informative programmes on PSM channels and services; however, the "fair and balanced" approach is often very mathematical, looking for one representative of "the right" and one of "the left", or "pro" and "contra", which leads to relativism of issues. The PSM has precise rules regarding the representation of different groups of political actors during election campaigns, while there are no laws guaranteeing access to airtime on private channels. There are differences in coverage of parliamentary parties and non-parliamentary parties on the PSM, which can lead to problems when a new party or movement is running the campaign, even if they are very popular in public-opinion polls. The conditions and prices for advertising are set, however, political actors with a stable financial background can obtain more space than smaller parties and movements. There is also no regulation ensuring transparency of online political advertising. Sometimes the presentation of different groups of political actors is more fair on private channels compared to the national channels, as they don't have such specific rules as the PSM and can invite also smaller up-coming political groups, which do not get their share of timing on the public television. However, the representation can also be less fair, as certain stations give more time and less critical questions to the politicians whose views they and their TV stations agree more with (for example the private TV channel Nova24TV, which is owned by members of the strong political party SDS).

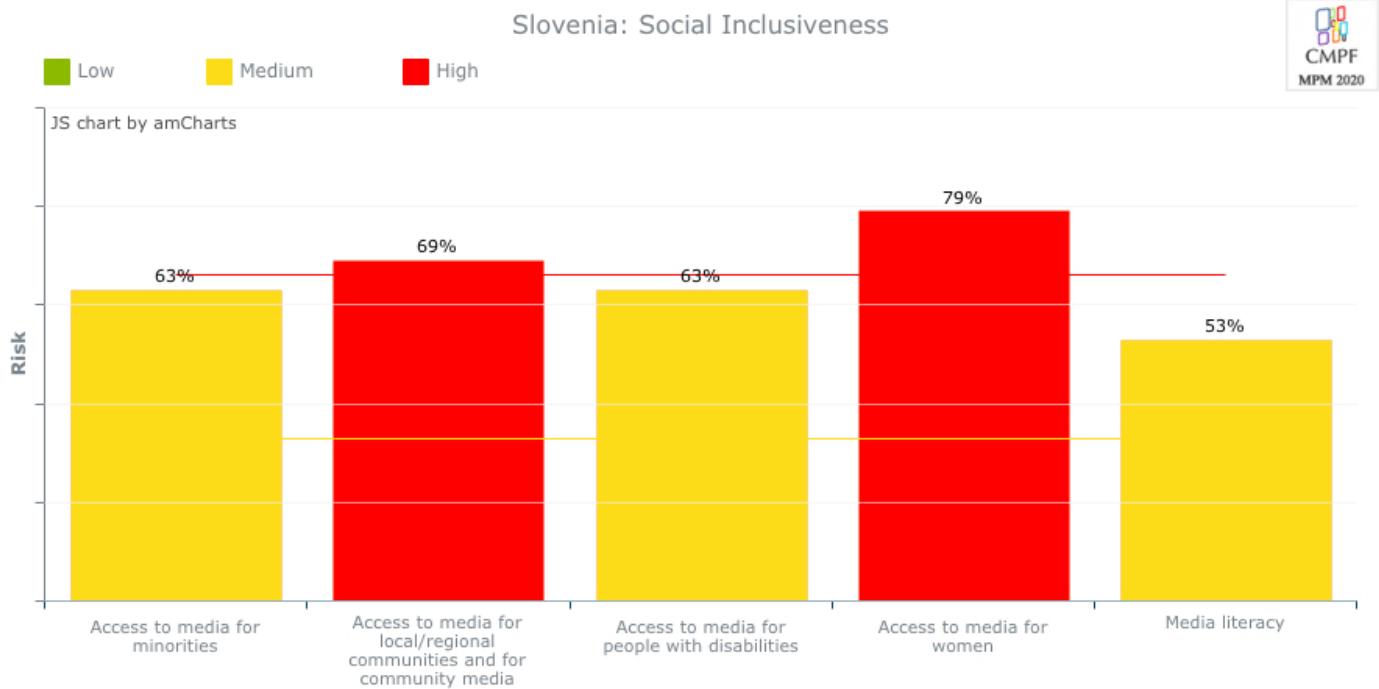
The legislation does not ensure transparent spectrum allocation and the allocation in practice is not transparent. There is a regular annual public call for co-financing media content, but the decision making process could be more transparent with the public. A report on beneficiaries and the given amount is published. As there is only one main public call for subsidies by the Ministry of Culture, many different electronic, printed, radio, television media on the national, local and regional level apply, they are only divided between those with a status of special importance and all others. If there were more direct subsidies the distribution would be more fair. There are no indirect subsidies (except from advertising revenues from state owned companies). There is also no clear set of rules regarding the distribution of state advertising and there is no official data on media, which received state advertising. Due to further privatisation of state-owned companies in 2010s, the practice of untransparent distribution of advertising has slightly decreased, however there are still allegations that the advertising is not distributed transparently, with clear criteria. The indicator on **State regulation of resources and support to media sector** therefore scored high risk with 71%.

