The *MELIA Observatory* Project

Media Literacy Observatory for Active Citizenship and Sustainable Democracy

Output T1.1. Repository on media landscape in the Danube Region

Document Reference

Project Acronym	Melia Observatory			
Project Code	**DTP3-657-4.1**			
Project URL	http://www.interreg-danube.eu/approved-projects/melia-observatory			
EU Project Officer	Johannes Gabriel			
Project Manager	**Name**	prof. dr. Matevž Tomšič	**Affiliation**	SASS
	Email	matevz.tomsic@fuds.si	**Phone**	+386 40 300-292	
Output Name	Repository on media landscape in the Danube Region			
Output Number	T1.1.			
Type	Report	**Distribution Level**		
Responsible Author(s)	Gabriel Bădescu (UBB)			
Contractual Date of Delivery	August 2021			
Status	Final			
Quality assurance reader	Tamara Besednjak Valič			

Change History

Version	Date	Status	Author (Unit)	Description
0.1	August 1st, 2021		G. Bădescu (UBB)	Repository on media landscape in the Danube Region
0.2	December 20, 2021		Nicoleta Voicu	
0.3	December 22, 2021		Gabriel Bădescu	

Table of Contents

Introduction

The repository is conceived as a useful resource for all interested in understanding the media context in the MELIA set of countries. In addition to offering valuable insight into the institutions regulating the media landscape and the legislation applicable to both media in general and media literacy and education in particular, the repository also includes important comparative information on media messaging. Key features of media landscapes and their contents in all countries that belong to the region were gathered. The repository includes both traditional and new media mapping and categories of media landscape.

The present document maps the structure of media landscape from institutional and legal perspectives and also explores patterns of producing contents and messages in different media outlets. More than that, it provides data on similarities and differences between countries regarding: 1.) the structure of media landscape in terms of institutional and legal features specific to each national context, while also documenting the presence of particular types media producers, 2.) key topics that can be found in media outlets, 3.) styles of reporting on the events in politics, economy, culture and other spheres of society and 4.) way of interpreting them, with a focus on the manifestations of fake news and spread of hate speech. The repository will be useful for developing training programs and awareness campaign in a later phase in order to raise understanding of importance of media literacy as core component of civic competences that is necessary of active role of citizens in democratic society.

Each country in this project has an institutional and legal setup focused on media literacy and media education. Nevertheless, the amount of diversity characterizing it is quite marked. The set of countries includes both EU and non-EU member states, and some of the diversity is due to this aspect, since the EU as a supranational actor is engaged in many activities

focusing on media literacy and media education.[1] Moreover, being part of the EU also means that fundamental rights and freedoms are or should be respected. Freedom of press or the existence of a pluralist media landscape are also directly connected to how media literacy and media education are understood and acted upon in every country. By the same token, the vast majority of the countries in the project are post communist – a label that may not be particularly apt since more than thirty years have passed since the collapse of communism – but the communist legacy is important in every country, especially from the point of view of regulations of the media landscape and media activity. In other words, the post communist countries had to create a legal and institutional context regulating media activities during the last 3 decades, while a country like Germany (the only non-post communist country in the project) benefitted from a much longer time for institutionalizing and regulating media. Given this diversity, descriptions of media related institutions and legislation are treated on a cases by case basis; media experts in all countries of the project have elaborated reports identifying the most important laws and institutions either focused or touching on media literacy and education, and these reports are presented here for the reader. This section of the media repository is separated in two subsections, one on institutions regulating media and one on legislative measures governing media activity in each country.

Media education and literacy can only be analysed and evaluated against a broader background configuring the social, political and cultural landscape of a country. Furthermore, especially in the case of EU member states, the influence of the supranational organization should also be taken into account.

Media education and literacy are directly related to the broader milieu of freedom of expression, freedom of thought, politicization / instrumentalisation of news, and also the laws and practices governing the regime of media ownership. For the countries included in the MELIA project, media indicators vary considerably. For example, the 2021 World Press

---

[1] https://digital-strategy.ec.europa.eu/en/policies/media-literacy

Freedom Index, created by Reporters without Borders, depicts a rather bleak story.[2] The index offers a glimpse into the status of journalism in 180 countries (especially focusing on ease of access to information, reporting freedom, state control of reporters, and even chasing and threatening of reporters), a ranking that has been headed by Scandinavian countries (Norway, Finland). In this context, the countries in this project rank as follows (out of 180 countries): Germany 13, Slovenia 36, Czech Republic 40, Romania 48, Croatia 56, Hungary 92, Serbia 93, Montenegro 104 and Bulgaria 112. Bulgaria and Hungary are two of the countries that have the most pressing issues with freedom of reporting, which is extremely worrying, given that they are both EU member states. The situation is not all negative, considering that Slovenia and the Czech Republic are in the first quarter, and they are both post communist countries, while Germany is the leader of the set. This brief analysis suggests that while communism may have affected the media landscape in some countries, the effect is not the same everywhere. Some of the countries in the project have also been included in surveys exploring people's relationship with mass media. For example, the 2021 Digital News Report (Reuters, University of Oxford) shows that the percentage of people trusting the news varies in different countries: Hungary 28%, Czech Republic 33%, Romania 35%, Bulgaria and Croatia 40%, and Germany 47%.[3] The poor status of Hungary in terms of media pluralism and increasing control of Viktor Orban's government on the media sector is reflected in people's trust of the media: in Hungary, there is the smallest percentage of people trusting the news, out of all the countries in the set. Once again, Germany is the undisputed leader when it comes to trusting the news.

2. Institutions regulating media in MELIA countries

[2] https://rsf.org/en/2021-world-press-freedom-index-journalism-vaccine-against-disinformation-blocked-more-130-countries
[3] https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2021

In every country, institutions focusing on media literacy and education involve a ministry, a public agency, a dedicated institution or a combination of public institutions. In this respect, there is a tremendous amount of diversity in the dataset. In Bulgaria for example, all media related issues are handled by the Ministry of Culture and the Electronic Media Council, while the Constitution is responsible for the provision of fundamental rights and freedoms. In Croatia, the Ministry of Science and Education is an important actor for media education, although it does not have a dedicated department focusing on this topic; the Croatian Ministry of Culture and Media, the Agency for Electronic Media and the Agency for Education are also involved, but there is insufficient engagement with media literacy, according to the MELIA experts. The Agency for Electronic Media seems to be the most active, having created in 2016 a media literacy web portal. In the Czech Republic, the Ministry of Education, Youth and Physical Education and the National Institute for Education work on different competences required of young people, but there is very little emphasis on media literacy. There is also the Czech Council for Radio and Television Broadcasting that is an important factor in the media landscape. Currently, there are efforts to make state institutions work together in order to create a unified conception of media education and media literacy.

Germany has, by far, the most elaborate institutional setup focusing on media education and literacy. Partially because of its federal structure, and partially because of the government's pro-active stance on creating and maintaining a pluralistic media sector, engaging with media education at different levels, and protecting the youth and minorities against potential issues caused by hate speech or inadequate representation of minorities. Since the MELIA partner from Germany is located in Bavaria, the case study on Germany reflects a dense network of public institutions sharing the responsibility for media education and media literacy, from the Bavarian State Ministry for Education and Culture, to the Bavarian State Center for Political Education or the Academy for Teachers Training and Personnel Management. Since 2020, even the Bavarian State Ministry of Justice entered the stage by instating 22 public prosecutors handling cases of online hate speech. There are of course also

federal institutions involved in media education, such as the Standing Conference of the Ministers of Education and Cultural Affairs.

In Hungary, since 2010, there is a specialized institution focusing on media, namely the National Media and Info-communication Authority, which includes the Media Council. In Montenegro, media literacy and media education are a prerogative of the Agency of Electronic Media. In Romania, the National Audio-Visual Council and the Ministry of Education through its General Directorate of Pre-university Education are the main institution with influence on media education. In Serbia, the Electronic Media Regulating Authority has competence on different media related fields, and since it is not required by law to promote media literacy, it has only engaged with it sporadically, often through a partnership with UNICEF. Finally, in Slovenia, there are several institutions focusing on media education and literacy (the Ministry of Culture through its Media Directorate, the Committee on Culture in the national legislative forum, Radio and Television Slovenia, the Slovenian Press Agency, the Agency for Communication Networks and Services). Moreover, the Ministry of Education, Science and Sport handle the more specialized issues regarding media education and school curriculum for it, and the Pedagogical Institute and the Slovenian Institute for Adult Education are involved.

The brief comparative analysis of institutions regulating media in the MELIA country set shows that diversity is the key word. While all countries have institutions governing media, a focused emphasis on media literacy and media education is insufficiently developed in every single one. Even in Germany, the country that has the most sophisticated institutional setup and a very dense network of overlapping state and federal level institutions, MELIA experts found that media literacy and education policies are treated mostly in "technical" fashion, without producing substantive results within the population.

2.1 Bulgaria

The most important state institution that are responsible for the preparation of a national policy for media literacy are the Ministry of Education and Science and the Ministry of Culture. Additionally, the Electronic Media Council also plays an important role. According to the Radio and Television Act (Art. 33a), these institutions are responsible for policy development, periodic reviews and updating.

The recent developments in the Bulgarian National Radio (BNR) can well exemplify the uneasy situation in the state-owned Bulgarian TV and BNR. They are expected to be efficient competitors to the numerous private TV and radio stations. This is the official expectation and requirement and for good reasons. However, at the same time, the state-owned electronic media have been chronically underfunded for decades, and throughout time, it becomes more acute. This became obvious with the stop of the broadcasting of radio Horizon for several hours in September 2020. Breaks in broadcasting have only been heard of in the times of the Second World War.

The issue is rather complex. First, the state-owned mass media are being financially squeezed. The market favours private broadcasters. However, they are losing the ability to function as critical and independent voices. Both political and economic pressures are having an impact on the work and market share of public service media. The state of the public mass media has been influenced by the current liberal media legislation. It does little to restrict the concentration of media ownership or cross-media ownership. This has allowed the bTV media group to expand its radio business and the Nova media group to become involved in the online media market, resulting in a concentration of media ownership that represents a threat to the pluralism of opinion.[4]

2.2 Croatia

---

[4] Indzhov,Ivo (2020) **Bulgarian public service media under threat**. *European Journalism Newsletter,*January.

The most important state institutions involved, in Croatia, in creating and monitoring policies on media literacy are: the Croatian Ministry of Science and Education (Ministarstvo znanosti i obrazovanja), the Croatian Ministry of Culture and Media (Ministarstvo kulture i medija), the Agency for Electronic Media in Croatia (Agencija za elektroničke medije), and the Agency for Education in Croatia (Agencija za odgoj i obrazovanje).

Croatian Ministry of Science and Education (Ministarstvo znanosti i obrazovanja)

The Ministry of Science and Education (MSE) performs administrative and other tasks related to preschool education, elementary and secondary education in the country and abroad. It develops the National Curriculum, approves textbooks and introduces regulations and standards as well as other requirements regarding educational work, fosters the development of the school system; works on improving the student standard, conducts inspections, establishes educational institutions and supervises the legal aspects of their activities, provides funding and facilities for educational work, enables children, young adults and adults to acquire technical skills and competences and supports organizations invested in education. The Ministry also performs administrative and other tasks related to: the development of higher education, the implementation of national strategies and higher education programs, and the provision of funding and facilities for higher education institutions and monitoring their activities, the preparation of reports on the activities and evaluation of higher education institutions and study programs, and their recommendation for approval, the subsidization of study costs, the improvement of the student standard, monitoring success rates of study programs and other higher education processes, administering the implementation of the Croatian Qualifications Framework, administering the Registry of Higher Education Institutions and the Registry of Study Programs, managing databases on higher education, fostering lifelong learning and higher education for adults, and also handles the administrative supervision of higher education institutions.

The Ministry of Science and Education in Croatia creates significant framework for educational institutions' activities. Being involved in the development of the National Curriculum, MSE and its experts determine learning outcomes of every school subject in

detail. In this way, MSE has the opportunity to include media literacy issues in every subject's program. MSE also approves textbooks, which gives the opportunity to the institution to control the ways in which media and media literacy are presented in textbooks, but also to intervene if a particular textbook does not adequately present media literacy issues or it does not improve students' media literacy techniques. In the process of evaluation of higher education institutions and its programs, MSE also nurtures the culture of improving media literacy. Being in charge for developing a school system in general, MSE is the highest national institution that takes care of appropriate implementation of educational programs – including parts of programs aiming towards improvement of media literacy. The Ministry cooperates with other public, private and civil society organizations regarding education and educational programs, but there is no official media literacy conceptualization – media literacy issues and projects are being integrated in education without a strong, unified and constant initiative.

Croatian Ministry of Culture and Media (Ministarstvo kulture i medija)

The Ministry of Culture and Media (MCM) performs administrative and other tasks in the field of culture that are related to the following: the development and improvement of culture, cultural and artistic creation, cultural life and activities, the foundation of institutions and other legal entities in the field of culture, the promotion of cultural relationships with other countries and international institutions, fostering the development of cultural and creative industries, normative and administrative tasks in the field of media, performing professional and administrative tasks for the Croatian Commission for UNESCO, fostering programs aimed at meeting the cultural needs of the Croatian people in other countries, the provision of financial, material and other prerequisites for the performance and development of cultural activities, especially museum, gallery, library, archive, theatre, music, music and theatre, publishing, visual art and audio-visual activities.

The Ministry also performs administrative and other tasks that are related to the following: researching, examining, monitoring, recording, documenting and promoting cultural heritage, the central information and documentation service, determining the characteristics

of the protected cultural property, prescribing criteria for defining the public needs programs in the segment of culture in the Republic of Croatia, the provision, coordination and supervision of funding programs related to the protection of cultural heritage, the creation and supervision of institutions performing tasks of the protection of cultural heritage and other tasks related to the protection of cultural heritage. Moreover, the Ministry performs administrative and other tasks related to monitoring and coordinating policies in the field of copyright and related rights protection, implements measures to improve the determined state of this area, and performs tasks related to financing culture and media from EU funds.

The Croatian Ministry of Culture and Media is a national unit whose main activities are focused on culture, cultural heritage and media but MCM lacks in strong and continuous initiative to create and conduct a reform of media landscape. The Ministry cooperates with other public, private and civil society organizations regarding culture and media, and is achieving numerous progresses, but media literacy and its improvement is not enough prioritized. The result is the lack of support for improvement of media literacy in Croatian media landscape.

The Agency for Electronic Media in Croatia (Agencija za elektroničke medije)

The Agency for Electronic Media (AEM) is an independent regulatory body that promotes public interest and media pluralism, justifies public trust through professional and transparent activities, encourages media literacy, creates conditions for the production of quality Croatian audio-visual content and ensures equal conditions for media development and media freedom. The Agency was established in accordance with the provisions of the Electronic Media Act. It consists of the Director of the Agency and the Electronic Media Council, which is the governing body of the Agency. The Agency performs administrative, professional and technical tasks for the Council. The President of the Electronic Media Council is also the Director of the Agency, and the Croatian Parliament appoints him. The Director of the Agency represents and manages the Agency, and is responsible for the work of the internal units of the Agency.

The AEM actively cooperates with other public and state bodies in its daily activities. Cooperation at the international level is also significant. In addition to membership in all relevant international regulatory networks (ERGA, EPRA, MNRA, CERF), the Council and the Agency actively participate in the work of the European Commission's Directorate-General for Communication Networks, Content and Technology (DG Connect), in line with the Audio-visual Media Services Directive. The Agency has maintained constant strategic cooperation with UNICEF, which is very important for the projects' success and reach.

The Agency has implemented numerous projects, like a web portal for media literacy (www.medijskapismenost.hr) and established the project Media Literacy Days. AEM and UNICEF Office in Croatia and partners launched web portal for media literacy in June 2016. Main goals of the web portal are raising awareness about the importance of media literacy and empowering parents and teachers in teaching children and youth how to critically consume media content as well as how to analyse, evaluate and critically reflect on media messages. By doing this, the AEM is trying to encourage conversations about the media and the safe use of technology. The main goal of the Media Literacy Days is to enable learning on media literacy to as many children and adults as possible in Croatia and it represents a platform for various activities and events aimed at promoting media literacy organized by various stakeholders. This project supports educators and teachers by developing educational materials for media education. Furthermore, the AEM pays particular attention to respect for human dignity, the protection of minors and the prevention of incitement and/or promotion of programs, which spread hatred or discrimination based on race, sex, religion or nationality.

Agency for Education in Croatia (Agencija za odgoj i obrazovanje)

The Agency for Education aims to create a new culture of education by continuously supporting quality improvement of the educational activities by continuous participation in the implementation of education reform, applying the best Croatian, European and world educational practices. The main activity of the Agency for Education is performing professional and advisory work in education, participation in monitoring, improvement and

development of education in the field of preschool, primary and secondary education, adult education and education of children of Croatian citizens abroad and children of foreign nationals.

The main problems that the Agency strives to overcome are various challenges in the education system; for example, the Agency organizes and conducts numerous educational courses for children and youth but also provides possibilities for lifelong learning. These lifelong learning programs are destined for all citizens, but it is particularly important that, by conducting these activities, the Agency allow teachers, trainers and educators to improve their competences. Teachers, trainers and educators can attend different courses, but there are not sufficient courses thematically close to media literacy allowing teachers to learn how to improve students' media literacy.

There is no separate department handling media literacy in the Agency for Education. Agency conducts various courses but most of them are not linked with improvement of media literacy. The Agency cooperates with other public and civil society organizations, especially with schools, very often, but their work and effort is not mainly addressed to resolve lack of reforms on media literacy.

2.3 Czech Republic

Officially, media literacy is ensured by the central Czech authorities such as the Czech government, the Ministry of Education, Youth and Physical Education (Ministerstvo školství, mládeže a tělovýchovy, MŠMT) or the National Institute for Education (Národní úřad pro vzdělávání, NÚV). All these institutions continually stress the importance of media literacy for people of all ages, but, above all, it focuses on the youth and the seniors (within the framework of long-life learning programs). Focus on media literacy might also be found also in the newest strategic document presented by the Ministry of Education, namely the "Education Strategy Policy of the Czech Republic until 2030+" (Strategie vzdělávací politiky

České republiky do roku 2030+) (MŠMT 2020). Nevertheless, this relatively long document (120 pages) mentions the media literacy only three times:

1. in the section "Digital technologies", where the term is included into the longer enumeration of issue related with the general term: "The education will include the information and data literacy, communication and cooperation; media literacy; creation of the digital content; security in the online environment, but also the problem solution and critical thinking"
2. in the section "Civic education"
3. in the section "Education for sustainable development".

Surprisingly, the strategic document does not include any notion about media education.

Next to the mentioned central institutions formulating the strategies and priorities in education policy, there is also The Council for Radio and Television Broadcasting (Rada pro rozhlasové a televizní vysílání, RRTV) that emphasizes the principles of the Czech Republic´s policy related to broadcasting and development, as well as to the strengthening of media literacy standards. Throughout its activities, the Council cooperates with the Czech Telecommunication Office (Český telekomunikační úřad, ČTÚ). However, the council does not assume a media education role; its role is strictly monitoring – "to observe the media literacy quality of the population and produce the information about the activities of the radio and television operators in this sphere. All other activities the Council performs beyond the framework of its duties".

Generally, the Council was relatively active in promoting the issue of media literacy, but its efforts did not create enthusiasm among the most important stakeholders, the central government and the Ministry of Education. In June 2015, the Council´s President Ivan Krejčí released a press statement on media education. The title of the release ("Media Literacy" – the Czech Republic is missing the boat") stressed the worrying situation of media literacy in Czech Republic, namely the low-level of media literacy in Czechia compared with other EU countries. He also stressed the dispersed competences and duties of different institutions and absence of one department fully responsible for media literacy. Krejčí asked for the

creation of an interdepartmental group, "ideally joining together the representatives of the involved state authorities (Ministry of Culture, Ministry of Education, Ministry of Labour and Social Affairs, Ministry of Interior, and The Council for Radio and Television Broadcasting), experts on media education and selected organisations … that would prepare the single conception for the strengthening of media literacy of the entire Czech population, including the endangered groups, socially disadvantaged, and seniors".

Nevertheless, the Council's declarations did not cause any important changes. Consequently, the Council abandoned the media literacy issue. This is clear from the "Report on the priority´s assessment for the year 2020" presented by the Council on the 12 January 2021, in which the term "media literacy" does not occur in the report.

In general, there is weakness and fuzziness of state institutions in what media education in Czech Republic is concerned about. This was confirmed also by repeated surveys focusing on media literacy. For example, in November 2019, a survey conducted by the STEM agency, showed that Czech citizens are not able to recognize the basic rules of proper news reporting:

- only ¼ of respondents were able to recognize in the sample article, if the rules of objective and balanced reporting are observed;
- the majority of the respondents were not self-confident regarding their ability to find and recognize trustworthy information;
- the survey showed that higher media and news literacy could lead to more critical investigations of all media, and, in some cases, to the identification of manipulative media;
- only 14% of the respondents declared that they always care for the selection of most reliable news;
- despite the fact that more than ¾ of the respondents declared public media as most trustworthy, only about half of the population thought that it "informs and acts in the interest of people such as we are";

- only 1/6 of the respondents answered that they know how to resist disinformation;
- the survey showed that the difference among the young generations and the groups 50+ and seniors is not as stark as expected. Differences that are more important were observed in terms of gender, employment and education.

The findings from the above-mentioned survey were confirmed also in the recent survey conducted by Median at the request of one of the leading projects in the area of media literacy – "One World in Schools" (Jeden svět na školách), implemented by the Czech quasi-governmental NGO "People in Need" (Člověk v tísni). Survey results showed that secondary school students do not have enough knowledge about media and their media literacy scores are low. The survey also showed a distinctive difference between students attending the comprehensive school (gymnázium) and students attending other types of secondary schools. General results stressed that:

- students have very weak knowledge about internet content, although the internet is their main source of news;
- only half of students were able to recognize the difference between regular news and commercial presentations;
- students were not sure which media outlets are public; some of them considered public media some disinformation websites. Specifically, the case of "Parliamentary Papers" (Parlamentní listy) was mentioned – one of the most influencing disinformation media in Czech Republic was wrongly recognised as "public" by more than half of the respondents;
- students were critical towards private media ownership, but they did not know the individual owners of private media outlets.

The Ministry of Education, including by Minister Robert Plaga, mentioned problems with media education and media literacy. In November 2018, Plaga delivered a critical speech at a conference on media literacy organised by the public Czech TV. Based on the report of the Czech School Inspection (Česká školní inspekce) he emphasized the problems with media

literacy in schools. As Plaga stressed, in the schools, media education is offered, but testing showed that the results are not satisfactory. He identified two important reasons for this unsatisfactory situation: the majority of teachers did not have sufficient training on the issue, and the needed textbooks and other requisites were not available. As the report of the Czech School Inspection indicated, only 10% of the teachers that teach the issues related to media education, graduated from this subject at the university or in other education (long-life learning courses). About 70% of the teachers were autodidacts regarding media education. The report of the Czech School Inspection indicated problems regarding the interpretation of news and the ability to identify eventual manipulations. Most problematic were the longer written news, where more than half of secondary schools´ students had serious problems understanding the content of the message and evaluating the author´s stance and the truthfulness of the message. Finally, Plaga highlighted the negative potential of social networks – in his opinion the social media present "the breeding ground for a lot of fake news and hoaxes".

2.4 Germany

In the text "Legal Framework Review" concerning Media Regulation, Media Literacy and Media Education and Policy Analysis on Media Literacy in Germany/Bavaria", it has already been stated that there is "no legal definition of media education and related concepts for Germany. And there is no central body that is in the position to decide on such a legal definition [...]."[5]) Accordingly, there is also no central public authority in Germany solely charged with media literacy policy making. Because "it has been a consistent phenomenon that media education policy is not an issue of its own right [...] [but] media education came into play as a side discourse whenever new media phenomena occurred [...]", it is only a

---

[5] Hasebrink, U. and R. Kammerl. (2014). Media and Information Literacy Policies in Germany p.4. (Available at: http://ppemi.ens-cachan.fr/data/media/colloque140528/rapports/GERMANY_2014.pdf). Accessed: 11 February 2021.

logical conclusion that public stakeholders involved in media literacy policy making are also located in departments of the public authorities that deal with policy making regarding media in general.[6] The following description gives an overview of the relevant public authorities in this policy field, which is characterised by "conflicting and unclear political competences".[7]

In the German federal system, "[…] culture and education fall under the responsibility of the 16 states ("Länder"). Thus, the whole school sector as well as most aspects of media regulation are organised on a regional level. As a rule, each state has a ministry for education that is responsible for schools; in most cases, there is another ministry for social affairs and/or for families and young people that deal with children and youth related issues, except general education. The responsibility for broadcasting media is located at the regional level, too; each state – some-times together with a neighbouring state – has its own legal basis for broadcasting. As a consequence, public broadcasting as well as the regulatory authorities for commercial broadcasting are organised on the states' level, too."[8]

Consequently, the following description will mostly focus on public authorities on the level of the Länder. Again, Bavaria as the location of the German project-partner and as the state that includes by far the largest and most significant part of the German Danube region, will serve as an example.

Bavarian State Ministry for Education and Culture (Bayerisches Staatsministerium für Unterricht und Kultus)

The Bavarian State Ministry for Education and Culture declared the handling of digital media and imparting media literacy as important educational goal in Bavarian schools.[9] As a supervisory authority, the Bavarian State Ministry for Education and Culture has a number of units that are involved in media and media literacy policy making. These are:

---

[6] Idem p.3
[7] Idem p.3
[8] Idem p.4
[9] See https://www.km.bayern.de/pressemitteilung/9925/.html

1. The Bavarian State Institute for Quality of Education and Educational Research (Staatsinstitut für Schulqualität und Bildungsforschung), which is located in Munich. Description of the unit involved: "The State Institute makes the results of research and classroom experience available to schools. The institute supports and advises the Bavarian State Ministry of Education and Cultural Affairs in the continuing development of the Bavarian educational system."[10] It was founded in 1966 as "Institute for Pedagogy in Gymnasiums" (Institut für Gymnasialpädagogik), expanded its area of activities in 1984 becoming the "State Institute for School Education and Educational Research" (Staatsinstitut für Schulpädagogik und Bildungsforschung). Since 2003, the institute is known under its current name. The institute is a Bavarian authority and subordinated to the Bavarian State Ministry for Education and Culture. The institute is structured in four departments according to the fourfold structured Bavarian school system (primary schools, secondary schools, gymnasiums, VET schools) and the general policy department as well as the media department operating for all types of schools. The institute employs teachers as well as researchers with expertise in the transfer of research results to the educational practice. Unit's responsibilities and main activities: The current main activities of the Bavarian State Institute for Quality of Education and Educational Research are the implementation of a new curriculum (LehrplanPLUS) introduced in 2017, the transfer between research and practice, digitalisation, value education, political education, promotion of STEM subjects, promotion of reading, inclusion, promotion of everyday competences and education for sustainable development. Official definition of media literacy/conceptualisation/operationalization: Media literacy and media education is conceptualised by the institute within the Competence Framework for Media Education in Bavarian Schools (Kompetenzrahmen für Medienbildung an bayerischen Schulen), where media education is structured in five areas: basic competences, searching and process relevant content, communicating

[10] http://www.isb.bayern.de/english-version

and cooperating, producing and presenting, analysing and reflecting. Prioritisation of media literacy: Media literacy and media education is one of the main activity fields of the institute and therefore also a priority in its agenda. Integration of media literacy issues/projects in various broader policy/legislative fields: Being a Bavarian authority subordinated to the Bavarian State Ministry for Education and Culture, the institute integrates media literacy issues in the policy field of education. Unit's cooperation with other public, private and civil society organisations: The institute cooperates mainly with Bavarian authorities on the same level that are also subordinated to the Bavarian State Ministry for Education and Culture. These are inter alia: The Academy for Teacher Training and Personnel Management (Akademie für Lehrerfortbildung und Personalführung), the nine school advisory services of the state of Bavaria and the state foundation for education in Bavaria (Stiftung Bildungspakt Bayern) as well as the networks for the ministerial commissioners for secondary schools (Bayerisches Gymnasialund Realschulnetz).

2. The Academy for Teacher Training and Personnel Management (Akademie für Lehrerfortbild-ung und Personalführung) is located in Dillingen (Swabia). Description of the unit involved: The academy is the central Bavarian training institution for teachers, multipliers, function holders, school principals and the staff of the education supervising authority and the school administration in Bavaria. The academy was founded in 1971 as Academy for Teacher Training (Akademie für Lehrerfortbildung) and expanded its activity field in 1997 in the area of personnel management. The academy is a Bavarian authority subordinated to the Bavarian State Ministry for Education and Culture. The academy is structured in five departments. These are the departments for teaching methodology and education development for humanities and STEM-subjects, the department for management, school and personnel management, the department for pedagogy, psychology and school counselling and the department for digital and IT-education. The academy also has a superior department for "Media, Pedagogy and Didactics" (Stabsstelle

Medien.Pädagogik.Didaktik). Unit's responsibilities and main activities: The main activity of the academy is the training of Bavarian teachers and multipliers of all types of schools and all school subjects (except sport and religion), who are encouraged to transfer the learned content in regional, local and in-school training offers. Furthermore, the academy has the task of training function holders and pedagogical managers (e.g., school principals). Further activities are the advice and further training of the target group in the sectors information technology and media education, as well as the support of the Bavarian School Server.

