



# DIACOMET

„Fostering capacity building for civic resilience and participation: Dialogic communication ethics and accountability“

Grant agreement no 101094816

Deliverable D2.4 – Policy recommendations  
on civic accountability mechanisms

## Document Information Sheet

Settings	Value
Document title:	Deliverable D2.4   Policy recommendations on civic accountability mechanisms
Project name:	Fostering capacity building for civic resilience and participation: Dialogic communication ethics and accountability
Project number:	101094816
Call/topic:	HORIZON-CL2-2022-DEMOCRACY-01-06 Media for democracy – democratic media
Project starting date:	1 June 2023
Project duration:	36 months
Work package no and name:	WP2   Code and Accountability
Lead beneficiary:	OESTERREICHISCHE AKADEMIE DER WISSENSCHAFTEN (OEAW)
Lead authors:	Krisztina Rozgonyi, Tobias Eberwein, Marie Rathmann (OEAW), Marko Milosavljević (UL)
Contributors:	Marina Lindmeyr (OEAW), Halliki Harro-Loit (UT), Heikki Heikkilä (TU), Eszter Hadnagy, Erik Uszkiewicz (MET), Auksė Balčytienė, Kristina Juraitė (VMU), Bessie Slagt, Yael de Haan, Sophie Duvécot (HU), Romana Biljak Gerjevič (UL), Colin Porlezza, Laura Amigo (USI)
Reviewers:	All partners
Document type:	R – Document, report
Dissemination level:	PU – Public access
Due submission date:	31.5.2026
Actual submission date:	29.5.2026

## Document Revision History

Version	Changes	Date	Contributor
0.1	First draft	16/03/2026	Krisztina Rozgonyi, Tobias Eberwein, Marie Rathmann (OEAW), Marko Milosavljević (UL)
0.2	Reviewed draft	31/03/2026	All partners
0.3	Final version	22/03/2026	Krisztina Rozgonyi, Tobias Eberwein, Marie Rathmann (OEAW), Marko Milosavljević (UL)
1.0	Submitted version	29/05/2026	Krisztina Rozgonyi, Tobias Eberwein, Marie Rathmann (OEAW), Marko Milosavljević (UL)

## Table of Contents

EXECUTIVE SUMMARY ..... 6

1. Introduction: The Role and Relevance of Policy Recommendations in Media and Communication Governance..... 9

    1.1 Policy recommendations as a bridge between research and practice in media governance ..... 9

    1.2 From compliance to civic accountability: why communication ethics matter for policy ..... 10

    1.3 Evidence-informed policy recommendations as process-oriented outputs ..... 11

    1.4 Positioning DIACOMET’s policy recommendations and their analytical structure ..... 12

2. Defining the Policy Problems ..... 13

    2.1 Summary of the Research Findings ..... 13

        2.1.1 Structural erosion of civic accountability in digital public communication..... 16

        2.1.2 Participation vulnerabilities and chilling effects ..... 16

        2.1.3 Information disorder, polarisation, and trust deficits ..... 17

        2.1.4 Algorithmic governance and opacity..... 17

        2.1.5 Market pressures, pluralism, and smaller media systems ..... 18

        2.1.6 Gaps between regulation and everyday communicative practice..... 18

    2.2 Key Policy Directions and Principles ..... 19

        2.2.1 Increasing resilience and communication security ..... 19

        2.2.2 Increasing transparency in public communication ..... 19

        2.2.3 Increasing inclusive participation within policymaking processes ..... 20

        2.2.4 Ensuring and increasing access to public dialogue for marginalised groups ..... 21

        2.2.5 Increasing public dialogue with media and media professionals..... 21

    2.3 Resources: DIACOMET Outputs as Policy Instruments ..... 22

        2.3.1 Overview: DIACOMET outputs and their policy functions ..... 22

        2.3.2 Principles for Dialogue-Supportive Communication (PDC) as an operational ethical standard and accountability benchmark ..... 22

