

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: Spain

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Research Project Report

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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 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 Spain the CMPF partnered with Jaume Suau Martínez, Carlos Ruiz Caballero, Pablo Capilla García, Elena Yeste Piquer, David Puertas Graell, Lidia Cordero Triay and Judit Agràs Masdeu (School of Communication and International Relations. Ramon Llull 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 Annex 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

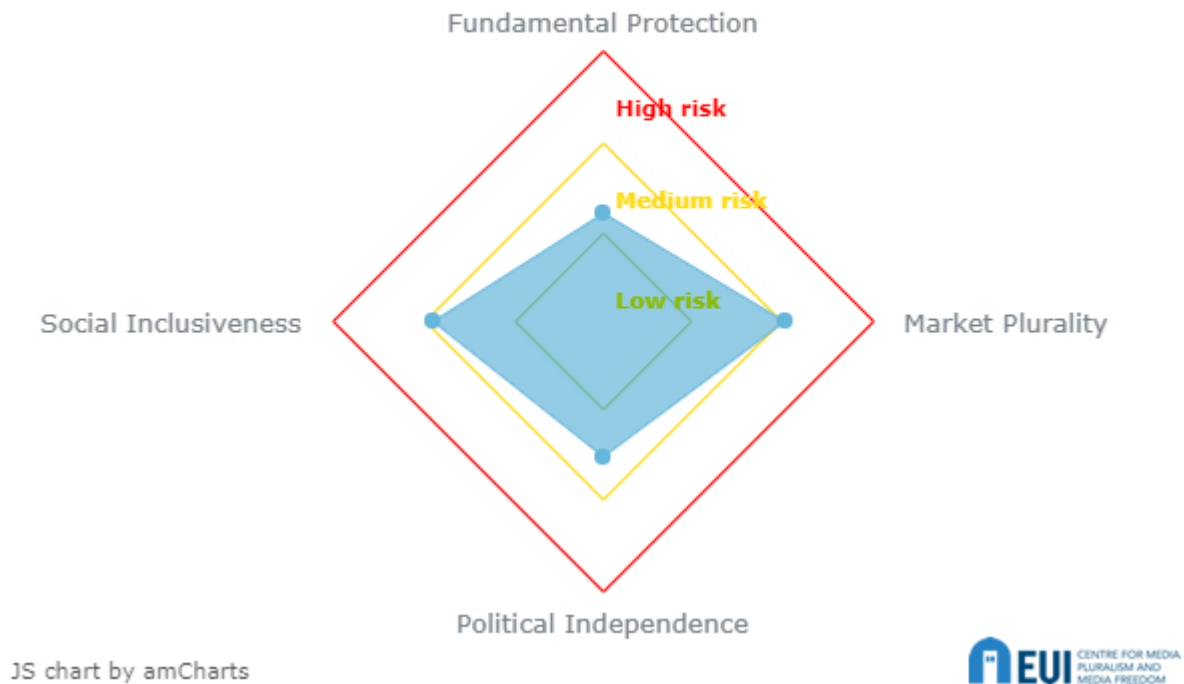
- **Country overview.** Spain has an area of 505,944 km² between southwestern Europe and northern Africa. In addition, it occupies most of the Iberian Peninsula, shared with Portugal. The two archipelagos that include it (Canary Islands and Balearic Islands) must also be taken into account, as well as the two autonomous cities located in North Africa (Ceuta and Melilla). According to the latest data from the National Institute of Statistics (INE, 2021a), the population of Spain fell by 72,007 people during the first half of the year and stood at 47,326,687 inhabitants. This decrease was due to a negative vegetative balance of 70,736 people and a practically zero migratory balance. These data are closely related to the situation arising from the pandemic caused by Covid-19. Compared to the data for the first half of 2020, the Spanish population was 47,332,614, a figure that would increase to 47,398,695 in the first half of 2021. The provisional data for foreigners in the second half of 2021 is 5,325,907. This figure represents a decrease with respect to the final figure of 5,368,271 foreigners in the first half of the same year. It is, therefore, the first time since the second half of 2015 (4,412,796) that there has been a drop in this aspect.
- **Minorities.** According to the statistics of foreigners residing in Spain, 5,800,468 was the total number of foreigners residing in Spain as of December 31, 2020. The most representative countries are: Romania (1,079,726), Morocco (811,530), United Kingdom (381,448), Italy (350,981) and China (227,415) (Ministry of Inclusion, Social Security and Migration, 2020).
- **Languages.** Castilian Spanish is the official Spanish language of the State, and the most widely spoken throughout the country (98.9%) (Ministry of Territorial Policy and Public Function, 2019). In the Spanish Constitution, in its Preliminary Title (article 3), the following provisions are included: (1) Castilian Spanish is the official Spanish language of the State. All Spaniards have the duty to know it and the right to use it. (2) The other Spanish languages will also be official in the respective Autonomous Communities in accordance with their Statutes (Basque (3%), Galician (6.2%), Valencian (5.8%), Catalan (17.5%) and Aranese). (3) The richness of the different linguistic modalities in Spain is a cultural heritage that will be the object of special respect and protection.
- **Economic situation.** In the economic aspect, in the whole of 2021, the GDP at current prices stands at 1,205,063 million euros, 7.4% higher than in 2020. In terms of volume, the GDP registers a variation of 5.1%. In this line, in relation to the fourth quarter of 2020, national income increased by 9.6% and disposable national income by 10.7% (CNTR, 2022). This information must be contextualized taking into account the percentage of people living in households whose total equivalent annual income is below the poverty line, that is, the population at risk of relative poverty (at-risk-of-poverty rate). In this line, according to the Living Conditions Survey of the year 2020 (INE), the value of the poverty threshold of a household in Spain of a single person (calculated with the income data of 2019) stood at 9,626 euros per year, 6.8% more than the estimate for the previous year. In other words, in Spain the poverty rate for unemployed men was 51.1% and for women 42.6%.
- **Political situation.** The political situation in Spain is represented by a progressive coalition government made up of the PSOE (center-left) and UP political parties (left). Since June 2018, the President of the Government is Pedro Sánchez (PSOE), after the governance of Mariano Rajoy and his right-wing party (PP) (2011-2018). Far right is increasing its presence in the country through the VOX party, and its president Santiago Abascal. For example, in the last elections to govern the autonomous region of Castilla y León, VOX has won 13 seats in 2022, 12 more than in 2019. The growth of the far

right can be also seen in the more extreme positions defended by other right wing parties, which contributes to a growing polarization.

- **Media market.** According to the Survey on Equipment and Use of Information and Communication Technologies in Households (INE, 2021b), 93.9% of the Spanish population aged 16 to 74 have used the Internet in the last three months. This figure drops if we take into account the percentage of all those who use the Internet for information or access to the media or other platforms, 84.1% according to data from the third wave of 2021 (AIMC, 2021). As for the media, the degree of penetration of television is 81.4%, this being the highest of all, although with a significant decrease compared to the previous year (84.2%). This also implies that 2021 is the year in which, for the first time, the Internet surpasses television in the measurement of penetration in the general media audience. On the other hand, radio reaches 54.9% (54.6% in 2020), magazines 22.7% (21.8%) and the written press 13.8% (14.8% in 2020). In another vein, trust in the news remains at its lowest level since 2015 and the general figures show no change in 2020. When users are asked about specific media brands, trust shows a remarkable decrease in all cases (Newman et al., 2021). In addition, the pandemic brought with it a series of new habits in the consumption of information and media by the Spanish population. Thus, up to 12% of the population pays for online news, while 38% say they have listened to podcasts in the last month.
- **Regulatory environment.** In the regulatory environment, the most outstanding aspect is related to the so-called 'Iceta Law' (Royal Decree-Law 24/2021, of November 2) (BOE, 2021). The purpose of this royal decree-law is to regulate the system for issuing and supervising covered bonds, establishing their characteristics, reporting obligations and investor protection mechanisms. Specifically, according to Article 73 'Use of protected content by service providers to share content online', the platforms will be "responsible for unauthorized acts of communication to the public, including the provision of works and other services protected by intellectual property rights. This implies a new regulation that focuses on those who could previously be considered mere intermediaries and who will now run the risk of receiving sanctions. Also, the Audiovisual Media Services Directive has been recently transposed into national law (Proyecto de Ley General de Comunicación Audiovisual), pending approval by Parliament.

