

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2021

Country report: Slovakia

Marína Urbániková, Masaryk University

Research Project Report

Issue -
June 2022



TABLE OF CONTENTS

1. About the project	4
1.1. Overview of the Project	4
1.2. Methodological notes	4
2. Introduction	6
3. Results of the data collection: Assessment of the risks to media pluralism	8
3.1. Fundamental Protection (28% - low risk)	9
3.2. Market Plurality (68% - high risk)	11
3.3. Political Independence (57% - medium risk)	14
3.4. Social Inclusiveness (54% - medium risk)	16
4. Pluralism in the online environment: assessment of the risks	19
5. Conclusions	22
6. Notes	24
7. References	25
Annexe I. Country Team	
Annexe II. Group of Experts	

© European University Institute 2022
Chapters © Marína Urbániková, 2022

This work is licensed under the Creative Commons Attribution 4.0 (CC-BY 4.0) International license which governs the terms of access and reuse for this work. If cited or quoted, reference should be made to the full name of the author(s), editor(s), the title, the series and number, the year and the publisher.

Views expressed in this publication reflect the opinion of individual authors and not those of the European University Institute.

Published by
European University Institute (EUI)
Via dei Roccettini 9, I-50014
San Domenico di Fiesole (FI)
Italy
ISBN:978-92-9466-303-0
doi:10.2870/946133



With the support of the Erasmus+ Programme of the European Union. The European Commission supports the EUI through the EU budget. This publication reflects the views only of the author(s) and the Commission cannot be held responsible for any use which may be made of the information contained therein.

1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 2021. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological notes

Authorship and review

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 is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.

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

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

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

Table 1: Areas and Indicators of the Media Pluralism Monitor

The digital dimension

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

The calculation of risk

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

Scores between 0 and 33%: low risk

Scores between 34 and 66%: medium risk

Scores between 67 and 100%: high risk

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

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2022 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2022, available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

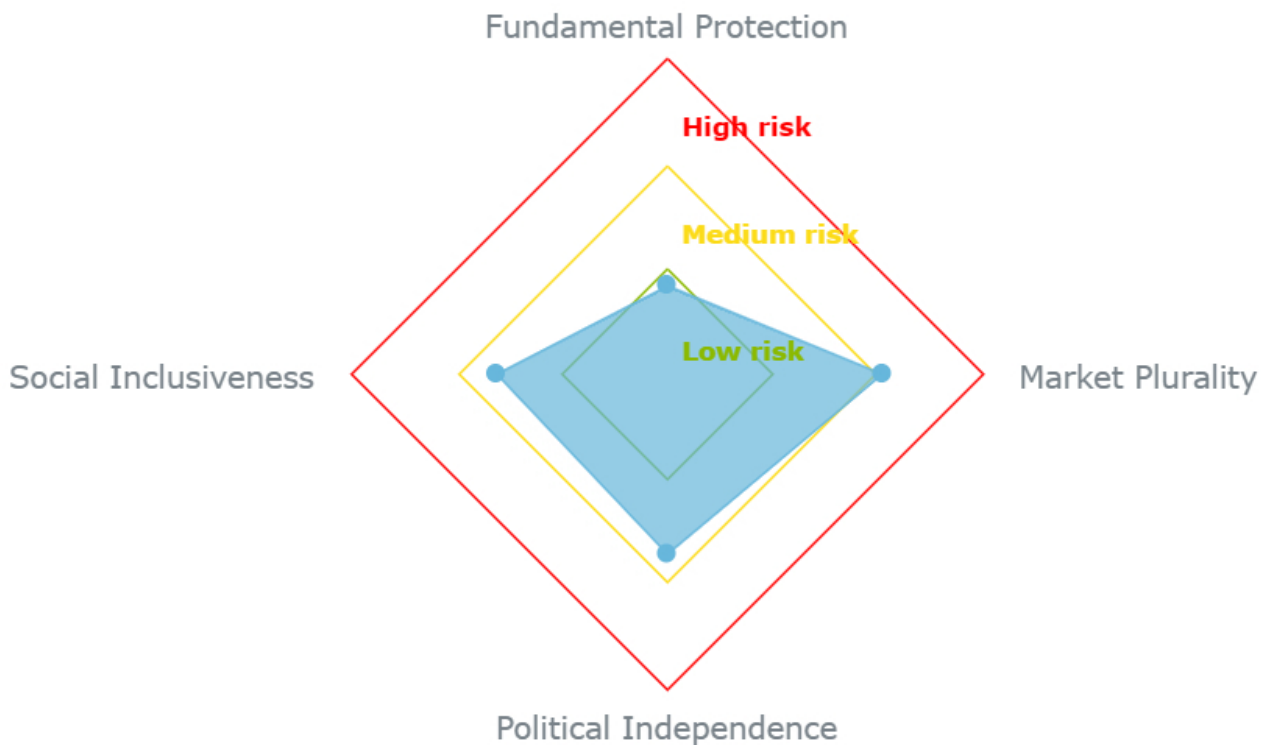
- **Country overview:** Slovakia is a landlocked Central European country with a territory of 49,035 square kilometres and a population that exceeds 5.4 million. Its capital is Bratislava, with a population of over 430,000.
- **Languages:** The official language is Slovak. There are nine minority languages recognised by law: Bulgarian, Croatian, Czech, Hungarian, German, Polish, Roma, Ruthenian, and Ukrainian.
- **Minorities:** According to the country's 2021 census (ŠÚSR, 2022d), the majority of the inhabitants have Slovak nationality (84%), with the most numerous national minority being Hungarian (8%), followed by Roma (1%), Czech (0.5%), Ruthenian (0.4%), and Ukrainian (0.2%). However, it is assumed that many Roma people chose not to declare their ethnic identity in the census and that the Roma minority is, in fact, much larger; it is estimated at 440,000 (8%) (MVSR, 2019). The Hungarian minority is concentrated mainly along the southern border with Hungary, while Roma people predominantly live in the eastern part of the country. The Bratislava region, which is situated in the west, is by far the richest of the country's eight regions, with a gross domestic product (GDP) that is almost double that of the Košice region in the east, which is second.
- **Economic situation:** The Slovak economy grew by 3% in 2021, according to the Slovak Statistical Office (ŠÚSR, 2022a). However, the losses from 2020, the first year of the pandemic, have not yet been erased: the total value of the GDP at constant prices continued to lag behind the pre-COVID-19 period by 1.5%. For 2022, the Slovak Ministry of Finance expects a GDP growth of 3.5 % (MFSR 2022). Due to rising energy prices, supply chain bottlenecks, the COVID-19 pandemic, and geopolitical tensions, inflation is a concern. Inflation increased to 3.2% in 2021, the highest it has been in nine years (ŠÚSR, 2022b), and it is expected to reach 6% in 2022 (MFSR 2022). The unemployment rate increased to 6.8% in 2022 (ŠÚSR, 2022c).
- **Political situation:** Slovakia is a parliamentary representative democratic republic with a multi-party system. Its political landscape is fragmented and, on average, six to seven parties are represented in the Parliament. The current government was formed in 2020, when the elections ended the eight-year rule of the left-wing Smer-SD party and brought to power a conservative-populist centre-right movement named OĽANO. A political crisis brought on by the murder of investigative journalist Ján Kuciak and his fiancée Martina Kušnírová precipitated the shift in government. As of 2019, the presidency is held by Zuzana Čaputová – who is female, liberal, and pro-European.
- **Media market:** Slovakia has a dual system of public and commercial broadcasting. The public service broadcaster, Radio and Television Slovakia (RTVS) has a relatively strong position; its most popular TV and radio channels are among the market leaders. There are seven nationwide daily newspapers (including two tabloids) and two nationwide press agencies that represent the written press landscape. Commercial TV stations and digital-born news portals remain the dominant news sources (Newman & et al., 2021). Czech and Hungarian media are also important players due to the shared historical background and language similarities with the Czech Republic and the presence of a significant Hungarian minority.
- **Regulatory environment:** The Ministry of Culture creates the national media policies and drafts most

media legislation. It also keeps the register of printed media. The major regulatory body is the Council for Broadcasting and Retransmission, which executes state regulation in the field of radio and TV broadcasting, retransmission, and on-demand audio-visual media services. Ethical self-regulation is performed by the Print-Digital Council of the Slovak Republic for the journalism industry and the Advertising Standards Council for advertising. The Slovak Syndicate of Journalists, the main journalists' professional association, plays a peripheral role because it lacks authority in the journalistic community.

- **COVID-19:** In 2021, more than 14,000 people died from complications related to COVID-19 in Slovakia, compared to 2,250 people in 2020 (MIRRISR, 2022). Besides the death toll, COVID-19 had a severe economic impact, including upon the media sector; although, the year 2021 was marked by a modest economic recovery compared to 2020. No particular restrictions upon the freedom of expression have been introduced in response to the COVID-19 pandemic, and the ones that have arisen from the state of emergency and that might have had an impact on fundamental rights and freedom (mainly freedom of movement and freedom of assembly) have been regularly scrutinized by the public as well as the non-governmental sector. The first wave of the COVID-19 pandemic raised a legally controversial issue of whether it is necessary for the Public Health Authority of the Slovak Republic to obtain information from telecommunications companies about their customers and, if so, to what extent. Following the presidential veto, the scope of data that can be processed by the Public Health Authority and the duration of their retention was limited by the new *Act No. 452/2021 Coll., on Electronic Communications* (Štarha, Gašparovič & Rievajová, 2021).
- **War in Ukraine:** The Russian invasion of Ukraine brought significant changes to the Slovak media sector. As the war has further increased the already high circulation of disinformation, propaganda, and hoaxes, the Slovak Parliament hastily passed an amendment to *Act No. 69/2018 Coll., on Cybersecurity* to allow the National Security Authority to shut down sources of “malicious content” (Slovak Spectator, 2022a). In the past, the proposals to give the National Security Authority the power to block websites have been rejected due to fundamental rights concerns; these concerns persist with regard to the new Act as well. For instance, the description of harmful content that can be blocked by the National Security Authority includes “serious disinformation” but the Act does not further define the term. In addition, the National Security Authority decides on blocking on its own initiative and at its own discretion. As a result, several websites that spread Russian propaganda (e.g., Hlavné Správy) have been blocked (NBÚ, 2022). One of the authors contributing to the disinformation outlet Hlavné Správy was, together with other persons, arrested and charged for taking bribes and conducting espionage for Russia (Slovak Spectator, 2022b). Please, note that the report covers data referring to the year 2021. The impact of war in Ukraine is not reflected in the overall scores and scores for different areas.