- 2.3.3 Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism: bridging regulation and lived experience ..... 23
- 2.3.4 “Dialogue Lab” – Training and Implementation Tool for Ethics and Governance .. 24
- 2.3.5 Discussion Forum – Dialogic Governance and Participatory Infrastructure..... 26
- 2.3.6 European NGO Network – EU-Level Coordination and Support Mechanism..... 27
- 3. Policy Recommendations..... 28
  - 3.1 EU-Level Policy Recommendations..... 28
    - 3.1.1 Current EU policy landscape: achievements and limits ..... 28
    - 3.1.2 Persistent policy gaps identified by DIACOMET ..... 29
  - 3.2 Data Privacy, Security, and Surveillance ..... 30
  - 3.3 Information and Content Governance..... 32
    - 3.3.1 Resilience of legacy media and journalism..... 33
    - 3.3.2 Disinformation, polarisation, and hate speech..... 34
  - 3.4 Artificial Intelligence and Algorithms..... 35
  - 3.5 Markets, Pluralism, and Competition ..... 36
- 4. Implementation Pathways and Conclusions..... 37
  - 4.1 From policy recommendations to implementation: closing the governance gap..... 37
  - 4.2 Multi-level implementation: roles of the EU and Member States ..... 37
  - 4.3 DIACOMET policy instruments as implementation enablers ..... 38
    - 4.3.1 Principles for Dialogue-Supportive Communication (PDC): Normative Operationalisation ..... 39
    - 4.3.2 Inclusive Accountability Toolbox: Institutional Bridge ..... 39
    - 4.3.3 Dilemma-Based Learning: Ethical Implementation Capacity ..... 40
    - 4.3.4 Dialogic Forums and Listening Infrastructures ..... 41
    - 4.3.5 European NGO Network: Coordination and Safeguarding Civic Space ..... 41
    - 4.3.6 Cross-Pillar Implementation Logic ..... 42
  - 4.4 Conclusions..... 42
- 5. National Policy Manuals ..... 43
  - 5.1 Austria ..... 43
  - 5.2 Estonia ..... 49

5.3 Finland ..... 52

5.4 Hungary ..... 56

5.5 Lithuania..... 63

5.6 The Netherlands ..... 69

5.7 Slovenia..... 74

5.8 Switzerland..... 78

References ..... 86

Annex 1: Template for the National Policy Recommendations..... 91

Annex 2: Summary and Synthesis of National and WP-Level Inputs Received for the  
DIACOMET Policy Recommendations ..... 93

EXECUTIVE SUMMARY

**Purpose and scope**

This deliverable presents the final policy recommendations of the DIACOMET project, an EU-funded research initiative examining civic accountability and dialogic communication in digital public spheres. The recommendations are grounded in extensive cross-country empirical research and are intended to support EU and national policymakers, regulators, media organisations, digital platforms, civil society actors, and educators in strengthening democratic communication, transparency, participation, and trust.

This Executive Summary synthesises DIACOMET’s core findings, outlines the main policy challenges, and presents headline recommendations at the EU and national levels. It also highlights DIACOMET’s policy-relevant outputs as practical instruments for implementation.

**Key policy problem**

DIACOMET’s research shows that democratic public communication across Europe is increasingly undermined by structural and cumulative dynamics rather than by isolated legal violations. Platformisation, algorithmic governance, the economic fragility of journalism, and political polarisation interact to produce participation-chilling effects, accountability gaps, and declining trust. Many of the most consequential harms, such as harassment-driven self-censorship, the marginalisation of low-visibility voices, opaque algorithmic content ranking on social media platforms, and lawful-but-harmful content moderation practices, are not sufficiently addressed by existing regulatory frameworks alone.

These challenges are particularly pronounced in smaller European countries, where media systems often face specific economic constraints, language barriers, and heightened dependence on regulatory and public funding frameworks. At the same time, such contexts may also offer greater institutional flexibility and policy innovation, enabling rapid and effective responses.

**Evidence base**

The recommendations are informed by a mixed-methods research design combining analysis of 429 ethical codes and normative guidelines for public communication, 87 focus groups involving more than 500 participants from diverse professional and social backgrounds, a three-round Delphi study with over 175 experts in media, education, technology, and policymaking, Q-sorting exercises capturing normative orientations and ethical priorities, and comparative analysis across eight European countries: Austria, Estonia,

Finland, Hungary, Lithuania, the Netherlands, Slovenia, and Switzerland. These findings are complemented by EU-level policy analysis.