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

Spain: Media Pluralism Risk Areas



The **Fundamental Protection** area scores an overall situation of medium risk (40%), slightly worse than last year (39%). The situation remains similar in all indicators. Restrictions to the right to information and freedom of expression remain despite repeated claims from the government coalition about legal reforms. Attacks and intimidations to journalists have been slightly reduced but mainly because the political situation during last year has been improved: the situation regarding the Catalan push for independence did not produce massive demonstrations or protests. The COVID-19 pandemic is still present in the country, although the economic impact on the journalistic profession has been reduced compared to last year.

The **Market Plurality** area scores a high risk of 67%, slightly lower than last year 75%. The improvement is due the fact that the media viability indicator has dropped its risk from 79% to 45% mainly due the fact that COVID-19 effects on media industries are partially mitigated, although the industry did not come back yet to pre pandemic numbers. Apart from that, Spain faces also a difficult situation in relation to transparency of news media ownership and ownership concentration, especially in audiovisual markets. Audiences concentration at TV market as well as concentration of advertising revenues in both audiovisual and online markets implies also risk for media pluralism.

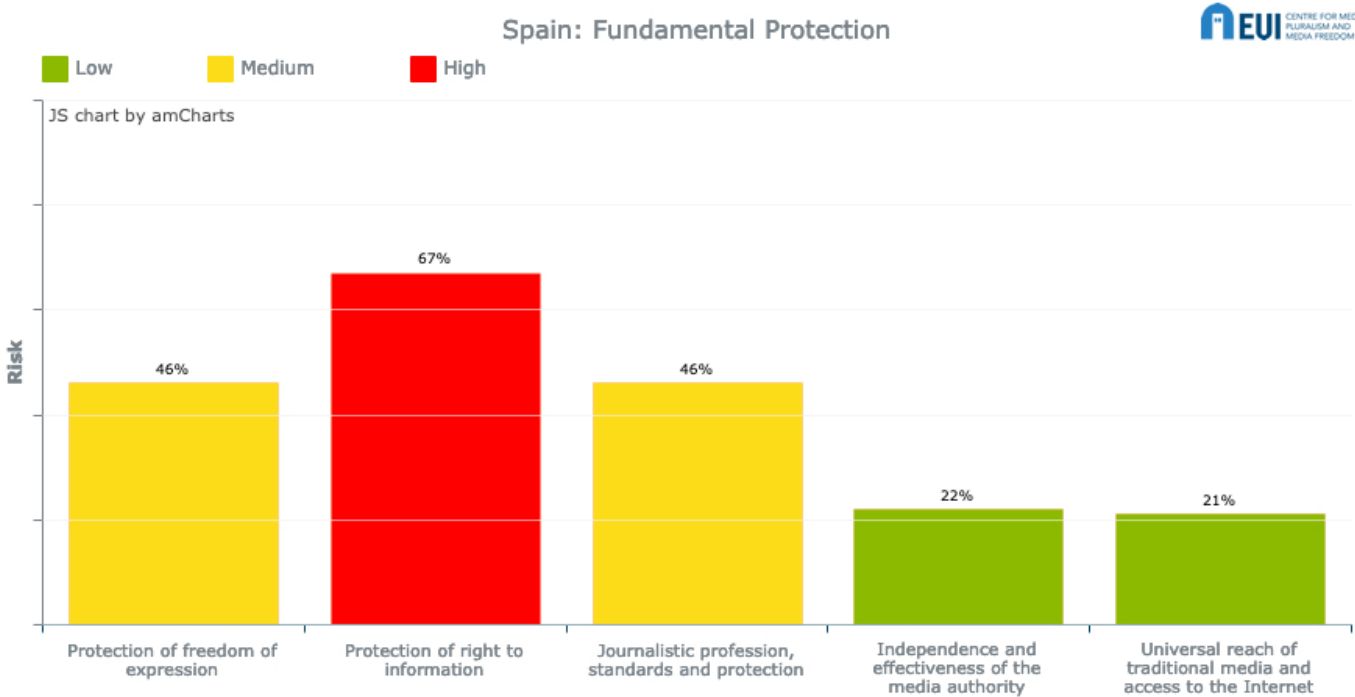
The **Political Independence** area scores medium risk at 50%, similar to last year's 47%. Main problems in this area are in Editorial autonomy (high risk) and in political and economic independence of news media, both public and private. Spain remains a country where the journalistic profession receives pressures and constraints from both market and political actors.

The **Social Inclusiveness** area presents a medium risk of 63%, similar than the 62% of last year. Most Indicators remain stable with the exception of Access to media for women that increases its risk up to 20 points more than last year, being the only high risk in the area. The increase is due to the decrease of the number of female executives in private media companies as well as the poor representation of women in

the media. On the other hand, Protection against illegal and harmful speech reduces its risk, due a big number of initiatives to mitigate such practices and a less convoluted public sphere.

3.1. Fundamental Protection (40% - medium 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.



The **Fundamental Protection** area scores medium risk (39%). One indicator represents a high risk (Protection of the right to information, 67%). At the same time, two are at medium risk (Protection of freedom of expression, at 46%, and Journalistic profession, standards and protection, at 46%). The other two indicators score low risk: Independence and effectiveness of the media authority (22%) and Universal reach of traditional media and access to the internet (15%).

The indicator on the **Protection of freedom of expression (46%)** remains at a medium risk level - similar to last year since there have been no legislative changes, although initiatives have begun to reform aspects of the regulation of freedom of expression. The Spanish Constitution (article 20) [1] recognizes the right to freedom of expression. However, the reforms of the Penal Code [2] and Organic Law 4/2015 [3] introduced limitations to this right that have been denounced by national and international organizations. The European Court of Human Rights (ECtHR) condemned Spain in 2021 for judicial decisions in which the ECtHR considers that there has been an "interference by public powers in the right to freedom of expression"[4]. The Commissioner for Human Rights of the Council of Europe sent a letter to the Minister of Justice of Spain [5] in which he expressed his concern "in relation to various provisions of Spanish criminal law that have a negative impact, including the paralyzing effect, on the exercise of freedom of expression". For example, in January 2021, the National Court ordered rapper Pablo Rivadulla Duro to be imprisoned for the crimes of extolling terrorism and insulting the Crown and State institutions. This sentence was denounced

by Amnesty International [6]. The Spanish Parliament began in June 2021 the processing of the reform of Organic Law 4/2015 with regard to the treatment of crimes of glorification of terrorism, hate crimes and defamation of state institutions. However, the Platform for the Freedom of Information (PLI) [7] considered that "the most harmful aspects of this law will continue to be in force" with the reform presented.

The indicator on the **Protection of the right to information (67%)** remains similar (high risk) compared to last year. The Spanish Constitution recognizes the right to information [8] as a fundamental right. Law 19/2013 [9] establishes the obligation of active publicity of all administrations and public entities, and the body in charge of ensuring compliance with this obligation is the Council for Transparency and Good Governance [10]. However, it does not have sanctioning capacity. The effective application of these legal provisions still has notable deficiencies. The latest CTBG report [11] indicates that a high number of freedom of information requests were not answered. Reporters Without Borders [12] underlined that in Spain, there was a "clear lack of transparency". Coalition for Access published a statement [13] in which they demand that the Government of Spain recognize the right of access to information as a fundamental right. Spain has not yet transposed into national legislation the Directive approved by the European Council on the regulation of whistleblowers. However, in 2021 the Spanish Government has begun the processing of a law to regulate State secrets [14], since a 1968 law is currently still in force, which does not provide any deadline for access and publicity of the documents declared secret. The Government anticipates that the new law will enter into force in 2023.