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

Slovakia: Media Pluralism Risk Areas



JS chart by amCharts



According to MPM 2022, the main risks to media pluralism in Slovakia lie in the area of **Market plurality** (this domain displays a high-risk score). The areas of **Political independence** and **Social inclusiveness** remain of concern as well. Although the score, in both cases, falls in the medium-risk zone, it is approaching the threshold of the high-risk zone. **Fundamental protection** is the only domain that displays a low level of risk for media pluralism. While the overall risk level in each key domain remains the same, there were some changes in individual indicators compared to 2021. The assessment of the risks for pluralism in the online environment provides slightly more favourable results than the overall pluralism assessment. This applies to the domains of Political independence and Market plurality in particular.

In the domain of **Fundamental protection** (28%), four out of five indicators displayed low risk. The remaining one — Universal reach of traditional media and access to the Internet — showed to be a medium risk, mostly due to the low share of households covered by broadband Internet and the decrease in the percentage of the population covered by the signal of public service channels.

Market plurality scored the highest risk of all the four domains (68%). In particular, News media concentration and Online platforms concentration and competition enforcement were high-risk areas. In this regard, the lack of legislation that requires the disclosure of information about the ultimate owners of news media, leaky safeguards against ownership concentration, and the slow economic recovery after the COVID-19 pandemic, are the main threats to media pluralism in Slovakia.

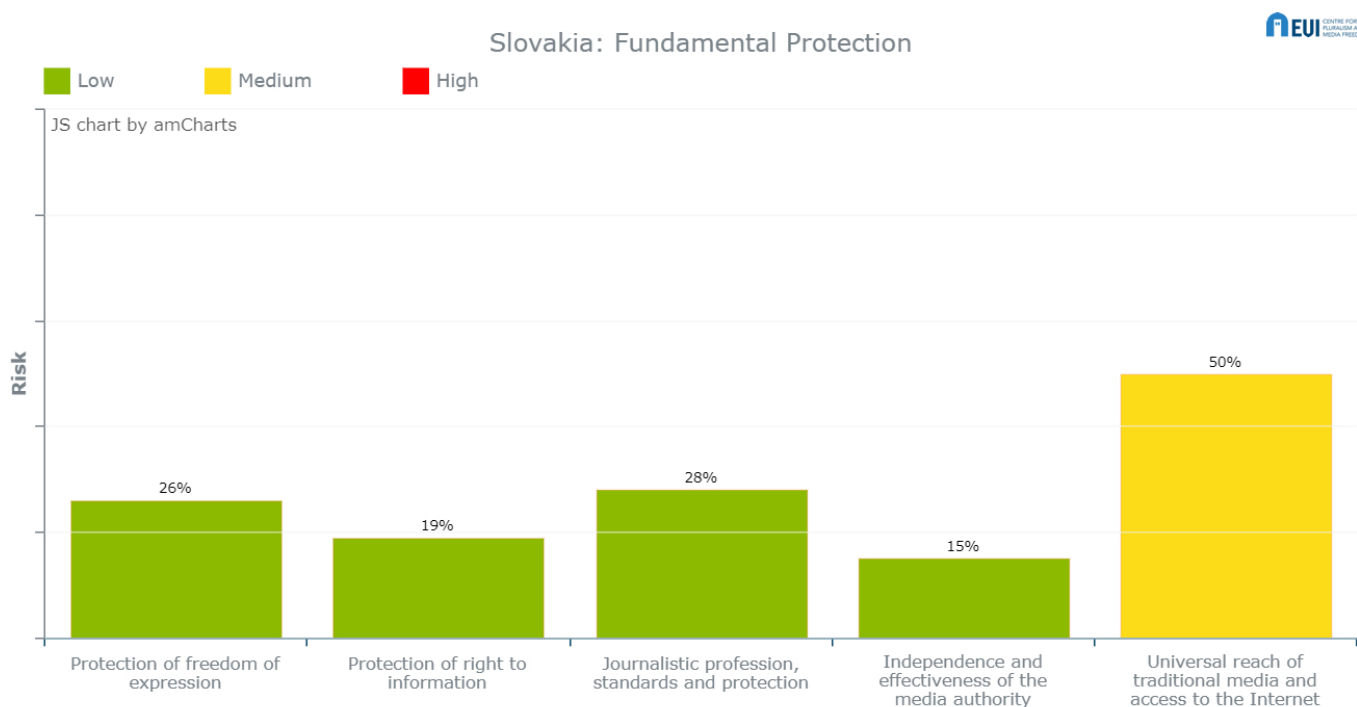
Political independence displayed medium risk (57%), with two indicators exceeding the high-risk

threshold: Political independence of media and Independence of PSM governance and funding. In both areas, long-term unresolved problems at RTVS, the Slovak public service broadcaster, play an important role. Moreover, the lack of safeguards that prevent politicians from owning media companies and the proliferation of disinformation websites pose further risks.

In the domain of **Social inclusiveness** (54%), Protection against illegal and harmful speech and Access to media for women were identified as the most problematic (both scored high risk). Media literacy and Access to media for local/regional communities and community media should be given attention as well, as these areas displayed medium risk.

3.1. Fundamental Protection (28% - low risk)

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



In the domain of **Fundamental protection** (28%), four out of five indicators displayed low risk (as in the previous year). The only exception was the indicator for the Universal reach of traditional media and access to the Internet. Compared to last year, the risk assessment deteriorated from to medium risk from low, mostly due to the low share of households covered by broadband Internet and the decrease in the percentage of population covered by the signal of public service channels.

Similar to last year, **Protection of freedom of expression** showed to be a low risk (26%) because the Slovak legal provisions adhere to international human rights standards (see *Act No. 460/1992 Coll., Constitution of the Slovak Republic; Act No. 23/1991 Coll., that introduces The Charter of Fundamental Rights and Freedoms*). Nonetheless, defamation is still defined as a criminal offence; it may be punished with up to two years of imprisonment and in case it causes "large-scale damage", e.g. loss of employment or divorce, offenders face up to eight years in prison (see *Act No. 300/2005 Coll., Criminal Code*). The

length of the prison sentence makes the Slovak defamation legislation one of the strictest in Europe (Griffen, 2017). Although accusations of defamation have been rare in recent years and have not led to convictions, in the past, politicians and judges used it as an avenue for responding to criticism (Griffen, 2017; Hanák, 2016). Thus, the legislation in its current form creates the potential for abuse and may lead to a chilling effect on journalists (see Hanák, 2016 for an analysis).

In the area of **Protection of right to information**, the risk was assessed as low (19%), the same as last year. Access to information is governed by *Act No. 211/2000 Coll., on Free Access to Information*. Although the right to information is generally respected, according to the reports of several NGOs (Transparency International Slovakia, 2021; Aliancia Fair Play, 2021), occasionally, public administration bodies arbitrarily deny access to information. Public administration bodies and public companies often take a very different approach to the provision of information, and, as pointed out by Transparency International Slovakia (2021), in many cases, citizens can only access information made available by a court decision, which usually takes years. Moreover, Slovakia has not yet transposed the EU Directive on Whistleblowing (Directive 2019/1937). On a more positive note, a newly-established independent Office for the Protection of Whistleblowers began operation in 2021 (based on *Act No. 54/2019 Coll., on the Protection of Whistleblowers*).

Journalistic profession, standards and protection showed to be a low risk (28%), with no annual change. Although the Slovak journalists' working conditions are generally rather favourable, several issues deserve attention. First, attacks and threats to the physical safety of journalists are rare but still occur (see European Centre for Press and Media Freedom, 2021a and 2021b). Regarding the prosecution of crimes against journalists, the case against the two persons accused of ordering and organizing the 2018 murder of the investigative journalist Ján Kuciak and his fiancée was still pending in 2021. In June 2021, the Slovak Supreme Court ordered a new trial, finding that the 2020 verdict did not adequately examine all of the available evidence (CPJ, 2021). Second, some journalists are in a vulnerable position due to the widespread practice of avoiding standard employment contracts in order to cut costs (which applies to the public service medium, too). Many journalists work as "external collaborators" or "freelancers" (i.e., self-employed persons), even though they work exclusively for a single newsroom and very often provide newsroom stability for many years. This adds to job insecurity and can also be used as a source of pressure because these contracts can be terminated at any time (see the case of long-term journalists working for the public service broadcaster RTVS; Reporters Without Borders, 2021). Third, the Slovak Syndicate of Journalists, the main journalists' professional association in Slovakia, is not effective. It lacks authority in the journalistic community, it does not engage in public debates on current issues regarding journalists and journalism, and the membership rate among active journalists is very low. Thus, a collective voice and defense are missing for when there is an attack against journalists or the journalistic community. Fourth, the lack of a specific anti-SLAPP (strategic lawsuits against public participation) legislation also contributes to the vulnerability of Slovak journalists. In 2021, one suspicious case was reported in this regard (European Centre for Press and Media Freedom, 2021c).