**Key policy directions**

Based on this evidence base, DIACOMET identifies five cross-cutting policy directions: (1) strengthening civic resilience and communication security; (2) improving transparency in public communication; (3) expanding inclusive civic participation in policymaking processes; (4) ensuring access to public dialogue for marginalised and low-visibility groups; and (5) fostering constructive engagement between media professionals and the public.

These directions guide the formulation of EU-level and national policy recommendations across four policy domains: *data privacy and surveillance; information and content governance; artificial intelligence and algorithms; and markets, pluralism, and competition.*

**EU-level recommendations**

At the EU level, DIACOMET recommends integrating participation-related harms into DSA systemic risk governance, strengthening privacy-by-design and protection against online harassment, safeguarding journalism and public-interest media through EMFA implementation and stable funding, expanding media literacy to include media regulation and digital governance literacy, ensuring civic contestability, auditability, and participatory oversight of AI-driven communication systems, and aligning competition and media policy instruments to protect pluralism and due prominence.

**National-level implementation implications**

National governments, regulators, and other policy stakeholders play a crucial role in translating EU frameworks into effective practice. DIACOMET's recommendations, therefore, call for improved accessibility and usability of accountability and redress mechanisms, stronger support for public-interest media and community-based dialogue initiatives, greater investment in media, digital regulation, and AI literacy, and the piloting of inclusive accountability infrastructures adapted to national contexts, including through the Inclusive Accountability Toolbox.

Hence, a collection of country reports translates the overarching policy recommendations to the level of the countries involved in the DIACOMET project and contextualises them in light of the prevailing conditions within each national media system.

**DIACOMET's policy-relevant outputs**

DIACOMET contributes a set of concrete policy instruments to support implementation. These include the Principles for Dialogue-Supportive Communication (PDC) as an

operational ethical framework and accountability benchmark; the Inclusive Accountability Toolbox, conceived as a prototype of a civic accountability mechanism bridging regulation and lived experience; the “Dialogue Lab” as a training and implementation tool for ethical governance; the Discussion Forum as a dialogic and participatory governance infrastructure; and the European NGO Network as a coordination and support mechanism.

DIACOMET output	Policy function
Principles for Dialogue-Supportive Communication <sup>1</sup>	Operational ethical standard and accountability benchmark
Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism <sup>2</sup>	Bridge between regulation and lived experience
Interactive online game “Dialogue Lab” <sup>3</sup>	Training and implementation tool for ethics and governance
Discussion forum <sup>4</sup>	Dialogic governance and participatory infrastructure
NGO network formation for ensuring the sustainability of the project’s results <sup>5</sup>	EU-level coordination and support mechanism

Together, these instruments enable policymakers and stakeholders to complement regulation with inclusive, dialogic, and learning-oriented approaches to democratic communication.

<sup>1</sup> See at: D1.1 – Concepts; D2.2 – [Analytical Report; Principles for Dialogue-Supportive Communication](#).  
<sup>2</sup> See at: D2.3 – [Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism](#).  
<sup>3</sup> See at: D1.2 – Didactics; and the [Dialogue Lab](#).  
<sup>4</sup> See at: [Discussion Forum](#).  
<sup>5</sup> See at: [NGO network](#).

## 1. Introduction: The Role and Relevance of Policy Recommendations in Media and Communication Governance

Over the past two decades, media and communication systems in Europe have undergone profound structural transformations. Digitalisation, platformisation, and datafication have reshaped how information is produced, distributed, and consumed, while simultaneously altering the conditions under which public debate, political participation, and cultural expression take place. These transformations have created new opportunities for communication and participation, but they have also intensified long-standing governance challenges related to power asymmetries, market concentration, editorial independence, and democratic accountability – developments that have revitalised scholarly and policy debates about what media policy is, what it is for, and how it is practised (Mansell & Raboy, 2011; Napoli, 2023).