The indicator on the **Journalistic profession, standards and protection represents a medium risk (46%)**. Year after year, the reports on the journalistic profession published by the Madrid Press Association highlight the two main problems of the journalistic profession: "poor remuneration for journalistic work" and "the lack of political independence or economic environment in which the journalist works" [15]. Regarding the first problem, in 2021, the number of unemployed journalists has decreased (from 23% to 15%) after an intense crisis due to the COVID-19 in 2020 [16]. This decrease must be contextualized in a long-term process of transformation of the journalistic profession towards progressive digitization and an increase in the number of freelancers, who already represent three out of ten journalists. Regarding the second problem, there is no legal framework in Spain that protects the work of the journalist. Journalists only have the protection of professional associations, as well as journalists' unions. However, membership is not compulsory for journalists, and the associations do not have the capacity to sanction either. And journalists must carry out their work in a climate of growing hostility, with several cases of attacks in 2021 at public events and in a climate of harassment through social networks.

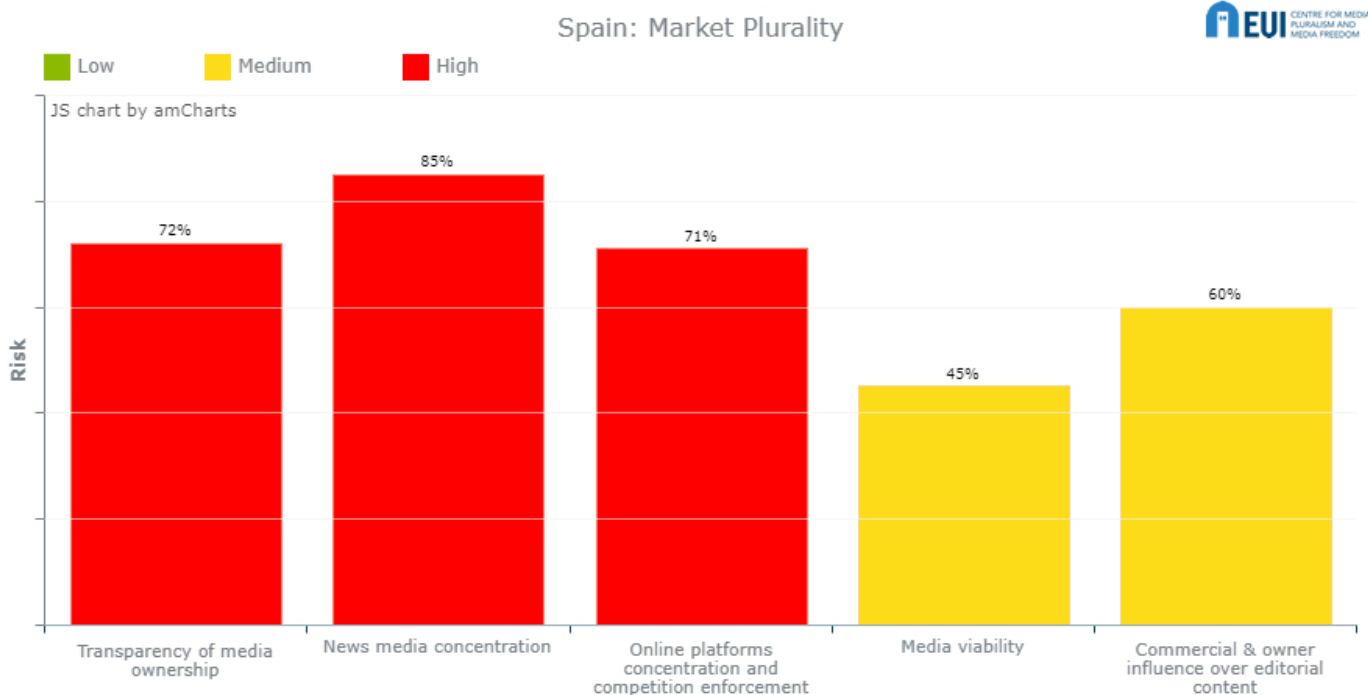
The indicator on the **Independence and effectiveness of the media authority (22%)** remains at the same low level of risk as in 2020 as there have been no legal changes. The risk is low, although it should be noted that there is only one media authority in the audiovisual sector, the National Market and Competition Commission (CNMC), that has the sanctioning capacity [17]. For example, in 2021, it imposed fines on Atresmedia and Mediaset for a value of 183,220 euros and 49,000, respectively due practices of covert advertising and programming changes. In past years the regulatory authority imposed also other fines to these media groups that form the television duopoly in Spain (see the Market Plurality section of the report). Despite the fact that there is no evidence that could cast doubt on its independence, there are two issues that cause controversy. On the one hand, there is the mechanism for electing the members of the CNMC, at the proposal of the Government and subject to up for a vote in Parliament, prompting accusations of partisanship. In November 2021, the two parties that make up the government were in favour of modifying the election system of the members of the CNMC, in the sense of making a public call and that the candidates be elected by a majority qualified by Parliament [18]. On the other hand, in February 2021, the

president of the CNMC, Cani Fernández, defended [19] the need to modify the law and the statute that regulate the CNMC to provide this entity with more financial autonomy in order to ensure its independence.

The indicator on the **Universal reach of traditional media and access to the Internet** scores low risk (**15%**). Coverage of PSM and broadband is almost universal, which explains why this indicator remains at the same level of risk. However, with regards to Internet Service Providers, the market shows high levels of concentration, although it has decreased slightly from the previous year (from 96% to 92%), according to data from the National Market and Competition Commission. There have been hardly any complaints about net neutrality during the first half of 2021.

3.2. Market Plurality (67% - 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.



This area is the one that shows higher risk, 67%, with some indicators showing top levels of risk. The indicators at high risk are: Transparency of media ownership (72%), News media concentration (85%), and Online platforms and competition enforcement (71%). Media viability (45%) and Commercial and owner influence over editorial content (60%) are both at medium risk level.

The indicator **Transparency of media ownership** remains at high risk with 72%, since the legal initiatives that are beginning to be taken to improve transparency are either limited or are pending approval. The

obligation to report on the ownership of the media only applies to audiovisual media, but not to the rest, unless they are media listed on the Stock Exchange. Information on the ownership of audiovisual media is centralized in a public registry of the National Securities Market Commission (CNMV), as established by General Law 7/2010 on Audiovisual Communication [20]. Access to the registry is universal and free, although the final owner of the media does not appear in it. This year Spain implemented Directive 2018/843 of the European Union, through Royal Decree-Law 7/2021, of April 27 [21], by which a single registry has been created, which should allow direct information to be obtained from the real owners of all companies based in Spain. However, full access to this registry is not universal. The creation of the new registry, despite its limited scope, is the main factor that explains the slight improvement in this indicator compared to last year (78%). On the other hand, Spain still has to transpose into its national legislation the Audiovisual Communication Services Directive and the European Code of Electronic Communications, which is why the Government has been negotiating a new General Law on Audiovisual Communication in Parliament.

The indicator **News Media Concentration** (85% - high risk) remains at the same high level of risk as in the previous edition of the MPM, since legal and market conditions have not changed. In Spain, only concentration in the audiovisual media sector is specifically regulated (Law 7/2010, of 31 March, of the General Statute of Audiovisual Communication). The CNMC is the body that regulates the audiovisual sector and can impose fines in case of non-compliance with the limits for concentration, although in the last two years it has not imposed any fine for these issues. For press and digital sectors there is no specific legislation, so the general legislation on competition applies directly to them (Law 15/2007, of 3 July, on the Defence of Competition [22]). However, the audiovisual sector is the one with the highest rates of concentration of audiences and income. In the first half of 2021, the four main media owners in the television sector obtained 77% of revenue, and 78% of audiences, according to data from the CNMC [23]. In radio, the three main media owners accounted for 96% of revenues and obtained 86% of audiences, according to data from the second wave of 2021 of the General Media Study (EGM). In the newspaper sector, there is no economic data for the sector as a whole, but the four main publishing groups obtained 87% of the audiences in 2021. There is no global data on the digital sector.