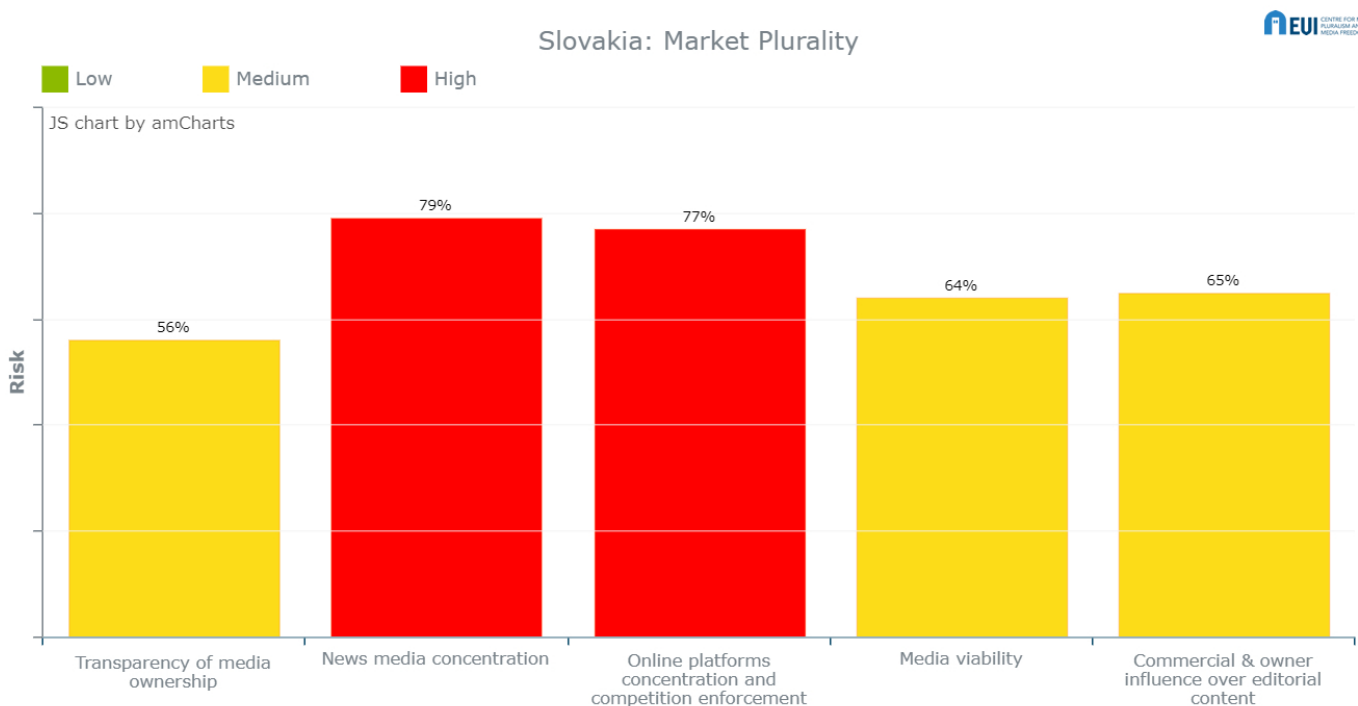
Independence and effectiveness of the media authority scored as a low risk (15%), the same as in the previous year. Regulatory authorities for audio-visual media services are generally independent of the government and public and private bodies. Procedures are designed to minimize the risk of political or economic interference, but, due to the political culture in Slovakia, these are not always effective. Regarding the key regulatory body, the Council for Broadcasting and Retransmission, politically motivated nominations have occurred in the past years. Even though the current Parliament introduced some changes in the procedure (e.g., live-streamed public hearing of the candidates in front of the Parliamentary committee), the

selection of candidates remains solely in the hands of the Parliament, and the risk of political nominations persists.

Compared to last year, the score for **Universal reach of traditional media and access to the Internet** increased to a medium risk (50%) from a low risk (25%). This is because the population covered by the signal of public service channels decreased from 98% to 94% in the case of the main radio channel and from 95% to 94% in the case of the TV channels (RVR, 2021 and 2022).^[1] Only 75% of households are covered by broadband Internet, well below the EU average of 87% (European Commission, 2021a). Also, regarding net neutrality, ownership concentration of the Internet service providers (ISPs) cannot be assessed because there are no comprehensive data on the market shares of the main players.

3.2. Market Plurality (68% - high risk)

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



Market plurality is the only domain that was assessed as high risk in Slovakia, even though the score improved compared to last year (to 68% from 79%). Specifically, News media concentration and Online platforms concentration and competition enforcement continue to be high-risk areas (the same as the previous year). On the other hand, in the case of Transparency of media ownership and Commercial & owner influence over editorial content, the risk assessment improved to medium risk from high risk, mostly due to the promising new media legislation currently being debated in Parliament that is expected to bring

more transparency into media ownership structures. The Media viability indicator has seen an improvement to medium risk from high risk as well, which reflects the modest economic recovery of the Slovak media sector from the impact of the COVID-19 pandemic.

Transparency of media ownership was shown to be a medium risk (56%) because Slovakia still lacks a law that would require the disclosure of information on the ultimate owners of news media. The ownership structure of many media organisations is, therefore, opaque. This is, to some extent, remedied by *Act No. 315/2016 Coll., on the Register of Public Sector Partners*, the main purpose of which is to identify the end-users of the benefits of the entities that receive public funds (including many major media organisations). These entities are listed in a publicly available online register that contains details on the actual owners. The Ministry of Culture prepared new media legislation in 2021 (as of December 2021, the draft has been debated in the Parliament), according to which all of the media should be listed in the register mentioned above (Denník N, 2021b). Also, the proposed law requires that the media publish a list of investors and donors, and prohibit anonymous donations. Due to this promising development, the risk score decreased to medium (56%) in the current year, from high (78%) in the previous year.

Like last year, **News media concentration** displays a high-risk score (79%). The current regulatory safeguards against the high degree of horizontal and cross-media concentration of ownership in the media sector do not cover native digital media and do not take into account the ultimate owners of the media companies. Consequently, the rules are relatively easy to circumvent. Moreover, the data on market share (based on revenues) in individual sectors are not collected and published, and it is, therefore, not possible to evaluate the level of concentration of ownership and the efficiency of the measures aimed at its prevention. The audience/readership concentration in the newspaper, audio-visual, and radio sectors is high because the audience/readership share of the top four media owners exceeds 60%.

There have been no changes in the area of **Online platforms concentration and competition enforcement** either. It remained in the high-risk zone (77%), as in the previous year. When it comes to online platforms, the concentration of ownership is difficult to assess because there are no data for online advertising revenue share or online audience share. Also, media-specific limitations are set for traditional media only and not for native digital media/platforms. The same applies to the concentration of the digital advertising market. The Antimonopoly Office enforces supervision under the general rules derived from *Act No. 187/2021 Coll., on the Protection of Competition*. Furthermore, Slovakia has yet to transpose EU Directive 2019/790; financial agreements between digital intermediaries and news-media producers to remunerate the publishers and contribute to their financing are not in place. No particular form of taxation for digital services has been introduced or scheduled.

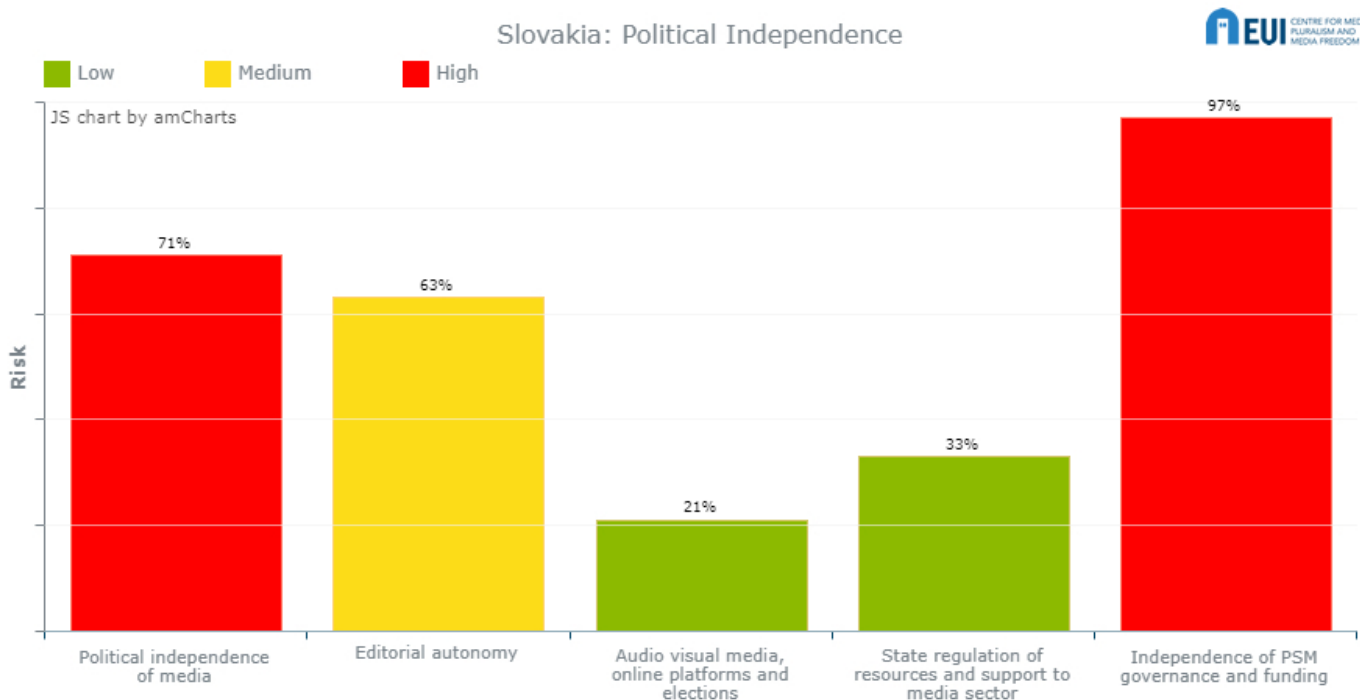
Compared to last year, the assessment of **Media viability** improved to medium risk from high (the score decreased to 64% from 83%). This reflects a modest economic recovery from the impact of the COVID-19 pandemic. Even though the pandemic struck the Slovak media sector hard in 2020, according to the industry associations, the financial situation improved in 2021 and revenues rose slightly. However, the overall economic conditions remain challenging, and the media sector has not yet fully recovered. There have been (some) salary cuts, or at least the salaries stagnated after the cuts taken in 2021. The audio-visual sector and the major TV companies, in particular, seem to be better off due to the increased advertising demand (HNOnline, 2021). According to the WARC Adspend database forecast for 2021, the annual advertising expenditure is expected to rise in all the media sectors, but it is still roughly at the level of 2019 (with the exception of the Internet advertising, which increased more significantly; however, this is a broad category that is not restricted to news websites and specific data on advertising revenues in the case

of online news media is not available, and, moreover, the revenues from online advertising go, to a large extent, to digital intermediaries). The economic condition of the media sector, as a whole, is difficult to determine because there is no data for revenues and revenue trends for 2021. In addition, the increase in advertising revenue is expected to be lower than the overall GDP increase (ŠÚSR, 2022a). Finally, the fragile economic situation of the news media is not helped by the absence of public support schemes for this sector.