Official definition of media literacy/conceptualization/operationalization: The academy offers consultations and teacher training in the fields of IT-education, media pedagogy and IT-equipment. The scope of the trainings is however rather limited to the qualification of teachers regarding the use of digital media, computers and the internet in class, so that their students can work with media themselves and not so much targeted towards the sensitization of teachers for negative media phenomena (e.g., hate speech, disinformation and conspiracy narratives). The academy describes the use of information and communication technology as decisive cultural techniques.

Prioritisation of media literacy: Imparting media and digital literacy for teachers in one of the main activities of the academy. The academy has consultants in media education and information technology (Medienpädagogische und Informationstechnische Berater, MIB) who support teachers in the use of (digital) media and schools in the formulation of media curricula). As already pointed out, the focus here lays predominantly on the mediation of technical skills and not on media literacy skills. Integration of media literacy issues/projects in various broader policy/legislative fields: Because the academy is a Bavarian authority subordinated to the Bavarian State Ministry for Education and Culture, the academy integrates media literacy issues in the policy field of education. Unit's cooperation with other public, private and civil society organizations: The academy mainly cooperates with Bavarian authorities on the same level that are also subordinated to the Bavarian

State Ministry for Education and Culture, especially the before-mentioned Bavarian State Institute for Quality of Education and Educational Research.

3. The Bavarian State Institute for Quality of Education and Educational Research and the Academy for Teacher Training and Personnel Management together with the (private limited company) Institute for Film and Picture in Science and Education (Institut für Film und Bild in Wissenschaft und Unterricht GmbH) are involved in the implementation of the Bavarian State Media Centre "mebis" (Landesmedienzentrum Bayern, mebis). The Bavarian State Ministry for Education and Culture established mebis to promote the use of digital media in teaching. The platform provides various offers regarding the use of digital media, like an information portal on media education and media didactics with teaching material and a media library with video and audio material for teaching. Since 2017, all Bavarian schools have free access to the offers of "mebis". In December 2020, mebiswas used in 5.600 Bavarian schools and hadover one million registered users.

4. Another relevant public agency of the Bavarian State Ministry for Education and Culture in the field of media literacy is furthermore the Bavarian State Centre for Political Education (Bayerische Landeszentrale für politische Bildungsarbeit). Like the other state centres for political education, the Bavarian State Centre for Political Education is independent and not organisationally subordinated to the Federal Agency for Civic Education (Bundeszentrale für politische Bildung, bpb). The state centres and the Federal Agency for Civic Education work at the interface between the state, politics, educational institutions, science and the media. Its impact includes extracurricular political youth and adult education, as well as political education at school. They work on a public mission and are guided by the principles of pluralism; controversy and rationality.[11] One of the main activity fields of the Bavarian State

---

[11] Massing, P. (2015). Bundes- und Landeszentralen für politische Bildung.
(https://m.bpb.de/gesellschaft/bildung/politische-bildung/193394/bundes-und-landeszentralen?p=all). Accessed: 08 March 2021.

Centre for Political Education is thematization and handling of challenges arising from the increasing digitalisation of your societies. This also includes media education and imparting media literacy, whereby the latter is understood as "self-determined, sovereign and responsible acting with media" .[12]

The Bavarian State Ministry for Science and Art (Bayerisches Staatsministerium für Wissenschaft und Kunst) is another state level institution with competences in media literacy. The department for science and art has been assigned multiple times in the past in the jurisdiction of the Bavarian State Ministry Bavarian for Education and Culture. Since 2018, the department is again organised in its own ministry, the State Ministry for Science and Art. As a supervisory authority, the Bavarian State Ministry for Science and Art is responsible for the following unit involved in media and media literacy policy making.

The Bavarian Regulatory Authority for New Media (Bayerische Landeszentrale für neue Medien, BLM) is one of 14 state media authorities in Germany and is located in Munich.

Description of the unit involved: The "BLM acts as a public-service institution licensing and con-trolling commercial radio, television and online services for Bavaria and beyond. With its research and development activities, the BLM aims at promoting a technical infrastructure which will warrant the future-proof, secure and sustainable development for commercial broadcasting in the digital world."[13] The tasks of the BLM are defined in the Bavarian Media Act (Bayerisches Mediengesetz – BayMG). As an institution under public law, the BLM has the right of self-government, carries out its tasks free of state influence and is subject to limited legal supervision by the Bavarian State Ministry of Science and the Arts. It was founded in 1985. In 2021, the budget of the BLM amounts to 29,39 million Euros, whereby 1,43 million Euros are budgeted for media education and media research.

The BLM is organised in several committees and councils, the most important one being the Media Council (Medienrat), which supervises the Television Committee (Fernsehausschuss),

---

[12] https://www.blz.bayern.de/thema-im-fokus/digitalisierung/meldungen.html
[13] https://www.blm.de/en/structure.cfm

the Ra-dio Committee (Hörfunkausschuss), the Policy Committee (Grundsatzausschuss) and the Deci-sion-making Committee (Beschließender Ausschuss).

The responsibility of the Media Council (Medienrat) extends to privately financed broadcasting; it corresponds in its function to the broadcasting councils of the public service institutions. Typical tasks are the authorisation of broadcasters, programme supervision and the handling of programme complaints.

Since 2014, the BLM also has crosscutting committees consisting of members of the Radio, Television and Policy Committees. These are the Media Literacy Committee (Medienkompetenz-Ausschuss) and the Digital Committee. Unlike most state media authorities, the BLM has another body, the Administrative Board being responsible for the economic affairs of BLM.

The members of the Media Council and Administrative Board are volunteers and do not receive any fees for any kind of cooperation at the BLM. To ensure the independence of the councils' work, the members cannot belong to any political party. In addition, no employees of the BLM and members of an institution of a public service broadcaster are allowed in the councils (See Bayerisches Mediengesetz – BayMG, Art. 10). Unit's responsibilities and main activities: The BLM bears public responsibility for the program offers of private providers that the BLM authorises (see BayMG, Art. 2). BLM's tasks include the approval and control of private broadcasters, who distribute their offers via broadcasting facilities in Bavaria. The supervision covers the compliance with the protection of minors and compliance with advertising regulations, including restrictions on the amount of advertising. Other tasks include, for example, the allocation of frequencies, the promotion of Bavarian radio and television programmes, public relations and the production of statistics on media use, media pedagogy and media education. Other activities are the annual awarding of prizes for outstanding journalistic contributions and the issuing of a magazine. The BLM also developed the Media Pluralism Monitor (Medienvielfaltsmonitor), which assesses the impact of media on the formation of opinion and the influence of the media companies). Official definition of media literacy/conceptualisation/operationalization: Imparting media

literacy is the goal of the BLM's media education activities in order to promote the responsible and reflected use of media. Knowing relevant media and understanding how to use them in a responsible and self-determined way is thereby of utmost importance. (See https://www.blm.de/aktivitaeten/medienkompetenz.cfm) . Prioritisation of media literacy: Promoting media literacy is one of the legally stipulated tasks of the BLM (see BayMG, Art. 11). The main target group are children and youth. Other target groups are parents and educators.The BLM engages in various projects and initiatives promoting media literacy and annually publishes a report on media literacy.[14] Integration of media literacy issues/projects in various broader policy/legislative fields: The media literacy projects of the BLM are integrated in the policy field of media regulation and authorisation, especially about the compliance with the legislation on the protection of minors (Jugendschutzgesetz). Unit's cooperation with other public, private and civil society organisations: The BLM cooperates with numerous regional and national organisations in the field of media and media literacy policy. The list of holdings can be accessed here: https://www.blm.de/ueber_uns/beteiligungen_mitgliedschaften.cfm

Regarding media literacy, the BLM is directly involved in the Forum Media-Pedagogy (Forum Medienpädagogik, founding year: 1994), which is a network of all relevant actors in the field of media education in Bavaria. .cfm) and in the Bavarian Foundation for Media-Pedagogy (Stiftung Medienpädagogik Bayern, founding year: 2008), which promotes media literacy in the sense of a preventive youth media protection. The foundation conducts its own projects and develops materials (e.g., Bavarian Media Driving License, Medienführerschein Bayern) for the promotion of media literacy targeted to-wards children, youth and educators. The foundation also provides a network of media education trainers that can be requested by Bavarian educational institutions free of charge in order to develop events focusing on media education.

The BLM also cooperates with the Bavarian State Ministry of Justice (Bayerisches Staatsministerium der Justiz) within the project "Justice and Media – Resolutely against hate"

---

[14] https://www.blm.de/infothek/publikationen/medienkompetenzberichte.cfm

(Justiz und Medien – konsequent gegen Hass). The project encourages media companies to report incidents of hate speech online on their websites directly to the authorities before deleting them by using an online form. One of the project's activities is organizing training courses on ways to detect hate speech for the employees of the media companies. The project was initiated in October 2019, whereby currently 113 Bavarian media companies participate in the initiative. Until February 2021, 175 requests, 34 indictments and 17 convictions can be recorded, while in 64 proceedings the investigations are still ongoing. The project wants to build awareness that hate speech online has penal consequences and aims to-wards a quick criminal prosecution.

In this context, also the Bavarian State Ministry of Justice has to be mentioned. In January 2020, the ministry installed all 22 Bavarian public prosecutors with special departments for hate speech online and also appointed the Commissioner for Hate Speech of the Bavarian Justice (Hate-Speech-Beauftragter der Bayerischen Justiz) at the central public prosecutor's office in Munich within the Central Office for the Suppression of Extremism and Terrorism (Zentralstelle zur Bekämpfung von Extremismus und Terrorismus, ZET). Within one year, 1,648 proceedings against hate speech online have been initiated. In February 2021, the Bavarian Minister of Justice also announced that in the future hate speech proclaiming sexualised violence against women and girls will be recorded separately.[15]

Bavarian State Ministry of Family, Labour and Social Affairs (Bayerisches Staatsministerium für Familie, Arbeit und Soziales)

As a supervisory authority, the Bavarian State Ministry of Family, Labour and Social Affairs is responsible for the Centre for Media Literacy in Early Education (Zentrum für Medienkompetenz in der Frühpädagogik, ZMF). Description of the unit involved: The ZMF is a subordinated authority of the Bavarian State Ministry of Family, Labour and Social Affairs and was founded in 2018 after the request by practitioners (specialists in the area of child and youth care and parents) to develop guidelines and concepts for the handling of digital media. With only nine employees, the ZMF is a rather small public authority. Unit's

---

[15] https://www.justiz.bayern.de/presse-und-medien/pressemitteilungen/archiv/2021/9.php

responsibilities and main activities: The main activities of the ZMF are the networking of relevant actors in the field of media education, the qualification of specialists (especially in the area of child and youth care) through offering learning opportunities, the creation of a web-based learning interface and the guidance and support for specialists. Official definition of media literacy/conceptualisation/operationalization: Media literacy is defined as a key competence comparable with language and writing competence. Prioritisation of media literacy: Imparting media literacy is the main priority of the ZMF. Integration of media literacy issues/projects in various broader policy/legislative fields: Media literacy is integrated in the policy field of early education and the protection of minors. Unit's cooperation with other public, private and civil society organisations: The ZMF has the mandate to network and cooperate particularly with the following organisations:

- State Institute for Early Education (Staatsinstitut für Frühpädagogik, ifp)

- State Institute for Family Research (Staatsinstitut für Familienforschung, ifb)

- Institute for Media Research and Media Education (Institut für Medienpädagogik in Forschung und Praxis, JFF)

- Bavarian Regulatory Authority for New Media (Bayerische Landeszentrale für neue Medien, BLM) with its Bavarian Foundation for Media-Pedagogy (Stiftung Medienpädagogik Bayern)

- Bavarian Campaign for the Protection of Minors (Aktion Jugendschutz Bayern, AJ)

- Bavarian Youth Council (Bayerischer Jugendring, BJR)

- Bavarian State Youth Welfare Office (Bayerisches Landesjugendamt im Zentrum Bayern, Familie und Soziales)

Relevant Public Authorities at the Federal Level

In order to coordinate the states' media and media literacy policies, the following institutions have been established. The Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany (Ständige Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland, KMK) is the voluntary assembly of ministers of education, higher education, research, as and cultural affairs of the

German Länder. The Standing Conference has drafted some of the most important policies in the field of media education and media literacy (e.g. "Education in the Digital World" in 2016) (see "Legal Framework Review concerning Media Regulation, Media Literacy and Media Education and Policy Analysis on Media Literacy in Germany/Bavaria", p. 21) (see Hasebrink/Kammerl 2014, p. 5). The institution does not belong to the federal government, which is why its directives and policies do not immediately become effective, but have to be turned into state law first (see Gayer/Reip 2012, p. 22).

In addition, the state media authorities have established a national representation, called the media authorities (die medienanstalten), where also the joint institutions of the state media authorities are organised. Since 2020, with the entry into force of the Interstate Media Treaty (Medienstaatsvertrag), the media authorities are also responsible for the supervision of the so-called media intermediaries like social networks, news aggregators, search engines, app portals and user generated content portals.

One of the relevant joint bodies that is organised within the media authorities, is the Commission for the Protection of Minors in the Media (Kommssion für Jugendmedienschutz, KJM). "It is in charge of assessing commercial broadcasting and online media content with regard to the protection of minors; as such, this commission is a key player in the system of regulated self-regulation or co-regulation that has been implemented in the area of youth protection [...]. Its decisions are implemented by the media authority in charge of the respective content or service provider."[16]

Only recently, the German parliament decided on a reform of the KJM to better adapt to the dangers posed by an increasing digitalization. From now on, social media and internet service providers are obligated to protect minors from harmful contents, like cyberbullying, hate speech, tracking, sexual harassment and cost traps. Within the reform, also the Federal Department for Media Harmful to Young Persons (Bundesprüfstelle für jugendgefährdende Medien) is extended to a new public authority called the Federal Agency for the Media

---

[16] Hasebrink, U. and R. Kammerl. (2014). Media and Information Literacy Policies in Germany (2013) p. 5. (Available at: http://ppemi.ens-cachan.fr/data/media/colloque140528/rapports/GERMANY_2014.pdf). Accessed: 11 February 2021.

Protection of Children and Youth (Bundeszentrale für Kinderund Jugendmedienschutz), which also will be responsible for the supervision and compliance with the new regulations. Critics however fear that the reform further complicates the already complex German youth protection that divides the competences between the federal level and the level of the states and that the newly founded agency will therefore remain a toothless tiger.[17]

On the federal level also the Federal Ministry of Family, Senior Citizens, Women and Youth (Bundesministerium für Familie, Senioren, Frauen und Jugend, BMFSFJ) and the State Minister for Culture and Media (Staatsministerin für Kultur und Medien) are responsible for issues regarding media education and media literacy.

The Federal Ministry of Family, Senior Citizens, Women and Youth "defines the support of media literacy and the protection of minors as a core political objective […]" and supports the good upbringing with media with various projects.[18] In 2013, the ministry initiated the Media Literacy Report (Medienkompetenzbericht) that reflects the state of the promotion of media literacy for children and youth. The reports are published by the media authorities and comprise expert's opinions on the state of media literacy in families and education-al institutions and provide a database on institutions and projects fostering media literacy in Germany. This report, which latest version has been issued in 2019 , "come[s] closest to an assessment of the state of media literacy in Germany". [19]

The BMFSFJ is also the sponsor of the federal program Demokratie leben! ("Live democracy!"). which supports civic engagement for a diverse and democratic society since 2015, including projects of civil society non-profit organisations fostering media literacy. [20]

The State Minister for Culture and Media (Staatsministerin für Kultur und Medien, also Beauftragte der Bundesregierung für Kultur und Medien, BKM) "is concerned with a broad

---

[17] Höhne, V. (2021). Gesetzesreform. Der Jugendschutz wird moderner – ein biss-chen. (https://www.spiegel.de/politik/deutschland/der-jugendschutz-wird-moderner-ein-bisschen-a-a9c3a00b-169c-4e7e-8267-02eace156721?sara_ecid=soci_upd_wbMbjhOSvViISjc8RPU89NcCvtlFcJ). Accessed: 10 March 2021.

[18] Hasebrink, U. and R. Kammerl. (2014). Media and Information Literacy Policies in Germany (2013) p. 5. (Available at: http://ppemi.ens-cachan.fr/data/media/colloque140528/rapports/GERMANY_2014.pdf). Accessed: 11 February 2021.

[19] Idem p.6.

[20] https://www.demokratie-leben.de/en/),

range of media related issues linked with securing media diversity, regular assessments of the German media system, support for film productions, and media education."[21] The institution also finances Germany's international broadcaster Deutsche Welle and regularly publishes the Report on Media and Communication of the Federal Government (Medien-und Kommunikationsbericht der Bundesregierung). The State Minister for Culture and Media also promotes projects in the field of media literacy.

Since 2015, the State Minister for Culture and Media also presides over the then newly established Joint Commission of the Federal State and the Länder regarding Media Convergence (Bund-Länder-Kommission zur Medienkonvergenz, BLKM), which pursues the following five topics: Implementation of the Audiovisual Media Services Directive of the EU , youth (media) protection, competition law/protection of media pluralism, regulation of platforms and media intermediaries. The commission as a political steering group includes the Federal Ministry for Economic Affairs and Energy (BMWi), the Federal Ministry of the Interior (BMI), the Federal Ministry of Transport and Digital Infrastructure (BMVI) and the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) and the federal states of Rhineland-Palatinate, Berlin, Bavaria, Hessen, Hamburg (HH), North Rhine-Westphalia and Baden-Württemberg. The Commission is open to all Länder and federal departments.

2.5 Hungary

In Hungary, there is one central public authority responsible for media and enforcing legislation on media, the Nemzeti Média- és Hírközlési Hivatal (National Media and

---

[21] Hasebrink, U. and R. Kammerl. (2014). Media and Information Literacy Policies in Germany (2013) p. 6. (Available at: http://ppemi.ens-cachan.fr/data/media/colloque140528/rapports/GERMANY_2014.pdf). Accessed: 11 February 2021

Infocommunications Authority, further referred to as NMHH). Considering that media literacy issues may be strongly connected to the field of education and child protection, depending on the nature of the topic, ministries responsible for these fields may also be involved into the elaboration of relevant policies.

The NMHH was established in 2010 by the Act CLXXXV on Media Services and Mass Communication through merging two previous authorities, the National Radio and Television Commission (ORTT) and the National Communications Authority (NHH). The ORTT was set up in 1995, and aimed at protecting freedom of speech, supporting programme providers in entering the market, and securing the independence of these providers. The Commission was supervised by the Hungarian National Assembly. NHH was formed in 2003 by the Act C on Electronic Communications as the successor of the Communications Surveillance operating since 1993. Tasks of the authority included enhancing the efficient and undisturbed operation and development of the market of communication, postal and info technology services, and protecting the interests of service providers and users in the sector.

The NMHH is an autonomous regulatory body, which submits reports on its operations to the Hungarian National Assembly on an annual basis. The main residence of the NMHH is in Budapest, however, it maintains customer service points in five larger cities in the country, namely in Debrecen, Miskolc, Pécs, Sopron, and Szeged. NMHH has approximately 650 employees. In the field of info communications, the general task of NMHH is the enhancement of the effective and undisturbed operation and improvement of the info communication market, the protection of the interests of info communication providers and users, the assurance of honest business practices in the sector, and the surveillance of the compliance of actors in the sector to the relevant laws and regulations. In the field of media, powers of NMHH are divided among three major divisions described below.

NMHH exercises its authorities through three divisions, each of which has its own distinct scope of authority:

(1) The President

NMHH is led by the President appointed for nine years by the President of Hungary based on the recommendation of the Prime Minister. The mandate cannot be renewed. The candidate for the President's position must

- be eligible at national elections,

- have a clean record,

- not be banned from their profession,

- have a master's degree,

- have at least five years' experience in the field of media or press or communications surveillance,

- have an academic degree recognized in Hungary, or ten years' experience as an instructor in higher education.

The tasks of the President include:

- leadership of the NMHH,

- elaboration of recommendations for the modification of the act on info communication and media services,

- appointing, discharging, revoking the Commissioner for Media and Communications,

- preparing for and presiding at the sessions of the Media Council (if the President is the president of the Media Council at the same time, which is the case now).

(2) the Media Council

The Media Council is an autonomous organ of the NMHH with juridical person status, and is supervised by the National Assembly. At its creation, it became the successor of the National Radio and Television Commission (1996–2010). The Media Council consists of a president and four members, who are elected by the National Assembly for nine years. Since the President of the NMHH becomes the candidate for the presidency of the Media Council by the power of their appointment by the President of Hungary, the President of the NMHH is the president of the Media Council at the same time. Among others, the tasks of the Media Council include:

a) monitoring and enforcing prevalence of freedom of press,

b) invites and evaluates tenders in regard of media service entitlements owned by the state and dedicated to the purposes of media service,

c) administration of surveillance tasks assigned by the law,

d) providing programme monitoring and analyzing service,

e) providing expert opinion on legislation drafts in connection with media and communication,

f) elaborating statements and recommendations concerning the principles of the improvement of the Hungarian media service system,

g) initiating processes concerning customer protection and the prohibition of unfair business practices,

h) reporting to the European Commission on obligations regarding programme quotas,

i) if necessary, the Media Council may initiate the modification of the act on media services and mass communication at the minister responsible for audio-visual policy,

j) taking the initiative in the improvement of media literacy and media awareness; coordination of activities of other governmental actors in the field of media literacy; support to the government in preparing periodic reports on media literacy/awareness for the European Union.

(3) NMHH Office

The head of the Office is the General Director appointed by the President of the NMHH for an indefinite time. The General Director runs the three major divisions of the Office, which are responsible for (1) the administration of governmental info communications resources, (2) the surveillance of the info communications sector, and (3) the management of media regulation issues assigned to the Office. The Office provides professional support for the work of the President of the NMHH and their deputies, the Commissioner of Media and Communication, and the members of the Media Council.

Within the frames of the NMHH operates the Institute for Media Studies, which provides expert support for the Media Council by conducting research on media related topics in social sciences, organizing expert conferences and preparing publications.

The President of the NMHH appoints the Commissioner for Media and Communications, who possesses discretionary powers and separate rules of procedure. The Commissioner's duty is to assist consumers of media and info communications in protecting and asserting their interests and facilitating user awareness.

In addition, a governmental advisory body, the National Communications and Information Technology Council has to be mentioned. It consists of five members; the Prime Minister assigns its president and vice president. The Council has the mandate to provide expert preview, opinion and advice on any kind of document (including strategies, legislation, etc.) in connection with regulations of media, information society, information technology, or communications.

There is no official definition for media literacy available in Hungary. The reason for this may be that official documents follow a different approach, and media literacy skills are handled as a part of digitalization. Textbooks for primary or high school children run under titles using the phrase "digital skills/competences". The Digital Education Strategy of Hungary uses the term "digital literacy" and justifies its lack of definition by explaining that existing concepts on digital competence and digital literacy are not tailored to Hungarian circumstances. Therefore, the key concepts are digitalisation and digital transformation.

Since 2016, several digital strategies have been developed; the ones that are relevant for MELIA Observatory are Digital Education Strategy of Hungary (2016) and Digital Child Protection Strategy of Hungary (2016). The National Curriculum includes the subject "Motion picture and media studies"; however, it is only present in the last year of secondary school. In 2020, media literacy is merged into other humanities subjects, and no requirements are attached to this subject.

According to the law, initiation of activities aiming at improving media literacy is the task of the Media Council within the NMHH, and for this purpose, three "Magic Valley Media Literacy Education Centers" have been established. The first one, located in Budapest, was opened in 2014, the second one in Debrecen in 2017, and the third one in Sopron in the fall of 2020. The goal of these centers is to promote media literacy education of children between 9 and

16 through organizing various programs, workshops, and camps. Although these centres offer exciting and useful programs, their outreach is rather limited: there is obviously a geographical restriction, further, they only receive student groups registered by their teachers, and cannot be visited individually (i.e. with family).

In 2016, the Hungarian Government has launched the Digital Success Program (Digitális Jólét Program) led by a Commissioner of the Prime Minister. The program has a secretary within the Ministry of Innovation and Technology. The aim of the program is to support digital transformation in every field of life. Although the program has its own website publishing news on events and other activities, online magazines, etc., the structure and operation of the program is not made public.

It is rather difficult to evaluate the cooperation between NMHH and other public, private, or civil society organizations, since the webpage of NMHH does not introduce partnerships or cooperative projects systematically. It can be assumed that media literacy events organized in cooperation with others are promoted on the website and news about them may be published among the actualities, however, no "Partners" option is available. Maybe, NMHH's cooperation with other organizations might be mapped using a reversed approach, i.e. by examining the partners section at the webpages of organizations, which might have cooperated with the NMHH, but unfortunately, this method is like looking for a needle in a haystack. Sadly, the same applies to the homepage of the Magic Valley Centres, where solely their own projects are introduced and promoted.

2.6 Montenegro

In Montenegro, Media Literacy is a joint project of the Agency for Electronic Media of Montenegro and UNICEF Montenegro. The slogan of the Media Literacy Campaign is "Let's Choose What We Watch". The campaign "Let's Choose What We Watch" focuses on raising awareness of the importance of media literacy for parents, caregivers and children, the

importance of selection of media content for children, and improvement of the quality of media reporting on the issues affecting the children's rights.

Therefore, UNICEF and the Agency plan to establish a closer cooperation with the media and journalists in order to use the media resources to encourage both children and parents to a proactive attitude towards a planned media consumption, which will allow children to be in contact with the media contents free of hate speech and prejudice on the one hand, while promoting tolerance on the other.

According to many international studies, violence in the media can increase aggressiveness of children, while educational media contents may help children adopt certain knowledge and skills more effectively. It is vital to choose media contents carefully. Media literacy is the ability to use, analyze, critically evaluate and create different media contents. In the 21st century, it is just as important as traditional literacy, i.e. reading and writing.

A survey on how children and parents use the media in Montenegro, how and with whom they discuss the media contents, and how they interpret the information disseminated by the media is in the pipeline within the framework of this campaign. Moreover, the cooperation between the children and the media outlets will be strengthened through the campaign, in order to have more opinions of the young people in the media reports, and better quality of the programs focusing on the topics related to them.

2.7 Romania

The first initiatives regarding raising the issue of media literacy in Romania were taken by civil society. ActiveWatch Media Monitoring Agency, a human rights organization that militates free communication for public interest in partnership with the Ministry of Education started the first projects on media education in 1996. As a follow-up of those

initiatives and projects, in 2004, ActiveWatch elaborated and developed the optional subject or course for 'Mass-Media Competency', which was introduced as part of the school-based curriculum. Following the development of the optional course for media literacy, a textbook 'Competency in Mass Media: student textbook' [Ro. Competență în Mass Media: Manualul Elevului, 2004] was approved and published. The 'Competency in Mass Media: Teacher Guideline' accompanied the textbook [Ro. Competență în Mass Media: Ghidul Profesorului, 2005].

Media literacy is part of the school-based curriculum developed by the Ministry of Education (the national authority in the education field). In addition, it represents the educational offer, which is proposed to schools and high schools in accordance with the learning needs and interests of the students, with the specificities of the school and the needs of the local community/economic partners. The school-based curriculum consists of both optional packages of courses offered at national, regional and local level, as well as optional packages of courses offered at the level of the high school unit. The School Board of Management, after consulting students, parents and based on resources available, sets the school-based curriculum. In practice are two types of school-based curriculum programs, those accredited and offered by the Ministry of Education and those initiated at the school level, which are approved by the County Schools Inspectorates. The County School Inspectorates have the responsibility to elaborate and to disseminate among the schools its own procedure according to which the schools can propose optional courses as part of the school-based curriculum.

The national unit, which is involved, is part of the Ministry of Education - General Directorate of Pre-University Education and its responsibilities are:

- To ensure the elaboration of the methodological, functional and operational normative framework for the reference fields: management, human resources and school network in pre-university education.

- To participate in the elaboration of policies, national programs or strategies that aim at aspects from the reference fields.

- To provide counselling to school inspectorates in the fields of reference for the performance of the functions assigned to them.

- To monitor the activities regarding the staffing of pre-university education units and institutions with teaching staff, the elaboration and realization of the schooling plan, as well as in the field of institutional management in order to increase the quality of the education act in the pre-university education system.

- To monitor and evaluate the activities of school inspectorates, as well as the implementation in the pre-university education system of policies, strategies and normative acts in the reference fields and we establish improvement measures.

The General Directorate of Pre-University Education main activities are strategy, evaluation and curriculum monitoring; developing and monitoring the dual education in Romania; human resources management; developing the school network system and monitoring and improving the continuing education.