The indicator **Online platforms and competition enforcement** is associated with a high risk (71%). It remains at the same level of risk as in 2020 due to the traditional oligopoly situation of Meta-Facebook and Alphabet-Google, that monopolize 70% of advertising revenues, according to the report of the CNMC [24] that, however, only describes the situation of the sector, without the capacity to intervene in it. In 2021 there have been some initiatives to try to regulate the online platforms, but so far, with few results in practice. In January, the digital services tax was approved, in application of Law 4/2020, of October 15 [25]. But in October the Spanish Government, as in other countries, reached an agreement with the United States to temporarily suspend the application of this tax, given the threat of commercial retaliation by the United States [26]. In April, the European Union directives related, among other issues, to copyright, were transposed into Spanish legislation (Royal decree-law 7/2021, of April 27). However, the Spanish Government left it up to the media to agree with Google on payment for the use of their content.

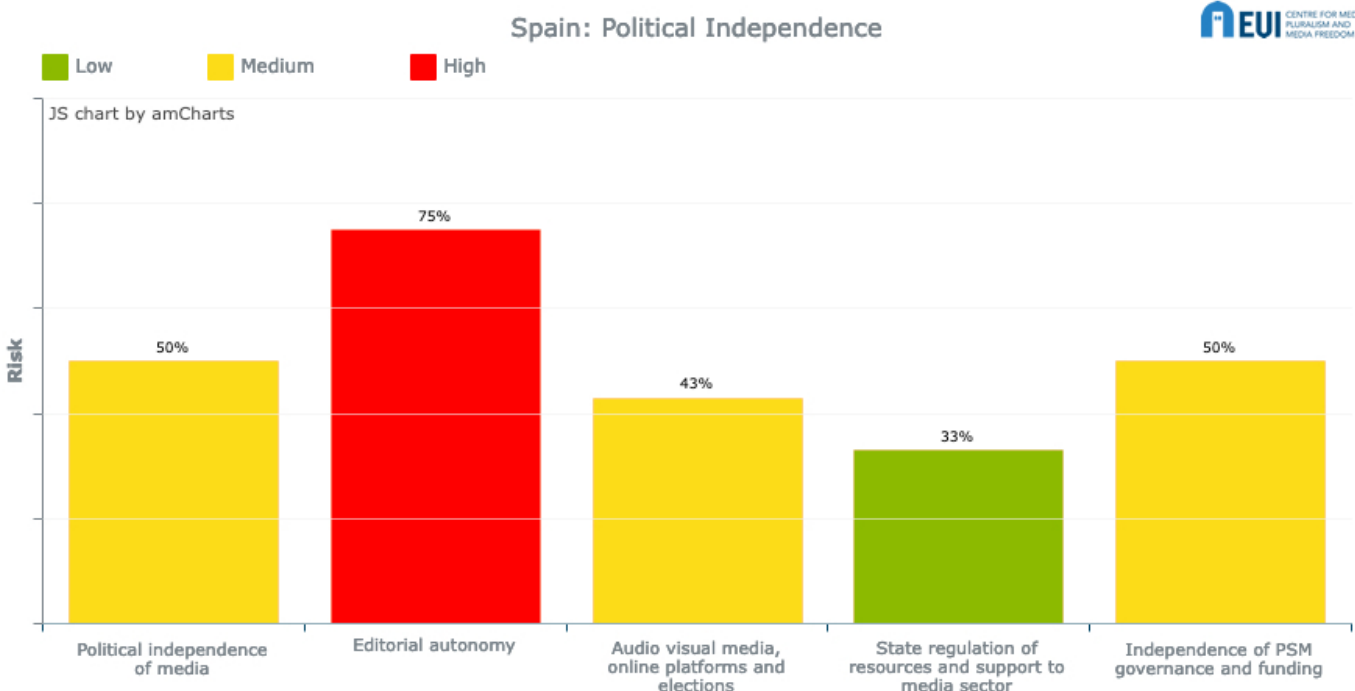
The risk associated with the indicator **Media viability** is medium, with 45%. After the COVID pandemic in 2020 caused a deep economic crisis, in 2021 there has been a recovery in the economic results of communication companies, as shown by the improvement in this indicator, moved from 79% to 45%. In any case, the levels of income prior to the pandemic have not been recovered, so the media are emerging from this crisis more weakened. Sometimes the increases in income have been similar to the GDP (which stood at 5% for all of 2021), as is the case of television and radio, but in other cases, such as newspapers, the

recovery was below GDP (a growth of 4%, according the consulting firm Deloitte [27]). The media are looking for other sources of income, but is yet to be seen whether those alternative incomes serve to compensate for the drops in their traditional income.

The indicator **Commercial and owner influence over editorial content** (60% - medium risk) remains at the same level as last year because, according to the report on the journalistic profession published annually by the Madrid Press Association, the lack of independence of journalists in the face of political and economic pressure continues to be among the main concerns of the journalistic profession [28], and this affects the trust of citizens towards the press (45% do not trust journalists, according to the Edelman Trust Barometer 2021 [29]). There is no specific legislation on this issue, since there is no professional status for journalists. Therefore, everything is left in the hands of the self-regulation of the media itself or of the professional sectors. However, some self-regulatory codes have prestige, and their recommendations are usually applied, as is the case of Autocontrol, which brings together advertisers, advertising agencies, media, and professional associations to resolve violations of the Advertising Code of Conduct. Along these lines, in 2021 the Code of Conduct on the Use of Influencers in Advertising came into force [30], one of the first steps to begin to regulate the commercial use of social networks.

3.3. Political Independence (50% - 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 area of **Political independence** represents an overall situation of medium risk of 50%. None of the indicators have modified their levels of risk. Most of the indicators (Independence of PSM governance and funding, Political independence of media and Audiovisual media, online platforms and elections) remain at

medium risk level, while State regulation of resources and support to the media sector is the only one at low risk and Editorial autonomy the one that represents the higher level of risk, increasing since last MPM.

As mentioned, **Editorial autonomy scores** high risk. This indicator has increased from medium risk (63%) in 2020 to high risk (75%) in 2021. Appointment and removal of media editors-in-chief are not safe from political interference in practice. No regulation guarantees autonomy when appointing and dismissing editors-in-chief in private news media. A modification of Law 17/2006, of June 5, on state-owned radio and television [31] was approved in 2017, establishing that candidates for the board of directors in public service broadcasting and its president are selected by public competition, with the participation of a committee of experts appointed by parliamentary groups. News Councils and key players in the fight to preserve freedom of information have denounced the partisan nature of the agreement in the election of the PSM board. There is no regulatory framework but a self-regulatory framework that guarantees impartiality and editorial independence in the news media, which sometimes is not implemented effectively.

Independence of PSM governance and funding maintains medium risk, with the same percentage (50%) as in the last MPM. It may seem that laws for Spanish PSM allow less political control than the previous ones. Nevertheless, political parties still have control over the election of the group of experts and also the election of board members and its president. As the members of the board are dependent on Parliament, there are no guarantees of political independence [32]. In conclusion, these laws do not provide enough elements to avoid political control over PSM, but this is more due to the lack of consensus of political parties rather than because the law does not provide fair and transparent mechanisms.