In the case of **Commercial & owner influence over editorial content**, the score (65%) is comparable to last year (70%). However, a slight decrease meant a shift to the medium-risk zone from the high-risk zone. Several risk factors can be identified. Slovakia lacks a mechanism (legal or self-regulatory) that would grant journalists specific social protection in the case of changes to ownership or the editorial line (journalists are only protected via general provisions of *Act No. 311/2001 Coll., Labour Code*). It also lacks regulatory safeguards to ensure that decisions regarding appointments and dismissals of the editor-in-chief are not influenced by commercial interest. Also, although there is no systematic data or reports on the commercial influences on editorial content, anecdotal evidence (e.g., see the case of the magazine *Trend*; *O médiách 2020a* and *2020b*) and the ownership structure of the Slovak media, give rise to concerns. The vast majority of the key Slovak media outlets are in the hands of the local (i.e., Czech and Slovak) oligarchs. These groups and businessmen have interests in many industries and politics. Given the difficult economic situation in the media market, it seems likely that at least some of these owners bought the media outlets to support their activities and interests outside the media field (in the past, some admitted it openly; see *Denník N*, 2015). On a positive note, laws and self-regulatory measures that prohibit advertorials and disguised advertisement are in place and are fairly effective.

3.3. Political Independence (57% - 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 the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



The domain of **Political independence** continues to be in the medium-risk zone; however, the risk score increased to 57% compared to 41% last year. Unlike the previous year, two indicators exceed the high-risk threshold: Political independence of media and Independence of PSM governance and funding. This is mainly the result of long-term unresolved problems at RTVS, the Slovak public service broadcaster, and the increased activity of disinformation platforms.

Political independence of media has deteriorated since last year and shifted to the high-risk zone (71%) from the medium-risk zone (46%). This is mainly due to ongoing concerns about the independence of the public-service broadcaster RTVS (Reporters Without Borders, 2021; Urbániková, 2021). Change is not in the offing. A proposal of the Ministry of Culture to depoliticize the election of the Director-General (the next election is due in 2022) by transferring the electoral power from the Parliament to the RTVS Council was opposed by the junior coalition party, Sme rodina (Denník N, 2021c). Boris Kollár, the party leader who also serves as the Speaker of the National Council of the Slovak Republic, declared that the election of the Director-General should be solely in the hands of the Parliament (Denník N, 2021c). At the same time, he owns two of the four radio stations with the highest audience share in Slovakia. Instead of solving this conflict of interest, he bought the second radio station in 2021 (Refresher, 2021c). There are no regulatory safeguards that would prevent a conflict of interest in the media sector or effectively limit the direct or indirect control of media outlets by politicians, political parties, and partisan groups. Also, the political independence of town hall (i.e., local/regional) media is of concern because these are funded and owned by

local/regional authorities, and their content is often blatantly skewed in favour of the current local/regional political representation (Transparency International Slovakia, 2022). Furthermore, fake-news websites and disinformation promoted by online media continued to proliferate in 2021. On the other hand, there are no reports (by scholars, NGOs, or media outlets) that newspapers or the major commercial TV stations are politically controlled.

Like last year, **Editorial autonomy** displayed a medium risk score (63%). On a positive note, self-regulatory measures that stipulate editorial independence from political interference are included in the Code of Ethics, and all of the major media outlets, including press agencies, signed on to it. In the monitored period, no major incidents were reported by the Print-Digital Council of the Slovak Republic, the self-regulatory body in the area of journalistic ethics. On a more negative note, there are no legal safeguards that would guarantee autonomy when appointing and dismissing editors-in-chief. In the past years, political interference into the appointments and dismissals of key personnel was discussed as part of the situation at RTVS, the public service broadcaster, because the top managers who were directly responsible for the news content were replaced within weeks of the new Director-General being elected by the Parliament in 2017 and taking office (for details, see Urbániková, 2021). In general, there are no serious signals that the majority of the legacy media would be troubled by political influence (although the conduct of RTVS raises some concerns).

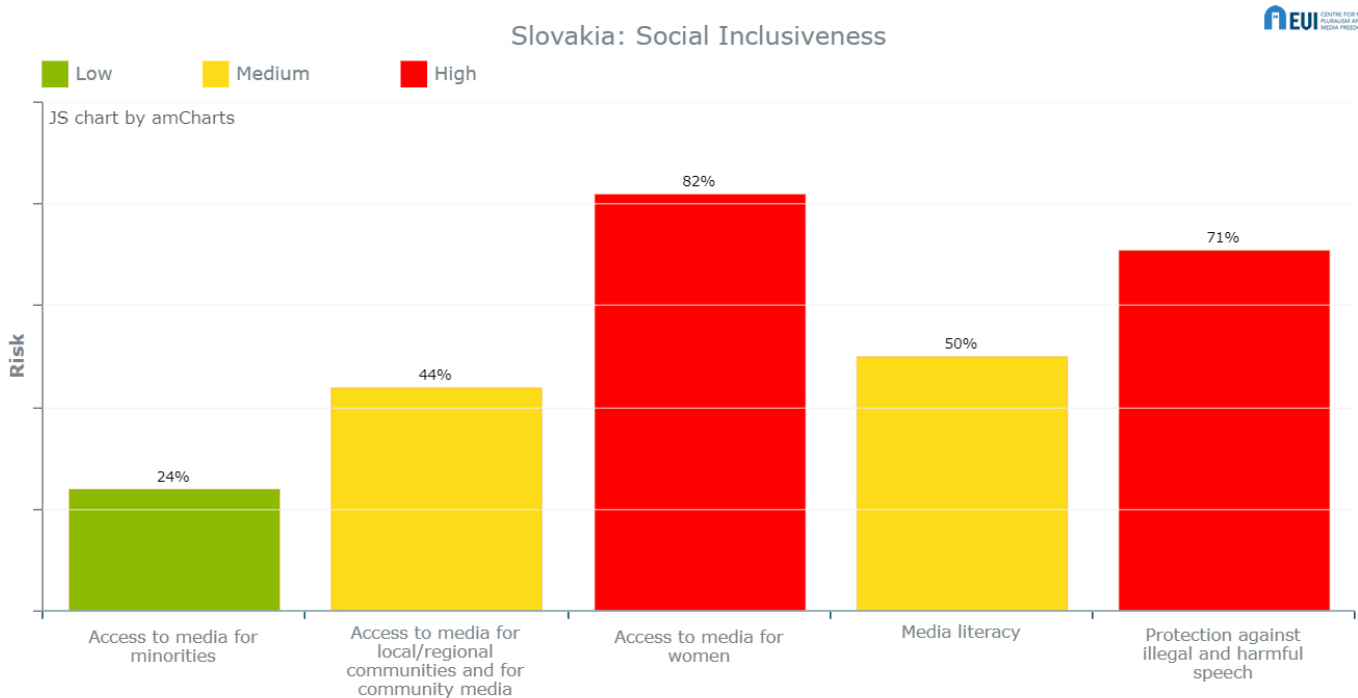
As in 2021, **Audio-visual media, online platforms and elections** scored low risk (21%). The regulatory and self-regulatory framework for the fair representation of different political actors and viewpoints is in place, and it is effective most of the time. There are, however, concerns regarding neutrality and balance in the case of the public-service broadcaster RTVS — this was also noted during the 2020 electoral campaign (MEMO 98 and GLOBSEC, 2020). There were no municipal, regional, parliamentary, or presidential elections held in Slovakia in 2021.

State regulation of resources and support to the media sector displayed a low risk score (33%). Like last year, a general lack of transparency regarding state advertising remains an issue. There is no specific legislation that would stipulate the rules for the distribution of state advertising to media outlets.

Independence of PSM governance and funding continued to be problematic and scored as a high risk (97%). The assessment is more negative than last year, when it was considered a medium risk. This reflects several long-term serious issues for PSM in Slovakia and the lack of political will on the side of the current political representation to address them. The current legal regulation does not guarantee the independence of the Director-General of RTVS and board members from political influence as these are elected directly by the Parliament. The law itself would not necessarily be problematic if the political actors were willing to select candidates based on professional and not political criteria. The top political representatives of the previous government under the rule of which the current Director-General was elected openly admitted before the election that their choice would be in line with their political interest (Urbániková, 2021). A change is not on the horizon because one of the current coalition parties vetoed the legislative proposal to depoliticize the election of the Director-General (which is due in 2022) and declared that the election of the Director-General should stay solely in the hands of the Parliament (Denník N, 2021c). At the same time, the funding of RTVS is inadequate (it was lamented by the Supreme Audit Office of the Slovak Republic; Denník N, 2021d), the licence fee has not been increased since 2003, and the broadcaster is, to a significant extent, financially dependent on a direct contract with the Ministry of Culture. This further deepens RTVS's dependence on political power. The lack of funding affects the online activities of RTVS as well. Moreover, an "online public service mission" does not exist as a legal concept and is not defined in law.