The concept of media literacy is stipulated in the Audio-visual Law no. 504/2002 [Ro. Legea audiovizualului], within the framework of Article 10, paragraph three. 'As guarantor of the public interest in the field of audio-visual communication, the Council has the obligation to ensure: i) raising public awareness about the use of media services broadcast, by developing and promoting media literacy across all social categories. The Council as the National Audio-visual Council of Romania is the only regulator for the audio-visual sector in Romania. Because of the projects implemented mainly by ActiveWatch, starting with 2007, the 'Media competency' optional course was taught in sixty high schools. In the run-up, the number of optional classes has been reduced dramatically, on the one hand because of the poor funding of teachers, on the other because the class per week devoted to learning media competences was often used to prepare students for national exams.

Other non-governmental organisations such as the Centre for Independent Journalism are actively involved in the field of media education and media literacy. The Centre had different projects for high school students in 2014-2015 focused on developing the media and advocacy competencies. A number of teachers were trained on the importance of media and advocacy competences in fighting against discrimination and hate speech. Starting with 2017, one of the most important initiatives implemented by the CIJ with the financial support of the Romanian-American Foundation is the strategic media literacy program - I Teach Media Education - The Media Education and Culture Laboratory! The program is introducing media education elements in high school curriculum for humanitarian subjects (Romanian Language, English Language, French Language, History, Social Sciences). The program is creating a set of tools and materials, so that students understand and respect the role of the media in a democratic society; distinguish propaganda information and how to use social networks in a responsible way.

Mediawise Society, another small but very active non-governmental organization is active by organizing workshops, courses and by developing various educational resources, to raise awareness of the importance of media literacy and media education and advocates its introduction in schools. Currently, different actions such as 'Emerge – Gender Media Education', 'The propaganda laboratory', the platform 'Mind over Media Romania' or 'Propaganda for critical thinking' are focusing on teachers, librarians and other education professionals.

Furthermore, in 2020, Centre for Independent Journalism signed a partnership agreement with the Ministry of Education by which high school students in Romania will acquire media competences, indispensable in a context where interaction with information and, implicitly, misinformation, has become a dominant part of daily life and learning process. The program "I teach media education - Laboratory of education and media culture ", developed by the CIJ,

will be introduced as a pilot project to test new competences, content and learning methods, in high schools, which will became pilot-schools and it will become operational in 2021. Specifically, the agreement has the following provisions:

- implementing of an extracurricular learning module in the field of media education for children and young people;
- at least 480 teachers of Romanian Language and Literature, who teach at high school level, will be trained and certified through a program designed for this purpose;
- training in the media field of school inspectors for Romanian language and literature by organizing three regional sessions / workshops;
- operationalization of a media education platform for teachers and students , including tools for training, assistance, monitoring / reporting and online evaluation;
- a guide on the rights of the child, as an integral part of human rights, in the context of media education.

2.8 Serbia

When implementing media literacy policy, it is important to determine who leads it. This means it is important to establish an institutional body or give an existing body an appropriate mandate so that it can coordinate the work of other state bodies, initiate and bring together educational, academic, cultural, civil society and wider communities and to create a platform for long-term, self-sustainable media literacy projects. This body should also lead and coordinate the adoption of a national sectoral policy that represents the most effective approach to media literacy, enabling wider social engagement in the process of adopting that policy. Following the adoption of the national policy, the body in question should further monitor its implementation, provide a platform for all actors to gather, conduct public awareness campaigns and organize the necessary research to be used for the further development of media literacy in the country. The competent institution could also, as a platform for gathering the wider community, form a coordination body that would, on a

voluntary basis, bring together all organizations in Serbia that are in any way engaged in the field of media literacy in order to exchange experiences and best practices, and to form a database and create opportunities for cooperation.

The Electronic Media Regulatory Authority of the Republic of Serbia (REM) is not required by law to promote media literacy, nor is it heavily involved in media literacy, except in a few sporadic cases (such as the media campaign conducted in cooperation with UNICEF). Regardless of whether it will be established as a national cross-sectoral body for media literacy, REM should take a more active role in encouraging and strengthening media literacy in Serbia. Not only because of social responsibility but also because the issue is almost complementary to other aspects of media regulation content and protection of minors and consumers, as well as due to a common preventive approach. Before embarking on any work on media literacy, it would be good for REM to formulate its own internal policy in this area, thus clearing the way for the concept of media literacy to be understood within the organization, to identify potential partners and resources and to determine communication channels and goals. This internal policy in the media literacy sector should cover all media literacy issues arising from the social, cultural and media environment, as well as from the ever-changing technological and communication environment. After that, it would be good if REM could commission and conduct research on the media behavior of children and parents in Serbia, and on their attitudes towards media literacy and their understanding of media literacy in order to collect data and gain insight into what projects and with which partners it should work. Overall, REM should provide funding for regular annual research on media literacy and media habits of citizens, which would allow establishing the degree of success in project implementation, but would also greatly help decision-makers.

 One of the most important roles that REM should play when it comes to media literacy is to find, encourage and involve various social actors in media literacy and media education projects. Significant results can be achieved only when more partners are involved and only where there is a common understanding of problems and goals, with the exchange of

knowledge and experiences. In this way, opportunities are created for the continuous development of media literacy projects, their maintenance and financing.

Partners can be found in a number of sectors:

- Media sector (from traditional to digital media, from public to commercial media);
- Education and academic sector (kindergartens, schools, universities);
- Civil society (NGO);
- Libraries;
- Professional associations (e.g. Film associations and journalists associations or self-regulatory bodies, such as the Press Council);
- State administration bodies and local authorities;
- International organizations (UNICEF and the Council of Europe, for example).

It is also important that REM work closely with the Ministry of Culture and Information and the Ministry of Education, Science and Technological Development on certain projects, which will gain stronger institutional support and achieve a common understanding of the concept of media literacy. It is especially important to include the public broadcasting services Radio Television of Serbia (RTS) and Radio Television of Vojvodina (RTV) in all efforts. As public services, they should actively work on raising the level of media literacy of citizens. Understanding the way in which the media function and produce media content is one of the preconditions for quality, exemplary development of media literacy and, in that sense, the media should be at the service of citizens. The media should take into account their specific and influential position in society, to be always aware of their significant social responsibility and to contribute to the well-being of society with everything they do. In addition to social responsibility, which can be understood as an obligation of the media, for the media themselves, their participation in media literacy projects is important, since in this way they raise the level and educate their future consumers. By improving the content production and indirectly influence the development of audiovisual and creative industries as well as the media scene in the country. When it comes to the relationship between the media and their consumers, especially children and youth, REM can be both a mediator and a driver of

cooperation and projects involving schools and the media, for example it can be a factor that enables such cooperation and creates a platform for this matter. When it comes to relations with the media, REM should treat them not only as partners but also as consumers (users) of projects, looking at improving media literacy skills as an integral part of education and improving professional journalism and media standards. Another important aspect is the cooperation between REM and self-regulatory bodies, such as the Press Council, as well as professional journalists associations, especially through cooperation and projects that encourage quality journalism and media content and strengthen journalistic cooperation standards and professionalism. Educational institutions, from kindergartens to universities, are also actors with which one can have effective cooperation. Kindergartens and primary and secondary schools are attended by children and youth who should be one of the main target groups of REM projects, while cooperation with higher education institutions, especially those that educate students for media-related professions (Faculty of Dramatic Arts or Journalism) can be project based. Finally, it is important to cooperate with the scientific and academic community, especially in terms of conducting relevant research and processing the data obtained through that research.

Protection of minors from potentially harmful media content is one of the most important aspects of the work of regulatory bodies for electronic media. However, in addition to approaching the protection of minors from a legal and regulatory point of view, this issue should also be approached from the point of view of prevention, through increasing media literacy, especially media literacy of children, parents and teachers. Empowering children and youth by infusing them with knowledge and enabling them to acquire skills that are part of media literacy, helps protect them from potentially harmful media content, which is very important in a digital and internet environment that is largely beyond the reach of regulatory bodies. However, the key question here is how to reach children, that is how to educate them in the media. The main "channel" should be their parents and guardians, as well as all those involved in the educational process (educators, teachers, professors).They should be able to expand and improve their knowledge and give them a platform on which to follow best

practices and experiences and to keep pace with the constant changes in the world of media, communications and technology. One of the effective means for that is the internet portal, which contains a general overview of best practices and provides answers to all questions about the media aspect of raising children. However, in order for this internet portal to be sustainable and to maintain a better and more lasting reach, it is crucial to involve as many different actors as possible in its functioning. In this way, they can share the content, technical, and financial aspects of the portal and make available their resources and the knowledge they possess. In addition, it is important to develop a platform that will encourage and engage actors at the local level and provide them with technical, promotional and communication assistance, and even, where possible, financial support. It is about the fact that children in large urban centers have more opportunities for the development of media literacy skills, which is why the authorities should try to provide the same opportunities for children in other communities. In this regard, it is important to work with civil society and associations involved in media education. Civil society should be encouraged to develop projects and create conditions for cooperation and implementation of joint projects (starting from various types of activities, organizing workshops and lectures, to publishing brochures), as well as to work together to find opportunities for project financing. Libraries are also one of the main actors in promoting media literacy because they have a well-developed network throughout the country. Even though they need to adapt to the digital age, libraries remain places where various projects, workshops, seminars or play groups in the field of media literacy can be organized, not only for children but also for young people and even and for senior citizens who need the help of society to cope with information technology and the digital space. In future projects, REM should include media literacy awareness campaigns because it will show to a large number of persons the importance of media literacy. Campaigns can be organized on specific elements of media literacy or related regulatory aspects (e.g. protection of minors, labels indicating the age at which certain media content is allowed, consumer protection, disinformation issues, etc.). For all of these projects, or at least some of them or some segments of media education, it would be remarkable if

REM could provide funding or launching funding opportunities to co-finance media literacy projects. Active international cooperation, exchange of experiences and best practices with other regulatory bodies, as well as participation in the work of international organizations and associations (EPRA, ERGA, CERF, MNRA, etc.) are crucial for REM to acquire knowledge and follow best practice in terms of access to media literacy.

MEDIA ORGANIZATIONS, MEDIA REGULATORY BODIES, LIBRARIES, LIBRARY ASSOCIATIONS, INSTITUTIONS OF NON-FORMAL EDUCATION /TRAINING, BUSINESS ENTITIES

Long-term goal - To increase awareness of media literacy among media professionals.

Key entity - Media organizations, media regulatory bodies, online media and information providers, social media users.

Strategies / Tasks: Adapt and test guidelines for broadcasters and print media in order to promote media and information literacy (MIL) and user content. The media make efforts to explain their work to the public and raise the level of transparency of their actions. Enable accurate reporting of problems, by developing media policies that discourage misinterpretations in the interest of publicity. Review existing media and information policies and strategies and see the extent to which they cover MIL. Work on improving the relationship between citizens and the media, for better understanding of the positive and negative potential. Establish a mechanism and regulatory framework for access to information and for an efficient feedback system; raising civic participation in the process through MIL activities. Raise awareness in the media profession about the benefits of MIL. Act ethically and professionally in accordance with sound media practices, develop and promote media codes of ethics to avoid sensationalism and stereotypes.

Long-term goal: To become a database of sources of information and media literacy

Key subjects: Libraries, library associations, IFLA

Strategies / tasks: Resist commercial pressures that lead to problems and citizens' rights to freedom of expression, fair reporting and protection from exploitation, including insufficient attention paid to consumers. Translate research and theory of information and media

literacy into practical information, training and educational tools for teachers and young leaders, parents and guardians of children.

Long-term goal: Institutionalize MIL (media and information literacy)

Key actors: Training institutes and higher education institutions

Strategies / Tasks: Develop a comprehensive information and media literacy policy for schools, librarians and journalists. Organize training for professional journalists on how to report on children and young people so that their voices are heard and their rights are respected. Organize training for librarians to work with other actors to create opportunities for women / girls, children and young people to express themselves and have their rights respected. Participate in research on various information and media practices and their impact on children's health, lifestyle, drug abuse, violence, democracy, environment, HIV / AIDS, etc., publish research results and create a rich source of information and perspectives for people of the same profession for IMP enthusiasts and policy makers, to develop policies and programs.

GOVERNMENT BODIES, MINISTRIES AND RELEVANT INSTITUTIONS

Long-term goals: Promote and improve MIL

Key entities: Ministry of Information and Communication, Library Associations, media professional associations

Strategies / tasks: Recognize MIL as an investment, not a cost, as a potential, not a burden and strive to integrate these facts into policies, including those related to memory institutions, media, etc. Initiate the development of policies and programs that specifically promote media and information policy. Understand that independent media and free access to information are a basic condition for building democracy and freedom and that censorship and control harm the best interests of citizens, both children and adults.

Long-term goals: Integrate MIL into school and higher education curricula

Key entities: Ministry of Education

Strategies / Tasks: Conduct research on the benefits and challenges of MIL. Support MIL initiatives and provide guidelines for the integration of information and media literacy in

school and higher education curricula, programs for educating teachers and librarians, as well as researchers (doctoral studies). Support the creation of national policies for MIL and the development of national youth media programs, with the aim of educating children and young people and learning more about the role of the media in national development. Develop and disseminate media education and information tools that actively encourage critical thinking and free expression, inspire civic participation in a democratic society, and promote gender equality. Organize MIL award programs to reward 'best practices' conducted by young media producers, journalists and librarians.

Long-term goals: To promote MIL

Key subjects: Teacher's "Union", Librarian's "Union", Library Associations

Strategies / Tasks: Create and support MIL school and extracurricular programs for children, youth and gender equality. Encourage the exchange of 'best practices' - knowledge, skills and activism - between teachers and students of media and information literacy, using workshops / seminars.

Long-term goals: Better communication between government and citizens

Key actors: Other relevant agencies / bodies

Strategies / Tasks: Seek institutional support for government bodies and programs that improve MIL without compromising professional independence.

Media literacy is one of the key competencies for living and working in a digital and mediated world, which is rapidly changing and constantly evolving, as well as for civic activism and participation in social and democratic processes. Therefore, a responsible and strategic approach to media literacy policy should be a priority in every society.

This applies not only to the regulatory body but also to all actors, as it is extremely important to monitor how media literacy is approached in other countries, compare and collect best practice, follow various surveys and research on media literacy, develop international projects and encourage cooperation with partners from other countries. Gathering actors at the national, local, regional and international levels and cooperation with them is a way to

work effectively on media literacy, because actors gain more information, gain knowledge and different perspectives, as well as opportunities for cooperation and development of media literacy.

2.9 Slovenia

In Slovenia, the most important regulation in the field of media is the Mass Media Act (Zmed). In addition, the Audiovisual Media Services Act (ZAvMS), the Radio and Television Slovenia Act, the Slovenian Press Agency Law and the Slovenian Film Center Act, a public agency of the Republic of Slovenia. The importance of media literacy is mentioned in the ZAvMS. Article 11 of the Audiovisual Media Services Act (ZAvMS) states that the Republic of Slovenia, in accordance with the law governing the media, promotes media literacy relating to skills, knowledge and understanding that enable users to use media and audiovisual media services efficiently and safely. The legislation emphasizes the importance of the protection of children and minors and the protection of vulnerable social groups. In accordance with the law governing the media, the Republic of Slovenia encourages providers to gradually provide persons with visual or hearing impairments access to their services. Special protection is provided for children and minors. The benefits of children and minors take precedence over all other rights and judgments as Article 10 of the ZAvMS points out.

The Ministry of Culture, and within the Ministry Media Directorate, plays a key role in preparing regulations in the field of media. It plans and implements additional measures to protect the plurality and diversity of the media so that the population in the entire territory of Slovenia has access to sufficiently objective information from various sources. The Ministry of Culture plays a significant role in ensuring the realization of the public interest in the field of media in the Republic of Slovenia. It especially supports the creation, dissemination of program content intended for the deaf and hard of hearing, as well as blind and visually impaired, and the development of appropriate technical support and

infrastructure intended for this group. It keeps a register of media, in which basic data on the media in the Republic of Slovenia are collected. In the area of film and audiovisual culture, the Directorate's key task is to provide the conditions for the development of high-quality film, cinematography and audiovisual activities in all stages of the cinematographic chain, from development, production, promotion, distribution and screening to storage and protection of film heritage to film education. The Directorate's tasks also include the implementation of European directives in the area of audiovisual media and cinematography and the implementation of the policy of the Council of Europe in this field..

In formulating policy decisions, the Ministry cooperates with various experts in the field of media landscape, either in the framework of forming permanent commissions or through periodic consultations with stakeholders in the field of media policy making. Agencies and organizations established by the state, civil society organizations, private organizations operating on the market and interested individuals participate in the preparation of legislation during the public presentation of opinions. The history of the Mass Media Act (Zmed), for example, shows that the Slovenian Advertising Chamber, the Slovene Association of Journalists, Radio Alfa, the Slovenian Chamber of Commerce, Infonet media dd, Public Relations Society of Slovenia, the Association of Journalists and Publicists contributed to the public debate on the Media Act. SAZAS (collective management organisation for the protection and promotion of musical authors' rights in Slovenia), VTV Studio, the Association of Trade Unions of Slovenian Music Artists, the City of Ljubljana and the Association of Journalists and Publicists prepared comments on the draft legislation.

The government, any MP in the National Assembly, the National council or at least 5,000 voters, can propose laws in Slovenia. The National Assembly is the holder of legislative power in the Republic of Slovenia and is therefore the sole body in the country, which can adopt laws. Laws are adopted in the legislative procedure, which consists of multiple stages - from discussing a draft law to tabling amendments (modifications and supplements), voting

on the law, promulgating the law, or otherwise concluding the legislative procedure. The National Assembly adopts laws, which re-regulate individual areas of the society, while it may, by adopting an amendment to an existing law, amend or supplement a legal regulation of the already regulated social relations.

The Committee on Culture discusses draft laws, other acts, and issues relating to:
- creation and art
- culture and cultural development of Slovenia, Slovenian people and the national communities, and cultural heritage
- media
- Slovenian language
- field of the freedom of religion
- field of movies and books
- other issues dealt with by the competent ministry.

The Committee discusses EU affairs pertaining to its scope of work and European initiatives and proposals which do not arise from the documents of EU institutions and the Republic of Slovenia.

Before submitting a bill, the proposer of the law may propose that a preliminary hearing be held on fundamental issues and social relations, which should be regulated by law. The Collegium of the President of the National Assembly decides on the proposal. Preliminary hearings are held only in a working body determined by the President of the National Assembly, but not at a session of the National Assembly. The working body conducts a discussion based on a presentation of the situation in the area to be regulated by law and theses for normative regulation (text in the form of articles), which may contain several possible solutions. After the hearing, the working body adopts an opinion, which is

forwarded to the proposer. If a preliminary hearing has been held, the proposer must explain in the introduction to the bill how he took into account the opinion of the working body.

It should also mention public organizations that play an important role in the field of media in Slovenia. Public service providers in the media field or to say, in the field of information are RTV Slovenia (Radio and Television Slovenia) and the Slovenian Press Agency (STA). RTV Slovenia is a public institution of special cultural and national importance, also responsible for original audiovisual production, educational program content, children's and youth program and thus also for media education. The Multimedia Centre and information on websites and theme portals, mobile apps and the teletext complement the production of RTV Slovenija. Besides, the MMC covers subtitling for the deaf and hearing impaired.

The Agency regulates electronic communications market for Communication Networks and Services of the Republic of Slovenia. An independent body regulates and supervises the electronic communications market, performs tasks related to radio and television, and regulates and supervises postal services and railway traffic in Slovenia. The Agency's mission is to ensure effective development of communications networks and services that benefit the residents and businesses of the Republic of Slovenia. Other roles are to encourage competition, ensure equitable operation of the operators of electronic communications network and services, postal service providers, and transport services providers in the railway system, to ensure universal service provision, to manage the radio spectrum and numbering space, to regulate the content of radio and television programming and on demand audiovisual media services, and to protect user rights.

The Broadcasting Council (SRDF), as an independent expert body, gives opinions, proposals and assessments primarily to the Agency, and to a lesser extent to the Ministry of Culture. It consists of seven members appointed by the National Assembly based on public invitation.

The MIPI - Media and Information Literacy portal also operates within AKOSA. MIPI is a portal for the promotion of media and information literacy, with which AKOS wants to make the public aware of the importance of critical and thoughtful use of media content and information technologies. The operation of the media at the local level is also influenced by the decisions of Municipalities that decide on and implement the financing of Municipal media. Funding must be in accordance with applicable legislation, at the Municipal level it is necessary to adopt a strategic document in the field of media, in which the Municipality would determine the purpose and define the objectives of publishing a Municipal newsletter and funding programming in other media. Supervision over the regularity and efficiency of the operations of the Municipalities is carried out by the Court of Audit of the Republic of Slovenia in the part relating to the issuance of Municipal bulletins and publications in the media.

The Ministry of Education, Science and Sport is responsible for legislation in the field of media education as well as curriculum development. The National Education Institute of Slovenia, which is the central national research and development and counseling institute in the field of preschool education, primary education, and general secondary education, offers Ministry the necessary support. The institute has the following tasks a.) to prepare expert documents; b.) to set up system conditions; c.) to develop quality education; d.) to encourage and support professional development; e.) to monitor and evaluate novelties; f.) to develop good school practice together with kindergartens and schools; g.) to collaborate internationally; h.) to cooperate with Slovenian teachers and headmasters abroad; i.) other tasks in collaboration with the Ministry of Education, Science and Sport.

The Pedagogical Institute also plays a role in the adoption of legislation and policy decisions, and in the field of adult education the Slovenian Institute for Adult Education, which is the central public institution and umbrella institution for adult education in the Republic of Slovenia. Individual experts and researchers from the academic or professional environment

play a very important role in the development of content aspects of policies, legislation as concrete learning contents.

Various stakeholders participated in both the preparation of the Kindergarten Curriculum and Curriculum of primary schools. The Kindergarten Curriculum, which was drafted in 1999, set out the objectives to be considered in educating preschool children on media-related topics. Media content as part of various subjects is taught to students during the nine-year period of primary education.

2. Legislation governing media, media literacy and media education in MELIA countries

All MELIA countries have legislation measures in place governing the media sector. They range from fundamental constitutional provisions regarding free speech, to more specialized normative acts regulating media ownership, protection of vulnerable groups against hate speech or discrimination, and, in some (few) cases there are also regulations focusing on media education itself. In most post communist countries, there is a preoccupation with politicization of the media and censorship, both legacies of the former regime, and exploring ways for limiting their negative effects. For example, although there is no official policy for media literacy in Croatia, the Draft Law on Electronic Media reflects a concern with censorship and the importance of protecting minors in the context of abusive online content. Media literacy is also present in Croatia education reform proposals, mostly defined as digital literacy. In the Czech Republic, the concern with the communist legacy on media is most visible in terms of ensuring media pluralism and increasing standards of media literacy.

In Germany, due to its federal structure, each state is responsible for its own legislation on media literacy, and multiple public institutions are involved in working on preserving media pluralism, fight hate speech and discrimination, develop media competences among the

population, and increasing the media literacy dimension existing in all types of education processes (formal, non-formal, informal). Although there is no general policy on media literacy in Germany and no strategic and harmonized concept of media literacy, the multitude of public institutions working on media literacy at all levels (state/federal) makes it a rather successful case (in comparison to other countries included in the project).

In the 2011 Fundamental Law of Hungary, freedom of opinion and freedom of press are enshrined, but MELIA experts consider that media literacy in schools is not optimal and significant training of teachers needs to take place if media competences are to be acquired by pupils. In Romania, the National Audio-Visual Council is the institution responsible for monitoring and penalizing instances of hate speech and for raising awareness on media education. Its mandate is based on the 2002 Law 540 of the Audiovisual. The 2011 Law on Education is also an important normative act for media literacy, since it identifies eight competences that children/youth need to acquire, and two of them can be related to media education and literacy, namely digital competences and social and civic competences. In 2019, digital competences were once again reaffirmed and strengthened, but there is no media literacy competence per se as of yet. The same approach based on fundamental competences can also be found in Serbia, where in the 2012 Education Development Strategy media education and literacy are implicitly assumed. In 2013, the National Education Council adopted guidelines for improving the role of information and communication technologies in education and identified eight literacies in the media environment. Be that as it may, there is no clear public policy or strategy for media and information literacy in Serbia (it is mostly at discourse level and connected to Serbia's EU integration efforts), where fears of media politicization are pronounced in Serbia as well. In addition to the fundamental rights and freedoms enshrined in the Slovenian constitution, the 1994 Mass Media Act is the most important legislative measure governing the media landscape. It was amended in 2001 by introducing an anti-concentration stipulation and in 2006 by introducing the right of correction. Two additional important legal documents are the Radiotelevision Slovenia Act of 1994 and the Audiovisual Media Services Act of 2011.

2.1 Bulgaria

Mass media are independent in Bulgaria according to the Constitution. In reality, the National TV and the National Radio are state property and therefore are under state control. The printed media are legally not controlled. There is no legislation for this purpose. Both the state-owned and the numerous private TV and radio stations are subject to regulation by the Council of Electronic Media. It is an independent public body. It is well-known that all mass media in the country have to cope with strong economic and political pressure.

The legislative base of the electronic media is the 1998 Radio and Television Act[22], which is the subject of numerous and continuing amendments. The EU 2007 Audio-visual Media Services Directive was transposed in Bulgarian law in 2010, including the requirements for cultural diversity. A law was adopted in 2014 to restrict media ownership from offshore tax Haven-based companies.

The Bulgarian media are ranked as "partly free" in the annals of Freedom's House and Reporters without borders. Due to cases of soft censorship by the authorities, international agencies conclude about constraints on the freedom of expression. The soft censorship includes control on positions for journalists, on grants, limiting access to information sources and TV or radio broadcasting, etc. Transparency on media ownership is pure. The concentration of media in terms of ownership and the audience is high. There is no clear regulation of TV and radio in this respect. There is no regulation of this type for printed media indeed. In practice, suspicious capital entering the media cannot be prevented. The advances in the liberal media regulations notwithstanding, Bulgaria has the lowest

---

[22] State Gazette No. 138/24.11.1998

standards of press freedom in Europe and is ranked 111th globally in terms of press freedom for a third consecutive year in the Reporters Without Borders annual edition of the World Press Freedom Index, which called the country "the black sheep of the EU"[23].

There are two amendments to the Radio and Television Act. One of the bills reads that at least 1/3 of the music content in radio and television programs must be intended for Bulgarian music. The second bill envisages registration of the sites and platforms in Bulgaria's Electronic Media Council.

The Radio and Television Act (March 2020) provided for the inclusion of the internet environment in the scope of the Act and provided for the Council for Electronic Media powers to exercise control for prevention and restriction of disinformation in the internet environment. This control included powers to announce that a given website spreads disinformation across the internet and to require a specific court in the country to order all providers of electronic communications networks and services to discontinue the access to the website. The Radio and Television Act also provisioned the registration of all media services providers who had intentions to provide said services online. The Radio and Television Bill defined disinformation in an internet environment as 'spreading in social media, internet sites or in another way in internet environment via websites accessible on the territory of the Republic of Bulgaria, of a publication that contains false information that affects natural or legal persons.' The parliamentary Culture and Media Commission rejected the Radio and Television Bill.

With the introduction of the provisions of the Audio-visual Media Services Directive in the Bulgarian legislation, provisions are envisaged that regulate the coordination of the media

---

23 Gotev, Georgi (2020) Bulgaria 'black sheep of the EU': World Press Freedom Index. *The Capitals Newsletter*, April.

literacy policy in Bulgaria. Art. 33a of the Law on Radio and Television, adopted on December 17, 2020.

According to Art. 33a. (New, SG No. 109/2020, effective 22.12.2020) (1) the media literacy policy shall contain measures for the development of skills and knowledge that enable citizens to:

1. Make informed choices about the media content and the media services;

2. Use the media services and the media content in a safe way;

3. Create media content and to participate responsibly, ethically and effectively in the various forms of communication.

(2) The Minister of Culture:

1. Initiate and manage the activity for preparation of a national policy for media literacy;

2. Report to the European Commission on the implementation of media literacy measures.

(3) The Electronic Media Council shall work for the development of media literacy in cooperation with a wide range of stakeholders, including the Ministry of Culture, the Ministry of Education and Science and other public authorities, media service providers, academia, organizations of civil society and consumers, such as:

1. Participate in the preparation of a national policy for media literacy;

2. Collect information regarding the participation of the media service providers and the platforms for sharing videos in the implementation of the policy under item 1, analyses the results and undertake updating of the policy every three years;

3. Prepare an annual report on the implementation of the policy as part of the report under Art. 39[24].

2.2 Croatia

While media freedom, media ownership, media pluralism, and media regulation in general are covered in by various legal acts, media literacy still lacks an official strategy. Currently, the importance of media literacy is mostly seen through various projects oriented towards the school system, teacher training and the introduction of media literacy programs as part of the cross-curricular theme in the proposed curricular reform.