Political independence of media (medium risk, at 50%) remains at the same level of risk as in 2020. Political control over audiovisual media in Spain does not exist through direct or indirect ownership of media outlets. The Audiovisual Communication Law (7/2010) [33] only limits media ownership in terms of media concentration, so that the media regulatory authority cannot act in possible cases of conflict of interest that go beyond media ownership concentration. There exist several mechanisms through which politics influence media decisions, mainly institutional advertising, regulated by Law 29/2005, of 29 December, of Institutional Advertising and Communication [34], and the grant of licenses. In 2021, the national government allocated 86% more institutional advertising than in 2020 [35]. Independent media have urged the government to protect the plurality and quality of information by applying an equitable distribution of institutional advertising, ensuring that it benefits media that are providing public service information according to professional quality standards [36].

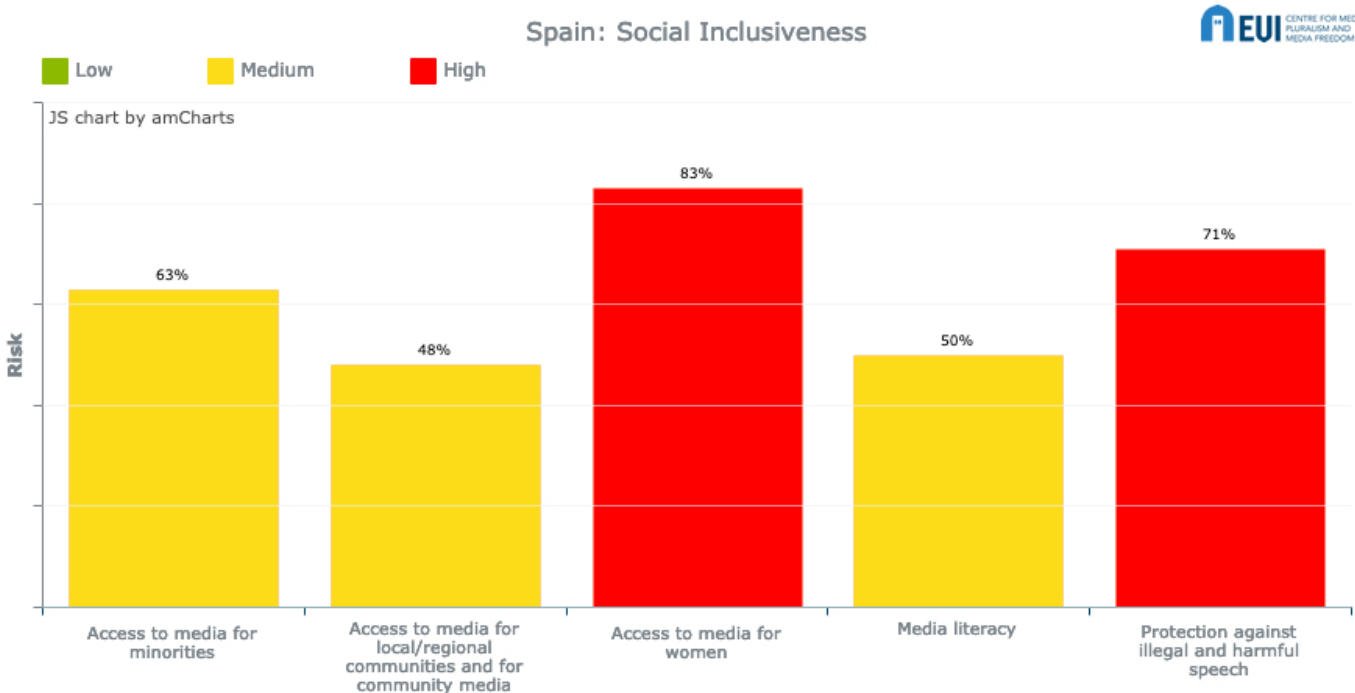
The indicator **Audiovisual media, online platforms and elections**, scores medium risk at 43%, slightly increasing since last MPM (38%). There is a law (Law 5/2017, which amends Law 17/2006, of June 5, on state-owned radio and television) that imposes rules aiming at impartiality in news and informative programmes on PSM channels and services, but these legal prescriptions are not implemented effectively, as political control on national and regional PSM persists [37]. Though there exist bodies aimed at impartiality in news and informative programmes on PSM channels and services, political parties, unions, and the News Councils of PSM, usually report that the law is not implemented effectively while denouncing partiality in news and informative programmes. Access to airtime on PSM channels and services for political actors during election campaigns is granted thanks to the existing legislation, despite many voices rejecting the interpretation of Law 5/1985, of June 19, on the General Electoral System [38], that imposes electoral blocks in the news programs according to exclusive criteria of proportionality.

State regulation of resources and support to the media sector remains as in the previous MPM low risk,

at 33%. Law 7/2010, of March 31, about General Audiovisual Communication, provides fair and transparent rules on spectrum allocation. Formally, Law 29/2005 of 29 December on Advertising and Institutional Communication establishes a framework of transparency and objectivity for the allocation of advertising resources to the media. However, Law 19/2014 on Transparency and Good Governance [39] does not include institutional advertising in its object, and alleged discretionary allocation practices have been reported. With the coronavirus crisis, the Spanish Government approved aid of 15 million euros to support national digital terrestrial television providers, as established by Royal Decree-Law 11/2020, of March 31 [40], with the adoption of urgent complementary measures in the social and economic sphere to deal with COVID-19.

3.4. Social Inclusiveness (63% - 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.



The risk score associated to the **Social Inclusiveness** area is 63% - medium risk.

The risk associated with the indicator **Access to media for minorities** is considered medium with 63%, the same figure as obtained in the previous edition of the MPM. Spanish law does not recognize any minority, strictly speaking. The Spanish government has expressly denied the existence of national minorities in Spain due to a restrictive application of the Council of Europe's Framework Convention for the Protection of National Minorities^[1]. However, in practice, Spain applies the FCPNM to the Roma community, even if it is not recognised as a national minority [41]. According to the article 28 of Law 17/2006 of June 5 on public broadcasting (radio and television state-owned), RTVE has the duty to ensure the expression of the social, ideological, political, and cultural diversity of Spanish society through its programming. Nevertheless, most non legally-recognised minorities do not have access to airtime or it is not proportional to the size of their

populations. In Spain, there are important religious minorities and they represent 3.2% of the population [42]. According to the Report on compliance by the corporation Spanish radio and television with the public service obligations and the financing (2018), published in March 2021 (CNMC) [43], indicates that, in 2018 TVE broadcast 189 hours per year focused on religion (2.2%), however, the vast majority of those programs was focused on Catholicism. In this line, the audiovisual media do not spend much time on other types of minorities either. There is also a high risk of minority access to airtime on private TV and radio. As far as the access to media for people with disabilities is concerned, the risk is low. The Act 7/2010, March 31, [44] General de la Comunicación audiovisual (Media Act) recognise the right of people with disabilities to access media content and is well-implemented. Audio descriptions for blind people are widely available, as well as subtitles for people with hearing impairments in audio-visual media (CNMC, 2021).

The indicator **Access to media for local/regional communities and for community media** is considered as medium risk with 48% (against 44% in the previous edition of the MPM). On the one hand, the risk associated to local and regional media is almost non-existent while the risk linked to community media is high. The law [45] grants regional or local media access to media platforms and is implemented effectively. Besides, the state supports regional/local media with an adequate level of subsidies. These are distributed in a fair and transparent manner. The subsidies to local and regional media are usually provided by the Autonomous Communities, rarely by the Spanish Government. On the other hand, the Access to community media is associated with a high risk. Although the Law 7/2010 on Audiovisual Communication recognizes community media, no community radio or TV has obtained a license since the law was published. Meanwhile, these media are broadcasting illegally. Besides, the independence of community media is not guaranteed by the law.