Within this evolving landscape, policy recommendations have become a central instrument through which research projects, expert communities, and civil society actors seek to inform and shape public decision-making. In contrast to binding legal norms, policy recommendations occupy an intermediate position between academic analysis and regulatory intervention. Their purpose is to translate empirical evidence and theoretical insight into actionable guidance for policymakers, regulators, and other stakeholders, while remaining attentive to institutional constraints, political feasibility, and contextual diversity. This translational function is particularly important in media and communication governance because the sector is characterised by multi-level policymaking, overlapping regulatory objectives, and rapidly changing technological and socio-economic conditions (Just & Puppis, 2012).

### 1.1 Policy recommendations as a bridge between research and practice in media governance

A key theme in media policy scholarship is that regulation alone rarely secures the democratic functions expected of media systems. Research in political economy, media law, and communication policy repeatedly demonstrates that compliance with formal rules may coexist with structural pressures that undermine pluralism, journalistic autonomy, and inclusive participation (Mansell & Raboy, 2011; Napoli, 2023). Policy recommendations are therefore valuable not simply as summaries of evidence, but as instruments that help define governance problems, identify implementation gaps, and propose feasible interventions within existing frameworks (Rozgonyi, 2023).

First, policy recommendations function as *interpretative tools* that clarify how abstract principles – such as freedom of expression, transparency, pluralism, and accountability – might be operationalised in specific technological and institutional contexts. This is

particularly relevant in the European Union (EU), where governance relies on a combination of binding legislation – intertwined with the intriguing issues of subsidiarity and the levels of competence –, implementation guidance, and interpretative practices often shape the real-world impact of policy instruments. Legal scholarship in media policy research underscores the importance of examining not only the “black letter” law but also the interpretative space, enforcement arrangements, and institutional settings through which legal norms gain meaning (Milosavljević & Poler, 2019).

Second, policy recommendations support the identification of *policy gaps*, especially those that arise where harms are lawful yet democratically damaging. Media and platform governance debates increasingly acknowledge that some of the most consequential challenges for democratic public communication – such as cumulative exposure to online harassment, chilling effects, attention-driven polarisation, or the opacity of algorithmic ranking – do not map easily onto illegality and are not fully addressed by content removal or compliance regimes. In such cases, policy recommendations can articulate where existing instruments underperform in practice, and where complementary mechanisms may be required to secure democratic values in everyday communicative life (Napoli, 2023; Puppis & Van den Bulck, 2019).

Third, policy recommendations can serve an *agenda-setting function* in a field characterised by fragmentation of responsibilities across regulators, platforms, media organisations, and civil society. Media governance increasingly involves hybrid arrangements – spanning law, self-regulation, co-regulation, and civic practice – making it difficult for any single instrument to address complex, cross-cutting problems. In this governance setting, recommendations can help align actors around shared definitions of problems, identify strategic priorities, and propose practicable implementation pathways (Popiel, Pickard, & Lloyd, 2017).

## 1.2 From compliance to civic accountability: why communication ethics matter for policy

A growing body of scholarship and policy practice indicates that democratic communication cannot be sustained through regulatory compliance alone (Puppis, 2010). The expansion of EU-level media and digital regulation is a major development, but it does not automatically translate into improved conditions for civic participation, ethical communication, or trust. A persistent issue in media governance is that individuals and organisations often struggle to navigate complex regulatory environments; complaint and redress mechanisms may be difficult to access or perceived as illegitimate; and ethical conflicts frequently fall outside the scope of formal legal remedies. In this context, policy recommendations can foreground the importance of *civic accountability* – mechanisms and practices through which actors can question, contest, and reflect on communicative power and responsibility in public life (Freedman, 2008).

Civic accountability approaches place emphasis on accessibility, dialogue, and contextual judgment rather than relying solely on ex post sanctioning. They are concerned with the everyday conditions under which public communication becomes trustworthy, inclusive, and responsive, and they highlight the need for support mechanisms that enable individuals and organisations to manage ethical issues before conflicts escalate into durable harm. This perspective resonates with work in media policy that stresses legitimacy, participation, and societal outcomes as core governance criteria, alongside legal effectiveness (Napoli, 2023; Bardoel & d'Haenens, 2004).