LEGAL REGULATIONS

Existing laws related to the media are primarily the Law on Media, the Law on Electronic Media and the Law on Croatian Radio and Television. In addition, to Articles 3 and 14 that guarantee the fundamental freedoms of citizens, Article 38 of the Constitution of the Republic of Croatia explicitly emphasizes the freedom of the press:

"Article 38

Freedom of thought and expression is guaranteed. Freedom of expression includes, in particular, freedom of the press and other means of communication, freedom of speech and public appearance, and the free establishment of all institutions of public communication. Censorship is prohibited. Journalists have the right to freedom of reporting and access to information. The right to correction is guaranteed to anyone who's right established by the Constitution and the law has been violated by public news. "

1. MEDIA FREEDOM

Article 3 of the Law on Electronic Media on items 1 and 2 guarantees the freedom of electronic media. This is in line with the Law on Croatian Radio and Television (HRT, which is a publicly funded broadcasting network), where General Provisions, Article 1, items 4 and 5 prescribe the independence of HRT and are in compliance with the Law on Electronic Media. The Law on Media defines freedom of expression and freedom of the media in more detail in the General Principles and guarantees the independence of the media:

„II. GENERAL PRINCIPLES

1.   Freedom of the media Article 3

(1)   Freedom of expression and freedom of the media are guaranteed.

(2)   Freedom of the media includes in particular: freedom of expression, independence of the media, freedom to collect, research, publish and distribute information in order to inform the public; pluralism and diversity of the media, freedom of flow of information and openness of the media to different opinions, beliefs and for various contents, availability of public information, respect for the protection of human personality, privacy and dignity, freedom of establishment of legal entities for public information, printing and distribution media from the country and abroad, production and publishing of radio and television programs, as well as other electronic media, autonomy of editors, journalists and other authors of program content in accordance with the rules of the profession.

(3)   Freedom of the media may be restricted only when and to the extent necessary in a democratic society for the interests of national security, territorial integrity or public order, prevention of disorder or criminal offenses, protection of health and morals, protection of reputation or rights of others, prevention disclosure of confidential information or for the purpose of preserving the authority and impartiality of the judiciary only in the manner prescribed by law.

Article 4

(1)   No one has the right to influence the program content of the media by coercion or abuse of position, nor in any other way to illegally restrict the freedom of the media.

(2)   The court shall decide on violations of freedom of expression and freedom of the media. "

2.   MEDIA OWNERSHIP AND PLURALISM

Articles 52 and 53 of the Law on Electronic Media regulate public ownership of the media. Pluralism of the media is regulated by articles 54 to 62 of the same Act and by the Fund for the Promotion of Pluralism and Diversity of Electronic Media (articles 63 and 64). The

Agency for Electronic Media and the Council for Electronic Media define the criteria for granting concessions for the provision of television and radio media services, among which it is important to single out the criteria of quality and diversity of audiovisual and / or radio programs.

3. DISCUSSION ON THE DRAFT NEW LAW ON ELECTRONIC MEDIA

On 12 November 2020, the Ministry of Culture and Media submitted to the Government of the Republic of Croatia a draft law on electronic media. In the assessment of the situation, it is stated "in the territory of the Republic of Croatia, in addition to Croatian Radio and Television, there are 26 television broadcasters broadcasting 29 programs, 138 radio broadcasters broadcasting 149 programs, while the number of providers of electronic publications is 276 with 336 electronic publications. There are also 59 media service providers broadcasting via satellite, cable and the Internet with 96 programs and 12 on-demand service providers with 14 services."

The public debate on the new law and criticism of the proposal was provoked by the issue of publishers' responsibility for user-generated content, which part of the public saw as potential censorship. Another criticism of this proposal is that in a way the responsibility is transferred from the author (in the case of comments it is a private person) to the publisher, where then any punishment or lawsuit would be moved from the real offender to the publisher. The Minister of Culture and Media Nina Obuljen Koržinek announced the results of the public debate. She stated that a large number of objections to the draft Law on Electronic Media were taken into account and announced that the draft law would be included in the Government session, which would refer it to the parliamentary procedure. She also stressed that text enhancement is an open option. It was stated that the law brings transparency provisions relating to the ownership and financing of media.

Regarding the problematic part of the draft, the Minister further clarified that the legally regulated obligation and responsibility of publishers for the content created by users already

existed, and was already defined. This obligation was also emphasized in the case of protection of minors, prohibition of sharing pornographic content or juvenile pornography, and according to the Minister, the draft of the new Law defines these obligations more precisely, which, if clarifications and definitions are precisely stated, should not add to censorship but rather facilitate the legal proceedings in case of violations. The penalties in the new Law should not be changed in any way in relation to the previous penalties (Articles 82 and 83 of the Law on Electronic Media, misdemeanor provisions). The Electronic Media Council (VEM) will continue to decide whether the offense will result in a reprimand or a penalty and whether it will be referred to the courts.

POLICIES

The digital transition of society and economy is one of the strategic goals stated in the Draft Proposal of the National Development Strategy of the Republic of Croatia until 2030, where the priorities for policy implementation in the field of education and training and work in a digitally transformed society are, amongst others:

• increasing the number of highly educated ICT professionals entering the labor market;

• support for secondary and higher education for jobs in the digital society;

• raising the level of basic and advanced digital skills of citizens for active participation in the digital society.

From the strategic plan of the Agency for Electronic Media, it is important to single out regulations within the legislative framework of the Republic of Croatia and the EU legislative framework, relevant conventions, strategies, program and membership in international organizations and international projects. In addition to the Digital Television in Southeast Europe project, the Agency, in cooperation with the Croatian Academy of Sciences and Arts and Croatian Studies, organized several international scientific conferences concerning media literacy. In the fall of 2017, the international project EU Kids Online was launched, a

research project in which AEM participates as one of the main partners. It is the largest European project in the field of children's research and the Internet, and a project that the EU has declared a priority in this area. The project will conduct a global survey "Children and the Internet - a national survey on child safety on the Internet", which is a key prerequisite for determining the current situation and implementing further activities regarding media and digital literacy of children, as well as considering the regulatory framework.

The Strategic goals of the Agency for the period 2017-2020 for media literacy, are proactive influence on future amendments to the Electronic Media Act and participation in the creation of a new media strategy of the Republic of Croatia, active participation in international regulatory groups, continuation of media literacy development and advocacy activities and adapting the Fund's technical platform with the aim of improving the user experience.

Media literacy is the focus of various projects primarily oriented to the education system. Although there is no official policy for promoting media literacy, the importance of media literacy is emphasized in the education reform proposal. Media literacy is not currently treated as a separate subject, but as an interdisciplinary topic, along with informatics (compulsory or elective, depending on the level of education). The curriculum of the cross-curricular topic states that the thoughtful use of information and communication technology in learning and teaching contributes to the digital literacy of students. The introduction of new pedagogical approaches, the application of technology and better availability of quality digital educational content enables students to master the basic skills needed to live and work in the 21st century. Following the latest research in the field of digital literacy (PISA 2012, ICILS 2013 and EU Kids online 2014), and taking into account the necessity of using technology, special attention is paid to educating children and youth to use digital technologies responsibly and independently.

It was also pointed out that the four domains of this cross-curricular topic are interconnected and are being built on top of each other in order to ensure the systematic development of general digital literacy for children and young people.

Domains can be easily linked to the contents of different subject areas and other cross-curricular topics. In some components, they overlap, but each domain has its own characteristics and affects the development of specific knowledge, skills and attitudes associated with the use of technology. They are functional and responsible use, communication and collaboration, research and critical evaluation and creativity and innovation in the digital environment.

Many key contents were extracted, such as the use of ready-made educational content to support learning, the use of simple computer programs and applications for education, the use of educational content "Five for net curriculum", safe and responsible use of technology and others.

The eSchool project was launched with the general goal to contribute to the digital transformation of teaching and business processes in the education system by raising the digital maturity of schools. The specific objectives of the project are to improve the strategic management of the school in the field of raising digital maturity and to improve the digital competencies of educators and other school employees.

As a part of the Erasmus+ eTwinning project, the group "Media Literacy and Misinformation" was launched on 9 February 2021. The aim is to share the examples of practice, discuss teaching and learning methodologies and find support for professional development. Various materials and teaching support materials for teachers will be available on the group. Furthermore, registered "eTwinners" can join online events that take place within the group. The group will also provide materials for the spring campaign and the eTwinning weeks in

2021, with the goal of remaining active and constantly updated with new resources. In 2021, eTwinning will promote media literacy and the fight against misinformation through the "Media Literacy and Disinformation" campaign, which started on 1 March and ran until 5 April 2021.

In January 2010, a survey was conducted on the experiences and attitudes of children, parents and teachers towards electronic media. The results of the research were collected within the school program "Break the Chain!" aimed at the prevention of electronic violence among children. The research included 5,215 students aged 10 to 15, 2,484 parents and 759 teachers, and showed that students use the Internet more than adults, most often for fun, correspondence do and socializing.

In 2014, UNICEF and the Electronic Media Agency (AEM) conducted a survey on television viewing habits among children and youth. Parents answered questions about the habits of 1561 children. Parents estimate that the majority of children, 56 percent, spend one to three hours a day in front of the TV, and about half of that time without adult supervision. With the message "Let's choose what we watch", the Agency for Electronic Media and UNICEF launched a national campaign to raise awareness of media literacy. The aim was to raise awareness of the importance of media literacy for parents, guardians and children and the importance of choosing media content for children.

Citizens' awareness of the importance of children's media literacy, as well as media literacy in general, is shown by the fact that 81 percentage of citizens believe that children are not taught enough media literacy, and that they rate their own media literacy with 2.8. of 5, which is the result of a survey conducted in 2018.

UNICEF and the Agency for Electronic Media are also organizing Media Literacy Days, which in 2019 focused on critical thinking, tolerance and fake news. As part of the 2nd Media Literacy Day, more than 180 events were held in Croatia with the aim of informing and

educating about media literacy, and the program "Children get to know the media" was already underway, which gave primary and secondary school students the opportunity to learn first-hand how the media functions.

The importance of greater involvement of topics of media literacy and in Croatian schools was discussed on 18 January 2016 at the round table organized by the Society for communications and media culture (DKMK) in cooperation with the Office of Education, Culture and Sports of the City of Zagreb and Administrative Department for Preschool, education and sports of the City of Velika Gorica. The round table was opened by the President of DKMK and Professor of Communication Studies at the Croatian Studies at the University of Zagreb, Danijel Labaš, who said that the Society wants to contribute to, support curricular reform, and strengthen media education in schools. He stressed that the focus should be on children, youth, and their habits of using traditional and new media. Igor Kanižaj from the Faculty of Political Science, University of Zagreb compared the media literacy in other countries and said media literacy in schools should be approached by learning from the positive examples of other countries that have positive experiences and results, such as Finland and the United Kingdom.

In order to promote media literacy in schools more successfully, additional professional development of teachers and teaching associates is needed. Therefore, different Ministries, groups and associations are organizing various conferences, seminars and webinars.

The project "Children of the Media", the main project of the Society for Communication and Media Culture was created on the basis of a joint initiative of the organizers and students of the Matica hrvatska School of Communication, which has been jointly organized since 2008 by Matica hrvatska, the Faculty of Croatian Studies and the Faculty of Political Science. The goal and purpose of the project "Children of the Media", the umbrella project of the Society

for Communication and Media Culture, is systematic education about the media, encouraging the development of aware users who understand and critically consume media content.

Another important project for the Company's communications and media culture is "Media education is important," which began to be implemented in October 2020, and will last 34 months. The project holder is GONG, and the partners are Society for Communication and Media Culture, IRMO, Pragma, Telecentar, Kurziv, Shadow Throwers, DOKKICA, Info Zone, Zlatna vrata Cultural Center and FER. The goal of this thematic network is to strengthen the capacity of civil society organizations for effective dialogue with public administration, social partners and higher education and research institutions in shaping and implementing reforms related to the development of media literacy as a new age literacy. The project contributes to networking for media literacy and includes public opinion research and needs assessments, scientific research on media literacy and its impacts on social inclusion and participation, social impact analysis, structured dialogues with decision makers to develop guidelines for public policy development and in the field of media literacy. The target group of the network is primarily youth and teachers and educators, but also all citizens and decision makers at the local, regional and national levels.

In addition to the focus on the education system, the importance of media literacy among adults has also been recognized. Therefore, the Agency for Electronic Media in cooperation with UNICEF, established the portal medijskapismenost.hr. From the very beginning, the portal's partners are the Academy of Dramatic Arts, the Faculty of Political Science, the Croatian Audiovisual Center and the Croatian Film Association, while in June 2019 they joined the Academy of Arts and Culture in Osijek, Department of Communication Studies, Department of Communication Studies, University of Dubrovnik, Faculty of Teacher Education, University of Zagreb, VERN 'Polytechnic and Edward Bernays College. In addition to materials intended for educators for media literacy classes, the portal also contains advice

for parents when it comes to the media and verified information on media education, as well as new trends and challenges of life in the modern age.

As for the use of the media itself, a survey conducted from November 16, 2020 to November 24, 2020, showed that 18.56% of respondents read daily newspapers, 10.73% read periodicals, 9.83% both periodicals and daily newspapers, and 60.88% of respondents do not read newspapers at all. 89.67% of respondents watch television, 59.88% listen to the radio, 77.33% use the Internet, and 58.98% use social networks. Among the newspapers, the most popular are 24sata, Jutarnji list, Gloria, Večernji list and Slobodna Dalmacija. The most popular TV stations are Nova TV, RTL Television, HTV1, HTV2 and Doma TV, and the most popular radio stations are HR1, Otvoreni radio, Narodni radio, HR2 and Radio Antena Zagreb. Among the portals, the most popular are 24sata.hr, index.hr, jutarnji.hr, vecernji.hr and slobodnadalmacija.hr.

2.3 Czech Republic

Regarding the print media, in the Czech Lands (before 1918) and Czechoslovakia, the media landscape was characterized by relative plurality. On the other side, the majority of influencing printed media was related to the political parties and related organizations. Next to the print media, in the interwar period the Radiojournal, the first Czechoslovak radio station, developed, since 1925 the Czechoslovak state became the main shareholder. The 1930s are usually reflected as the "Golden Age of radio". We have to mention also the importance of the Czechoslovak Press Agency (Československá tisková kancelář, ČTK), established at the same day the independent state was declared (28 October 1918). ČTK was the state agency producing all news for the Radio; furthermore, the Radiojournal resided in the ČTK´s building.

Since 1938, under different types of non-democratic regimes – authoritarian Second Republic (October 1938 – 15 March 1939), Nazi Germany occupation (15 March 1939 – 8 May 1945), pre-totalitarian regime of limited electoral democracy (Third Republic, May 1945 – 25 February 1948), and Communist dictatorship (1948 – November 1989) – the Czechoslovak media were subordinated to the government control including the censorship.

In 1945, the regime of the Third Republic banned the majority of right-wing political parties and the print media produced by these parties were eliminated. Since 1948, the Communist Party fully controlled all spheres including the media. Czechoslovak Radio was nationalized and became the monopolist broadcaster (the private radio station did not exist until 1990), the same process might be observed also in Czechoslovak television, established in 1957. The print media were mostly interconnected with political parties (Communist and satellite parties) and societal organizations (monopolist labor union, Army, Union of Socialist Youth etc.).

November 1989 and the beginning of democratic transition changed the situation dramatically. Already in 1990, we could observe the establishment of new print media owned by the private individuals and/or companies – next to the tabloid press (Špígl, Expres) also the first investigative journals were established (Reflex, Respekt). Nevertheless, we could also observe the last wave of establishment of the political parties printed (daily, monthly), established by the renewed or newcomer parties during the democratization and creation of the pluralist party system (Denní Telegraf, Republika etc.)

The network of private radios also developed quite rapidly – due to the technical limits, majority of the first wave private radios broadcasted only within the limited territory (regional radios). As regards the television, the situation was different due to the limited offer of frequencies. The first license for the private television (TV NOVA) was granted by the Czech Parliament in 1993 and the first broadcasting day of the TV NOVA was the 4 February

1994; for the purpose of broadcasting one of originally 3 licenses of the Czechoslovak (since January 1993 Czech) TV was selected.

The legal determination of the mass media in Czechoslovakia in 1989 – 1992 was limited by the complicated discussion about the new constitution in the situation of federal state and minority veto right of both constitutive nations – Czech and Slovak. Maybe also this matter of fact caused that the mass media and generally the issues related with the news production and distribution through the media is not mentioned neither in the Czech Constitution (the Constitutional Act 1/1993, The Constitution of the Czech Republic from the 16 December 1992), not in the Charter of Fundamental Rights and Freedoms (Constitutional Act 2/1993) that presents the integral part of the Constitutional order of the Czech Republic. In the later Act we can find the article 17 as the part of the second part ("Political Rights"), where in paragraph 3 it is mentioned that "Censorship is inadmissible" and in the previous paragraph we can read that "Everyone has the right to express his/her opinions by word, writing, print, picture or other means, as well as freely search for, adopt, and distribute ideas and information despite the state borders".

The above-mentioned situation does not mean that media and generally the free production and distribution of news was not an important part of the public and political debate in the Czech (and Czechoslovak) Republic. The legal framework for the print media and private radios immediately after 1989 was presented by the amended and changed legal acts from the non-democratic period. Furthermore, in both spheres we could observe the dynamic liberalization and development ("what is not prohibited is allowed"). The main issue for the legislative debate and regulation became the issue of state media – The Czechoslovak Television, The Czechoslovak Radio, and The Czechoslovak Press Agency.

As regards the Czechoslovak TV and Radio, two important impulses for the debate might be observed within the discussion about the new legal framework. Firstly and primarily, the

generally shared opinion that both state media must be – not only because of the experience of the Communist totalitarian control and censorship above them – transformed into the public media. Secondly, the crisis of the federal framework presented an important impulse for the debate about the share of competences and duties between the federal level (Czechoslovak TV, Czechoslovak Radio). As the result of these debates, two important laws were adopted by the Czech National Council (Česká národní rada, ČNR – the parliament of Czech Republic as the constitutive part of the Czechoslovak Federation): Act on Czech Television (Zákon o České televizi no. 483/1991) and Act on Czech Radio (Zákon o Českém rozhlasu no. 484/1991), both adopted on 7 November 1991 with the validity since 1 January 1991. Both acts reflected similar activities of the Slovak Nation Council and new legislation adopted in mid-1991. Based on the agreement between the Czech and Slovak political actors, the Czechoslovak TV and Radio continued as one TV program unit and one radio program unit; the content was produced in the cooperation of Czech and Slovak TV/Radio. In the case of Czechoslovak Radio, also the foreign broadcasting in Czech language was ensured as "federal".

Both the Czech TV and Czech Radio were created with the new Acts as public media. As the most important bodies ensuring the independence of both mass media from the political influence the Councils were included into both documents – the Council of Czech Television with 15 members, as well as the Council of Czech Radio with 9 members; in both cases the members of the Council are elected for 6 years. As regards the nomination of candidates, in both Acts it is declared that "The proposals of the candidates for the Council membership are propounded to the Czech National Council (since 1993 to the Chamber of Deputies of the Czech Parliament) by the organizations and associations representing the cultural, regional, social, labor, employers, religious, education, scientific, ecologic and ethnic interests". From the membership the representatives of executive, legislation, courts, and state agencies are excluded, as well as relatives of the persons that are holders of paid functions in the Czech

TV/Radio. One person cannot be a member of more than one Council (TV, Radio or Czech Press Agency).

All members of the Councils are elected in the Chamber of Deputies. Despite these relative strict limitations, since the very beginning we could observe the endeavor of political parties and other political actors to install as the members their supporters and/or collaborators (often former party members, persons related with the party think-tanks, candidates representing formally established NGOs related with the political actors etc.).

Repeatedly, there was political pressure on the Directors of both public media, including also the public protests against the attempts to politically interfere into the activities of Czech TV/Radio. Specifically, we have to stress that Czech TV and Czech Radio are not supported directly from the state budget, but primarily financed from the license fees paid by the owners of TV or Radio receivers (individuals and families, as well as hotels etc.)

Next to both above-mentioned public media, also the Czechoslovak Press agency was transformed into the new public medium in November 1992 with the Act on Czech Press Agency (Zákon o České tiskové kanceláři no. 517/1992). In addition, in this case, the Council is elected by the Parliament (7 members for 5 years). Since 1996, the Agency is financed from the state budget. Nevertheless, any type of the license fees was introduced, so the Agency behaves as the business-firm.

While the three internal Councils take care of regular financial operation, election of the Director of respective public mediums, respect to the objectivity, independent and balanced presentation of all relevant opinions and information, and respect to the minority stances, the main regulatory body was created by another legal act. In the last period of the Czechoslovak state's existence at the federal, as well as at the domestic Czech level the Councils for Radio and Television Broadcasting was established. The federal Council was

created and defined in November 1991 with the Federal Act on the running of the Radio and Television Broadcasting (Zákon o provozování rozhlasového a televizního vysílání no 468/1991). At the Czech national level, similar Council was created in March 1992 with the Act on the Council of Czech Republic for Radio and Television Broadcasting (Zákon o Radě České republiky pro rozhlasové a televizní vysílání no. 1031992).

The law defined the Council (RRTV) as the body that primarily co-formulates the state policy on the broadcasting and its development; 2) comments on the awarding and drawing of licenses; and many duties regarding the cooperation with the Federal Council. Generally, it was discussed and expected that the Council will support the public interest in promoting freedom of expression and right on information, support the plurality of broadcasting within the created dual system (public and private media), as well as the development of domestic and European audiovisual production. The Council has had 13 members elected for 6 years; the prerequisites for the candidates were defined similarly as in the case of the public media councils. As the main legal act, the Council operated with we have to mention the Federal Act on the running of the Radio and Television Broadcasting that was implemented also during the first years.

The plethora of legal acts organizing the radio and television broadcasting was partly rationalized with the novelization of the acts on Czech TV, Czech Radio, on the Council for Radio and Television Broadcasting and other laws (Law no. 301/1995). In this law, we can find the stress on the national background of TV and Radio broadcasting (the broadcaster was newly obliged to have a permanent seat in Czech Republic). Important decision regarding the Council for Radio and Television Broadcasting gave to this body the exclusive competence to grant the licenses for broadcasting (§ 10, Article 3). The Council could decide that the information about the program structure presented by the applicant is fully or partly binding (§ 12, Article 2) – such an amendment was a clear reaction to the performance of TV NOVA that offered extremely different content than previously promised.

The decisive legal regulation of Czech media was prepared around the millennium, also in the response on the continued Europeanisation of the country and preparations on the EU-membership. Firstly, the Act on Press (Zákon o právech a povinnostech při vydávání periodického tisku a o změně některých dalších zákonů no. 46/2000) was adopted in 2000, one year later than the new Act on the running of the Radio and Television Broadcasting (Zákon o provozování rozhlasového a televizního vysílání a o změně dalších zákonů no. 231/2001). The later legal act newly and more precisely defined also the rights and duties of the Council for Radio and Television Broadcasting (RRTV). All activities of the RRTV are defined in the second part of the amended act. Specifically, we have to mention the § 5 ("Scope of Authority of the Council"), article m: "(The Council) participates with her attitudes and proposals for the creation of the principles of the state policies of the Czech Republic in the relation to the broadcasting and its development conception in the relation to the increasing of the media literacy standard". In the § 6 ("Council´s Duties") there is declared that next to other materials, the RRVT annually presents to the Chamber of Deputies also the "information about the media literacy quality in the relation to the new communication technologies and about the measures for the support of the media literacy adopted by the radio and television broadcasting operators, operators of the adopted broadcasting, operators of audiovisual media services in demand and auto regulative authorities". Such adjustment made the RRTV the most visible authority responsible for the media literacy issues, next to the Ministry of Education.

The real activities of the RRTV depend on the actual composition, as well as on the preparedness of other important authorities (see more in the part 7 of this analytical report). From the important activities, we have to stress the repeated surveys on the media literacy (extensive surveys are conducted approximately each 5 years – 2011, 2016, and 2021) and recommendations for the public media as well as other institutions to implement the program and education units oriented on strengthening media literacy quality. Visible were for example the TV campaigns aiming on strengthening the parent's responsibility for the

selection of media content, as well as program units presenting the negative impact of fake news on the young people. In cooperation with RRTV, the Czech TV presents annual seminars for the teachers about media education recognized also by the Czech Ministry of Youth.

Regarding the legal framework of the media regulation in the Czech Republic, we have lastly mention the Act non audio-visual media services on demand and about the amendment of other laws (Zákon o audiovizuálních mediálních službách na vyžádání a o změně některých zákonů no. 132/2010) that implements the Directive 2007/65/EC of the European Parliament and of the Council of 11 December 2007 amending Council Directive 89/552/EEC on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the pursuit of television broadcasting activities.

2.4 Germany

The media today is often referred to as a "fourth power", alongside the legislature, the executive and the legislature in democratic countries, to emphasize their great influence on the political system despite not being a formally institutionalized "power". The Official Journal of the European Union describes media as "the most visible and familiar "power" of all" (Official Journal of the European Union 2006, p. 168).

How media is legally framed in Germany and which relevant policies are relevant in this regard, is the subject of the following analysis. As Germany is a federal republic (see Sturm 2013) what may entail different legal frameworks and policies regarding media in the 16 *Länder*, the present review and analysis will focus on some aspects of the situation in Bavaria as it is the location of the German project-partner and as the state that includes by far the largest and most significant part of the German Danube region.

Freedom of Media

The freedom of media in Germany is a fundamental right enshrined in Article 5 ("Freedom of expression, arts and sciences") of the German Basic Law (constitution) from 1949, together with the freedom of expression, the freedom of broadcasting and the freedom of information:

"(1) Every person shall have the right freely to express and disseminate his opinions in speech, writing and pictures and to inform himself without hindrance from generally accessible sources. Freedom of the press and freedom of reporting by means of broadcasts and films shall be guaranteed. There shall be no censorship."[25]

Despite censorship being outlawed, Article 5 of the German Basic Law however, also provides restrictions regarding the freedom of media, the freedom of expression, the freedom of broadcasting and the freedom of information:

"(2) These rights shall find their limits in the provisions of general laws, in provisions for the protection of young persons and in the right to personal honor."[26]

The freedom of media in Germany is therefore subject to restrictions regarding the protection of minors and young persons (*Jugendschutzgesetz*, Protection of Young Persons Act) (e.g., in the form of age restrictions for movies and games), the right to personal honor and other general laws. The phrase "general laws" refers to laws protecting a superior right in cases of conflict, e.g., the right of reply for individuals or treason which then also justifiably restricts the freedom of media.[27]

Furthermore, Article 5 of the German Basic Law reads as follows:

---

[25] Basic Law for the Federal Republic of Germany, Art. 5 (1)
[26] Basic Law for the Federal Republic of Germany, Art. 5 (2)
[27] Duden Recht A-Z. (2015). Fachlexikon für Studium, Ausbildung und Beruf. Berlin. Lizenzausgabe Bonn: Bundeszentrale für politische Bildung. (Available at: https://www.bpb.de/nachschlagen/lexika/recht-a-z/) Accessed: 21 January 2021.

(3) Arts and sciences, research and teaching shall be free. The freedom of teaching shall not release any person from allegiance to the constitution.

The German Basic Law is the constitution of the Federal Republic of Germany and was the constitution of West Germany before the German reunification in 1990. It was drafted and adopted by the Parliamentary Council, the West German constituent assembly in Bonn on 23 May 1949 by order of the allied victors of World War II. The main purpose of the Council was the drafting of a new constitution for Germany and thereby especially acknowledging lessons learnt from the failure of the Weimar Republic that paved the way to the rise of National Socialism. The result was a constitution establishing a federal state based on a representative parliamentary democracy, welfare and the rule of law (*Rechtsstaat*). Human dignity was declared inviolable and the protection of it as the duty of all state authority.

Therefore, the German *Grundgesetz* understands democracy and rule of law as protecting inalienable, individual rights. This is a strong contrast to an understanding of democracy as the rule of the majority (or for that matter a class) against individual rights. These can be restricted and framed, but not to the degree that they cannot be exercised in their core. The constitutional court has a very strong role in the constitutional framework and has restricted lawmakers wherever it felt that laws made by the majority violated individual rights.

Ownership of Media

The German media landscape is divided into print media (newspapers, book, publishing, magazine publishing), audiovisual media (radio, broadcast television, multichannel TV platforms, video portals, films), telecommunications media (wireline and wireless telecom), and Internet media (Internet Service Providers, search engines, online news market, Internet portals).

Regarding audiovisual media, the dozen public service broadcast institutions are the most important players, which are organised in the broadcasters ARD (*Arbeitsgemeinschaft der Öffentlich-Rechtlichen Rundfunkanstalten Deutschlands*, working group of the public service broadcasters in Germany) including branches that are regionally organised and broadcasted and ZDF (*Zweites Deutsches Fernsehen*, Second German TV Channel). Even if these institutions are organised within a public service broadcasting system, they are not "state media" in the sense that they are bound to governmental instructions (*Anstalten des öffentlichen Rechts*). They are public, not state media.