3.4. Social Inclusiveness (54% - medium risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech.



In the domain of **Social inclusiveness** (54%), two out of five indicators displayed high risk: Access to media for women and Protection against illegal and harmful speech (unchanged from last year). In the case of Access to media for local/regional communities and community media, the risk assessment improved to medium risk from high, mostly due to the proposed new law that introduces the concept of community media to Slovak law and regulates the conditions of their operation (TA3/TASR, 2021). The risk assessment also improved for Access to media for minorities (to low risk from medium), primarily due to a more positive evaluation of RTVS's national-minorities broadcasting by the RTVS Council (RTVS, 2021). Media literacy remains in the medium-risk zone.

The risk score for **Access to media for minorities** decreased to low risk from medium in the current year (to 24% from 44%). Only public service media are legally required to grant proportional airtime access to national minorities (see section 5, para. 1, letter g) of *Act No. 532/2010 Coll., on the Radio and Television of Slovakia*); this does not apply to commercial media. Risk reduction primarily reflects an improved assessment of the RTVS's performance in this regard by the RTVS Council. While its tone was openly critical in previous years, the recent report noted only minor problems related to broadcasting for national minorities. It also welcomed a report and the conception of broadcasting for national minorities produced by RTVS (RTVS, 2021). In addition, Slovakia has a well-developed and implemented legal framework for providing media content to people with disabilities; the statistics on adherence are regularly published (RRV, 2021).

Access to media for local/regional communities and community media scored as a medium risk (44%), an improvement compared to last year's high-risk score (75%). This reflects the fact that, although

the legal framework for community media is missing (i.e., community media are not recognised by law), a change seems to be on its way. As of December 2021, the Parliament is currently discussing a new law that was drafted by the Ministry of Culture (i.e., *Act on media services*) that introduces the concept of community media into Slovak law and regulates the conditions of their operations (TA3/TASR, 2021). Among other things, the proposed *Act on media services* implements the Audiovisual Media Services Directive 2018/1808 that should have been transposed by September 2020.

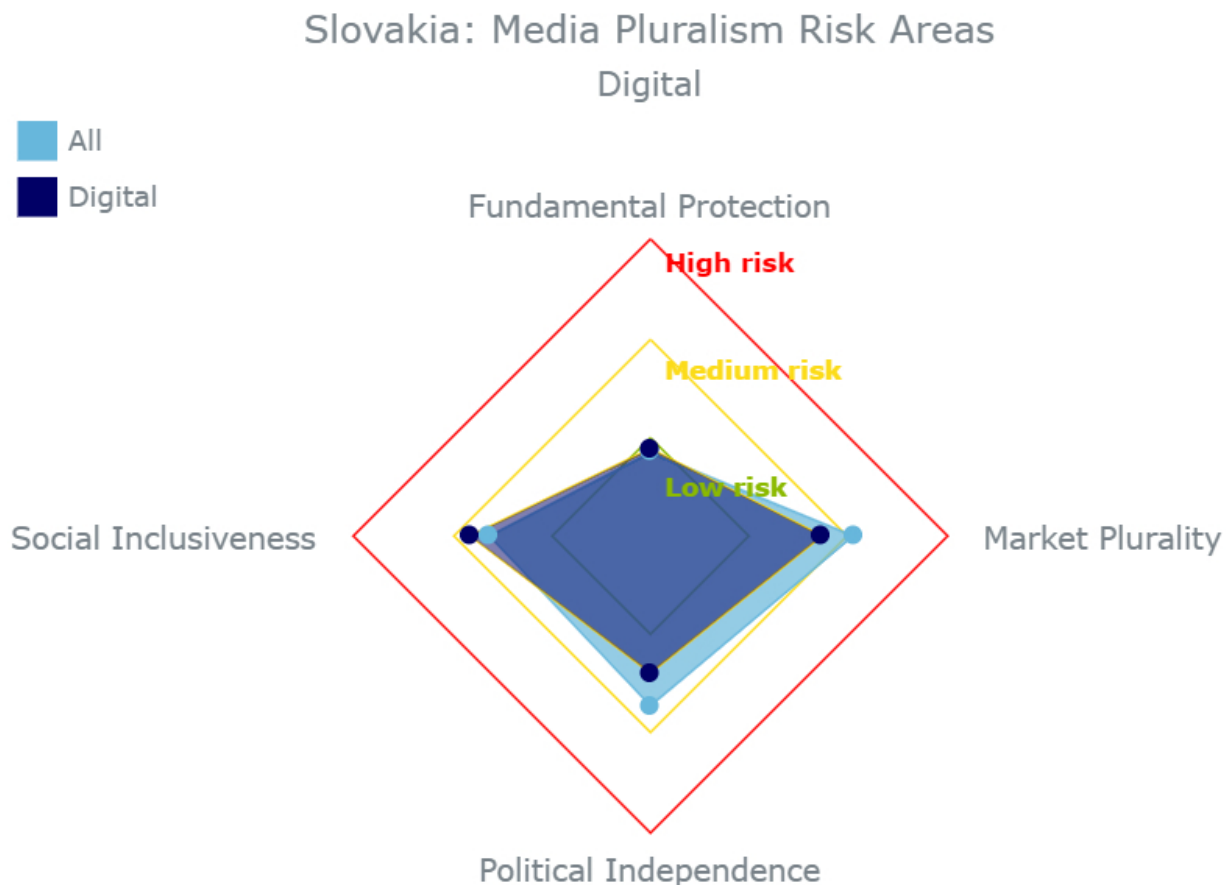
As in the previous year, **Access to media for women** scored high risk (82%). Women are severely underrepresented in executive positions and on the management boards of both public service media and commercial media, and comprehensive gender equality policies are lacking (even in public service medium). Besides, male experts seem to be more often invited to comment on political and other relevant matters and events than female experts, although no systematic data are available on this topic. Such bias is, to some extent, attributable to the lower representation of women in politics and the public space; however, this is rarely considered problematic, and systematic efforts to achieve equitable representation for women in the media are lacking.

Media literacy remains in the medium-risk zone (50%). The key issues are the same as in the previous year: the media literacy policy is underdeveloped, outdated, and it is not among the priorities of the current political leadership. Although media literacy is a compulsory cross-cutting subject in primary and secondary education, there is some evidence that, in practice, it is not being implemented in the curriculum (Bielčíková, 2021). Activities to enhance media literacy are limited and often depend on EU funding, so they are not sustainable in the long term.

The assessment in the area of **Protection against illegal and harmful speech** has not changed since the preceding year and it scored as a high risk (71%). Disinformation is widespread in Slovakia; according to the GLOBSEC report (2021a), Slovakia "is one of the CEE countries most susceptible to conspiracy theories and disinformation." This has become even more evident during the COVID-19 pandemic (see GLOBSEC, 2021b for specific examples of conspiracies and disinformation and their prevalence among Slovak citizens). As the war in Ukraine has further increased the already high circulation of disinformation, propaganda, and hoaxes, in February 2022, the Slovak Parliament hastily passed an amendment to *Act No. 69/2018 Coll., on Cybersecurity* to allow the National Security Authority to shut down sources of "malicious content" (Slovak Spectator, 2022a). In the past, the proposals to give the National Security Authority the power to block websites have been rejected due to fundamental rights concerns; these concerns persist with regard to the new Act as well (for instance, the description of harmful content that can be blocked by the National Security Authority includes "serious disinformation" but the Act does not further define the term; in addition, the National Security Authority decides on blocking on its own initiative and at its own discretion). Also, the dissemination of disinformation can be prosecuted under Section 361 of *Act No. 300/2005 Coll., Criminal Code*. Although a legal framework for sanctioning disinformation exists, what is missing is a coherent national policy and measures against the spread of disinformation, as well as an information security strategy; the existing policies are insufficient, not up-to-date, and not comprehensive (see, e.g., the Conception of the Slovak Republic for the Fight against Hybrid Threats, 2018). This might change soon because the Ministry of Defence is currently preparing the Action Plan for the Coordination of Countering Hybrid Threats 2022-2024 (MOSR, 2021). There are numerous NGO activities and initiatives to fight disinformation, but civil society does not have the support of the state. In addition, there is no specific regulatory framework to counter online hate speech, and the existing law (see para. 337 and 421-424 of *Act No. 300/2005 Coll., Criminal Code*) is ineffective. Efforts to remove hate speech from social media have had limited success. According to the 6th evaluation of the Code of Conduct on Countering Illegal Hate Speech

Online, in Slovakia, the rate for the elimination of hate posts on Facebook, Twitter, Instagram, Youtube, and other social media platforms fell to 47% in 2021 from 94% in 2020 (European Commission, 2021b). Also, the speed of elimination decreased (European Commission, 2021b), both probably due to staff shortage and the increase of hate speech, hoaxes, and conspiracy theories related to the COVID-19 pandemic (DigiQ, 2021).

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



JS chart by amCharts



The assessment of the risks for pluralism in the online environment gives slightly more favourable results than the overall pluralism assessment. This applies to the domains of Political independence and Market plurality in particular.

To start, **Fundamental protection** scored as a low risk with almost the same result as the overall score for this domain (29% for digital media compared to 28% in total). Freedom of expression is clearly defined by law, and it applies to the online environment as well, without any limits or exceptions. Freedom of expression online is well respected; there were no reports (by scholars, NGOs, or media outlets) of a violation in 2021, and the COVID-19 pandemic has not brought about any deterioration in this regard.

On the other hand, the online safety of journalists is a concern. Online harassment and abuse come from different actors, especially from audience members (e.g., insults and threats via e-mail or social media) and political actors (e.g., see European Centre for Press and Media Freedom, 2021d).