In addition, contemporary media governance debates underline that accountability in digital public spheres is distributed across actors and infrastructures: platforms, media organisations, regulators, and civic intermediaries co-shape what is visible, what is rewarded, and what is sanctioned. This is why policy recommendations increasingly need to speak not only to formal obligations, but also to the *institutional and socio-technical arrangements* that determine whether rights and norms are usable in practice (Milosavljević & Poler, 2019; Popiel, Pickard, & Lloyd, 2017).

### 1.3 Evidence-informed policy recommendations as process-oriented outputs

Policy recommendations are not simply normative statements. Best practices in media policy research emphasise that they should be evidence-informed, transparent about their knowledge base, and explicit about the linkage between analysis and proposals. Methodological guidance on writing policy reports highlights the value of clear problem definition, coherent structuring of options, careful attention to feasibility, and presentation of recommendations as actionable steps for identifiable decision-makers (Raats, 2019).

At the same time, debates on evidence-based policy caution against treating “evidence” as politically neutral; rather, evidence should be situated in its epistemic assumptions, interpreted in relation to values, and integrated with considerations of context and implementation (Schneider et al., 2025). The implication for media and communication governance is that policy recommendations should communicate not only what is known, but also what uncertainties, trade-offs, and implementation dependencies should be considered by decision-makers – particularly where interventions intersect with fundamental rights and with socio-technical systems that evolve rapidly.

Finally, policy-oriented academic writing in adjacent EU research projects<sup>6</sup> illustrates how recommendations can be framed in relation to longer-term European policy trajectories, showing how conceptual tensions (e.g., competitiveness vs. cultural diversity; market integration vs. pluralism) are negotiated across legal and policy instruments and how these

<sup>6</sup> See e.g. [The Reboot Project](#).

tensions create implementable entry points for action (Michalis, 2014; Psychogiopoulou, 2007, 2015, 2021; Ranaivoson et al., 2023; Vlassis, 2021). This strand of work is particularly relevant for policy recommendations in the EU context, where effective proposals must be grounded in legal competencies, implementation pathways, and the diversity of national media systems.

#### 1.4 Positioning DIACOMET's policy recommendations and their analytical structure

Against this background, DIACOMET's policy recommendations are situated at the intersection of media and communication governance, digital policy implementation, and democratic theory. They are informed by cross-country empirical research and by an explicitly dialogic understanding of public communication ethics. Rather than proposing wholly new regulatory frameworks, DIACOMET's recommendations focus on strengthening the effectiveness, inclusiveness, and legitimacy of existing governance arrangements by addressing implementation gaps and by proposing complementary civic accountability infrastructures.

DIACOMET's approach is built around two linked premises. First, many of the most harmful effects on civic participation arise not simply from the absence of regulation, but from deficits in *implementation, accountability, and everyday communicative practice* – including limited access to redress, uneven protection from harassment, and opaque socio-technical mediation of visibility and voice in the platformised communicative context. Second, strengthening democratic and inclusive public communication requires both (a) legal and institutional measures and (b) practical instruments that help actors apply norms in concrete situations and learn from ethical dilemmas.

Accordingly, the recommendations presented in this deliverable aim to: (i) identify key governance and implementation gaps affecting civic participation, protection, and accountability; (ii) articulate feasible policy options and actionable steps for EU and national decision-makers; and (iii) embed DIACOMET's policy solutions – operational ethical principles and civic accountability mechanisms – as practical resources that can support ethical decision-making and responsive public communication across diverse European contexts.

To ensure analytical clarity and policy usability, DIACOMET structures its recommendations around *four interrelated pillars* that map core dimensions of contemporary communication governance:

1. **Data privacy, security, and surveillance:** addressing cumulative exposure, monitoring, and protection deficits that chill participation
2. **Information and content governance:** addressing the conditions for resilient journalism and the structural drivers of disinformation, polarisation, and hate

3. **Artificial intelligence and algorithms:** addressing opacity, bias, contestability, and concentration in systems that shape visibility and trust
4. **Markets, pluralism, and competition:** addressing the limits of competition-centred approaches for sustaining pluralism and diverse voices, especially in smaller media markets

Across these pillars, DIACOMET integrates a cross-cutting lens on vulnerability – understood as structural, relational, and intersectional – and proposes an implementation pathway grounded in civic accountability infrastructures, including the Principles for Dialogue-Supportive Communication, inclusive accountability mechanisms, and associated learning and deliberation tools.