They are institutions, supervised by independent broadcasting and television boards (*Rundfunk- und Fernsehräte*), consisting of members of the state governments and state parliaments as well as delegates of relevant social groups (e.g. Catholic and Protestant church, Jewish religious community, employer's and employee's associations). In addition, the public service broadcasters are not profit-oriented but fulfil a social function (see bpb 2017a).

The 14 state media authorities of the German states (*Länder*) (*Landesmedienanstalten*) set the policy framework and monitor especially the private broadcasters. Some large print publishers have also successfully established a substantial role in television like Bertelsmann Company with RTL (*Radio Télévision Luxembourg*) and Axel Springer Verlag AG with Sat1 and ProSieben.

This dual public-private broadcasting system mainly goes back to a decision of the German Federal Constitutional Court in 1981 that also enabled the establishment of commercial programs in TV; alongside with the already existing public service broadcasters (see bpb 2017b). The dual system also regulates the concentration of media, ensuring that no single company is in charge of more than 30% of all TV audiences. Regarding telecommunications media, the most important players are Deutsche Telekom, Vodafone and Telefónica. Besides

the already mentioned internationally active Bertelsmann Company based in the German city of Gütersloh and the Axel Springer Verlag AG, are the also internationally active companies Hubert Burda Media, Bauer Media Group and Holtzbrinck Publishing Group. . Since 2020, the majority of the shares of Axel Springer Verlag AG, home of the most important und influential tabloid newspaper "Bild", is owned by the US-American holding company KKR.

Like already mentioned before, the state media authorities (*Landesmedienanstalten*) supervise and control private broadcasting regarding youth media protection and legal requirements (ensuring the diversity of opinions, violations of rules on advertising and tracking of glorification of violence, incitement of the people).[28]

Because of the freedom of broadcasting, embedded in the *Grundgesetz*, the state is not allowed to directly or indirectly influence broadcasting, which is why media regulation is organised independent from the state.

Digital platforms have been increasingly included in the supervision in recent years.[29] The Interstate Media Treaty (*Medienstaatsvertrag*), implemented in 2020, for example, "mandates that so-called media intermediaries like social networks have to fulfil obligations regarding transparency, non-discrimination and the labelling of social bots. The Network Enforcement Act (*Netzwerkdurchsetzungsgesetz* of 2017) also takes aim at tightening the social networks' obligations to tackle hate speech online more effectively. The law for the protection of minors is also to be adjusted to protect against online harms more effectively.

---

[28] die medienanstalten (not dated): Medienkompetenz. (https://www.die-medienanstalten.de/themen/medienkompetenz). Accessed: 08 February 2021.

[29] Holznagel, B. and J. Kalbhenn. (2020): Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019 – Country report: Germany, p. 7. (Available at: https://cadmus.eui.eu/bitstream/handle/1814/67803/germany_results_mpm_2020_cmpf.pdf?sequence=1&isAllowed=y). Accessed: 25 January 2021.

Other new legislation concerning the media comes from EU legislation (e.g. Copyright directive, AVMS-directive)."[30]

Regarding the popularity of media in Germany in general, it can be said that according to the Centre for Media Pluralism and Media Freedom, in 2015 the most accessed media channels were television and radio. While 84% of the population watch television every day, 69% daily listen to radio. 57% of the population used the Internet on a daily basis; while print media was daily consumed by 56%.[31]

In 2020, the most popular media channels are still television and radio. However, the time spent watching TV decreased in recent years, while the time spent listening to radio programs remained constant.

The amount of people using the Internet steadily grew over the last two decades. In 2020, 66 million people use the Internet at least infrequently, which corresponds to approximately 80% of the German population.

The biggest decrease can be recorded in the consumption of magazines and journals, and also the amount of people never reading newspapers reached an all-time high with 8,5 million people in 2020.[32]

Concerning the popularity of specific media programs in Germany, it can be stated that regarding television, the most popular television channels remain the public service channels (*öffentlich-rechtlich*), despite the many available private channels. According to a

[30] Ibid.
[31] Schulz, Wolfgang, H.-D.Schroeder, and K. Dankert. (2015): Germany. (https://cmpf.eui.eu/mpm-2015/germany/). Accessed: 25.01.2021.
[32] Weidenbach, B. (2020): Mediennutzung in Deutschland. (https://de.statista.com/themen/101/medien/#dossierSummary__chapter5). Accessed: 25 January 2021.

video research institute, the regional programs by ARD (working group of the public service broadcasters in Germany) were the most popular with 14,7% of the spectators, while the ZDF (Second German TV Channel) was watched by 13,4% of the viewers. The nationwide channel ARD was watched by 12,1%, whereas the private channels RTL and SAT 1 were watched by 7,5% respectively 5,4% of the audience.

As already stated above, the time spent watching TV decreased in recent years despite still high audience ratings. The reason for that is the increasing popularity of streaming services. Especially in the age group of the 14 to 29-years olds streaming becomes more and more popular (67% watch streaming services weekly), while only 23% in the age group of 50 to 60-year olds consume streaming services on a regular basis.[33]

Regarding the popularity of radio stations, recently conducted surveys have shown that *radio NRW* (Radio North Rhine-Westphalia), *Bayern 1* (Bavaria 1) and SWR3 (Southwest German Radio) were the most popular in 2020 (see Weidenbach 2020b). While *NRW* is the main program for 45 local radio stations and a private radio station, *Bayern 1* and SWR3 are public service channels (*öffentlich-rechtlich*).

The most read newspapers in Germany in 2019, were the daily tabloid BILD-Zeitung of the Axel Springer Verlag, the left-liberal daily newspaper *Süddeutsche Zeitung* (South German Newspaper) and the centre-right, liberal-conservative daily newspaper *Frankfurter Allgemeine Zeitung* (Frankfurt General Newspaper).[34]

Accumulated data from different surveys show the following results with regard to the media usage in Germany in 2018:
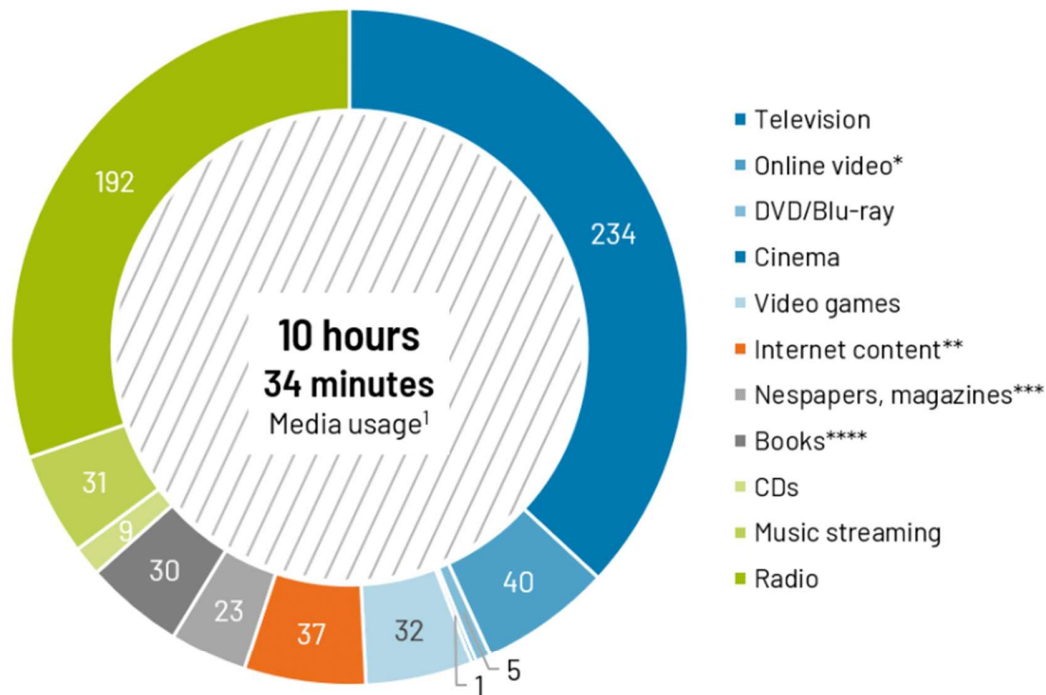
---

[33] Berg, K. (2021). So schauen die Deutschen fern. (https://www.deutschland.de/de/topic/kultur/fernsehen-zahlen-und-fakten-zum-fernsehen-in-deutschland). Accessed: 25 January 2021.
[34] https://www.deutschland.de/de/topic/wissen/ueberregionale-zeitungen

Share of Media Time Budget[1] 2018

Average daily media use, in minutes

10 hours
34 minutes
Media usage[1]

- Television — 234
- Online video* — 40
- DVD/Blu-ray — 5
- Cinema — 1
- Video games — 32
- Internet content** — 37
- Nespapers, magazines*** — 23
- Books**** — 30
- CDs — 9
- Music streaming — 31
- Radio — 192

[1]Note: The stated media time budgets originated from different surveys so that, due to methodological deviations, the total figures in particular should be regarded merely as approximate values; *Free and paid video-on-demand; **Excluding communication, online videos and music streaming; ***Including ePapers; ****Including eBooks

Sources: VAUNET Analysis based on the Working Group for Video Research (AGF) in cooperation with GfK 2018 (TV, aged 14+), ma (Media Analysis) 2018 Audio II (radio, workdays, aged 14+) and SevenOne Media / forsa - Media Activity Guide 2018 (all other media, aged 14-69)

VAUNET

Table 1 Retrieved from Krieger 2019, (https://www.broadbandtvnews.com/2019/01/22/media-usage-in-germany-rises-to-9-hours-per-day/). Accessed: 25 January 2021.

Even if television and radio still play a dominant role, it can be observed that the market is more and more to digital media (see Holznagel/Kalbhenn 2020, p. 7). Especially, the increasing usage of streaming services – video-on-demand services like Netflix and Amazon

Prime or music stream services like Spotify – and the crisis of print media clearly highlight this trend (see Weidenbach 2014).

Media Pluralism

The Media Pluralism Monitor (MPM) is a research tool that helps to assess potential risks to media pluralism in the member states and candidate countries of the European Union, taking into consideration both online and offline news environments. The Centre has developed it for Media Pluralism and Media Freedom, a research institute co-financed by the European Union.

The Monitor divides risks to media pluralism into four areas: basic protection, market plurality, political independence and social inclusiveness, comprising five indicators each (e.g. protection of freedom of expression, transparency of media ownership, political independence of media, and access to media for minorities)For the survey period of 2018/2019, it could be stated that the risks for media pluralism in Germany are rather low. Some indicators however show a medium risk; especially regarding online-related sources of risk.[35]

In the area of basic protection all five indicators (protection of freedom of expression, protection of right to information, journalistic profession, standards and protection, independence and effectiveness of the media authority, universal reach of traditional media and access to the Internet) show a low risk (14%). The indicator "universal reach of traditional media and access to the Internet" shows the highest risk (21%), which is mainly due to a high concentration of Internet service providers.[36]

---

[35] "The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk." (Holznagel/Kalbhenn 2020, p. 5). More information in Holznagel/Kalbhenn, pp. 5-8.
[36] Idem pp. 8-10.

In the area of market plurality (indicators: transparency of media ownership, news media concentration, online platform concentration and competition enforcement, media viability, Commercial and owner influence over editorial content), the indicators "news media concentration", "online platform concentration", and "media viability" show a medium risk and the remaining two show a very low risk.[37]

The medium risk in this area is partly due to the "lack of impact of the current media concentration law, combined with rising concentration of power in some areas. The upcoming reform to the Act against Restraints of Competition wants to adapt competition law to the increasing digitization of the market and aims at helping competition enforcement to become more effective in regulating the platform economy. The decline in local news media outlets is one reason the indicator Media Viability has a medium risk assessment".[38]

With regard to the area of political independence, all indicators (political independence of media, editorial autonomy, audiovisual media, online platforms and elections, state regulation of resources and support to media sector, independence of PSM (public service media) governance and funding) show a low risk. Nonetheless, the indicators "audio-visual media, online platforms and elections" and "state regulation of resources and support of the media sector" almost show a medium risk. Because there are no rules for online election campaigns, the former almost shows a medium risk.[39]

The area of social inclusiveness (indicators: access to media for minorities, access to media for local/regional communities and for community media, access to media for people with disabilities, access to media for women, media literacy) shows medium risks for the indicators "access to media for minorities" and "access to media for women" and almost a medium risk for the indicator "access to media for people with disabilities". Although, in all

---

[37] Ibid.
[38] Ibid.
[39] Ibid.

three areas, campaigns and initiatives are being led to enable greater access for minorities, women and people with disabilities, the representation of women in management positions of media companies is for example still low.[40] As already stated above, the indicators that are online related generally show higher risks about media pluralism, which is due to a lack of effective laws.[41]
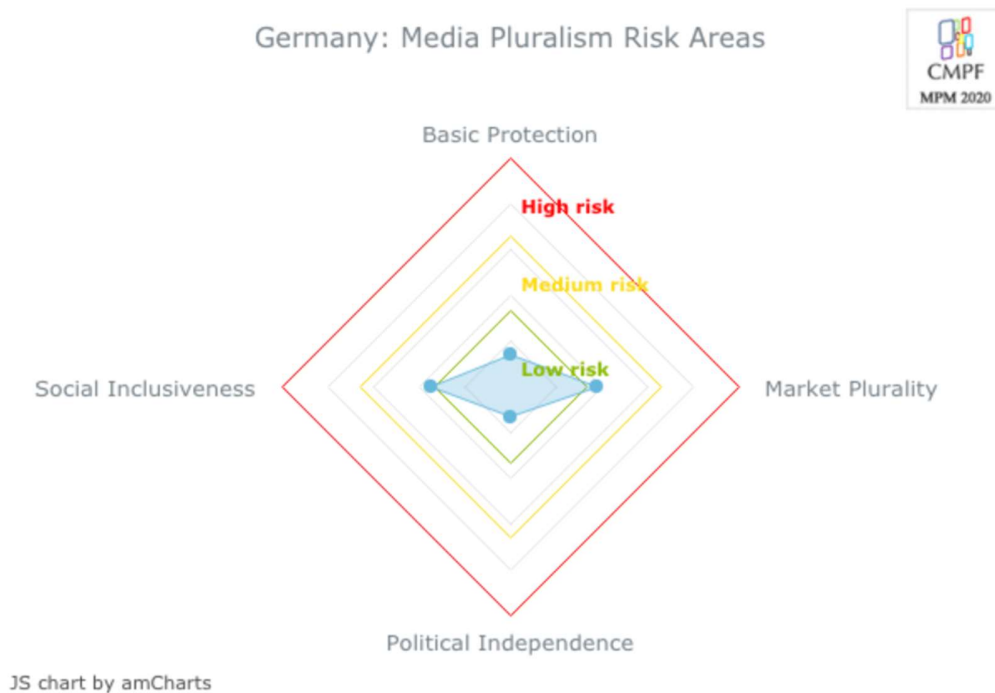
Table 2 Retrieved from Holznagel/Kalbhenn 2020, p. 8.

In order to better assess the situation of media pluralism in Germany, it is necessary to supply comparative data. While the data conducted in Germany showed a low risk to medium risk in all four areas (basic protection: 14%, market plurality 38%, political independence: 13%, social inclusiveness: 35%), the aggregated data from the Media Pluralism Monitor in the survey period of 2018/2019 from all 28 member states of the EU (UK still included at that time) plus Albania and Turkey, shows a medium risk in all four areas

---

[40] Ibid.
[41] Ibid.

(basic protection: 33%, market plurality 64%, political independence: 47%, social inclusiveness: 52%).[42]

Legal Evolutions

As already mentioned above, ongoing debates regarding media legislation in Germany increasingly focus on digital platforms. The **Interstate Media Treaty** (*Medienstaatsverstrag*), effective only since 7 November 2020, replaces the former Interstate Broadcasting Agreement (*Rundfunkstaatsvertrag*), effective since 1991 that was mostly targeted towards television and radio. The Interstate Media Treaty focuses on all media, including the landscape of digital media and sets rules for the so-called media intermediaries like social networks, news aggregators, search engines, app portals, user generated content portal (e.g. YouTube, Wikipedia), etc. Alongside with a liberalization of an admission regarding radio programs, the treaty sets universal rules for tele media (including Facebook, Google and Twitter etc.) and has its focus on the legal introduction of transparency rules and the ban of discrimination. Thereby, diversity of opinions and transparency should be guaranteed.

All media providers are obliged to provide users access to their methods of collecting, selecting and presenting content and information about the use of algorithms and the effects of social bots. Responsible for the supervision and compliance with the Interstate Media Treaty are the state media authorities of the *Länder*.[43] In addition, the already mentioned Network Enforcement Act (*Netzwerkdurchsetzungsgesetz*) of 2017 (popularly known as the Facebook-Act) mandates social networks to approach hate speech online more vigorously. The law imposes fines when social network providers fail to comply with rules regarding hate speech, hate crimes online and fake news. Providers have to fulfil a quarterly reporting obligation, are mandated to install an efficient complaint management, to nominate a

---

[42] https://cmpf.eui.eu/mpm2020-executive-summary/

[43] Mantel, U. (2020). Letzte Hürde genommen. Neuer Medienstaatsvertrag passiert letztes Länderparlament. (https://www.dwdl.de/nachrichten/80021/neuer_medienstaatsvertrag_passiert_letztes_laenderparlament/). Accessed: 08 February 2021.

national authorized recipient and have to comply victims of hate speech with information on the damaging party. The law was widely criticised – on the one hand from critics that were concerned about the freedom of expression and freedom of the press and on the other hand from civil society players that criticised the law for not countering hate speech and fake news effectively enough.[44]

Currently, the *Bundestag* (German parliament) is debating the adjustment of the *Jugendschutzgesetz* (**Protection of Young Persons Act**). The adjustment of the law is supposed to better adapt to the digital media reality of children and youths and oblige for example social media and internet service providers to protect minors from harmful contents, like cyberbullying, hate speech, tracking, sexual harassment ("cyber grooming"[45]) and cost traps (e.g. "loot boxes"[46]). Also the adjustment of the law intends to extend the Federal Department for Media Harmful to Young Persons (*Bundesprüfstelle für jugendgefährdende Medien*), which also will be responsible for the supervision and compliance with the new regulations

In addition, the European Union sets news legislation concerning digital media. In 2019, the Directive on Copyright in the Digital Single Market came into force. The directive explicitly targets to better protect press publications and to encourage a better cooperation between the rights holders of the content and the online platforms who provide the content and profit

---

[44]

Harner, M., J. /Körber, and P. Schedelbeck. (2018). "Facebook-Gesetz".
Ein Gesetz, das die Freiheit im Netz beschneiden könnte. (https://www.br.de/puls/themen/netz/hate-speech-maas-gesetz-100.html). Accessed: 08 February 2021; Rafael, S. (2020). Stellungnahme der Zivilgesellschaft zum Entwurf eines Gesetzes zur Änderung des Netzwerkdurchsetzungsgesetzes vom 28.01.2020.
(https://www.amadeu-antonio-stiftung.de/zweite-stellungnahme-zum-zweiten-entwurf-des-erweiterten-netzdg-54567/). Accessed: 27 January 2021.

[45] "Cyber grooming is the process of 'befriending' a young person online "to facilitate online sexual contact and/or a physical meeting with them with the goal of committing sexual abuse." (see https://www.childsafenet.org/new-page-15)

[46] "[I]n online gaming, a box of virtual items that players buy before they know exactly what it contains." (https://www.macmillandictionary.com/buzzword/entries/loot-box.html)

from distributing this content. The directive was embraced by journalists and publishers, but opposed by tech companies, most internet users and human rights advocates who raised concerns about the negatives consequences for freedom of speech. The member states of the EU have to implement the directive within two years; the German Federal Ministry of Justice and Consumer Protection drafted the introduction of two new legal instruments regarding copyright law in order to comply with the directive in 2020. The legislative proposal will be passed by the German Federal Cabinet end of January 2021. The law is criticized for deviating to strongly from requirements set by the directive of the EEU.

Another directive of the EU is the **Audiovisual Media Services Directive** (AVMSD), signed by the legislators in November 2018, which aims to "govern[…] EU-wide coordination of national legislation on all audiovisual media, both traditional TV broadcasts and on-demand services".[47] The directive was integrated in the already mentioned Interstate Media Treaty (*Medienstaatsvertrag*), implemented in 2020.

Status of Media Literacy

In Germany federal institutions like the State Minister for Media and Culture or the Federal Ministry of Family Affairs, Senior Citizens, Women and Youth support different projects and initiatives promoting media literacy, but the responsibility for legislations on media literacy lie within in the responsibility of the *Länder* (states). Furthermore, the state media authorities (*Landesmedienanstalten*) are inter alia responsible for the promotion of media literacy.

As already stated in the introductory remarks of this review, this is due to the federal system in Germany granting partly sovereignty to the *Länder*, including the areas education and culture. This is one of the reasons why there is no consistent policy on media literacy in Germany (see 3. Policy Analysis on p. 18). In addition, there is "no legal definition of media

---

[47] https://ec.europa.eu/digital-single-market/en/audiovisual-media-services-directive-avmsd

education and related concepts for Germany. And there is no central body that is in the position to decide on such a legal definition […]."[48] For this reason, the following section will focus on respective legislative initiatives in Bavaria.

The Bavarian State Ministry for Education and Culture gives a broad definition of media literacy on its website: "Being media-competent means far more than being able to operate digital devices. Without sound media literacy, for example, it will be difficult to deal with social media and the information offered by the World Wide Web in a self-determined way. Children and young people should have the values, skills and knowledge as well as the necessary critical understanding to address the challenges of digital technologies and the Internet and to benefit from a wide range of opportunities."[49]

Media literacy is also referred to as digital education or media education. The *Kompetenzrahmen für Medienbildung an bayerischen Schulen* (Competence Framework for Media Education in Bavarian Schools) sets the framework for the teaching of media literacy in Bavarian schools. The framework focuses on five areas: basic competences, searching and process relevant content, communicating and cooperating, producing and presenting, analyzing and reflecting.

The Competence Framework serves as a starting point for the elaboration of the schools' individual media curricula. It is universal in the sense that it its applicable for all forms of schools, school subjects and grades. Therefore, there is no separate subject for media literacy in Bavarian schools, but schools are asked to implement the Competence Framework in their media curricula. Media literacy is also covered in a directive of the Bavarian State Ministry for Education and Culture and defined as a priority and as an essential element of general education. Recently, the Bavarian State Ministry for Education and Culture has also invested

---

[48] Hasebrink, U. and R. Kammerl. (2014). Media and Information Literacy Policies in Germany (2013), p.4. (Available at: http://ppemi.ens-cachan.fr/data/media/colloque140528/rapports/GERMANY_2014.pdf). Accessed: 8 February 2021.

[49] https://www.km.bayern.de/eltern/erziehung-und-bildung/medien.html, unofficial translation

in the optimization of the digital education infrastructure, enabling schools to provide their IT-classes with a modern equipment. The requirement for schools to apply for these grants is the elaboration of individual media curricula. In this way, the Bavarian State Ministry for Education and Culture encourages Bavarian schools to promote media literacy.

Legal Framework for Media Literacy Education

Regarding the legal framework for media literacy education, we again focus on the situation in the Danube region state of Bavaria. As already briefly mentioned above, the Bavarian State Ministry for Education and Culture covers media education in a directive from 24 October 2012, implemented on 1 November 2012 called *Medienbildung. Medienerziehung und informationstechnische Bildung in der Schule* (Media Education. Media Literacy and IT-Education in Schools). Media education is divided into four categories:

- media studies (knowledge of the technical, procedural, economic, legal, aesthetic, organizational and social conditions in the use of media)
- IT-education (handling of information and technology technologies, *IuK-Techniken*)
- media didactics (studying the theory and practice of the use of media as supporters of teaching and learning content and as aids in teaching)
- media literacy education (stimulating and accompanying those learning processes that enable the adolescent to act independently, competently, responsibly and legally impeccably with media)

Media education mandatorily has to be taken into account in the curricula of all schools, grades and subjects. Regarding the elaboration of the media curriculum, schools can receive support from the 149 Bavarian Reference Schools for Media Education (*Referenzschulen für Medienbildung*). However, there is no control, if schools do implement the media curriculum. Media pedagogy is also embedded in the training for Bavarian teachers as an exam subject. Furthermore, the directive also institutionalized decentral consultants for media education and IT-related issues. The consultants support teachers and educators in the areas of media

technology, IT-education, media didactics and media education and are included in the training of teachers and educators. The consultants are coordinated by the Academy for Teacher Training and Personnel Management (*Akademie für Lehrerfortbildung und Personalführung*).

It can be concluded that there are directives regarding media education by the Bavarian Ministry for Education and Culture, but there are no legally binding instruments regarding the implementation of media literacy – whether on the level of the states nor on the national level.

Policy Analysis

On both levels – federal and on the level of the *Länder* – the key word "Digital education" has been introduced in recent years as a specific focus of education policy. This endeavour is highly complex for several reasons:

- "Digital education" is envisaged to follow the principle of life-long learning. Target areas include therefore early childhood education up to senior's education.

- All educational processes should be included (formal, non-formal and informal contexts).

- The area of business and entrepreneurship is equally addressed as the area of schools and universities.

- "Digital Education" may involve other areas depending on the specific context (e.g., infrastructure, research ethics).

- The endeavors on Digital Education are aimed to take a stand regarding technological developments (e.g., Big Data, Internet of Things), whose effects on society are not yet fully predictable.[50]

---

[50] Aßmann, S.(2017). Medienbildungspolitische Positionen, Forderungen und Strategien. In: Harald Gapski/Monika Oberle/Walter Staufer (eds.): Medienkompetenz. Herausforderung für Politik, politische Bildung und Medienbildung. Bundeszentrale für politische Bildung. Bonn, pp. 136-145, p.137.

Policy proposals/Initiatives on Media Literacy

As already indicated above, there is no general policy on media literacy in Germany. An expert report by the Hans Bredow Institute assumes that "media education policies are rather a by-product of other policy areas than a policy field in its own right. As a result, there is a discrepancy between media education and media literacy being intensively discussed and asked for in connection with a broad range of topics on the one hand, and a lack of concrete and binding policies. The issue is rather omnipresent, and a lot of single projects are implemented again and again, while a consistent, nationwide, and sustainable strategy to support media literacy is almost absent."[51]

Even if there is no nationwide strategy, there are nevertheless several policies regarding media literacy, which will be presented in the following. Again, some policies originate from Bavarian institutions.