The indicator **Access to media for women** is considered high risk at 83%. This represents a growth of almost 20% compared to the previous year's report. In Spain, equal rights for men and women in general and equal rights for men and women concerning the media are widely regulated [46] [47] [48]. However, the number of women in executive positions has drastically diminished in 2021. Since the election of a new Board of Directors for the PSM in March 2021, there are no women among executives. The number of women on the PSM management board accounts for 38%^[2] [49]. In addition, the number of women in executive positions for private has been reduced from 29% to 0%, and the number of women on the management board has fallen from 30% to 14% [50] [51]. It is also important to mention the existence of an important wage gap in PSM and private TV companies, that amounts between 5 and 28% [49] [53] [54]. Nevertheless, on a positive note, the figure for editors-in-chief in the leading news media has improved with the appointment of Pepa Bueno as director of El País [52]. The score of the subindicator on the representation of women has also deteriorated. According to the latest Global Media Monitoring Project (September 2020), just 2% of the news published in the traditional press or broadcast on radio or TV defies gender stereotypes. In digital media, the percentage rises to 5% [55]. The same report shows that women account for only 26% of the subjects reported in the press, radio and TV (28% in GMMP 2015). For digital newspapers, the percentage rises to 31% (but 33% in GMMP 2015). All documentation shows that women appear systematically less than men as expert voices in the media. During the Covid-19 pandemic, the number of women in the health-related news (where usually have a strong presence) went backwards, just when this topic became the protagonist. This data is consistent with international studies [56] [57].

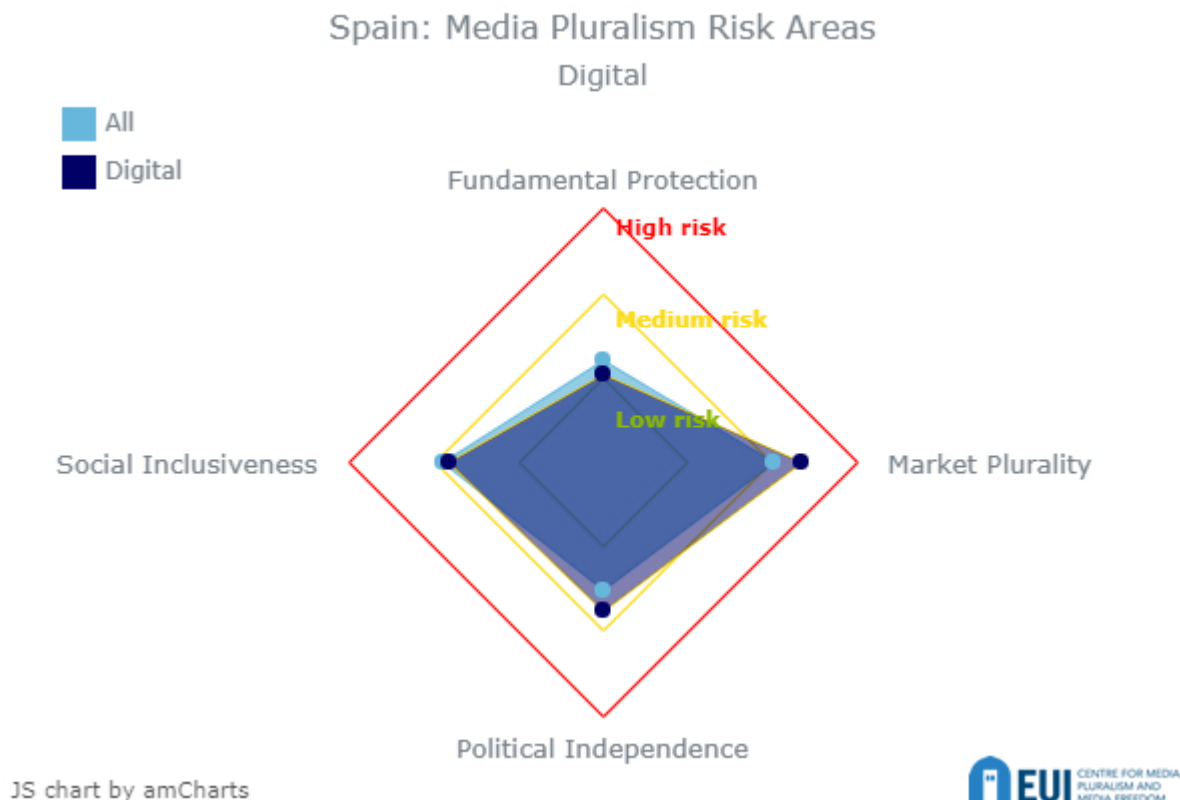
The risk associated with the **Media literacy** indicator is medium and similar to last year, with 50%. Although the education Law 3/2020 was approved in December 2020 and the final specification of "digital competence" (July 2020) could lead to some improvement in the field of media literacy, these new measures are yet to be implemented. Law 3/2020 (law LOMLOE also known as the Celaá Law) regulates

the evaluation of the learning of high school students, which will be continuous, formative and inclusive. In addition, it introduces the subject of Education in civic and ethical values and provides for a contingency plan for the centers in emergency situations, as well as an improvement plan that must be included in the educational project. Currently, Media literacy is present in the education curriculum but only to a limited extent. Teachers are only provided with occasional and insufficient training. Regarding non-formal education, there are well-known initiatives organised by the civil society such as Spectus, Teleduca, HEKO Kolektiboa, Entrelínes, or Abaoaquo. Two approaches coexist in the non-formal education sector: a defensive approach (often identified with associations of parents and users, and vigilant on the application of the regulatory mechanisms of the audiovisual sector), and an empowering approach, considering media literacy as a preparation.

Protection against illegal and harmful speech is considered as high risk, albeit the risk has dropped from 90% to 71% this year. Although there are numerous initiatives conducted by the civil society to fight disinformation, disinformation is still widely spread in the country. Some aspects that explain this are the confusing or contradictory information that often emanates from the authorities or information overload. In addition, the impact of misinformation in the field of health and in relation to the coronavirus has generated social tension. Numerous demonstrations have been held in Spain in protest against the use of the mask and denying official information about the pandemic. The National Security Council approved in October 2020 an Action Procedure against Disinformation. This followed the provisions of the Action Plan to combat disinformation approved by the European Council in December 2018. This procedure establishes the responsible bodies in Spain for the fight against disinformation and contemplates the collaboration of the private sector and civil society in this area. Likewise, it establishes four levels to detect disinformation and to deal with campaigns of this nature, as well as the need to exchange information and good practices between EU member countries. Similarly, there are a good number of initiatives carried out by civil society with the aim of fighting disinformation. Some examples are Zaska Antirumorez, a group of 30 organizations whose main objective is to overthrow hate speech and different discrimination through disinformation, or Learntocheck, a pioneering web platform focused on training against misinformation, with fully open and trilingual content. Certain Spanish fact-checkers (Newtral, Maldita, EFE Verifica, RTVE Verifica, Verificat...) also take part in this type of activity.

With regard to State institutions, there have been many campaigns and actions against disinformation that have taken place in Spain. An example of this is found in the campaign launched in March 2020, through #EsteVirusLoParamosUnidos and in relation to the state of alarm decreed on the same date. This same hashtag would be published in different generalist communication media, with its corresponding mass dissemination through different social networks. A recommendation appealed directly to the subject dealt with in this matter: "We stop it when you don't share false information." In relation to this, in February 2020, the National Cryptological Center published a statement on how to act against disinformation campaigns. In allusion to this, he wrote a security decalogue in which he recommended, among other aspects, to carry out an analysis of the news sources and to doubt the screenshots of the social network receipts. However, it is not easy to give a concrete answer regarding the efficiency of the actions undertaken. The reasons for them are, above all, ignorance about the totality of disinformative content that circulates throughout the country, as well as the percentage of which is detected.