## 2. Defining the Policy Problems

Building on the conceptual framing set out in the Introduction, this section defines the policy problems addressed by DIACOMET and situates it within the current European media and communication governance context. It draws on DIACOMET’s cross-country empirical research and thematic work packages to identify recurring patterns, structural drivers, and implementation gaps that affect civic accountability, participation, and trust in digital public communication.

Rather than treating these challenges as isolated or sector-specific issues, DIACOMET conceptualises them as interrelated manifestations of broader transformations in communication infrastructures, governance arrangements, and everyday communicative practices. This perspective informs the project’s emphasis on policy recommendations that complement existing regulation by addressing implementation deficits and by strengthening civic accountability capacities.

### 2.1 Summary of the Research Findings

#### Methodological basis and empirical scope

The policy problem definition and recommendations developed within the DIACOMET project are grounded in an extensive, mixed-methods research design that combines qualitative and quantitative approaches across multiple empirical sources and national contexts. The project’s analytical framework integrates empirical evidence from different levels of public communication – professional, organisational, platform-based, and civic – and links these findings to current European policy debates in media, digital, and communication governance.

## Empirical sources and research strands

DIACOMET's policy recommendations draw on four major, interrelated research strands:

1. **Empirical analysis of codes of ethics and normative guidelines for public communication**, examining how ethical responsibilities and accountability are articulated across different communicative domains, including journalism, advertising, public institutions, corporate communication, and digital platforms ([D2.2 Analytical-report](#)).<sup>7</sup>
2. **A Three-Round-Delphi study with experts in communication, media, education, technology, and policymaking**, conducted in two rounds of in-depth questionnaires followed by extended facilitated discussions (under the frame of a Design-Thinking process). This method enabled the identification of areas of expert consensus and disagreement regarding ethical challenges, governance gaps, and potential policy responses ([D2.3 Inclusive Accountability Toolbox](#)).<sup>8</sup>
3. **A Q-sorting study**, designed to capture patterns of normative judgement and value prioritisation among participants when confronted with ethical dilemmas in public communication. This approach allowed for a systematic comparison of subjective perspectives across stakeholder groups.<sup>9</sup>
4. **Focus group discussions** involving a broad range of civic societal actors, providing insight into lived experiences of public communication, the risks they encounter, and perceptions of accountability mechanisms ([D3.3 Focus Group Country Reports](#)).<sup>10</sup>

Together, these research strands enabled DIACOMET to triangulate findings across methods, actors, and communicative contexts, strengthening the robustness and policy relevance of the resulting analysis.

This breadth of empirical material allows the DIACOMET findings to identify recurring patterns that are relevant for policy formulation.

<sup>7</sup> 429 ethical codes and normative guidelines, covering a wide range of public communication contexts and addressing multiple stakeholder groups (e.g. journalists, public relations professionals, advertisers, public institutions, and digital platforms). The sample reflects different analytical levels (micro, meso, and macro) and accountability frames, including professional, market-based, public, and political accountability (Bardoel and d'Haenens, 2004). See at: [Analytical Report](#).

<sup>8</sup> See at: [Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism](#).

<sup>9</sup> See at: [D1.3](#).

<sup>10</sup> 87 focus groups, involving more than 500 participants from diverse professional and social backgrounds, including journalists, PR and communication professionals, policymakers and regulators, educators, influencers, corporate communication actors, young people, minority groups, and participants exposed to heightened vulnerability in public communication contexts. See at: [Focus Group Country Reports](#).

## Cross-country coverage and the relevance of small(er) Member States

DIACOMET's research is conducted across eight European countries: Austria, Estonia, Finland, Hungary, Lithuania, the Netherlands, Slovenia, and Switzerland. These countries are considered "small" in terms of population size, territorial scale, or both. In addition, the project systematically engages with supranational documents and EU-level policy frameworks, ensuring that national findings are interpreted in a broader European context.