- The policy "Media Education. Media Literacy and IT-Education in Schools" (*Medienbildung. Medienerziehung und informationstechnische Bildung in der Schule*) is a legal announcement of the Bavarian State Ministry for Education and Culture from 24 October 2012. The policy addresses media education and media literacy in schools and in teacher training (see pp. 17/18) and encourages the elaboration of media curricula in the schools. The policy has been effective since 01 November 2012.[52]

- The policy paper "Digital Education in Schools, Universities and Culture" (*Digitale Bildung in Schule, Hochschule und Kultur*) of the Bavarian State Ministry for Education and Culture was formulated in January 2016. It addresses the challenges for schools, universities and cultural institutions regarding the increasing digitalisation. It evaluates the status quo in Bavaria regarding digitalisation in these areas and formulates inter alia the following strategic objectives and measures for these areas to better adapt to challenges in the context of digitalisation:

---

[51] Hasebrink/Kammerl 2014, p. 24
[52] https://www.gesetze-bayern.de/Content/Document/BayVwV270223

> ➢ Training of Bavarian students to become digitally literate, creative but also critical media consumers when dealing with new technologies
> ➢ Confident handling and use of digital media by Bavarian teachers
> ➢ Schools ought to use the potential provided by digital media systematically for improvement of teaching
> ➢ Providing schools with modern IT-equipment and professional support[53]

- "Education Offensive Strategy for a Digital Knowledge Society" (*Bildungsoffensive für die digitale Wissensgesellschaft*) is a policy of the Federal Ministry of Education and Research from October 2016. The policy addresses challenges in the field of education policy regarding an increasingly networked and digitalized world. The policy especially sets impulses for imparting digital education. It evaluates the status quo in Germany regarding digital education and media literacy and points out the following fields of action that should be ideally achieved by 2030 (Digital Education World 2030):

> ➢ Enabling of all learners (kindergartners, students, VET students, university students, students in further education) to competently use digital media and to participate in the digital word in a self-determined and responsible way.
> ➢ Equipment of all German educational institutions with an efficient and barrier-free digital infrastructure with standardized interfaces.
> ➢ Establishing a modern legal framework for the production and use of digital educational offers, especially about data protection and copyright laws.
> ➢ Strategical development of all educational institutions regarding the implementation of digital education.
> ➢ Using the potentials of internationalization so that Germany will become an even more attractive location for education, work and residence.[54]

---

[53] https://www.km.bayern.de/epaper/Digitale_Bildung_in_Schule_Hochschule_Kultur/files/assets/basic-html/page-1.html

[54] https://www.bmbf.de/files/Bildungsoffensive_fuer_die_digitale_Wissensgesellschaft.pdf

- „Education in the Digital World" (*Bildung in der digitalen Welt*) is a policy of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* (*Kultusministerkonferenz*), a body which is not part of the federal government and can therefore not pass immediately effective directives (see Gayer/Reip 2012, p. 22). The policy was passed on 06 December 2016 and is an attempt to coordinate the education policy of the *Länder*. Therein, inter alia the following joint goals regarding digitalization are defined:

  - The handling of digitalization in the area of education (schools and universities) has to be integrated in pedagogical concepts. Students should have access to internet and a digital learning environment until 2021 when deemed pedagogically useful

  - Formulation of a mandatory competence framework for an education in the digital world

  - All stakeholders in vocational education must ensure to provide the necessary equipment in order to keep up with the technological developments in their respective fields

  - Prioritization of digital education in teacher training[55]

- The "Master plan Digital Bavaria II" (Masterplan Bayern Digital II) is a catalogue of measures of the Bavarian government inter alia addressing the digitalization in Bavarian Schools and providing financial resources for the upgrade of the IT and educational offers for media education in schools. It was formulated in May 2017 and budgets investments amounting to 3 billion Euros during the period 2018-2021.[56]

- The "Competence Framework for Media Education in Bavarian Schools" (*Kompetenzrahmen zur Medienbildung an bayerischen Schulen*) is an important document that sets the framework for the teaching of media literacy in Bavarian

---

[55] https://www.kmk.org/fileadmin/pdf/PresseUndAktuelles/2018/Digitalstrategie_2017_mit_Weiterbildung.pdf
[56] https://www.bayern.de/wp-content/uploads/2014/09/17-05-30-masterplan-bayern-digital_massnahmen_anlage-mrv_final.pdf

schools (see pp. 16/17). It was formulated in 2017 by the Bavarian State Institute for Quality of Education and Educational Research (*Staatsinstitut für Schulqualität und Bildungsforschung*), which supports and advises the Bavarian State Ministry of Education and Culture.[57]

- The policy "Media Concepts in Bavarian Schools" (*Medienkonzepte an bayerischen Schulen*) is a guideline by the Bavarian State Institute for Quality of Education and Educational Research for schools. It was formulated in August 2018 and includes the following suggestions:
  - ➢ Detailed recommendations and templates for the formulation of media curricula for different types of schools (primary schools, *Mittelschule, Realschule, Gymnasium* (secondary schools), special schools, business schools, VET schools).
  - ➢ Schedules for teacher training events regarding media education.
  - ➢ Guideline for the digital equipment of schools.[58]

- The "Pact on Digitalisation regarding Schools 2019-2024" (*DigitalPakt Schule 2019-2024*) is an administrative agreement between the Federal government and the governments of the *Länder* from May 2019. It contains the assurance of financial resources for €5 billion for the development of the digitalization in schools from the federal government to the *Länder*. The agreement is linked to the already mentioned policies „Education Offensive Strategy for a Digital Knowledge Society" (*Bildungsoffensive für die digitale Wissensgesellschaft*) from October 2016 and Education in the Digital World"(*Bildung in der digitalen Welt*) from December 2016. For the implementation of the policy, it was necessary to change the constitution because education policy is the responsibility of the *Länder*.[59]

---

[57] https://www.mebis.bayern.de/wp-content/uploads/sites/2/2017/03/Kompetenzrahmen-zur-Medienbildung-an-bayerischen-Schulen-1.pdf

[58] https://www.mebis.bayern.de/wp-content/uploads/sites/3/2017/10/ISB_-Medienkonzepte-an-bayerischen-Schulen.pdf

[59] https://www.kmk.org/fileadmin/pdf/Themen/Digitale-Welt/VV_DigitalPaktSchule.pdf

- The "Report on the protection of minors and media literacy" (*Jugendschutz- und Medienkompetenzbericht der Landesmedienanstalten*) is an evaluation of the media regulatory authorities, firstly issued in 2013 and initiated by the Federal Ministry of Family, Senior Citizens, Women and Youth. The reports comprise expert's opinions on the state of media literacy in families and educational institutions and provide a database on institutions and projects fostering media literacy in Germany. This report, which latest version has been issued in 2019, "come[s] closest to an assessment of the state of media literacy in Germany.[60] The report from 2019 especially highlights the following points:
  - Hazard potential of witnessed and experienced hate speech online among youths.
  - Hate speech and cyberbullying as challenges for media education.
  - Right-wing extremist online strategies.
  - Best practices regarding media literacy projects in the *Länder*, implemented by the regional media authorities (*Landesmedienanstalten*).[61]

As a conclusion, there are numerous policies on media education and media literacy. Challenges lie in the harmonization of the different policies from the federal governments and the governments in the *Länder*. Furthermore, the policies predominantly focus on the provision of financial resources for the equipment of schools and for the facilitation of a modern IT-education and the teaching of technical skills. The teaching of media literacy however, has retreated rather in the background of these policies. This evaluation is also shared by the already quoted expert report from 2014 on media literacy by the Hans Bredow Institute: "In order to assess the current situation correctly, it must be made clear that the implementation of media education at school often remains at a technical level and does not result in imparting media literacy."[62]Even if the financial resources regarding the adjustment

---

[60] Hasebrink/Kammerl 2014, p. 6
[61] https://www.die-medienanstalten.de/publikationen/jugendschutz-medienkompetenzbericht
[62] Hasebrink/Kammerl 2014, p. 11

of educational environments to a digitalized world were increased, there is still no real strategic and harmonized concept regarding media literacy.

Formulation and Implementation

All of the policies mentioned above have been already formulated. The status of implementation however is hard to assess as these policies are often rather suggestions, assessment reports or assurances of financial resources and do not entail obligations for the addressed institutions.

- The policy "Media Education. Media Literacy and IT-Education in Schools" (*Medienbildung. Medienerziehung und informationstechnische Bildung in der Schule*) was formulated by the Bavarian State Ministry for Education and Culture and has to be implemented by Bavarian schools.
- The policy "Digital Education in Schools, Universities and Culture" (*Digitale Bildung in Schule, Hochschule und Kultur*) was formulated by the Bavarian State Ministry for Education and Culture and has to be implemented by Bavarian schools, universities and cultural institutions (e.g., libraries, museums).
- The policy "Education Offensive Strategy for a Digital Knowledge Society" (*Bildungsoffensive für die digitale Wissensgesellschaft*) was formulated by the Federal Ministry of Education and Research and addresses all institutions that are in charge of the implementation of digitalization strategies.
- The policy „Education in the Digital World"(*Bildung in der digitalen Welt*) was formulated by the Standing Conference of the Ministers of Education and Culture and targets the implementation of digitalization strategies in schools, VET schools, universities and other training facilities.
- The investment program "Master plan Digital Bavaria II" (Masterplan Bayern Digital II) was formulated by the Bavarian government and provides financial resources for the digitalization of schools.

- The "Competence Framework for Media Education in Bavarian Schools" (*Kompetenzrahmen zur Medienbildung an bayerischen Schulen*) was formulated by the Bavarian State Institute for Quality of Education and Educational Research and is asked to be implemented in Bavarian schools.

- The policy "Media Concepts in Bavarian School" (*Medienkonzepte an bayerischen Schulen*) was formulated by the Bavarian State Institute for Quality of Education and Educational Research and is asked to be implemented in Bavarian schools.

- The policy "Pact on Digitalization regarding Schools 2019-2024" (*DigitalPakt Schule 2019-2024*) was formulated by the Federal government and the governments of the *Länder*. The financial resources that the pact entails can be requested by German schools.The "Report on the protection of minors and media literacy" (*Jugendschutz- und Medienkompetenzbericht der Landesmedienanstalten*) was formulated by the national representation of the regional media regulatory authorities (*die medienanstalten*) and initiated by the Federal Ministry of Family, Senior Citizens, Women and Youth (BMFSFJ).

Target Groups

It can be stated that all policies on media literacy especially target schools and educators and therefore the youths. Some policies cover more target groups and include for example universities and other educational institutions. When it comes to imparting media literacy and media education the target groups clearly are schools, the students and their educators.

Stakeholders

In the process of debating over media literacy policy and its formulation and implementation, the most important stakeholders on the federal level are the following:

- Federal Ministry of Family, Senior Citizens, Women and Youth (*Bundesministerium für Familie, Senioren, Frauen und Jugend*)Federal Ministry of Education and Research (*Bundesministerium für Bildung und Forschung*)

- Standing Conference of the Ministers of Education and Cultural Affairs (*Kultusministerkonferenz*)

- National representation of the state media regulatory authorities (*die medienanstalten*)

These stakeholders can only formulate directives as education policy lies within the responsibilities of the *Länder*, which has been already pointed out repeatedly. An exception is the "Pact on Digitalisation regarding Schools 2019-2024" for which a change of the constitution was necessary. This policy however only provides financial resources from the federal government for the *Länder* and does not interfere with the education policy of the *Länder*.

The most important stakeholders in the *Länder* regarding media policy (hereby demonstrated for the case of Bavaria) are the following:

- Bavarian State Government and Bavarian State Chancellery as highest state authority (*Bayerische Staatsregierung* and *Bayerische Staatskanzlei*).

- Bavarian State Ministry for Education and Culture (*Bayerisches Staatsministerium für Unterricht und Kultus*).

- Bavarian State Institute for Quality of Education and Educational Research (Institut für Schulqualität und Bildungsforschung).

- Bavarian media regulatory authority (*Bayerische Landeszentrale für neue Medien*) with the Bavarian Forum for media-pedagogy (*Forum Medienpädagogik*).

The expert report by the Hans Bredow Institute explicitly names the (state) media authorities as "key partners for policies in media education".[63]

---

[63] Hasebrink/Kammerl 2014, p. 16

Important societal stakeholders debating over media literacy policy are inter alia the following:

- Professional Association for Media Education, Media Literacy and Communication Culture (registered, non-profit organisation) (*Gesellschaft für Medienpädagogik und Kommunikationskultur e.V., GMK*).

- Institute for Media Research and Media Education (*JFF – Institut für Medienpädagogik in Forschung und Praxis*).

- Amadeu Antonio Foundation (*Amadeu Antonio Stiftung*).

- Clearing Center for Media Literacy of the German Bishops Conference at the Catholic University Mainz (*Clearingstelle Medienkompetenz der Deutschen Bischofskonferenz an der KH Mainz*).

- Confederation of German Employers' Associations (*Bundesvereinigung der Deutschen Arbeitgeberverbände, BDA*).

- The klicksafe project (mutual project promoting media literacy of the Central Authority for Media and Communication Rhineland-Palatinate (LMK) and the Media Authority of North Rhine-Westphalia).

- German Federal Council of Parents Associations (*Bundeselternrat*).

- German Trade Union Confederation (*Deutscher Gewerkschaftsbund, DGB*) and especially the Union for Education and Science (*Gewerkschaft für Erziehung und Wissenschaft, GEW*).

- Schoolbook publishing houses (Cornelsen, Ernst Klett, Westermann).

- Bertelsmann Foundation (*Bertelsmann Stiftung*).[64]

---

[64] The Bertelsmann foundation is a German civil law foundation (*Stiftung bürgerlichen Rechts*) whose lobbying and influence on politics and society has repeatedly been criticised for being too comprehensive for a non-profit organisation (see Munzinger 2018). The foundation also publishes a large number of surveys regarding the situation of the German education sector, which are regularly criticised for being too scandalising. One of its main activity fields is the digitalisation of education (especially with regard to higher education). The "Monitoring of Digital Education" (*Monitor Digitale Bildung*) measures how well-prepared German educational institutions are in regard to an increasing digitalisation (see Warnecke 2016).

In addition, the big tech companies increasingly gain influence regarding the digitalization of schools and therefore as well over the debate on media literacy. The board of the German National Association of Consumer Advice Centers (*Bundesverband der Verbraucherzentralen*) recently warned about the influence of learning materials from German industries that are not quality-assured and teacher trainings by tech companies like Apple and Microsoft that will inevitably lead to the corporate branding of schools for marketing purposes. Furthermore, it was criticized by the board of the German National Association of Consumer Advice Centers that the education ministers have failed to develop quality-assured digital offers. The tech companies are eager to fill this gap.

Results

Unfortunately, there is a lack of systematic evaluations of media literacy programs and policies and there are "no legal mechanisms to ensure and measure the efficiency of media education policies", which do exist in other fields (e.g., nationwide minimum standards regarding reading literacy).[65]

Regarding the "Pact on Digitalization in Schools 2019-2024" (*DigitalPakt Schule 2019-2024*) however, it can be observed that until June 2020 only a small part of the funds (15.7 million of 5 billion euros) provided by the state governments for the *Länder* has been called upon (see Bundesministerium für Bildung und Forschung 2020). Given the fact that the funds can only be retrieved based on an application process, which includes the schools having set up a media education and IT concept, it can be speculated that the competency to develop such concepts to a convincing standard, is not yet very widespread. Any competency development in the area therefore has to address the teachers as well as the students.

Also, regarding the "Masterplan Digital Bavaria II" an inquiry by a member of the Bavarian state parliament (*Landtag*) in 2020 disclosed, that the desired policies regarding media

---

[65] see Hasebrink/Kammerl 2014, p. 19

education and digital education (IT-equipment, teacher training) are still being implemented.

Even if there are no systematic evaluations regarding media literacy policies, there are evaluations from foundations and non-profit associations assessing the status of digital education and media literacy in German educational institutions, like the Bertelsmann foundation (see footnote 4 on p. 27) or the Bavarian Business Association (*Vereinigung der bayerischen Wirtschaft, vbw*). The latter for example, conducted a survey in 2017 among Bavarian teachers evaluating the conditions for and the embedding of digital learning in Bavarian schools and their own media-related competences. The results revealed that regarding the conditions for digital learning in schools, there has been progress in recent years, but that there is still a lot to accomplish. Imparting media literacy is frequently embedded in the school curricula (around 75%, of the Bavarian schools formulated their own media curriculum) a systematic integration is however still missing..

It can be concluded that there are numerous initiatives in the policy field of media education and media literacy in Germany. In addition, high funding amounts have been made available in the education sector. These are however often targeted towards the upgrading of technical equipment in educational institutions and the general use of digital media and not at imparting media literacy skills.

Despite the fact that progress in this policy field due to conflicting and unclear political competences is rather slow, the public awareness for the importance of media literacy has been clearly raised in recent years by macrosocial educational campaigns especially targeting students, educators and parents (also in light of the increasing danger emerging from negative internet phenomena like hate speech and the spreading of disinformation and conspiracy narratives).

2.5 Hungary

Media regulation is subject to several legal regulations and fundamental laws in Hungary and Europe. It is important to note EU rules because the community obliges members to regulate this area according to uniform rules and adaptations.

The Fundamental Law of Hungary (25 April 2011)

In the Fundamental Law of Hungary, Article IX deals with freedom of opinion and freedom of the press. In this sense:

(1) Everyone has the right to freedom of expression.

(2) Hungary recognizes and protects the freedom and diversity of the press and ensures the conditions for free information necessary for the development of democratic public opinion.

(3) In order to provide adequate information for the development of democratic public opinion during the election campaign period, political advertising may be disclosed in media services without any consideration and under the conditions laid down in the cardinal law ensuring equal opportunities.

(4) The exercise of freedom of expression shall not be intended to violate the human dignity of others.

(5) The exercise of freedom of expression should not be aimed at violating the dignity of the Hungarian nation, national, ethnic, racial or religious communities. Persons belonging to such a community, as defined by law, shall have the right to enforce their claims against public opinion for violation of their human dignity.

(6) The detailed rules on freedom of the press and the body responsible for supervising media services, press products and the communications market are laid down in a cardinal law.

When interpreting the article, it should be noted that the majority of Hungarian people actually make use of the opportunity to express their views. This is primarily done on social media. However, it is also worth noting that this dialogue is not nonviolent and in many cases offensive to personality. Therefore, most of the intellectuals stay away from these surfaces.

So, their thoughts don't gets up there, they cannot be recognized by the majority. A regulation could change that a lot. With regard to other media, it is possible to use editorial letters and call-in from media consumers (television, radio, and print media).

The diversity of the press is regulated in accordance with the laws, such as the Media Act, although it seeks not only to inform but also to influence the content of the diversity.

As regards the emergence of political advertising, the rules are currently such that only media who report such communications before the campaign period by a specific date. The control of the Hungarian media content applies to media registered at NMHH and licensed to provide media services, and this applies regularly to all content with certain periodicity and in the case of tendering programs. This appears as a mandatory element in the contracts.

The Fundamental Law also protects violations of human dignity, and the media law deals with this. By tightening the rights of the person, it is forbidden to publish any recording or photograph in any medium without his consent. With regard to content incorrectly published in the media, it is possible to signal the correction of the wrong content to the editor-in-chief. Remedial action is mandatory for the medium. Unfortunately, in the course of the course of journalism and in the absence of qualified media staff, the designation of resources is not available during the production of the content. The designation "Information has reached our editorial office" does not hold up. The source must be specifically marked. Journalists trained in previous decades have learned that information should be confirmed from at least three different sources. Then it is allowed to be made public.

The number of press litigations in the courts has increased significantly. The main reason for this is the lack of resources already mentioned and the violation of personal rights, the disclosure of false, excessive and distorted information. Unfortunately, a press trial today can be very useful for the actors involved, as this will certainly put them in front of the public

and share other thoughts with the public. They can build their own personalities and destroy other people's personalities.

The National Media and Info communications Authority oversees the functioning of the Hungarian media market in compliance with the content and legislation. There are frequent attacks on the authorities because they can be criticized with political bias. These steps bring new media attention and interest in the masses. Sympathizes and expressions against it infect the free media world, but this phenomenon is not only typical of Hungary.

Definition of freedom of the press and its interpretation

"The freedom of press is called a state where press staff – journalists — rely only on their own expertise, experience and opinion, free of external influences, threats and legal limitations anddecide what content appears in the press products they edit. This freedom also extends to the absence of Stateinterference.

The truth and reality of the above lines are highly questionable. As we know, and unfortunately, it appears in the teaching material, the media have owners and gatekeepers, who do not allow journalism based on expertise and influence immunity, but also determine the importance of individual topics, or their silence, as well as the method of processing the news. As much of the journalistic society says, all news can be written with positive or negative overtones, and, according to the media effect, people are identified with the news when they mention the omens of the news.

In this Article, the word "press" refers to printed and electronic means of communication, content provided by them and persons producing such content. One of the rights of citizens is a free, non-authorized and limited expression of opinion through the press. The ownership, the media monopolized by multinational corporations, can be controlled, but its power seems to outweigh the courage to enforce the law. Thus, neither state, EU nor world

organisation can enforce the laws of freedom of the press or press regulation. In addition, in court, there is many prolonging and protracted cases, loose ends. Therefore, this is not a Hungarian phenomenon.

The European Convention on Human Rights guarantees freedom to disseminate opinions, ideas, news and information. The constitutions protect the freedom of the press, but control, defense is changing. Almost nowhere should the freedom of the press be fully free.

Hungary, for example, limits the representation of "self-conformities" in the press, including the sickle, while this symbol is part of the coat of arms in neighbouring Austria. The older Hungarian electoral law also prohibited the press from formulating political opinions on the day of the election and until the end of the vote. In other countries, this was not allowed to be restricted.
In many countries, it is accepted that the State maintains a television or radio station and is financed in whole or in part by public funds. The danger of this is always that the power is trying to determine the content.

In Hungary, the new press law specifies in detail what rather content the broadcasting of the public service media is obliged to broadcast within a minimum timeframe, and the board of trustees elected by the parties oversees the operation.

Due to its decentralized form, the Internet is one of the most difficult presses to limit. Urgent action is needed on the media regulation in this area.

Key issues of media regulation
The most important issue in our opinion is ownership. The issue of speech and expression is important. By doing so, ensuring a democratic society, properly regulating, limiting and punishing extremist views.

Abolition of media monopolies. Unilateral influencing or attempting to influence the events of the world, the events of a country. Create an equal and independent position of force. Promote culture at an appropriate level, create equal opportunities and ensure that all members of society have advanced access to media content.

Content regulation should be more developed and accountable for age groups. High-educated and high-quality staff should carry out the tasks of the media. Commercial channels should also be obliged to do these tasks, taking into account, of course, the proportions. In terms of regulation, we consider it important to maintain national archives of already produced content and to make it researchable at a certain level, once appropriate segmentation has been carried out.

Social media platforms have become the main field of online publicity. There is no legal definition. Mass opinion formation is uncontrollable. There is a wide freedom of opinion. Its language is also too free, not always acceptable. There is a lot of slander, no source and no evidence of accusations. The removal of such opinions is not subject to legislation, but only depends on the moderator of the interface. The responsibility of hosting providers is a huge force that shapes society, influences and transforms it. There are no rules for disputes between users, no liability.

It is also unsolved to protect privacy. Freedom of thought is under control. Individual convictions are often hidden under bushels, so bad results, decisions and regulations based on false information can be made. Those who share their opinions can either rely on supporters or critics or become involved in a long, deteriorating dialogue, which is interesting in their vocabulary and in its increasingly shorter content, which is proposed for analysis.

It is difficult to determine whether the person expressing the opinion is real or still alive. Photos, opinions and correspondence of the deceased survive on the surface. We consider it important to remove, punish and penalize content against public order, threats, hate speech content, false news and false news.

Forms of ownership

In terms of ownership, we can talk about private property, association property, corporate property and state-owned media. In terms of state ownership, the number of media owned by municipalities is significant. These are televisions, radios, weekly newspapers, and websites. For local media, the following information has been collected among televisions.

According to the graphic, the vast majority of local media and televisions are municipal-owned. This could be a dangerous factor in terms of influence, but the role of national and local media varies considerably. Local media, in particular television, are concerned with documenting the events of the settlement in addition to local news and conflicts of opinion. Partnerships and private ownership have a third share, and there is a minimum number of mixed properties.

ELLÁTOTTSÁGI TERÜLETEK

Nagyobb 20%
Saját település 33%
Kistérség 47%
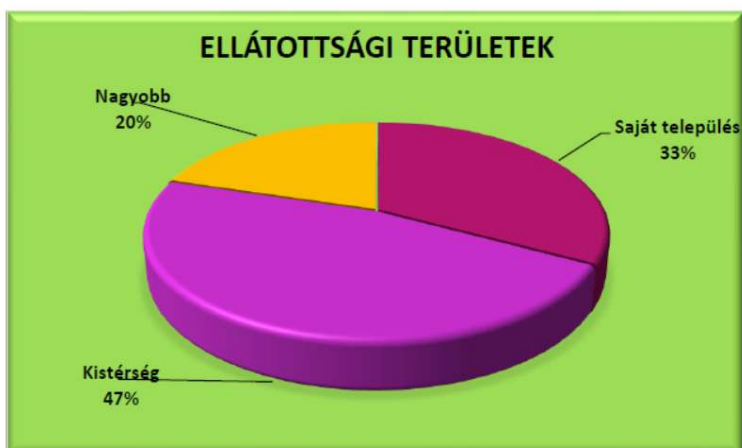
Local media primarily serve their own settlements. According to surveys, televisions are considered authentic and lovable to national media. The sub region is a larger area in relation to the area, with contacts above 100,000 households. Moreover, there is a local media in the region, which is legally regulated under the Media Act, but it also provides greater marketing opportunities.

TELEPÜLÉSEK SZERINTI MEGOSZLÁS

Megyeszékhely 22%
Egyéb 10%
Város 68%

Most local media operate in small settlements and in smaller towns, with legal regulations and media authority operating contracts and audits.

TELEVÍZIÓK MŰKÖDÉSI FORMÁI

Local television, but it is a nationally characteristic medium, commercially licensed and classified. According to legal regulations and the Media Act, they produce their programs in terms of advertising and the quota system. Community status is becoming increasingly popular, and several commercial channels are requesting its reclassification. As a matter of interest, it should be noted that a number of tenders are available for social media, thanks to the Media Authority. They can apply for programs, but also for technical development and overhead support. They do not have a broadcasting fee and service providers are obliged to transmit their signals.

MÉDIACENTRUM-TAGSÁGOK
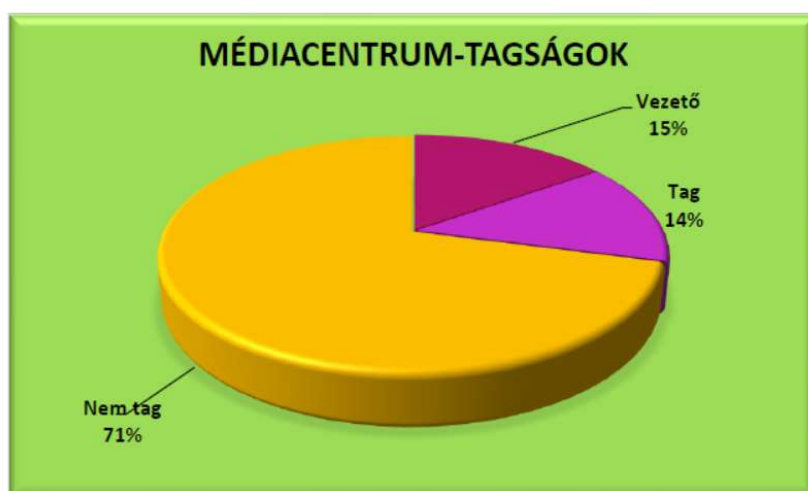
The media centre is a typical legal category. Their appearance is typical in the county seats, where television is the leading media, and its colleagues produce local radio programs, as well as the content of weekly newspapers and news portals. This also involves adding up the revenue side and rationalizing the expenditure side.

In terms of revenue, ownership (self-government support) is characteristic, which is followed by the amounts received in the tenders and the advertising revenues.
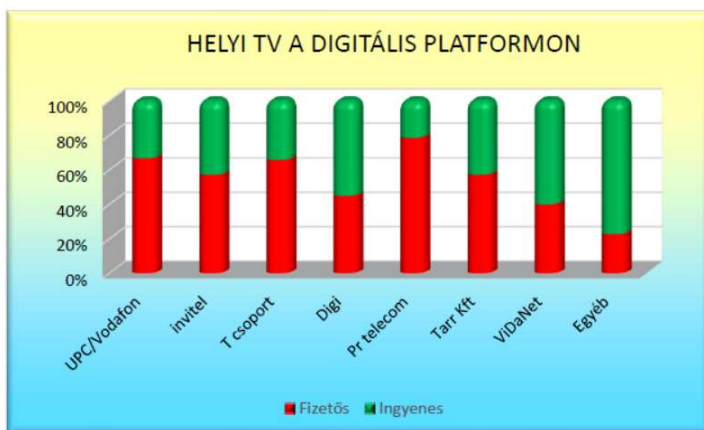
It is legally unclear how providers transmit signals from electronic media. As thegraphic shows, the national situation is very eclectic, even for individual operators. This legal relationship should be resolved and consolidated as soon as possible, whether based on household number, commercial and community status, support, size of programming, etc.

During the period of the pandemic, several surveys were conducted on the operation of media in Hungary. The research of NMHH and IPSOS has brought interesting data to the surface. Closeness, desire for news, and entertainment put television channels first.

Legal progress

It is important to note that the law on the media is a permanent topic in Hungary, which regulates its operation!

In Hungary, the amendments to the EU Media Act generate daily debates. This shift of thought is characteristic primarily among politics, the public does not perceive this division, and perhaps their interest is not so sensitive. In mediums, depending on the ownership background, the law is criticized and protected. EU legislative harmonization will take place in Parliament.

There are also debates between different media forums, the tone of which does not really reflect the fact that listening to each other and finding a compromise are the basis for this. In addition to the various ownership groups, the MUOSZ, the MUK and the various ownership groups fall short of the involvement of rural media communities, such as the National Association of Local Radios and the National Association of Local Televisions, in the fields of legal harmonization and media regulation. They may express their thoughts in a touchy manner, but they are not included in the invitations during real debates.

The situation with regard to local news portals is no better, but competition is more competitive than cohesiveness.

Status of media literacy

"The world of the media in the set century is a big mountain that must be climbed at the end of the twelfth year, preferably not wandering off the path of national identity, consciously

avoiding the dangers on the road – the text of the 2020 NAT makes the convergent media environment look like.

Among the principles and objectives, authors often refer to the awareness of consumer behavior as if the use of the media had no other purpose than consumption. It essentially looks at the media about the negative effects on the individual. Thus, the media is outlined as a fundamentally institutionalized phenomenon opposed to us. It is not about how users shape it, take possession of it, and use it for games, learning, entertainment, or other things.

At the same time, it is welcome to include the importance of emotional education, the development of debate culture, the presentation of media ethics problems, or the importance of teaching personal rights issues. However, these elements are included in the relatively coherent text listing specific characteristics, which is probably the basic text.