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



Pluralism in the online environment tends to be at similar risks compared to the overall risk assessment. Regarding pluralism in the online environment, Spain presents a higher risk in the area of Market Plurality (78%), medium risk in Social Inclusiveness (60%), Political Independence (58%) and a lower risk in the area of Fundamental Protection (34%). These figures represent a slight increase in three of the four areas. These are: Political Independence (1%), Fundamental Protection (2%) and Market Plurality (6%). However, it also translates into a drop of up to 10 points in the area of Social Inclusiveness, which changes its status from high risk to medium risk compared to the 2021 report. It is also interesting to compare the figures for the digital section with those referring to all the rest of the indicators in each area, described above. In this sense, the Market Plurality and Political Independence areas obtain a higher risk score, up to 6% and 8%, respectively. With regard to the areas of Fundamental Protection and Social Inclusiveness, a slightly better score can be observed in pluralism in the online environment. However, this implies only about 4% on Fundamental Protection and 2.5% on Social Inclusiveness.

Fundamental Protection (34% medium risk)

Spain has implemented through national legislation (Law 25/2007, of October 18) the derogation provided for the GDPR on freedom of expression and journalistic activities in a way that complies with article 10(2) of the European Convention on Human Rights. However, it does not properly ensure a right balance between data protection and freedom of expression with regard to journalistic activities.

According to Article 20 (1) of the Spanish Constitution, the right "to freely express and disseminate thoughts, ideas and opinions through word, writing or any other means of reproduction" is recognized and protected. Despite this, there is a medium risk in terms of protecting freedom of expression. Thus, although freedom of expression online is clearly defined in law, the restrictions to freedom of expression online are not 'proportionate' to the legitimate aim pursued. At this point, it can be stated that there are occasional

violations related to filtering, monitoring, blocking, or arbitrarily removing online content. Some researchers [58] consider that the popularization of social networks as a forum for the expression of ideas and political debate has increased the tension between freedom of expression and control by the authorities. As an example, some existing laws in the current Criminal Code pose a threat to freedom of expression. Thus, the PDLI denounced on December 10, 2019 in Geneva before the UN Human Rights Council, violations of freedom of expression in Spain. For example, a disturbing development was the Royal Decree-Law 14/2019, of October 31, which takes urgent measures for reasons of public safety in matters of digital administration, public sector contracting and telecommunications.

The Platform for the Defense of Freedom of Information (PDLI) considers that the fact that the Royal Decree allows the Government "the intervention of electronic communications networks and services in certain exceptional cases that may affect public order, public safety and national security" is truly worrying. In February 2020, the organizations Amnesty International and ARTICLE 19 denounced that this Royal Decree gives excessive powers to the government to intervene, suspend or take over the management of electronic communication networks and services without control mechanisms to prevent it from being applied disproportionately and arbitrary. They consider that the Royal Decree encourages prior censorship and the capture of Internet content by the Government.

There is also a medium risk related to the guarantees for freedom of expression online. It is important to note that one of the problems is that in Spain, unlike in other countries, the citizens' right to information is not regulated, which establishes the duties and rights of journalists, according to the Union of Journalists of Catalonia (2015) [59]. One aspect worth mentioning is that online platforms show some data from governments requests but remain still not really cooperative in explaining the blocking or removing of content done in accordance to their terms and conditions and/or internal rules and procedures. Last year, Twitter has suspended or blocked different accounts in Spain, including famous people who supported anti-vaccination campaigns or accounts of the far-right political party Vox or the left wing Podemos. In these cases, platforms normally explained the reason of the block, but there is a need for more transparency, as they do not inform about these in their periodical reports. Therefore, the existence of some threats related to the online safety of journalists should be highlighted. For example, in 2021, some online news media, such as La Marea or El Salto, suffered strong cyberattacks that made their websites inaccessible for some time, as well as journalists' emails [60]. In this case, it is women who are most at risk, although there is a lack of data about online threats and attacks against women journalists.

Market Plurality (78% high risk)

Spanish legislation does not have any specific provision that requires digital news media (understood as digital native media) to publicly declare their ownership. For this reason and considering the different parameters that will be developed below, it can be argued that the risk in this indicator is very high. Thus, it cannot be said that the disclosure of digital news media ownership is effectively provided to public bodies and the public.

Closely related, regulatory guarantees to prevent concentration in the media sector do not apply to digital news media either. Regarding online platforms concentration and competition enforcement, the main way in which people access news online in Spain is mainly side-door. According to data from Digital News Report 2021 Spaniards access news mainly through intermediaries (59% of citizens use this option compared to 51% who use direct access to news through a website - results are not exclusive). More specifically, 79% say that they access news online, with 63% TV, 56% through social media and just 34%

newspapers. In addition, the online advertising revenue share of the Top4 players in Spain is 80% [61], and the audience concentration of the Top 4 online players is 71% [62].

The digital-specific indicator on Online platforms concentration and competition enforcement is at medium risk. In Spain, a high degree of ownership concentration can be avoided by applying competition rules that consider the specificities and digital evolution of the media sector. The same thing happens in the digital advertising market. However, this is not the case for all media.

In April 2019 the CNMC initiated an investigation into the conditions of competition in the online advertising sector in Spain. But this is a consultative investigation, without the capacity to impose sanctions. In a first phase, a public consultation was opened to operators, regulators, consumers, and experts in the sector, in which 65 actors participated. The answers sent by FEDE (advertising agencies employers' association), the Spanish Advertisers' Association, the Spanish Advertising Media Association, the Coalition of Creators and Content Industries and CEDRO, among others, which can be consulted on the CNMC website, point to the existence of a situation of concentration of digital advertising in Spain. Google also responded (which denied that there was a problem of competitiveness in the Spanish market), but not Facebook.

In a second phase, the CNMC requested information from relevant actors, after which the CNMC planned to produce a final document, which was expected to be published in early 2020, which has finally been published on July 2021, without implying any further action from regulator or government, although the documents states the need for a more fair distribution of digital advertisement market.

Accordingly, the only sector with administrative authority is the audio-visual sector, the CNMC, which has the power to supervise concentration processes and to impose sanctions in accordance with Law 7/2010 of 31 March. However, this law only provides for the control of horizontal concentration processes. For the rest of the media, the generic competition law applies. All this configures a panorama of market plurality in Spain in which the revenues of digital-native news media have decreased over the past year [63]. Furthermore, the public support schemes for the media sector don't cover online media.

In this sense, the aforementioned 'Iceta Law', Royal Decree-Law 24/2021, of November 2, establishes the end of the Canon AEDE and has allowed the return of Google News to Spain. In addition, Article 73, which deals with the 'Use of protected content by service providers to share content online' has received various criticisms since it opens the door to apply direct censorship via algorithms and broadens the impact by adding additional responsibility regarding streaming content. According to this law, the platforms will be "responsible for unauthorized acts of communication to the public, including the provision of works and other services protected by intellectual property rights." That is, if there is content protected by copyright, the responsibility will fall on the platform and not on the user who has uploaded it. Effects of the law are yet to be analyzed with some time perspective at the moment of writing this report.

Political Independence (58% medium risk)

The digital risks in this area are related mainly to the rules on political advertising online. The current regulation applies also to political advertising on online platforms during electoral campaigns. This legislation does not provide transparency, and not even the degree of action or limits to political parties are clear. In addition, the rules for political parties are in place but are not effectively implemented. For example, regarding transparency, there is a lack of information available on political parties' websites about the amounts they spend on social media political campaigns.

The Agencia Española de Protección de Datos (AEPD) (Data Protection Spanish Agency) is the body in charge in Spain to oversee the personal data of individuals and its use by public administrations and private companies. AEPD played a relevant role in shaping the interpretation of the article 58 bis of the Organic Law 5/1985, of June 19, of the general electoral regime (LOREG) (Representation of the People Institutional Act), as modified by the new Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights. As the amendment proposed by the new Organic Law 3/2018 raised some concerns, the AEPD published a statement regarding the correct interpretation of the law. The statement clearly limits the capacity of political parties to make political advertisements on social media during electoral processes.