The data retention obligations for Electronic Telecommunications Operators and Internet Service Providers are transparent and fully comply with the international human rights standards. Regulatory safeguards regarding net neutrality are well implemented in practice and regularly monitored by the Regulatory Authority for Electronic Communications and Postal Services. On a less positive note, the ownership concentration of the Internet service providers (ISPs) cannot be assessed because there is no comprehensive data for the market shares of the main players. Also, the share of households covered by broadband Internet is well below the EU average (75% compared to 87%; European Commission, 2021a).

In the dimension of **Market plurality**, the online media environment displayed lower risk (61%; medium risk) than the media market overall (68%; high risk). To start with the transparency of media ownership, media-specific legal provisions that require the disclosure of ownership details do not apply to native digital media. Moreover, Slovakia still lacks a law that requires the disclosure of information about the ultimate owners of news media (this applies to both legacy and native digital media). This is, to some extent, remedied by *Act No. 315/2016 coll. on the register of public sector partners*, the primary purpose of which is to identify the end-users of the benefits of the entities that receive public funds (including many major media organisations). These entities are listed in a publicly available online register that includes details on the actual owners. The Ministry of Culture prepared new media legislation in 2021 (as of December 2021, the draft has been debated in the Parliament), according to which all media, including native digital, should be entered in the register mentioned above (Dennik N; 2021b). In the case of native digital media, the current lack of transparency of ownership is particularly worrying because of the trend for the increase of biased content, fake news, and disinformation by news websites with unclear ownership structure and funding, which continued in 2021.

Also, native digital media are not covered by the regulatory safeguards that have been put in place to buffer the high degree of horizontal and cross-media concentration in the news media sector. This means that there are no set limitations for native digital media, nor are these media outlets considered when evaluating threshold or other limitations set for traditional media (only digital branches of the traditional media are taken into consideration). Thus, unlike traditional media, in the case of native digital media, there is no media-specific administrative authority that oversees compliance with the ownership limitations and hears relevant complaints. There is also no sanctioning mechanism. The Antimonopoly Office carries out the supervision under the general rules derived from *Act No. 187/2021 Coll., on the Protection of Competition* without taking into account specificities and the digital evolution of the media sector. The actual level of ownership concentration in the online news media sector is difficult to assess because there is no data about their market shares or advertising revenue. Based on the limited data on the Top 10 most visited Slovak websites, the top four online news websites achieve an audience/reach share of 50% (IAB Slovakia, 2021).

Furthermore, Slovakia has yet to transpose EU Directive 2019/790; financial agreements between digital intermediaries and news media producers to remunerate the publishers to contribute to their financing are not in place. This is important because the Slovak audience access the online media mainly via a side-door (via social media and search engines; IAB Slovakia, 2021). In economic terms, online news media are, in general, more viable than their traditional counterparts, also because the year 2021 witnessed an extreme growth of 32% in Internet advertising spending and the online sector became the strongest advertising medium for the first time (IAB Slovakia, 2022). In addition, Slovak digital media are quite inventive and successful in developing non-traditional advertising-based revenue streams. The most prominent news sites have been charging for their content and setting the paywalls since 2011; in fact, Slovakia has been at the forefront of these efforts (Baker, 2012).

When it comes to commercial influence on digital media, the legal regulation that stipulates the obligation to avoid the influence of commercial interests applies only to radio and TV broadcasting (i.e., *Act No. 308/2000 Coll., on Broadcasting and Retransmission*). In this case, compliance is regularly monitored by the Council for Broadcasting and Retransmission. Both in traditional and digital media, disguised advertisement is banned by law (*Act No. 250/2007 Coll., on Consumer Protection*). Regarding self-regulation, commercial interference is also prohibited by both the Journalist's Code of Ethics and the Code of Ethics for Advertising Practice. There are no systematic data or reports on the commercial influences upon editorial content in the monitored period, but this does not necessarily mean that there were no such efforts.

In the dimension of **Political independence**, online media are less at-risk of being politically controlled than the media sector in general (47% compared to 57%; medium-risk zone). The leading native digital media are largely free from political influence. However, the worrying trend of the increased activity of news websites with unclear ownership structures and the funding that produce biased content, fake news, disinformation, and, in some cases, extremist propaganda, continued in 2021. These online media do not adhere to journalistic standards or ethical codes of conduct, and their stories often do not have an identifiable author. Typically, the presented views align with the extreme right or pro-Russian political parties.

Besides, the risk also lies in the lack of regulation regarding political advertising on online platforms. *Act No. 181/2014 Coll., on Electoral Campaign* does not apply to news websites and broadcasting carried out exclusively via the Internet (RVR, 2019). This also means that political parties and candidates who compete in elections are not obliged to report separately on campaign spending on online platforms. This is, at least partially, remedied by the estimation of the costs of the online advertising campaign provided by Transparency International Slovakia, which are based on the analyses of the transparent accounts of individual political parties (Transparency International Slovakia, 2020).

In the dimension of **Social inclusiveness**, the risk score for the online media environment somewhat exceeds the risk identified for the total media sector (61% compared to 54%); still, in both cases, it falls within the medium-risk zone. The digital skills of the Slovak population are average (54% of the population has basic or above basic overall digital skills, and 19% have low overall digital skills; Eurostat, 2019). This, together with the lack of a systematic, comprehensive, and up-to-date media literacy policy, and the burgeoning activities of dis- and misinformation online media, leads the Slovak population to face a serious risk for succumbing to disinformation and conspiracies (see part 3.IV for more detailed comment). These drawbacks became fully apparent in the context of the COVID-19 pandemic. According to the Police Force report on disinformation in Slovakia in 2021 (Police Force, 2022), most of the hoaxes spread in 2021 were related to COVID-19, and they affected the vaccination level in Slovakia and resulted in verbal and physical attacks against state representatives.

5. Conclusions

Fundamental Protection scored as a low risk (28%). In general, the protection of the freedom of expression and the right to information follow international human rights standards. On a more critical note, legislation on defamation is still among the strictest in Europe (Griffen, 2017): it is a criminal offence and may be punished with up to eight years of imprisonment (see *Act No. 300/2005 Coll., Criminal Code*). Also, although the Slovak journalists' working conditions are generally rather favourable, attacks and threats against the media do occur. Moreover, many journalists are in a vulnerable position due to the widespread practice of avoiding standard employment contracts. On top of that, the Slovak Syndicate of Journalists, the main professional association for journalists in Slovakia, does not effectively fulfil its role.

Recommendations for the government:

- **Amend the Criminal Code to decriminalise defamation or at least reduce the possible prison sentence**
- **Enact a specific anti-SLAPP (strategic lawsuits against public participation) legislation to prevent vexatious lawsuits against journalists**

Recommendations for the journalists:

- **Renew and strengthen (or newly establish) the professional association of journalists that would act as a respected voice for journalists and journalism in Slovakia**

Recommendations for the National Labour Inspectorate:

- **Monitor compliance with the labour law in the media sector, with a focus on the performance of illegal work (i.e., dependent work carried out outside an employment relationship)**

Market Plurality scored a high risk (68%). Slovakia still lacks a law that would require the disclosure of information on the ultimate owners of news media (although, a legislative change is on the way). The current regulatory safeguards against a high degree of horizontal and cross-media concentration of ownership in the media sector do not cover native digital media and they do not consider the ultimate owners of the media companies. The data on the market shares within individual media sectors are not collected and published. The COVID-19 pandemic struck the Slovak media sector hard in 2020; the financial situation improved in 2021, and revenues have risen slightly, but the media sector has yet to recover fully.

Recommendations for the government:

- **Enact a law that requires the disclosure of information on the ultimate owners of news media**

Political Independence scored as a medium risk (57%). Independence of PSM governance and funding continues to be problematic. Change is not in the offing because the legislative effort of the Ministry of

culture conducted in 2021 to depoliticize the election of the Director-General failed. Also, PSM funding remains inadequate. At the same time, no regulatory safeguards prevent political representatives from owning media companies (and some are taking advantage of it). Moreover, the worrying trend of the increased activity of news websites with unclear ownership structures and funding, which produce biased content, fake news, and disinformation, continued in 2021.

Recommendations for the government:

- **Amend the Act on the Radio and Television of Slovakia to depoliticise the election of the Director-General and the members of the Council of RTVS; increase the licence fees; and ensure sufficient, stable, and reliable funding for RTVS**
- **Require the Council for Broadcasting and Retransmission to regularly carry out/commission rigorous empirical analyses of the neutrality and the objectivity of the news and current affairs programmes of RTVS; undertake studies of its conduct and its fulfilment of its public-service mission; and provide funding for these purposes**
- **Enact a law to prevent political representatives from owning media companies to prevent conflicts of interests**
- **Adopt the rules for fair and transparent distribution of state advertising and introduce a monitoring mechanism**

Social Inclusiveness scored as a medium risk (54%). The PSM's performance in broadcasting for national minorities improved compared to the preceding year. Also, although a legal framework for community media is missing (community media are not recognised by law), a legislative change seems to be on its way. On a more negative note, women are severely underrepresented in executive positions and on media organisations' management boards, and comprehensive gender equality policies are lacking. The media literacy policy is underdeveloped and outdated, and that is one of the reasons why disinformation is widespread in Slovakia, which has become even more evident during the COVID-19 pandemic.

Recommendations for the government:

- **Develop and implement an up-to-date and comprehensive action plan to increase media literacy and digital skills**
- **Develop and implement a comprehensive action plan to tackle the rise of disinformation media**

Recommendations for media organisations:

- **Develop and implement comprehensive gender equality policies to cover both personnel issues and programming content**

6. Notes

- [1] Please note that as regards the PSM signal coverage, an error occurred in the Media Pluralism Monitor (MPM) 2021 report and the analysis produced incorrect scores for this specific variable (see Corrigendum in <https://cmpf.eui.eu/mpm2021-results/>). Thus, the year-on-year increase in risk score is the result of an erroneous assessment in the previous year.