In November 2020, Psyma Hungary Market and Public Opinion Research Ltd., on behalf of the National Media and Info communications Authority, the National Media and Info communications Authority conducted a survey on the availability of local media to rural societies and the consumption of local media content, including the young generation. It is not possible to present the details of the results, to present the characteristics of the youth age group separately here and now. Among the rural towns, the towns of Pécs and Kecskemét were highlighted in our research.

Summary of the survey:
In both cities, especially in Kecskemét, very powerful local patriotic sensations are observed (Vienna: 85,5 points, Kecskemét: 87.5 points), but this is not accompanied by strong public activity. The overall level of public activity is moderate: in addition to being somewhat more localised, the people from Kecskemét are more active in public life than the people in Pécs (Pécs: 41,3 points, Kecskemét: 46.5 points).

The fact that local public activity is not very intense – dominantly medium or weak – certainly plays a role in the fact that public interest in local information (public life) is not so high. In both cities, about a third of the respondents are interested in "very" news about local urban events. Each second question is more of a "moderate interest", and a little more than a tenth of them is "a little or not at all".

Local politics and local events make people less concerned than national politics and events of national importance. 31% of the inhabitants of Pécs and 26 % of Kecskemét people see that more interest in national politics/events and attention to local public life/history are lost. In Pécs there is a very high number of people who are constantly informed about national politics, which is certainly related to the higher educational attainment of the people living in the city, the nature of the University City, and the stronger intellectual and cultural potential symbolizing the city. In Kecskemét, people think more within the city limits, and because of the greater local public activity, people may reflect more on local things.

Local media preferences are triggered by interest in local events in both cities. Both in Pécs and in Kecskemét, most people explain the need for information about local things to read/listen to local media. In addition, an important aspect is that they can get fresh, up-to-date and accurate, reliable information from here. Among the topics related to local public life, the "buyers" are primarily asked for "common" information. Interest is not so much aroused by materials on local policy, but rather information on education, health, the social system, or reports on local events and events.

Local media is not only closer to people in time and space than in national media. Interviewees generally value local media more favorably than national media. This is true for both cities and for each of the main media segments (TV, radio, press, online media). The highest satisfaction scores of the local media were given to radio stations in both cities.
In recent years, the media space has been significantly restructured in rural cities.

In this respect, the following main findings can be found:

In both cities, viewers of local television have fallen sharply – especially in Pécs. Based on the size of the audience reached in the local media structure, the televisions were pushed back to the last place. This is a local, specific media market phenomenon, and there are no signs of this in the national media space. At national level, the decline of television can only be seen in news programs. In both cities there was a significant decline in local press reading. This follows the general national (or global) trends.

The market position of local radio in both general and news programs is particularly strong in the county seats examined. The strong rise of the radio segment goes against national media consumption trends. While radio at national level is increasingly falling backwards, this is not perceived at local level, in the cities surveyed.

The use of Internet platforms in the use of local media devices in both cities is greatly expanded – this is in line with general, national trends. The advance of the online media space is much stronger in Pécs, which can be explained by the more modern and western structure of the city.

Local Internet portals are the first in both cities to consume news related to local public affairs (Vienna: 66 %, Kecskemét: 65 %). In the second place, local radio stations are next, but with a much smaller mention (Vienna: 40 %, Kecskemét: 46 %), followed by local TVs and newspapers, with a reference rate of 25-30 percent. The people in Kecskemét for news programmes use Media that are more traditional. The overall national situation in the county seats is not fully represented. At national level, television is still the most important news channel; the Internet is second, radios are ranked third and printed media is fourth.

The importance of local internet portals is even clearer if only one intermediary can be highlighted from the channels of local news consumption. About 60 percent of news users

are primarily informed about the Internet, while other media devices – TV, radio, and press – are generally preferred by about 40 percent when they consume local news. Based on the news consumption habits of local residents, it can be concluded that in the national media space the weight of television is three times higher than in the local media space when it consumes national news. In the case of radios, the situation is reversed: radio news shows three times in the local media space compared to national proportions. The position of the local press in the local media space is relatively stronger, because the difference here is about ten times."

Two things need to be mentioned, which have not been noted or mentioned in the summary.
- On the one hand, local television and daily newspapers operate websites with significant visitation (which is characterized by video sharing on television portals, which is preferred by the public).
- On the other hand, besides the county seats, which make up only one third of rural media, it is also important to learn about the media consumption of smaller settlements. Local television and their Internet news portals are characterized by small towns. There are no radios, but there are no separate websites in addition to the monthly publication of the newspapers.

It is also important to note that Hungarian media law differs or needs to be supplemented in what is not typical of other countries in Europe, that is a significant local medium of democracy, where the local government, civil society organizations, economic operators, culture, education, health and many other sectors can also appear. They would not be able to do that on national channels.

Legal framework for media literacy education

Media pedagogy – media environment – media awareness

The aim of media education is media literacy and media literacy. Media literacy is a set of skills and knowledge that ensures conscious, active media inclusion and use.

The emergence of new media, interactivity and new on-line social spaces has fundamentally rewritten it, and media pedagogy has become a complex area that develops broader, more diverse knowledge and skills. In addition to the acquisition of the audio-visual language, particular emphasis will be placed on improving skills related to access to information, interpretation, placement and transformation.

This also creates a new situation in terms of movement in the social environment, and the awareness and acquisition of customs, norms and responsibility issues have become part of the area.

Areas, which have significantly changed:
- Rapid change in communication tools in civilian life and work.
- Digital technical development and content dumping. It became the media industry.
- The content range has shifted towards bulging. Public service needs to be reinterpreted and protected.
- The boundaries between media texts and content have changed. The appearance of advertising texts has a huge influence on ordinary language.
- Media users have changed and can be divided into smaller, identifiable segments.

Children and youth are becoming increasingly difficult to adjust in this context, and they find it difficult to judge attitudes towards society. What is our role in this process? What does the school have to do?

In the new National Curriculum adopted in2012, MovingPicture Culture and Media Knowledge is among the Arts, and its teaching is aimed at obtaining basic media literacy, especially with regard to the development of cinematographic literacy, and to explore the

social role and functioning of the media. A system of skills and personality development that is necessary for students to be able to navigate and choose in the public created by traditional and new media, giving them the chance to be competent, critical, equal participants in the new social scenes. Responsible citizens of media democracy must have media literacy." (NAT 2012, p. 176) The 2012 NAT uses the concept of critical media awareness, and development tasks include critical thinking, reading and comprehension, analysis and knowledge and communication. "

The NAT Directives guarantee media literacy only theoretically. The secondary school framework curriculum shows that from September 2013, motion picture education will appear: in the eight, six and four-class high schools in the 9th grade, "Dance and Drama" or Moving Images can be chosen in all institutions in the 9th grade, while in the 11-12nd grade "Arts" can be chosen in the cultural domain of "Arts" in addition to singing music, visual culture and dance and drama. Another novelty is that vocational secondary schools can also choose media literacy in the 11st grade (also within the "arts") (Gymnasium framework curriculum).

Unfortunately, the conditions for developing media and information literacy in schools are not optimal. The Bűvösvölgy Media Understanding Centre was established in 2014 as an informal development stage in Budapest, established by the National Media and Info communications Authority to support children in the conscious and safe use of the media. In 2017, such a workshop opened in Debrecen, where experts await study groups and teachers with full-day sessions.[66]

The revised National Curriculum did not touch the essential elements. In the 2012 plan, motion picture culture and media literacy were separated, this is not reflected in the 2020 plan. Cinema is not the same as media culture. That is a fact. In fact, getting to know the media in the media could be in the media. We should not train film directors, screenwriters, but

---

[66] http://buvosvolgy.hu

really the mechanisms of the media, the concept of news, the process of making it, and the recognition of its truth content, with examples and analyses. This would require the training of educators who are interested in this area.

There is concern whether teachers teaching art subjects is necessarily suitable for this task. In addition, there is no suitable expertise, and there is no close cooperation with local media. In this area, it should be based on the staff of the media and teaching the subject by sharing the syllables of theory and practice.

It is also important to describe the means of expressing the motion picture, i.e., teaching the basics of cinematography, but then we should separate the two objects! Teachers (respect to the exception), who teach art objects, I think primarily of teachers teaching drawing; it is easier to deal with the film part. They may not be motivated to get to know the world of the media, and many of them are shutting themselves away from regular media consumption and some of its players. That is understandable and acceptable.

What could we do, do we have to deal with it?
1. Conscious media use.
2. The role and use of the media in society.
3. Expressions of motion picture communication.
4. Text and Picture World. It is a media language.
5. The traditional and the new media.
6. It is a sensible reception.
7. The media created a world and a comparison of reality.
8. The operation of mass communication.
9. The structure of the news, the role of resources.
10. The role of the media as an opinion-maker.
11. Use of the media.
12. Types of media.

While teaching the subject, it would be important to focus on the interfaces that link media education to other subjects, Hungarian language and literature, visual culture (drawing), history and, of course, IT subjects.

2.6 Montenegro

Media literacy is an elective one-year program in high school. The role of the media in today's societies is extremely large. The media is not only the most important source of information, but at the same time it is obvious they greatly influence the shaping of worldviews of individuals and promote values and patterns of behavior within society. Therefore, critical understanding and conscious use of the media is crucial for the autonomous action of individuals and for their active civic participation. Media literacy contributes to understanding the role of the media in society and acquiring the essential examination skills that are necessary for citizens of democratic societies who seek to understand, participate in and contribute to public debate. Through media literacy classes, students will acquire the skill of analyzing and critically "reading media messages" and developing an awareness of how words and narratives, images and sound can be used in the promotion of certain ideas and goals. Based on the acquired knowledge, the student is able to make a choice fact, concludes and critically evaluates media text. Media literacy also enables students to use the media to express their ideas and views. It may be a way of actively participating in the creation of public space for and within civil society. This aspect of subject teaching contributes at the same time developing their creative potential and aesthetic sensibility. As one of the necessary conditions for the establishment and development of a democratic society, media literacy can make a significant contribution to the adoption of democratic values. Like acquiring any other literacy, it can only be truly successful if you get through it

and gain an understanding of the connection between two key factors: the specificity of the (given) medium and the way in which those who form understand these specifics.

Media literacy is an elective one-year program that is studied in the 2nd or 3rd grade of high school with two classes per week.

The general objectives of the course Media Literacy are:

1. Awareness of one's own attitude towards the media and media texts;

2. Development of the ability of critical reception of media texts.

   A student will:

 - understand that all media texts are constructs that do not reflect empirical reality, but construct media reality;

- understand that media texts are constrained by the use of creative language with its own rules;

 - understand which determined the reception of the media text;

- be able to reveal the values and purposes inherent in the media text;

 - be able to identify who benefits from the effects of media text;

- understand the role of the media in democracy;

- know and understand the basics of heads of media ethics;

3. Development of the ability to produce media texts with regard to their aesthetic, technological, and organizational-production aspect.

A student will:

- be able to construct media text using media language in an adequate way;

- be able to design a media text according to the type of audience;

- know how to use the media in advocating certain democratic values or ideas (civic initiatives, NGOs, etc.);

4. Encouraging and meaningful and productive inclusion of elements of media literacy in other subjects, especially in language teaching and literature, sociology, psychology, philosophy and history.

2.7 Romania

Romania's approach to media education has only very recently started to directly address media literacy. Starting from 2004, when the first legal provision for the introduction of *Information and Communication Technology* courses in the school curriculum was adopted ; the policy focus has been on building "digital skills", "digital education" and "digital literacy" alongside developing digital infrastructure and resources for schools.[67]

Media literacy took a background role, and educational initiatives fell mainly upon civic society organizations. Through NGO-led efforts and partnerships, some media literacy courses were introduced as part of other disciplines (Civic Society, Social Sciences).[68]. Only starting in December 2020, Romania's educational policy started to directly address media literacy through a pilot project introducing media literacy training to high school teachers and students as well as in the government's new strategy concerning the digitalization of education, which was submitted to a public consultation in January 2021.

The status of media literacy within the mass-media policy framework remained in a less developed stage. The Romanian law of the audio-visual (504/2002) services was updated in 2008 (Art 10.3.j) in order to conform to the European Audio-visual Media Services Directive (2018/1808), to include an obligation for the Romanian National Audio-visual Council to promote media education (Art 10.3.i). Its role, however, remained limited to the protection

---

[67] Popescu, M., I. Lupea, R. Gubernat, and R. Bodea. (2015). Mapping Media Policy and Journalism—Romania. European University Institute.   https://cmpf.eui.eu/mpm-2015/romania/
[68] Fotiade, N. and M. Popa. (2008). Evaluation of Media Literacy Level in Romania. Active Watch – Media Monitoring Agency.
https://activewatch.ro/Assets/Upload/files/Media%20Literacy%20in%20Romania%20MMA%20Research%20English%20Report.pdf

of minors from violent and adult content, rather than developing media literacy skills through educational efforts.

Up to this point, the Romanian legal framework does not include a dedicated media education policy, but it looks like the introduction of one is imminent as part of the newly proposed policy for the digitalization of education.

Media literacy in the legal media framework

The Law 504 of the audio-visual, from 2002, constitutes the backbone of the legal media framework. It institutes the Romanian National Audio-visual Council (CNA), which has a regulatory role and has an autonomous status while also being subject to parliamentary control (Art 10). The law guarantees social cultural and political pluralism (Art 3.1), it requires audio-visual providers to inform the public objectively and represent events accurately (Art 3.2). It band censorship (Art 5), guarantees editorial independence and fair competition. Parliamentary control of the CAN consists in the parliamentary debate by the committees for media and budget of an annual activity report and budget submitted by the CNA. The only prescribed sanction is the firing of the head of CNA in case the report is rejected by the parliament.

In 2009, the law was modified to include a new prerogative of the CAN, that of raising the awareness of the public about how to use audio-visual media though developing and promoting media education for all social categories (Audiovisual Law 504 2002, Art. 10.3.i). Another change was made in 2009 (idem, Art. 39.2.3) to allow for the broadcast of programs, which may present harm towards minors' physical, psychological or moral development only under conditional access or with a visual or audio warning.

Hate speech based on race, gender, religion, nationality and sexual orientation is banned (Art 40) and CNA can sanction media providers who do not comply, either based on CNC's own

monitoring of the media or based on a complaint from a public authority or from a civil society organization or a complained from a person injured by a violation of the law regulating the audio-visual services (Art 89). Likewise, anyone may claim the right of rebuttal (Art 41).

The phrase "media literacy" is absent from the legal media framework with one minor exception. The public relations department of the Ministry of Defense is tasked with monitoring the media and rebutting misinformation, propaganda and fake news. At the same time, one of its prerogatives is to organize media literacy courses for the military and civil personnel of the ministry of defense (Order M.103/2020, art 118.4).

In the annals of the parliament, there may be indications that Romania would welcome a push towards introducing media literacy if there was more support for it from the EU. For instance, decision 58 from 2018 notes that a rapid action at the level of the EU is needed in order to remedy the difference in digital literacy across the union, differentiated by the degree of national media literacy (Decision 53/2018, Art 11). Likewise, Decision 41/2013 states that the senate believes that a better "media education" of the European public would help grow the popularity of media content produced in Europe.

The print media is not regulated.

In the digital media, the ministry of communication (Law 106/2020 Art 5) is tasked with preventing, analyzing, identifying and reacting to violent incidents in the digital media. When it comes to "cybernetic violence", it has the obligation to develop public awareness campaigns as well as to organize digital literacy programs addressed towards a "large variety of (Internet) users". It must also assist authorities in preventing and responding to cybernetic violence.

Media literacy in the legal education framework

The Romanian national education law (1/2011) prescribes eight foundational competency domains for students before high school. Two among these domains form the basis of the inclusion of digital and media literacy: "digital competencies in using information technology as a tool for gaining knowledge and "social and civil competencies" (Art 68). The law upholds the discipline "Information and Communication Technology" as optional for primary school and mandatory for middle and high school (Art. 68.3). The law also instituted two digital resource platforms: a virtual library and an e-learning platform while also pledging that the Education Ministry will provide teachers and students with the necessary infrastructure and equipment, including laptops and tablets, to use these resources (Art 70.2, Art 94.2.z). Moreover, an evaluation of digital competences (Exam D) is required as part of the Bachelor's exam, which is the national testing at the end of high school (Art 77.4).

School libraries are understood as places to develop the informational and documentary skills of the students, referred to as "information literacy". For this purpose, a new teacher role was introduced in 2011 (Regulation for the Organization and functioning of school libraries and centers for documentation and information), that of the documentarist teacher along with a new library-related space, that of the Centers for documentation and information (CDI). The CDIs include, besides the classical library spaces, areas for digital and multimedia resources. The documentarist teacher is tasked with training students in using classical and digital resources, in doing research or helping students with special learning needs.

The education law does not, in its current form, prescribe any media literacy courses. However, it leaves the possibility open for such courses to be introduced on a school-by-school basis as optional courses through the extracurricular program "School after school", in partnership with NGOs, parents associations and local public authorities (Art 58).

In 2019, the Ministry of education and research considered bringing changes to the policy of the national school curriculum as part of the Strategy Europa 2020 and the Strategy concerning school drop-out, adopted by the government in 2015 (Ministry of Education and Research 2019). In the policy paper submitted to the public consultation, the Ministry takes note that one of the important global tendencies is that people are increasingly becoming consumers and producers of media content and that most jobs require digital skills. As such, the ministry believes schools have an important role to play in teaching digital skills..Again, this opportunity to improve the school curriculum for digital education is not taken advantage of to introduce media literacy, but rather to strengthen the already existing programs of digital literacy, as well as to strengthen the complementary use of traditional and digital or multi-media pedagogic resources. However, progress is made in re-formulating the first of the eight basic competences provided by the national educational law, namely communication competences in the mother tongue, into "literacy competency" defined as "the ability to identify, comprehend, express, create and interpret concepts, feelings, facts and opinions both verbally and in writing, using audio-visual and digital means in any discipline and in any context".. Moreover, this is in addition to the regular digital competency, which includes, specifically, digital literacy.

When it comes to continuing education, there is a law of Community centres for permanent education (Decision 598/2017) and among the courses, these centres may provide to the public, the law enumerates media education (Art 18.4.s).

The first dedicated program on media education was introduced through a regulation approved by order 6234/2020. It establishes a pilot program in 100 high schools across the country for the duration of three years (2021-2023). Its purpose is to train 600 Romanian language and literature teachers to be able to teach media literacy (Art 3, 6). High schools may apply to be part of the pilot project until 20 January 2021. The Ministry of Education in collaboration with the NGO Centre initiates the project for Independent Journalism (Art 4.2).

The NGO contributes by offering continuous training courses, which will train teachers in media literacy and well as in reporting on the progress of the program and analyzing its impact. Both students and teachers will be evaluated before, during and at the end of the program. Based on all these results, the ministry of education will decide if the media literacy program is worth extending to all high schools in the country, after 2023.

Alongside the media literacy pilot, a new digital strategy for education, SMART.Edu was proposed by the Romanian government in December 2020 and was under public consultation until 15 February 2021. The project's domains of action are: developing digital competencies of students, adapting the school curriculum to emerging jobs, life-long digital education, professional formation of teachers for digital education, digital resources and infrastructure, connectivity, creation of open educational resources, cyber security and IT ethics..

To contribute to improving education for emerging jobs, the policy proposed a major change to the institutional structure of education in Romania: the addition of a new type of educational institution, Community colleges ("Colegii ale comunității"), combining the institutional models of the high school, the applied sciences universities and professional excellence centers..

The policy has three main objectives: achieving digital literacy for 90% of Romania's population, introducing digital resources and infrastructure in all educational units in Romania and workforce absorption of 82% of the population between the ages 20-34 with an emergent jobs formation (p 13). Importantly, the policy proposal stressed that the digital competency among the eight European key-competences includes media literacy (p 15).

Among the novelties of the new proposal which might contribute to promoting media literacy, there are: developing digital literacy programs for preschoolers, an overhaul of the

curriculum for Information and technology course in middle school, developing programs for parents to help them support the digital formation of students, developing a common guide for students, teachers and parents which includes combating misinformation.

Among the newest initiatives, the media literacy pilot program for high schools is the most comprehensive and the only one directly addressing the issue. Should it prove successful and be extended to the rest of the country, in conjunction with a coherent digital education strategy, it has the chance to bring a substantive improvement in Romanians' digital skills for life.

2.8 Serbia

Media and information literacy (MIL) is understood as a complex concept, modeled on the wording provided by UNESCO, which recognizes the roles that the media and other sources of information play in our personal lives and democratic society in general. This concept emphasizes the right of the individual to communicate and express, seek, receive and communicate information and ideas. It encourages the evaluation of information and media content based on the way that information is produced, the messages they convey, the audience to which the personal experience of the recipient of the information is intended and their interaction with the information. The MIL concept also implies the development of knowledge that encourages democratic attitudes and communication values based on the protection of the right to information and freedom of expression.

Legal framework

The Strategy for the Development of the Public Information System in the Republic of Serbia until 2016 (hereinafter: the Strategy) determines the guidelines for the development of the public information system in the Republic of Serbia until 2016, with the basic goal of further strengthening established democratic relations in that area.

The goal of the Strategy is to determine the most important directions of development of the public information system in the Republic of Serbia and parts of that system in order to develop the freedom of the media and the media market to further strengthen democratic relations in society. Improving the public information system includes harmonization of domestic legal framework and practice with international and European regulatory framework and experience, the obligation of the state to respect and implement them, as well as strengthening the capacity and obligation of all participants in the public information process to work in the public interest and all social groups. With this strategy, the Republic of Serbia defines for the public interest, the role of the state in the public information system, the position and role of public media in a democratic society, ownership in public media and pays special attention to public ownership and media concentration. The strategy also defines the role of print media and news agencies, conditions for further development of electronic media and media on new technological platforms, as well as the special position of the public service in the public information system.

Freedom of public information

Public information is free and not subject to censorship. Direct and indirect discrimination of media editors, journalists and other persons in the field of public information is prohibited, especially according to their political affiliation and belief or other personal characteristics.

The free flow of information through the media must not be endangered, as well as the editorial autonomy of the media, especially by exerting pressure, threatening or blackmailing editors, journalists or sources of information. Physical assault on an editor, journalist and other persons involved in the collection and publication of information through the media is punishable by law.

Freedom of public information must not be violated by abuse of official position and public authority, property and other rights, as well as the influence and control over the means of printing and distribution of newspapers or electronic communication networks used for the distribution of media content.

Ownership of media

The determination of the state is not to be the owner of the media. The state, territorial autonomy and local self-government unit, as well as institutions, enterprises and other legal entities that are wholly or partly state-owned or financed in whole or in part from public revenues, according to the law governing the field of public information, cannot be, neither directly nor indirectly, the founder of the media. In order to ensure the public interest in the field of public information, the state may be the founder of national, provincial and regional public radio and television services. The state can be the founder of a public media in the Serbian language for the needs of the population of Kosovo and Metohija. The state can be the founder of specific media that are in the function of closer information and acquainting citizens with the work of state bodies and public companies (internet portal, assembly channel, etc.). National councils of national minorities may be the founders of public media in the language of the national minority for which they were established.

Ownership of media in Serbia (individuals/corporations)

The media in Serbia are mostly in the hands of private owners and companies, although the state still has a significant share in the ownership of some media, such as Politika and Večernje novosti. The main characteristic of media ownership in Serbia is that on paper, everything often looks relatively clear and simple, but, in practice, this is often not the case. In a small number of print media cases, the owners are journalists (for example, Danas or Vreme), while other media are most often owned by business people and media companies. Two groups dominate the print media market - Ringier Axel Springer, which has in its portfolio the daily Blic, the weekly NIN and numerous other lifestyle issues, and Igor Žeželj,

the new owner of Adria Media Group, which, among others, publishes the daily Kurir. These two media houses also have some of the most visited web portals such as blic.rs, kurir.rs and espreso.rs.

In the field of electronic media, the concentration of ownership is higher than in other parts of the media arena. In this part of the media sector, the influence of telecommunication operators is visible - cable operator Copernicus now owns the former Antena Group (owner of national televisions O2 and Prva), while N1 television is owned by United Group, the largest telecommunications provider in the region. The state telecommunications operator Telekom Srbija has cooperation with Pink Media Group and the public service RTS through joint production, primarily of serial content. Three companies - S Media Team, Maxim Media and Media Public Service, have about a 40% share in radio listenership. As for online media, companies that already own other types of media own most influential portals.

Despite the fact that most media are privately owned, the ruling party has a huge influence on the media - through advertising control, directing state funds, acquaintances and influencing owners. All this has the consequence that, despite the fact that private property is diverse, editorial policies often have the same directorate, news programs look similar, and there is a noticeable lack of criticism of those in power.

The state owns a small number of influential media - these are primarily two public services, Radio Television of Serbia and Radio Television of Vojvodina. In addition, the state has some ownership in the dailies Večernje Novosti and Politika. Other media are commercial, and their owners are individuals or private companies (domestic or foreign). Most companies headquartered in Serbia are registered as limited liability companies (LLCs), and a small number of media outlets are joint stock companies (JSCs), whose shares are traded on the stock exchange.

The publicity of the ownership

Ownership data in the media is public. The actual owner of the legal entity that is the founder of the media and the origin of the capital invested in the media must be known. The Republic of Serbia will improve and consistently implement legislation that will ensure public ownership and availability of:

1) information on natural or legal persons participating in their ownership structure, including information on the nature and scope of that participation, as well as on the ultimate owners of that participation,

2) information on the nature and scope of participation that the same natural or legal persons have in other media and companies active in the media sector and other economic branches,

3) information on other natural or legal persons that could significantly influence the editorial policy,

4) information on state aid measures used by the media, taking into account that the extent to which the public availability of such data is provided is proportional to the public interest and harmonized with the regulations governing the protection of personal data.

Media pluralism

The Republic of Serbia will support the development of media pluralism, which includes the diversity of ownership, sources of information and media content. Preserving and promoting media pluralism implies measures that enable citizens to access various sources of information, opinions and media content that help them form their own opinion and resist the influence of dominant opinion created in the centers of power.

The Republic of Serbia will harmonize the laws related to the media in such a way that media pluralism at the national, regional and local levels is not endangered.

The Republic of Serbia will monitor the development of the media on new technological platforms and take measures that encourage the preservation and strengthening of media pluralism and the diversity of media content.

Protection of media pluralism and prohibition of monopolies in the field of public information

In order to enable citizens to form their own opinion about phenomena, events and personalities, a variety of sources of information and media content is provided. In order to protect competition and diversity of ideas and opinions, any kind of monopoly in the field of public information is prohibited. No one can have a monopoly on publishing information, ideas and opinions in the media. No one can have a monopoly on the establishment or distribution of media.

Prohibition of violating media pluralism

In order to prevent the emergence or strengthening of the predominant influence in the field of public information, which significantly limits media pluralism, it is not allowed to unite:

- founding or management rights in two or more publishers of daily newspapers that publish information from all areas of social life, whose total annual circulation exceeds 50% of the sold or otherwise realized circulation of daily newspapers in the Republic of Serbia, in the calendar year preceding the merger;

- founding or management rights in two or more publishers that provide audio or audio-visual media services, whose combined share in listening or viewing exceeds 35% of the total listening/ viewing in the coverage area, in the calendar year preceding the merger.

Consolidation of founding or management rights implies the possibility of decisive influence on the conduct of business in two or more publishers, and especially in the capacity of a controlling (parent) company, or controlling member or shareholder, based on ownership or other property rights on property or part of property, rights from contracts, agreements or securities, on the basis of receivables or means for securing receivables or on the basis of business practice conditions.

Identifying threats to media pluralism

The existence of endangerment of media pluralism for print media is determined by the ministry in charge of public information, and in cases of merging or cross-acquisition of participants in which at least one electronic media is a participant, an independent regulatory body in charge of electronic media, in accordance with the law. The Ministry in charge of public information affairs shall initiate a procedure.. When it determines that media pluralism is endangered, the ministry shall warn the publisher and order him to submit evidence that it has eliminated the causes of endangering media pluralism within six months from the day of receiving the warning. Moreover, the Ministry shall, ex officio, notify the Registrar of the issued warning. If the publisher of the print media does not act upon the warning, the Registrar, based on the decision of the ministry responsible for public information, shall delete the media from the Register.

Media literacy status

There are no clearly formulated public policies and a comprehensive strategy for the development of media and information literacy in Serbia. However, the importance of some of its aspects has been recognized in various documents. In strategic documents, it is recognized as a necessity, it is an important topic of public debates, and its development is at the level of designing public policies and strategic framework. Since Serbia is in the process of joining the European Union (EU), the concept of media literacy is mainly considered within this process. Many strategies and policies state in their guidelines the importance of empowering specific social groups, but in practice, it has been shown that it is necessary to coordinate this motivation at the national level with a multi- stakeholder approach that means with all interested social actors as well as citizens in this MIL framework. Freedom of the media is a condition for and an indicator of measuring freedom of expression and information in democratic societies. As stated in the document "Instrument for Pre-Accession Assistance (IPA II)" for the period 2014-2020, although Serbia had a media strategy and action plan for the period 2012-2016, in that period there

was first little progress, and then a decline when it is a matter of freedom of expression as well as the slow implementation of the Media Strategy action plan.