The rules for appointments and dismissals of PSM management and board functions are relatively fair and transparent, however they also leave a gap for occasional political influences, as a big number of board members are appointed by the National Assembly. There have been frequent conflicts and problems in regard of appointing and dismissing management and board functions. The majority of the PSM funding comes from monthly contributions every household with a TV subscription must pay. The Mass Media Act only prescribes that the government shall pay a sum equivalent to 3% of the amount of the contribution to the programs of RTV Slovenia, which was collected in the previous year for the development of programs with the status of local, regional and student or non-profit radio or television program (article 4a). The Radio And Television Corporation of Slovenia Act mentions where the PSM gets the funding from and for what the finances are directed to. The indicator on **Independence of PSM governance and funding** therefore score medium risk with 50%.

3.4. Social Inclusiveness (65% - 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** scored 63% and presents a medium risk. The law guarantees access to airtime on PSM to legally recognized minorities and the media coverage of minorities is by far the biggest on the PSM channels given the entirety of all Slovenian media. The problem is more with minorities, which are not recognised by law. Eventhough the Slovenian legislation complies with all international treaties, these rights only apply to a small segment of its minority populations. The Italian and Hungarian (legally recognised) minorities represent only 6.8% of all minorities in Slovenia, even if we include the Roma, that still means that more than 90% of persons belonging to minorities do not receive collective rights. Outside the PSM there is no regular access to airtime, in the form of specialised shows, informative programs in minority languages, perhaps with a few exceptions in the near-border areas.

Regional and local radio and television programs, together with PSM channels, student media and non-profit media have a status of programs of special importance, that is defined in the Mass Media Act. To get this status they have to follow some demands Mass Media Act and they can apply for some amount of state funding given in the form of a yearly public tender, however the funding is not enough solely to be able to function on it. Many regional/local media suffer from insufficient funding, small number of staff members, being taken over by bigger media or just stopping to function because there is not enough funds. The Mass Media Act nor the Radio and Television Corporation of Slovenia Act include obligations to keep local and regional correspondents or branches, in fact a number of local correspondents have been cut in the last years. Community media is somewhat present, but not always independent. The law does not mention independence of community media specifically, generally it does mention mass media should be independent but gives very little concrete legal safeguards, sanctions, consequences. While there is no systematic political interference, the content and number of community media is interfered by the amount of state funding. If we understand municipal newspapers as community media, there is also a big problem, as mentioned they are mostly under the mayor's dominance, so the community which indirectly finances city's editions doesn't have any influence on the content (see [article](#)). The indicator on **Access to media for local/regional communities and for community media** therefore scored high risk with 69%.

The state policy on access to media content by people with physical challenges is underdeveloped. The general media law is not precise enough and not up-to-date with changes in the media landscape, so especially private media channels are not committed to assuring access to their content for audiences with disabilities. The exception here is only the

PSM, which is obliged to more developed policies by the Radio and Television Corporation of Slovenia Act. Subtitling and sound descriptions are available at public service television channels in different timings. However, a full service for people with hearing or sight impairments is still not available. Audio descriptions for blind people are not available and support services such as subtitles, signing and sound descriptions are available only on irregular basis or in the least popular scheduling windows for people with hearing impairments. The indicator on **Access to media for people with disabilities** scored 63%, which presents a medium risk.

The indicator on **Access to media for women** scored high risk with 79%. There is no gender equality mentioned in the PSM regulatory framework, the general media law only imposes a general prohibition of incitement to inequality and intolerance, which also includes gender inequality. In 2018, there were 31 members of the PSM programme board and 6 of them were women. A number of reports have shown that women are underrepresented in the media or depicted in a stereotyped way. A project called Meta dekleta (Meta girls), assessing the gender balance in media since 2014, showed generally two thirds of guests / sources are male and one third of them is female. In monitoring 11 Slovenian daily newspapers, data from 2018 shows 75 percent of interviewees were male and 25 percent were female, which includes all topics (the number was equal only in the religion and legislation topics). Data collected between 2014 and 2016 shows the percentage of female guests and interviewees on main TV informative shows was around 20 and 32 percent. Similarly, a report from 2018 based on monitoring of gender diversity during reporting on the electoral campaign, shows that on average the female gender is featured as a guest or interviewee on TV and in newspapers for 27 percent of the time. They are most commonly featured on topics such as health, environment, culture and society and the least of politics and economy.

The indicator on **Media literacy** scored 53%, which presents a medium risk. Media literacy is often mentioned in government documents related to the media; however there is a lack of consistent policy and programmes, covering all aspects (education, digital divide, generation gap, new media etc). It is not mentioned in the general Mass Media Act, presented drafts of the new media strategy have included media literacy. For now, media literacy is present in the primary education and secondary education curriculum, but only as an optional course or integrated in other courses. There is a (self)regulatory framework to counter hate speech, however it is not effective, especially online and on social media.

ANNEXE I. COUNTRY TEAM

First name	LAST name	Position	Institution	MPM2020 CT Leader
Marko	Milosavljevic		University of Ljubljana	X
Romana	Biljak Gerjevic	Assistant Researcher	University of Ljubljana	

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
Blaz	Petkovic	Journalist / Management Board member	Daily Vecer / Slovene Association of Journalists
Cene	Grnar	Legal Expert	Pro Plus TV / Association of Broadcasters