7. References

- Act No. 452/2021 Coll., on Electronic Communications*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/452/20220201> [Accessed March 16, 2022].
- Act No. 187/2021 Coll., on the Protection of Competition*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2021/187/> [Accessed March 16, 2022].
- Act No. 54/2019 Coll., on the Protection of Whistleblowers*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2019/54/20190301> [Accessed March 16, 2022].
- Act No. 69/2018 Coll., on Cybersecurity*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2018/69/> [Accessed March 26, 2022].
- Act No. 315/2016 Coll., on the Register of Public Sector Partners*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2016/315/> [Accessed March 16, 2022].
- Act No. 181/2014 Coll., on Electoral Campaign*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2014/181/20210715.html> [Accessed March 16, 2022].
- Act No. 532/2010 Coll., on the Radio and Television of Slovakia*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2010/532/20140101.html> [Accessed March 16, 2022].
- Act No. 250/2007 Coll., on Consumer Protection*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2007/250/> [Accessed March 16, 2022].
- Act No. 300/2005 Coll., Criminal Code*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2005/300/20210101> [Accessed March 16, 2022].
- Act No. 311/2001 Coll., Labour Code*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2001/311/> [Accessed March 16, 2022].
- Act No. 308/2000 Coll., on Broadcasting and Retransmission*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2000/308/20160101.html> [Accessed March 16, 2022].
- Act No. 211/2000 Coll., on Free Access to Information*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2000/211/> [Accessed March 16, 2022].
- Act No. 460/1992 Coll., Constitution of the Slovak Republic*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/1992/460/> [Accessed March 16, 2022].
- Act No. 23/1991 Coll., that introduces The Charter of Fundamental Rights and Freedoms*, Slov-lex (Legal and information portal), Ministry of Justice. Available at: <https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/1991/23/> [Accessed March 16, 2022].
- Aliancia Fair Play, 2021. Časť samospráv stále ignoruje infozákon. *Aliancia Fair Play*. Available at: <http://www.fair-play.sk/articles/tlacova-sprava-cast-samosprav-stale-ignoruje-infozakon> [Accessed March 9, 2022].
- Baker, W.F., 2012. A National Paywall That Works. Lessons from Slovakia. *Columbia Journalism Review*, 14.02.2012. Available at: https://archives.cjr.org/the_news_frontier/a_national_paywall_that_works.php.
- Bielčíková, K., 2021. Mediálna výchova na druhom stupni ZŠ na Slovensku (Media Education in Lower Secondary Education in Slovakia). *Prohuman*. Available at: <https://www.prohuman.sk/pedagogika/medialna-vychova-na-druhom-stupni-zs-na-slovensku>.
- CPJ, 2021. Ján Kuciak. *Committee to Protect Journalists*. Available at: <https://cpj.org/data/people/jan-kuciak/> [Accessed March 9, 2022].

Directive 2019/1937 on the protection of persons who report breaches of Union law. European Parliament, Council of the European Union. Available at: <http://data.europa.eu/eli/dir/2019/1937/oj>

Directive 2019/790 on copyright and related rights in the Digital Single Market. European Parliament, Council of the European Union. Available at: <https://eur-lex.europa.eu/legal-content/SK/TXT/?uri=CELEX:32019L0790>

Directive 2018/1808 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities. European Parliament, Council of the European Union. Available at: <https://eur-lex.europa.eu/legal-content/SK/TXT/PDF/?uri=CELEX:32018L1808&from=EN>

Denník N, 2021a. Podľa špeciálneho prokurátora Daniela Lipšica komentátor SME a Cynická obluda v súvislosti so speváčkou Simonou Magušinovou nespáchali trestný čin hanobenia národa, rasy a presvedčenia. *Denník N*, 24th November 2021. Available at: <https://dennikn.sk/minuta/2622602/>.

Denník N, 2021b. Ministerstvo kultúry mení mediálne zákony. Chce odhaliť skutočných vlastníkov médií aj regulovať zdieľanie videí. *Denník N*, 14th October 2021. Available at: [https://dennikn.sk/2573194/ministerstvo-o-kultury-meni-medialne-zakony-chce-odhalit-skutocnych-vlastnikov-medii-aj-regulovat-zdielanie-videi/](https://dennikn.sk/2573194/ministerstvo-kultury-meni-medialne-zakony-chce-odhalit-skutocnych-vlastnikov-medii-aj-regulovat-zdielanie-videi/).

Denník N, 2021c. OĽaNO chcelo odpolitizovať voľbu riaditeľa RTVS, Boris Kollár je proti. *Denník N*, 1st October 2021. Available at: <https://dennikn.sk/2558408/olano-chcelo-odpolitizovat-volbu-riaditeľa-rtvs-boris-kollar-je-proti-a-reformu-zastavil/?ref=inc>.

Denník N, 2021d. RTVS nedodržiavala interné predpisy a financovanie média je nedostatočné, ukázal audit Najvyššieho kontrolného úradu. *Denník N*, 3rd November 2021. Available at: <https://e.dennikn.sk/2596001/rtvs-nedodrziavala-interne-predpisy-a-financovanie-media-je-nedostatočne-ukazal-audit-najvyssieho-kontrolneho-uradu/?ref=inc>.

Denník N, 2015. Spolumajiteľ Penty: Médiá sú pre nás ako atómový kufrík. Istota, že nás nebudú napádať. *Denník N*, 21st April 2015. Available at: <https://dennikn.sk/107592/spolumajitel-penty-media-su-pre-nas-ako-atomovy-kufrik-istota-ze-nas-nebudu-napadat/>.

DigiQ, 2021. Zvládli sme nenávisť v roku 2021? *DigiQ Digitálna inteligencia*. Available at: <https://digiq.sk/ako-sme-zvladli-boj-s-nenavistou-v-roku-2021/> [Accessed March 14, 2022].

European Centre for Press and Media Freedom, 2021a. Denník N journalist Monika Tódová surveilled by unknown men in Slovakia. *Mapping Media Freedom*. Available at: <https://www.mapmf.org/alert/23753> [Accessed March 9, 2022].

European Centre for Press and Media Freedom, 2021b. Reporting crew obstructed and insulted covering Covid-19 vaccine law protest. *Mapping Media Freedom*. Available at: <https://www.mapmf.org/alert/24168> [Accessed March 9, 2022].

European Centre for Press and Media Freedom, 2021c. Two Denník N journalists face criminal charges. *Mapping Media Freedom*. Available at: <https://www.mapmf.org/alert/24241> [Accessed March 9, 2022].

European Centre for Press and Media Freedom, 2021d. Aktuality.sk Editor-in-Chief insulted by former Prime Minister Robert Fico. *Mapping Media Freedom*. Available at: <https://www.mapmf.org/alert/24163> [Accessed March 14, 2022].

European Commission, 2021a. NGA broadband coverage/availability (as a % of households). *Digital Economy and Society Index*. Available at: https://digital-agenda-data.eu/datasets/digital_agenda_scoreboard_key_indicators/visualizations [Accessed March 14, 2022].

European Commission, 2021b. Factsheet - 6th evaluation of the Code of Conduct. Available at: https://ec.europa.eu/info/sites/default/files/factsheet-6th-monitoring-round-of-the-code-of-conduct_october2021_en_1.pdf [Accessed March 14, 2022].

EUROSTAT, 2019. Individuals' level of digital skills. *EUROSTAT*. Available at:

<https://appsso.eurostat.ec.europa.eu/nui/submitViewTableAction.do> [Accessed March 15, 2022].

GLOBSEC, 2021a. *GLOBSEC Vulnerability Index - Slovakia*, Bratislava: GLOBSEC. Available at: https://www.globsec.org/wp-content/uploads/2021/11/Vulnerability-Index_Slovakia.pdf.

GLOBSEC, 2021b. *GLOBSEC Trends 2021: Central & Eastern Europe one year into the pandemic*, Bratislava: GLOBSEC. Available at: https://www.globsec.org/wp-content/uploads/2021/06/GLOBSEC-Trends-2021_final.pdf.

Griffen, S., 2017. *Defamation and Insult Laws in the OSCE Region: A Comparative Study*. A report commissioned by the OSCE Representative on Freedom of the Media. Vienna: OSCE. Available at: <https://www.osce.org/files/f/documents/b/8/303181.pdf> [Accessed May 16, 2022].

Hanák, P., 2016. Kriminalizácia žurnalistiky: Trestne stíhaní novinári na Slovensku v európskej perspektíve. *Mediální studia / Media Studies*, (2), pp.245-264.

HNonline, 2021. Markíza zdvíha cenu reklamy pre budúci rok dvojciferne. *Stratégie HNonline*, 9th November 2021. Available at: <https://strategie.hnonline.sk/media/12923124-j-m> [Accessed March 12, 2022].

IAB Slovakia, 2022. V roku 2021 zaznamenali výdavky do internetovej reklamy extrémny rast 32%. *Združenie pre internetovú reklamu (IAB Slovakia)*. Available at: <https://www.iabslovakia.sk/tlacove-centrum/v-roku-2021-zaznamenali-vydavky-do-internetovej-reklamy-extremny-rast-32/> [Accessed March 14, 2022].

IAB Slovakia, 2021. Návštevnosť slovenského internetu v roku 2020. *Združenie pre internetovú reklamu (IAB Slovakia)*. Available at: https://www.iabslovakia.sk/wp-content/uploads/2021/04/IAB_Sprava_navstevnost_SK_net_IABmonitor_2020.pdf [Accessed March 14, 2022].

MEMO 98 & GLOBSEC, 2020. Slovenské voľby 2020 v informačnom priestore. *MEMO 98*. Available at: <https://memo98.sk/article/slovenske-volby-2020-v-informacnom-priestore> [Accessed March 12, 2022].

MFSR, 2022. 58. zasadnutie výboru pre makroekonomické prognózy (február 2022). *Ministerstvo financií Slovenskej republiky*. Available at: <https://www.mfsr.sk/sk/financie/institut-financnej-politiky/ekonomicke-prognozy/makroekonomicke-prognozy/58-zasadnutie-vyboru-makroekonomicke-prognozy-februar-2022.html> [Accessed March 8, 2022].