Smaller European countries are particularly instructive for policy analysis in media and communication governance for several reasons. Economically, they often face limitations in economies of scale and scope, as well as language barriers that constrain the development of strong market-driven media models and indigenous digital platforms within the contemporary attention economy. As a result, their media and communication systems tend to be more dependent on regulatory frameworks, public funding, and policy interventions than those of larger Member States.

This dependence makes smaller countries especially sensitive to the design and implementation of European policies. Regulatory changes, platform governance rules, and funding mechanisms can have disproportionate effects – both positive and negative – on their media ecosystems. At the same time, a smaller size can foster greater institutional flexibility, enabling quicker responses and innovation in policymaking and regulation.

Notably, several countries in the DIACOMET sample have been *policy frontrunners* in digital communication governance. The Netherlands and Slovenia were among the first European countries to implement Net Neutrality as a regulatory tool, and both have played leading roles in adapting national frameworks to emerging digital challenges. More recently, Slovenia has been at the forefront of regulating artificial intelligence and generative AI within its revised Mass Media Act (2025). These examples illustrate how smaller countries can function as early indicators of both regulatory challenges and policy solutions relevant at the EU level.

## Implications for policy relevance

The combination of diverse empirical methods, extensive data collection, and a focus on smaller European countries gives DIACOMET's findings particular policy relevance. The project captures both *structural vulnerabilities* and *innovative governance responses* that may be less visible in larger markets but are highly informative for EU-level policy design and implementation. The policy recommendations developed in this deliverable, therefore, highlight the most pressing issues within each thematic area – data privacy and surveillance, information and content governance, artificial intelligence and algorithms, and markets and pluralism – while emphasising opportunities to strengthen democratic communication,

transparency, and civic resilience. The following subsections synthesise these findings and articulate how they inform the policy challenges addressed in subsequent sections.

### 2.1.1 Structural erosion of civic accountability in digital public communication

A central finding of DIACOMET is that civic accountability in public communication has weakened under conditions of platformisation and algorithmic mediation. While regulatory frameworks increasingly address platform responsibilities and illegal content, many communicative harms identified by participants – such as harassment-driven self-censorship, reputational damage, and exclusion from public debate – remain difficult to contest or redress in practice.

Research participants across countries reported that existing accountability mechanisms are often:

- fragmented across institutions and platforms,
- difficult to access or navigate,
- perceived as opaque or ineffective, and
- poorly aligned with the lived realities of digital communication.

This results in a situation where individuals and organisations are formally protected by rights and rules, yet are practically unable to exercise them in meaningful ways. The accountability gap is particularly visible for actors operating at the margins of public visibility, including journalists in smaller markets, civil society organisations, minority groups, and local public institutions.

### 2.1.2 Participation vulnerabilities and chilling effects

DIACOMET findings highlight that participation in public communication is increasingly shaped by cumulative and anticipatory risks rather than single events. Participants across focus groups and expert consultations described how the prospect of harassment, misrepresentation, or permanent digital traceability influences decisions about whether and how to speak publicly.

These participation vulnerabilities are reinforced by:

- asymmetric power relations between users and online platforms,
- limited transparency of content moderation and ranking decisions,
- inadequate protection against coordinated harassment and doxing,
- and weak support structures for those exposed to public scrutiny.



Importantly, these dynamics affect not only individuals traditionally labelled as “vulnerable” but also professionals such as journalists, educators, and public servants. DIACOMET therefore conceptualises vulnerability as *structural and relational*, rather than as a property of specific groups.

### 2.1.3 Information disorder, polarisation, and trust deficits

Across national inputs and thematic analyses, DIACOMET identifies information disorder, polarisation, and declining trust as interconnected challenges rather than discrete policy problems. Our research subjects and informants – experts in media, education, technology, digital communication, politics, and policymaking (Delphi-participants), also participants of the various focus group discussions involving a broad range of societal actors, providing insights into lived experiences of public communication – consistently pointed to the role of structural incentives – economic, algorithmic, and political – that reward emotionally charged, polarising, and fear-based communication.