Social Inclusiveness (61% medium risk)

The risk associated to the indicator on Protection against illegal and harmful speech - has decreased from 90% in the previous edition of the MPM, to 72% this year. Despite such a positive evolution, the risk level remains in the high risk range for different reasons. Disinformation is widely spread in Spain and some clear consequences on fundamental rights and democracy have been observed. Furthermore, the existing regulatory framework is inefficient. In this same direction, disinformation initiatives are widespread and, in a relative sense, effective. However, there may be a risk to freedom of expression if criminal proceedings are preferably used to prosecute several disinformation actions, as indicated, for example, by the State Attorney General's Office. Regarding the Protection against hate speech, it is crucial to point out that hate crimes are classified in Article 510 of the Penal Code. This article was modified by Organic Law 1/2015, of March 30, and entered into force on July 1, 2015. Hate speech has increased in recent years due to the use of information and communication technologies. In addition, new technologies have also amplified their potential expansion, increasing the harm to victims. That is, the existing regulatory framework related to hate speech is ineffective and harms freedom of expression.

31% of the Spanish population has low overall digital skills. At the same time, 57% of the population has basic or above basic overall digital skills. In Spain, there is an Action Procedure against Disinformation, approved by the National Security Council in October 2020, based on the provisions of the Action Plan to combat disinformation approved by the European Council, in December 2018. In addition, there are numerous initiatives conducted by civil society to fight disinformation, in which some of the Spanish fact-checkers participate (Newtral, Maldita, EFE Verifica, RTVE Verifica, Verificat...).

5. Conclusions

The situation in Spain remains similar to the previous MPM report. Medium risk dominates all areas under study except Market Plurality, without seeing relevant improvements nor great declines in relation with the past year. In the areas that improve in relation with former MPMs this is due the fact of a recovery from pandemic effects. In no relevant issues the country experienced an improvement due to policy or regulatory changes, although there are signs that perhaps some legal reforms will be decided and implemented next year. In any case, Spain is a country that has seen how risks to media pluralism have increased in recent years. The current situation stabilizes this situation, without either advancing to mitigate or increasing risks.

In the **Fundamental Protection** area, most indicators continue at similar levels of risk than in last report. No relevant legislation has been passed to reform some of the laws that imposed risks from freedom of expression and right to information. For example, despite the government making claims to reform Organic Laws 1/2015 and 4/2015, no advance has been made in this direction. In 2021, the European Court of Human Rights (ECtHR) condemned Spain on different occasions, considering that there has been an "interference by public powers in the right to freedom of expression". Problems also continue in relation to the right to information (absence of an Organic Law defending it) and also in the protection of whistleblowers (no transposition of the EU Directive). Journalistic profession, standards, and protection see some improvement after the effects of the COVID-19 pandemic on the economy has been mitigated. The unemployment of journalists has been reduced. Also, although there continue to be cases of harassment towards journalists, these are less frequent than in recent years, mainly due to a less conflictual political context with fewer demonstrations and clashes with law enforcement.

Recommendations:

- **The coalition government (PSOE- Podemos) should implement the changes in current laws that endanger freedom of expression and information, as promised during last electoral campaign.**
- **To apply effective protections for the journalistic profession, especially in what regards economic and working conditions but also about physical and online threats.**

Market Plurality is the area that sees a higher level of risk, three of its indicators are in high risk. Spain continues to be a country with lack of transparency on media ownership, with by law just being mandatory to report on audiovisual media. Spain has not yet transposed the Audiovisual Communication Services Directive and the European Code of Electronic Communications. Furthermore, in Spain only horizontal concentration in the audiovisual media sector is specifically regulated. Media concentration is, hence, a big problem in the Spanish media system, in different media sectors. In television, the two main media groups gathered 80% of advertising revenue, while in radio the three main media owners obtained 96% of revenues. Press sector can just make estimates, although data seem to point out that four main publishing groups reached 87% of audiences. The lack of reliable data on the digital sector remains a relevant shortcoming. Finally, there is a need to regulate the digital market to incentivize competition: Meta and Google monopolize 70% of the income, according to the Spanish regulator. Several legislative initiatives in relation to this have been approved but is yet too soon to evaluate their effects. Finally, it is necessary to highlight that the Media viability indicator improves as the effects of COVID-19 on media industries have reduced during last year, although we cannot establish that the situation has returned completely to pre-pandemic figures.

Recommendations:

- **To control concentration of advertising revenues in the audiovisual and digital markets.**

The area of **Political Independence** presents an overall assessment of medium risk, with just the indicator of Editorial autonomy ranked as high risk. Appointments of editors-in-chief and other professionals in both management and newsroom positions continues to be highly influenced by market and political pressures and influences, damaging the journalistic profession as a whole. Journalists lack also a regulatory framework to defend their impartiality and editorial independence, in both private and public service media. Regarding PSM, recent legal reforms have not been fully implemented, elections of members of the board of both regional and national PSBs are still depending on parliamentary majorities, with no guarantees of political independence. Institutional advertising and other forms of public funding to private media continue to be a controversial issue in the country.

Recommendations:

- **To reform laws and regulations to ensure political and economic independence of public and private media. This would include also reforms regarding transparency on media ownership, state advertisements and subsidies, protection of whistleblowers, and the appointment of PSM boards, at both national and regional levels.**

Finally, **Social Inclusiveness** shows in general a situation of medium risk, although indicators are in high levels of risk. The most relevant one is access to media for women, which jumped from 63 to 83% in just one year. Big gaps in salaries still exist while the number of women in management positions is really low yet, despite representing a big percentage of media professionals. The share of women appearing as experts in different sectors, but especially in relation with the Covid-19 pandemic, has been reduced in comparison to previous years. In relation to the Protection against illegal and harmful speech, this indicator remains at high risk despite the growing number of initiatives in the country against such practices and the less convoluted public sphere. However, online threats are still frequent although analyzing their frequency or relevance remains difficult.

Recommendations:

- **To recognize the particular danger and effects of online threats aimed at female journalists.**
- **To mitigate the existing salary gap as well as the unbalanced presence of women in management positions.**

6. Notes

- [1] See the Framework Convention here: <https://www.coe.int/en/web/minorities>. Along these lines, the Committee on National Minorities of the Council of Europe (CoE) regrets the “restrictive” application of the Convention on National Minorities in Spain, which leaves out Catalans, Basques and Galicians. Thus, only the gypsy community is covered by this agreement.
- [2] Due to the provisional status of the management board, this data was not evaluated in 2020.

7. References

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
<i>Jaume</i>	<i>Suau Martínez</i>	<i>Professor</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	X
<i>Carlos</i>	<i>Ruiz Caballero</i>	<i>Profesor</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	
<i>Pablo</i>	<i>Capilla García</i>	<i>Profesor</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	
<i>Elena</i>	<i>Yeste Piquer</i>	<i>Profesora</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	
<i>David</i>	<i>Puertas Graell</i>	<i>Investigador</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	
<i>Lidia</i>	<i>Cordero Triay</i>	<i>Investigadora</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	
<i>Judit</i>	<i>Agràs Masdeu</i>	<i>Ayudante Investigación</i>	<i>School of Communication and International Relations. Ramon Llull University</i>	

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>Joan</i>	<i>Barata</i>	<i>Académico</i>	<i>The Center for Internet and Society. Stanford University</i>
<i>Aitor</i>	<i>Moll Sarasola</i>	<i>Vicepresidente de la Asociación de Medios de Información (AMI)</i>	<i>CEO de Prensa Ibérica y del Grupo Zeta</i>

<i>Francesc</i>	<i>Ràfols Sagués</i>	<i>President of the journalists association</i>	<i>Sindicat de Periodistes de Catalunya</i>
<i>Alejandro</i>	<i>Perales</i>	<i>Presidente</i>	<i>Asociación de Usuarios de la Comunicación</i>

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