MIRRISR, 2022. Koronavírus na Slovensku v grafoch. *Ministerstvo investícií, regionálneho rozvoja a informatizácie Slovenskej republiky*. Available at: <https://korona.gov.sk/koronavirus-na-slovensku-v-cislach/> [Accessed March 8, 2022].

MOSR, 2021. Rezort obrany predstavil expertom na Globsecu Akčný plán koordinácie boja proti hybridným hrozbám. *Ministerstvo obrany Slovenskej republiky*. Available at: <https://www.mosr.sk/49526-sk/rezort-obrany-predstavil-expertom-na-globsecu-akcny-plan-koordinacie-boja-proti-hybridnym-hrozbam/> [Accessed March 8, 2022].

MVSR, 2019. Ábel Ravasz predstavil nový Atlas rómskych komunit - trendy sú pozitívne. *Ministerstvo vnútra Slovenskej republiky*. Available at: <https://www.minv.sk/?tlacove-spravy&sprava=abel-ravasz-predstavil-novy-atlas-romskych-komunit-trendy-su-pozitivne> [Accessed March 8, 2022].

NBÚ, 2022. Zoznam blokovaných subjektov. *Národný bezpečnostný úrad*, 21th March 2022. Available at: <https://www.nbu.gov.sk/urad/o-urade/hybridne-hrozby-a-dezinformacie/zoznam-blokovanych-subjektov/index.html> [Accessed March 26, 2022].

Newman, N. & et al., 2021. *Reuters Institute Digital News Report 2021*, Oxford: Reuters Institute for the Study of Journalism. Available at: https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2021-06/Digital_News_Report_2021_FINAL.pdf.

O médiách, 2020a. Bývalý redaktor Trendu o spôsoboch Penty: Drž hubu a krok, šúchaj nohami o zem a bude pokoj. Ak sa ozveš, dostaneš cez držku. *O médiách*, 13th August 2020. Available at: <https://www.ome diach.com/tlac/18591-byvaly-redaktor-trendu-o-sposoboch-penty-drz-hubu-a-krok-suchaj-nohami-o-zem-a-bude-pokoj-ak-sa-ozves-dostanes-cez-drzku> [Accessed March 12, 2022].

O médiách, 2020b. Z Trendu odchádzajú ďalší redaktori. *O médiách*, 12th August 2020. Available at: <https://www.omediach.com/tlac/18587-z-trendu-odchadzaju-dalsi-redaktori> [Accessed March 12, 2022].

Police Force, 2022. *Správa Policajného zboru o dezinformáciách na Slovensku v roku 2021*. Bratislava: Policajný zbor SR. Available at: <https://www.minv.sk/?policia&subor=431583>.

Refresher, 2021. Boris Kollár sa zmocnil ďalšieho veľkého slovenského rádia. *Refresher*, 26th August 2021. Available at: <https://refresher.cz/102505-Boris-Kollar-sa-zmocnil-dalsieho-velkeho-slovenskeho-radia> [Accessed March 12, 2022].

Reporters Without Borders, 2021. Slovak public TV fired journalist for criticising fake story about Covid vaccine. *Reporters Without Borders*. Available at: <https://rsf.org/en/news/slovak-public-tv-fired-journalist-criticising-fake-story-about-covid-vaccine> [Accessed March 9, 2022].

RTVS, 2021. *Výročná správa o činnosti a hospodárení Rozhlasu a televízie Slovenska za rok 2020*, Bratislava: Rozhlas a televízia Slovenska. Available at: https://www.rtv.s.org/media/a542/file/item/sk/0002/rtvs_vyrocná_správa_2020_final.aYhH.pdf.

RVR, 2021. *Správa o stave vysielania v Slovenskej republike a o činnosti Rady pre vysielanie a retransmisiu za rok 2020*, Bratislava: Rada pre vysielanie a retransmisiu. Available at: http://documents.rvr.sk/_file_system/vyrocná_správa_2020_final_tlac_NRSR.pdf.

RVR, 2020. *Správa o stave vysielania v Slovenskej republike a o činnosti Rady pre vysielanie a retransmisiu za rok 2019*, Bratislava: Rada pre vysielanie a retransmisiu. Available at: http://documents.rvr.sk/_file_system/vyrocná_správa_2019_rozne_3.pdf.

RVR, 2019. Stanovisko k voľbám do Národnej rady Slovenskej republiky vo vysielaní 2020. *Rada pre vysielanie a retransmisiu*. Available at: <http://www.rvr.sk/aktualita-stanovisko-k-volbam-do-narodnej-rady-slovenskej-republiky-vo-vysielani-2020> [Accessed March 16, 2022].

Slovak Spectator, 2022a. War in Ukraine prompts Slovakia to act against disinformation. *Slovak Spectator*, 2nd March 2022. Available at: <https://spectator.sme.sk/c/22849983/war-in-ukraine-prompts-slovakia-to-act-against-disinformation.html> [Accessed March 26, 2022].

Slovak Spectator, 2022b. News digest: Unprecedented charges. Slovaks confess to spying for Russia. *Slovak Spectator*, 15th March 2022. Available at: <https://spectator.sme.sk/c/22861897/news-digest-unprecedented-charges-slovaks-confess-to-spying-for-russia.html> [Accessed March 26, 2022].

Štarha, Š., Gašparovič R. & Rievajová, M., 2021. Nový zákon o elektronických komunikáciách: čo sa mení pri spracúvaní osobných údajov? *Havel & Partners*, 15th December 2021. Available at: <https://www.havelpartners.cz/novy-zakon-o-elektronickych-komunikaciach-co-sa-meni-pri-spracuvani-osobnych-udajov/>

ŠÚSR, 2022a. Gross domestic product in the 4th quarter of 2021. *Štatistický úrad Slovenskej republiky*. Available at: <https://bit.ly/3tHOpJM> [Accessed March 8, 2022].

ŠÚSR, 2022b. Inflácia, vývoj spotrebiteľských cien v roku 2021. *Štatistický úrad Slovenskej republiky*. Available at: <https://bit.ly/3sQXdOc> [Accessed March 8, 2022].

ŠÚSR, 2022c. Unemployment in the 4th quarter of 2021. *Štatistický úrad Slovenskej republiky*. Available at: <https://bit.ly/3zd7xDV> [Accessed March 8, 2022].

ŠÚSR, 2022d. Počet obyvateľov podľa národnosti v SR k 1. 1. 2021. *Štatistický úrad Slovenskej republiky*. Available at: <https://www.scitanie.sk/obyvatelia/zakladne-vysledky/struktura-obyvatelstva-podla-narodnosti/SR/SK0/SR> [Accessed March 8, 2022].

TA3/TASR, 2021. Zákon o mediálnych službách prináša do legislatívy nový formát - komunitné médium. *TA3*, 7th November 2021. Available at: <https://www.ta3.com/clanok/217456/zakon-o-medialnych-sluzbach-prinasa-do-legislativy-novy-format-komunitne-medium> [Accessed March 13, 2022].

The Conception of the Slovak Republic for the fight against hybrid threats, 2018. National Security Authority of the Slovak Republic. Available at: <https://www.nbu.gov.sk/wp-content/uploads/PHHD/Koncepcia-boja-SR-proti-hybridnym-hrozbam.pdf> [Accessed March 13, 2022].

Transparency International Slovensko, 2022. Radničné noviny stále zostávajú najmä hlásnymi trúbami

primátorov. *Transparency International Slovensko*. Available at: <https://transparency.sk/sk/radnicne-noviny-stale-zostavaju-najma-hlasnymi-trubami-primatorov/> [Accessed March 12, 2022].

Transparency International Slovensko, 2021. Zverejňovanie zmlúv má desať rokov, infozákon potrebuje upgrade. *Transparency International Slovensko*. Available at: <https://transparency.sk/sk/zverejnovanie-zmluv-ma-desat-rokov-infozakon-potrebuje-upgrade/> [Accessed March 9, 2022].

Transparency International Slovensko, 2020. Strany minuli na online reklamu rekordnú sumu. *Transparency International Slovensko*. Available at: <https://volby.transparency.sk/parlament2020/2020/02/27/strany-minuli-na-online-reklamu-rekordnu-sumu/> [Accessed March 16, 2022].

Urbániková, M., 2021. Resisting Perceived Interference in Journalistic Autonomy: The Study of Public Service Media in Slovakia. *Media and Communication*, 9(4), pp.93-103. Available at: <https://www.cogitatiopress.com/mediaandcommunication/article/view/4204>.

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
<i>Marína</i>	<i>Urbániková</i>	<i>Assistant Professor</i>	<i>Masaryk University</i>	X

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 that make up the MPM2022. Consulting the point of view of recognized experts was aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as being subjective, and, therefore, to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflect the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
<i>Ivan</i>	<i>Antala</i>	<i>President</i>	<i>Association of Radio Stations of Slovakia</i>
<i>Ľuboš</i>	<i>Kukliš</i>	<i>Chief Executive</i>	<i>Council for Broadcasting and Retransmission of Slovakia</i>
<i>Ján</i>	<i>Hacek</i>	<i>Associate Professor; Head of Department of Journalism</i>	<i>Comenius University</i>
<i>Alžbeta</i>	<i>Galpaš Mordinová</i>	<i>Lawyer</i>	<i>Association of Television Broadcasters of Slovakia</i>
<i>Alena</i>	<i>Pániková</i>	<i>Chairperson</i>	<i>The Print-Digital Council of the Slovak Republic</i>
<i>Peter</i>	<i>Hanák</i>	<i>Journalist; PhD candidate in media studies (Charles University)</i>	<i>Aktuality.sk; Charles University</i>

Research Project Report

Issue -

June 2022

doi:10.2870/946133

ISBN:978-92-9466-303-0

QM-07-22-563-EN-N



Publications Office
of the European Union