Media and information literacy policies in the education sector

The Education Development Strategy of Serbia until 2020 (adopted in 2012) emphasizes the development of eight competencies and lifelong learning, and media education and media literacy are implicitly assumed as one of the outcomes. The Strategy emphasizes the importance of information literacy and emphasizes the role of school libraries as learning spaces and resource centers for the implementation of media literacy. The strategy also presents the problems of the existing school system, which faces many challenges: "students leave primary school with underdeveloped basic competencies that are key to continuing education and better coping in private and public life" (Education Development Strategy in Serbia until 2020, 2012: 33).

One year after the adoption of the Education Development Strategy, the National Education Council of the Republic of Serbia adopted the Guidelines for Improving the Role of Information and Communication Technologies in Education (2013), which lists eight different literacies that are important in the new media environment.

In 2017, the Ministry of Education, Science and Technological Development started an important consultation process regarding the draft Digital Competence Framework - Teacher for the Digital Age, which was designed to support teachers in the education system in the process of integrating digital content into the curriculum practice. Nevertheless, there is no single accepted MIL formulation or explicit public policy in this area in Serbia.

An overview of the existing media and information literacy policy in the media sector

Media literacy was explicitly recognized as a concept for the first time in an official document in the Strategy for the Development of the Public Information System in the Republic of Serbia until 2016.

The idea of media literacy also appears in the Law on Public Information and Media and the Law on Public Media Services. In the new set of media laws, adopted in 2014, media literacy is recognized as an important area of public interest.

In the process of consultations regarding the development of a new Media Strategy with the support of the OSCE in Serbia, in 2016 a comprehensive discussion was held on the importance of strengthening media and information literacy. At the beginning of 2017, more precisely on February 10, 2017, the recommendations on media literacy prepared for the new Media Strategy were unanimously adopted. They emphasized the importance of:

1) cross-sectoral and inter-organizational cooperation;
2) innovative and creative projects for new digitally literate generations that will address emerging occupations;
3) projects related to media literacy intended for digital natives, which would bridge the gap between their advanced information literacy and insufficiently developed competencies in the field of media literacy;
4) media education projects for all target groups, including professionals in the field of media and education, as part of lifelong learning;
5) greater support for audience research projects and those who advocate media literacy. Participants proposed the establishment of a fund for doctoral students, to support research on media literacy within doctoral dissertations;
6) creating a portal that would contain information about all actors, activities and materials in the field of media literacy (tutorials, research results, textbooks, scientific papers and books, schedules of seminars, summer schools and camps).

Participants/actors

There are many different bottom-up and top-down initiatives regarding the MIL in Serbia. However, most involved are one-year projects of civil society organizations funded by relevant ministries, European or international donors.

Government - *Ministry of Telecommunications and Information Society, Ministry of Youth and Sports, Ministry of Culture and Information.*

Regulatory and self-regulatory bodies - *Regulatory Body for Electronic Media (REM), Association of Journalists of Serbia (UNS), Press Council.*

Information intermediaries - *Library Association of Serbia, Institute for Continuous Information System e-Culture.*

Civil society organizations - *Media Literacy Campaign, US Agency for International Development, researchers, government institutions, CSOs, schools, universities.*

Private sector - *publishing house Clio from Belgrade.*

Overview of the state of MFA in Serbia - Results

Many results of recent comparative research show that in the region of Southeast Europe and the Balkans, with some differences between individual countries, media and information literacy (MIL) is not a sufficiently developed area. As in other countries in the region, strategic and legal documents as well as educational programs in Serbia recognize some elements of media and information literacy, however, in practice; the MIL is mostly developed by civil society organizations.

Proposed guidelines for public policies of the MFA

The results of this analysis show that Serbia has already taken important steps in developing media and information literacy competencies. The challenge is to ensure MIL for all citizens. In addition, it is necessary to strengthen the mechanisms for the involvement of various social actors, by using existing resources but also by creating new ones. When planning future public policies and strategies for the development of media and information literacy, it is necessary to emphasize the importance and connection of these competencies and issues

such as gender equality, discrimination and youth participation. Below are suggestions on how public policy guidelines and strategies could be considered when defining public policies.

- The MIL provides basic knowledge, skills and attitudes that protect and encourage the further development of democratic values, economic and national development.

- A multi-stakeholder approach facilitates consensus among different societal actors on the MIL's vision, key values and beliefs (personal, social and economic strengths of the MIL), enabling the creation of new partnerships in providing knowledge and organizing resources to achieve common goals in relation to the MIL and overcame existing and future obstacles.

- MIL programs should take into account existing media and information and communication technologies (ICT), so that citizens can fully enjoy the benefits of media and technology they already use and to participate in a responsible and active way in society, political and cultural life of the community.

- MIL programs should provide knowledge, attitudes and skills to all, in order to enable citizens to critically use the media and other sources of information, through a lifelong learning process, which includes formal, non-formal and informal education.

- MIL programs should support the development of an open knowledge society, including the reform of libraries, the diversity of media free from external and internal influences, fostering freedom of expression and information, accountability and transparency, and respect for human rights.

- MIL programs should promote social inclusion and seek to reduce all types of "digital divide", "knowledge gap" and "participation gap", by providing opportunities for participation to those who are in any way denied and marginalized.

Specifics of media consumption - which medium is the most popular

Place NUMBER 1. The best-listed medium on the Internet is Blic, which is on the 5th place in terms of readership in Serbia, and is one of the most read portals in the diaspora, which is shown by the fact that it is on the 2,990th place out of all sites in the world.

Place NUMBER 2. Immediately after him is the best ranked Kurir, which is in 6th place. Like Blic, it is one of the most read portals, so it is listed on the world market at a high 3,132 place.

Place NUMBER 3. Media portal B92 is on the high 9th place in Serbia, which ranks it as the third most read media in Serbia. Globally, it ranks 4,939 out of all sites on the web.

Place NUMBER 4. Another medium on the Internet followed the popularity of the previous two, so the Telegraph ranked 17th in terms of readership in Serbia, while it took 8,294th place on the world list of all sites on the web.

Place NUMBER 5. Media portal that deals with a wide range of serious topics of public importance is H1, which is on the 26th place in terms of readership in Serbia, and their site is ranked 10,218th in the world.

Place NUMBER 6. Večernje Novosti also ranked 3 places below H1, taking 29th place in Serbia, and 12,651 place in the world.

Place NUMBER 7. Informer is on the 35th place in Serbia.

Place NUMBER 8. List Today, on the Internet, it was found at 40.

Place NUMBER 9. Immediately after them, the Mondo portal ranked 43rd.

Place number 10. The RTS portal is ranked 46th in Serbia and 14,884th in the world.

Place NUMBER 11. List Politika on the web ranked 69th in Serbia.

Place NUMBER 12. Portal Pink took the 82nd place of all sites in Serbia.

This data shows that citizens read more and place more trust in less serious portals, banal and pop content, gossip and scandals, embellishment of reality or portals that often have a black chronicle in breaking news, while topics of public interest are pushed off the air. Portals in the race for clicks and juicy stories and headlines prefer to resort to profit and quantity rather than quality and see information as a commodity instead of as a very important item for informing the public. It follows that citizens have less and less interest in important state, political, social and other issues and prefer to follow tabloid content. It also produces a suitable ground for media, political, but also other manipulation.

2.9 Slovenia

The Constitution of Slovenia (Article 39) guarantees freedom of thought, expression, public performance, press and other forms of dissemination of public information and expression. Every citizen has freedom to gather, consume and spread information and thoughts. Further, every citizen shall be provided with the public information, which is in the legal interest according to the law.).

1) *Mass Media Act*

Based on the Constitution, there are three different acts that are put in order regarding the media environment in Slovenia. The most important is Mass Media Act, which was first introduced in 1994 and adopted a few times in the following years. As it is stated in Article 1, the act defines *"(…) rights, obligations and responsibilities of legal and natural persons and the public interest of the Republic of Slovenia in the area of the mass media"*.

When it comes to the public interest Mass Media Act stipulates (Article 4) that Slovenia is obliged to support, develop and fund mass media programs, which are created for citizens of Slovenia, Slovene minorities in the neighbor countries, Slovenes around the world, ethnic groups and Romani community who are living in Slovenia. This article stipulates that it will :

1) provide public information,

2) protect Slovenian ethnic and cultural identity,

3) assure plurality and diversification,

4) promote cultural creativity

5) develop education and science in the area of mass media

Article 6 of the Mass Media Act stipulates that all media activities must respect and protect human personality and dignity. Further Slovenia is obliged to :

1) promote freedom of expression,

2) assure journalists, authors and editors' autonomy,

3) assure free flow of the information and freedom of expression of different opinions or beliefs.

As we mentioned above the Mass Media Act was changed a few times. Regarding protection of media pluralism, we should mention Section 9 of the Mass Media Law. The changes were registered in the law in 2001. Those entities or persons, who are publishers of basic informatively newspapers or journals and have more than 20% of the ownership share of this newspapers or journals, or more than 20% of management or voting rights, are allowed neither to be the owner or co-founder nor anyhow connected in creation of television or radio activities.

Other changes of the Mass Media Act happened in 2006, at the halfway point of the right-wing government, ruled by SDS. Former restrictions on media ownership were abolished. Referring to the revised act, local or foreign investors can own 33% of the media company. Another thing that was changed in 2006 was the introduction of the right of correction. Thus, any citizen who was offended by something that was publicly written or said, has the right to present his opposite fact or point of view and this correction shall be published at the same place..

2) Radiotelevizija Slovenija Act

The RTV Slovenia Act, which came into force in 1994, stipulates status, activity, leadership, management, control and funding of the only national public broadcasting organization in Slovenia. It is ruled by the Supervisory board, consisting of 11 members, among whom the Slovenian government appoints four. Another body is the Programming Council, which is dealing with questions relating to Article 16 (ZRTVS-1).

RTV Slovenia is a very large organization as it has more than 2400 employees. Both radio and television are offering Slovenian citizens varieties of programs. Primarily RTV Slovenia is news organization, yet it covers also topics like culture, sport or entertainment.[69]

As the name indicates, RTV Slovenia offers radio, television and from 2002 multimedia portals (MMC). According to the law (Article 1), RTV Slovenia as a public and non-profit institution, "(…) *shall perform a public service in the area of radio and television activities as specified by this Act, for the purpose of providing for the democratic, social and cultural needs*." Article 4 specified that RTV Slovenia shall provide citizens with information that are impartial and credible. Regarding broadcasts, RTV Slovenia shall ensure citizens comprehensive and credible information about national and international political events .[70]

3) *Audiovisual Media Services Act*

The act was adopted by the Slovenian parliament in 2011. With this act, the Republic of Slovenia transmitted a special *Audiovisual Media Services Directive* (AVMSD), which stipulates coordination of some laws and regulations with other EU member states. As it is written in the Article 1, the law stipulates rights, duties and responsibilities of entities and natural persons, who are dealing with audiovisual media activity.[71]

Media regulation

In Slovenia media are regulated by five different bodies. The most important is the Media Directorate, which belongs to the Ministry of Culture. According to Mrs. Menih Dokl, the Head of the Media Directorate, the main aim of the body is to frame the field of media in terms like "(…) *protection of children from harming content, then some limits, to set some limits in media*

---

[69] Rebernik, J.(2021). Personal interview with the author. Recording on computer. 20. Januar 2021.
[70] Ibid.
[71] Zakon o avdiovizualnih medijskih storitvah (ZAvMS). Uradni list RS, št. 87/11, s sprem. in dop. http://pisrs.si/Pis.web/pregledPredpisa?id=ZAKO6225. Accessible on 21.02.2021.

buying, then to assure the right to answer, to publish the opposite opinion and the presentation of opposite facts."[72]

In our interview, Mrs. Menih Dokl also mentioned regulation of the media evidence and the support of *"(...) the development and distribution of the contents, which is presented in media and it is in public interest* (...)", as one of the main objectives. Lastly, the role of the Media Directorate is to "(...) *spread diversity of media content and assure that the media landscape is more (...) pluralistic*".[73]

Other four bodies, we could mention in relation to the media regulation are:

1) *The* **Broadcasting Council of the Republic of Slovenia** (SRDF), a body that is responsible for broadcasting regulation.

2) *Agency of Communication networks and services of the Republic of Slovenia* (AKOS), which role is to organize and control the market of electronic communications.

3) *Culture and Media Inspectorate of the Republic of Slovenia*, which cares that everything related to media and culture is according to rules, laws and regulations.

4) *Council of Electronic Communication of the Republic of Slovenia*, which is treated as a consultative body (giving opinions, suggestions etc.) .

Media education, literacy and projects

Content that educates primary school students about mass media is part of various courses that students attend during the nine-year period of primary education. Media education is also offered to students in the form of elective courses. In the last triad of primary school (grades 7-9), students can be offered three elective courses that are directly related to media and media education, namely courses entitled Media Education: Press, Media Education:

---

[72] Menih Dokl, U.(2021). Personal interview with the author. Recording on computer. 26.01.2021.

[73] Ibid.

Television and Media Education: Radio. From 2006, these courses are offered to primary school pupils as optional courses in those primary schools where teachers educated in media contents, who can carry out the lessons and act in accordance with the envisaged curriculum, are employed. In primary schools, where there are no teachers of media education, they are less likely to choose to offer these electives. In addition to elective subjects of media education, primary schools can also offer pupils in the last triad a subject called School Journalism. Recently - in 2018 - Film Education was added to the list of elective subjects, which is a positive step towards updating the content of media education.

Schools play an important role in the actual implementation of the curriculum and legislation, as their ability to provide media education differs. The list of possible electives that primary schools can choose and offer to their students is long and varied, and not all primary schools offer all possible electives, nor do they have specialized staff or competencies to implement media education content.

Media Education as a compulsory course

Up until 1996, there was no special course in primary or secondary schools that would focus on media education. One year later, there was a special international conference, which took place in Piran and was dedicated to the topic of media education. The event was co-organized by Slovenian Ministry of Education and Sport, School Office of Slovenia, National Education Institute of Slovenia and the European Association of Audiovisual Media Services. The participants were talking about the state of media education in Slovenia and found out, which projects and practices were running in other European countries and which may fit in the Slovenian context. After the conference, special collection, titled Media Education through Media, (Vzgoja za medije z mediji) was published. Based on that, National Curriculum Council of Slovenia decided to Media Education in the school curriculum for the school year 1997/1998.[74]

---

[74] Dragan, A. N.(1998). Uvod. Vzgoja za medije z mediji. Zavod Republike Slovenije za šolstvo: Ljubljana.

With the integration of media education in the school curriculum for primary schools, Slovenia became one of the first Central European countries who decided to do that. Media Education, which was in the case of Slovenia defined as a process where children are taught about media through the media, was offered as a compulsory subject to those interested children who entered the last three classes of the primary schools.[75]

The last change in school curriculum was made in 2006 when the name of the subject also got its own subtitle: press, radio and television. These topics are separately divided in three years, yet they complement one another. In introductory lessons, children are learning about basic topics that relate to media. For example, educators teach children about characteristics of the media, construction of media reality, promotion media propaganda as well as journalism ethics and standards. The goal of this subject is to raise the awareness among children to become critical citizens. As stated in the school curriculum of Media Education (Curriculum for Media Education 2006), there is, however, little said about the use of modern technologies like smart phones, tablets, computers and particularly the internet.

Digital Literacy in Primary and Secondary Schools
The internet is just partly integrated in the school curriculum, yet it was written already in 2006. It should be taken into account that this school curriculum is not in accordance with the time we are living. In comparison to 2006, the use of the internet has increased. It has never been easier for to kids to reach out for information and to share it in the community, yet without proper education they can become easy targets for manipulation and victims of hate speech. There are, however, some possibilities for children to improve their digital skills in Slovenian primary schools. The latter offer Computer Science as a compulsory subject for

---

[75] Erjavec, K. and Z. Volcic.(2008). »Becoming Media Literate? Media Education in Slovenia after Ten Years. « Journalism & Mass Communication Educator 61(3). https://www.researchgate.net/publication/43455566_Becoming_Media_Literate_Media_Education_in_Slovenia_after_Ten_Years/references. Accessible on 21.02.2021.

children in 4th, 5thand 6th class. In these subjects children are taught basic things (like accessing, collecting, editing, evaluating and processing information) about computers and how to use them in everyday life (Curriculum for Computer Science 2013).

Speaking about digital literacy in Slovenian secondary schools, we have to mention here Information and Communication Technology (ICT Studies), which is a mandatory subject for students who are entering the 1st and 2nd class of secondary schools. The school curriculum of the ICT Studies, which students have two times a week, is divided into theoretical (25% of time in the week) and practical part (65% of time in the week). (Curriculum for ICT Studies 2008).

Mrs. Hrast Debeljak, the principal of one of the Slovenian high schools who participated in our interview, explained the clearest explanation of what students are supposed to do in this subject. "*They learn how to technically use and search information. How to check them, how to correct them and how to understand them the right way. How to compare information with other media and what are the sources of information that are objective and what are the fake news sources of information.*"[76]

Media Education as a theme within existing courses

Children from Slovenia are shaping their first experience with the media already in their preschool period. In three different areas. There are three areas which are covering media related topics. First is the area of Arts where children are discovering media through games, films, television and educational programs. It is in this area where children are expected to use media, identify, comment and use them (recording, taking photos). Next, is the area of Languages, where children are teaching media through listening to fairy tales, singing songs or watching different video materials that are appropriate for them. literature, books and reading. The last area, which is covering media, is Society. It is in this area where children

---

[76] Hrast Debeljak, B.(2021). Personal interview with the author. Recording on computer. 20.01.2021.

are introduced with themes like commercials, trends and fashion. This is also the opportunity to encourage children to speak openly about prejudices or stereotypes that are presented in the media.[77]

Speaking about media education in secondary schools, there is no special subject that would cover this area. It is integrated into already existing subjects like for example Slovenian language, Psychology, the History of Art and Sociology. In comparison to other three high subjects, Sociology is the one that gives the most emphasis on contents that are relating to media. According to the Curriculum for Sociology (1993), students are here learning about media institutions, media persuasion and media propaganda.[78]

However, from the perspective of Mrs. Hrast Debeljak this is "*(…) really not enough. I think we need a new course, but as I, you know, I think you probably too, a new subject called Active Citizenship will be part of our school curriculum in the third year of the education, but it would be mostly, less or more about active citizenship and critical thinking (…) "*.[79]

Principal of the high school later on in our interview explained that the best idea in her opinion would be to have media literacy education integrated in more courses. *"So I hope it won't be a part of only one corset, but I think there will be multi, there will be more themes involved, more teachers (…)."* She believes *"(…) that only in that way we can educate people to be really active citizens, to take part in our society (…)"*.[80]

---

[77] Lepičnik Vodopivec, J. (2011). »Some aspects of teaching media literacy to pre-school children in Slovenia from a perception standpoint of teachers and parents. « Acta Didactica Napocensia, 4(2-3). https://dk.um.si/IzpisGradiva.php?id=35406&lang=slv Accessible on 21.02.2021; Rek, M.(2019). »Media Education in Slovene Preschools: A Review of Four Studies. « Center for Educational Policy Studies Journal 9(1):45.

[78] Erjavec, K. and Z. Volcic.(2008). »Becoming Media Literate? Media Education in Slovenia after Ten Years. « Journalism & Mass Communication Educator 61(3). https://www.researchgate.net/publication/43455566_Becoming_Media_Literate_Media_Education_in_Slovenia_after_Ten_Years/references. Accessible on 21.02.2021.

[79] Hrast Debeljak, B.(2021). Personal interview with the author. Recording on computer. 20.01.2021.

[80] Ibid.

3. Styles of reporting and ways of interpretation

Project partners have identified the most prominent or contentious instances of reporting affected by disinformation and hate speech in their respective countries. While the selected case studies do not offer a complete picture of the media landscape in these countries, they are nevertheless illustrative examples of the reporting styles used and the topics likely to be exploited for the purposes of perpetuating disinformation and hate speech.

Problematic media messaging in these countries seems to revolve around three common topics, even though there is plenty of variation between countries regarding the type of media most likely to contain disinformation and hate speech as well as their styles of reporting. The following table summarizes the topics identified as highly vulnerable to disinformation and hate speech. Issues related to ethnic minorities, the LGBTQ community and the Covid-19 pandemic are present in virtually every country studied.

Country	Topics covered
Bulgaria	Roma, Covid, LGBTQ
Croatia	Weapons, ethnic minorities
Czech Republic	Covid, international relations, minorities
Germany	Covid, minorities
Hungary	Covid, supranatural phenomena, Roma, LGBTQ
Montenegro	Covid, international relations, minorities
Romania	Covid, Roma, LGBTQ
Serbia	Gender, ethnic minorities, migrants
Slovenia	Migrants, LGBTQ, international relations

Breakdown of topics

Ethnic minorities. This topic category includes reporting of incidents related to historical ethnic minorities, such as in the case of Bulgaria, Croatia, Montenegro and Serbia, refugees and migrants in Germany, Czech Republic, Serbia and Slovenia. The Roma minority especially is often targeted (in Bulgaria, Hungary and Romania). It is not only media outlets reporting on specific events that feature such stories. Outside of traditional media, private citizens and public personalities can use social media to promote hate speech, which, sometimes, snowballs into the mainstream media.

LGBTQ minorities. Gender and sexual minorities have been targeted by hate speech and misrepresented as a threat to traditional family values and to the health and lives of children. In the countries where such cases have been identified (Bulgaria, Romania, Hungary and Slovenia), the mainstream media usually steers clear of inflammatory language whereas religious media, far right outlets and social media are responsible for most of this type of messaging. Notably, elected politicians are a strong force driving misrepresentation of LGBTQ issues, especially in Hungary and Romania.

Covid-19. The Coronavirus pandemic was a topic often targeted by disinformation. In almost every country studied a variety of conspiracy theories: the safety of the vaccines or treatments used to manage Covid-19 in hospitals or the origin of the virus could be identified.

3.1 *Ethnic minorities*

The origins of negative stories about ethnic minorities are murky in many of the cases analyzed. Falsely contextualizing an incident, misleading use of information along with fabricated content are all strategies used to misrepresent ethnic minorities.

In Germany, a disinformation campaign targeting an audience of German-Russians has exploited the "Lisa case", the false story of a girl raped by refugees. The case was featured in right-wing extremist groups from Germany (NPD, Bärgida) and Russian media (Sputniknews, RT Deutsch, Perwy Kanal). Another example is the case of a Serbian tabloid publishing an unverified picture of an Albanian baker posing with an Albanian nationalist symbol.

The reporting on anti-Roma far-right march from Hungary (2012) offers a good example of the use of mis-contextualization. During the march, there were some incidents of protesters chanting hateful slurs at the local Roma population as well as throwing rocks at them. The police did not intervene. There were visible differences between the style of reporting of most mainstream outlets on this match, which offered factual accounts and condemned the police apathy, and far-right outlets, which stressed the peacefulness of the demonstration and failed to mention both the hateful chanting and the rock throwing. Others however, went so far as to fabricate the information that the Roma population had started throwing rocks at demonstrators first. Despite video evidence to the contrary, the false information persisted among supporters of the march.

Another example of a misleading strategy is the reporting of an anti-Serbian social media post made by a politician in Montenegro. While a part of the media took a critical tone, those outlets closer to the structures of power choose to frame the hateful message as an issue of the freedom of speech rather than hate speech.

Framing an event in a misleading way is also a strategy preferred by most Romanian media, including mainstream traditional media in reporting on incidents related to the Roma minority. In the first months of the Covid-19 pandemic, the role of members of the Roma minority coming from abroad or not following social distancing rules in speeding the virus was blown out of proportion and contrasted to the good behavior of Romanian families.

Hate speech using racial slurs is not uncommon, especially on social media. In Croatia, for instance, there were two incidents of public personalities expressing hateful views towards the Serbian minority on Facebook and the national television. One of these cases provoked a positive reaction triggering a prosecution for hate speech and strong opposition broadcast through the mainstream media against the use of hate speech targeting Serbians.

The media landscape in Slovenia is deeply divided along ideological and normative left-right lines on the topic of ethnic minorities and migrants. Therefore, the content is often emotional and value-based, with both sides using prejudice, accusations and insults. Labels include, on the one side, xenophobic, racists, populists, fascists, and on the other side, Islamists, terrorists, globalists, terror-appeasers.

Strategies of reframing, misrepresentation and mis-contextualization along with outright fabricated content manage to achieve an important outcome when they are interpreted by the public, that of emotional activation. This not only drives more traffic to the media outlet, but also drives and incites prejudice. Real or fabricated events like minorities not following pandemic rules or minority violence against the majority population along with crimes, whether real or fabricated, are exploited to incite a strong emotional response in media consumers.

3.2 *LGBTQ minorities*

A common thread among instances of prejudiced reporting on LGBTQ issues consists in representing these minorities as cultural, psychological and safety threats to the values and the children of the people. In some countries this is the most widespread view, such as in

Bulgaria, while in others, it is the purview of the far right or religious media while the mainstream media prefers to take a neutral or even sympathetic view on LGBTQ minorities.

Hungary and Romania offer interesting examples of how these two sides of messaging intersect with the conservative views of politicians taking anti-LGBTQ stances. In Hungary, hateful anti-LGBTQ video content was produced by politicians such as an MP who filmed herself burning a children's book, which contained LGBTQ characters. This MP, along with other politicians misrepresented the book as "homosexual propaganda". This incident invited a host of copycat videos to appear on social media. The opposition to this stance was lead not by traditional media but by other members of the civil society who publicly condemned the book burning.

Very similarly, faced with prejudiced anti-LGBTQ political initiatives, mainstream media in Romania prefer to take a factual, neutral, ultimately cautious approach to the topic. It falls on civil society organizations to counteract the misrepresentation perpetuated by religious and far-right media as well as conservative politicians. Emotional appeals to the safety of children are common among this slice of the media, along with misrepresenting the issue of equal rights for sexual and gender minorities as an ideological propaganda that is diabolical, toxic, monstrous and has been even likened to terrorism.

The anti-LGBTQ content is likely to be consumed by a very conservative part of the population who already share the values that motivate the negative campaigns. However, the laid back non-critical attitude of the mainstream media towards both the topic and the negative reporting that it receives, could be interpreted by those who do not already have a morally motivated opinion on equal rights that this topic lacks importance.

3.3 Covid-19

Covid-19 related misinformation is dominated by conspiracy theories. However, there are some lighter examples of misleading representation in the countries studied. Most of these originated and spent their life cycle on social media rather than traditional media, with a few notable exceptions.

In Germany, there was a false equivalency made its way through social media between pandemic-related restrictions and the Nazi Enabling act of 1933. This can be interpreted as a point of criticism towards the government's strategy to contain the spread of the virus rather than misinformation. Known conspiratorial outlets have sometimes used real documents to justify a misleading claim. For instance a German outlet of this type referenced an official document to support a claim that the government's strategy in dealing with schools during the pandemic was akin to child deprivation. While the document referenced existed, it was misquoted, leading to a false claim.

The bulk of Coronavirus misinformation rests on the fabrication of conspiracy theories, mainly present in social media and conspiratorial outlets, and not present in mainstream media. Examples of such ideas are that vaccines contain microchips meant to track the global population or that vaccines are more dangerous than the virus itself.

Both types of misrepresentation are present across the board in the countries studied. Romania, however, stands out because mainstream media have picked up false information about the treatment of Covid-19 from social media and have widely distributed using their platform. Several national newspapers and television stations have given ample time to a pulmonologist who wrongly claimed that Covid-19 treatments used in hospitals were harmful and that patients should refuse them.

These claims, unsupported by evidence and unverified, were given a large, uncritical broadcast. It is not surprising that this type of visibility has led some members of the public

to doubt the safety of the Covid-19 treatments offered in hospitals and to put their lives on the line by refusing them.

CONCLUSION

Media literacy is a very complex, multi-contextual, dynamic, multidimensional and fluid concept that must be adaptable to social needs and which should always be viewed in a situational and local context, but also as a specific cognitive skill of an individual. Numerous analyzes and practices confirm the importance of defining the concept of media literacy and setting the concept of media literacy for a variety of needs (education, civic participation, protection from manipulation, misinformation and propaganda, etc.), as well as for developing various sectoral policies and strategies. It is important that the concept derive from social discussion and self- examination of values, democracy, education and culture, as well as to be clearly and unambiguously defined in order to be understandable to the whole society. Social understanding of the concept of media literacy, especially its goals, is invaluable because activities should be planned based on these goals, which is important for activities both at the micro level (education systems and projects) and at the macro level (strategic planning, sectoral policies). If the goals and concept of media literacy are not clear, there is a possibility that, during implementation, not all their relevant elements and dimensions will be taken into account or that different actors will interpret the concept differently.