Key findings include:

- disinformation and polarisation are amplified by attention-driven online communication platform architectures,
- content moderation alone is insufficient to address the underlying dynamics,
- journalistic standards are under pressure from economic precarity and speed-driven production cycles,
- trust deficits are exacerbated by weak accountability and limited opportunities for dialogue and clarification.

These findings suggest that policies focusing narrowly on content removal or fact-checking risk addressing symptoms rather than causes, unless they are complemented by measures that strengthen ethical reflection, accountability, and dialogic capacity.

### 2.1.4 Algorithmic governance and opacity

DIACOMET research confirms that algorithmic systems play a decisive role in shaping visibility, relevance, and reach in public communication. Participants expressed widespread uncertainty about how content is ranked, promoted, or suppressed, and about the criteria governing automated moderation decisions.

This opacity has several implications:

- it undermines users’ ability to understand and contest decisions affecting their participation,

- it shifts communicative power towards platforms and system designers,
- and it complicates the attribution of responsibility when harm occurs.

The findings underline that algorithmic governance challenges are not limited to technical issues, but are deeply entangled with questions of accountability, legitimacy, and democratic oversight.

### 2.1.5 Market pressures, pluralism, and smaller media systems

Country-level inputs highlight that structural market conditions significantly shape the impact of digitalisation on media and communication. In smaller or economically constrained media markets, participants reported heightened dependence on platform intermediaries, limited resources for ethical governance, and increased vulnerability to political and economic pressures.

These conditions exacerbate:

- risks to editorial independence,
- marginalisation of local and minority voices,
- and uneven implementation of EU-level policies.

DIACOMET findings thus emphasise that policy responses must account for diversity among European media systems and avoid one-size-fits-all assumptions.

### 2.1.6 Gaps between regulation and everyday communicative practice

Across all thematic areas, a recurring finding is the gap between formal regulation and everyday communicative practice. While participants generally recognised the importance of EU-level legal instruments, they also stressed that rules alone do not resolve ethical dilemmas encountered in concrete situations.

Examples include:

- balancing freedom of expression and protection from harm,
- deciding how to respond to controversial or harmful speech,
- navigating unclear or inconsistent platform rules,
- and addressing conflicts that do not reach the threshold of illegality.

These findings provide the empirical justification for DIACOMET's emphasis on *practical, dialogic, and inclusive policy solutions*, including the Principles for Dialogue-Supportive Communication and inclusive accountability mechanisms.

## 2.2 Key Policy Directions and Principles

Based on the empirical findings summarised in Section 2.1 and a systematic round call among all project partners (see Annex: Summary and Synthesis of National and WP-Level Inputs Received for the DIACOMET Policy Recommendations), DIACOMET identifies a set of cross-cutting policy directions and principles that should guide both EU-level and national policy responses in the field of media and communication governance. These principles do not function as abstract normative ideals, but as *research-informed orientations* that address recurring vulnerabilities, implementation gaps, and governance deficits identified across countries and stakeholder groups.

Together, they provide a coherent framework for translating empirical insights into concrete policy recommendations and for aligning DIACOMET's policy instruments with existing regulatory and institutional arrangements.

### 2.2.1 Increasing resilience and communication security

A central policy direction emerging from DIACOMET's findings is the need to *strengthen resilience and communication security* in digital public spheres. Research participants consistently described how exposure to harassment, surveillance, reputational risks, and opaque moderation practices undermines their willingness and ability to participate in public communication. These risks are often cumulative and anticipatory, producing chilling effects even in the absence of overtly illegal acts.

From a policy perspective, resilience refers not only to the capacity of communication systems to withstand external shocks (such as coordinated disinformation campaigns), but also to the ability of individuals, organisations, and institutions to engage in public communication without disproportionate personal, professional, or psychological risk. Communication security, in turn, encompasses protection against harassment, misuse of personal data, and forms of exposure that undermine trust and participation.

DIACOMET's research indicates that existing regulatory frameworks tend to address these issues indirectly or reactively. A key policy direction is therefore to complement formal regulation with supportive and preventive mechanisms that enable actors to anticipate risks, navigate ethical dilemmas, and seek assistance before harm escalates. This includes strengthening accountability infrastructures that are accessible, trusted, and capable of addressing communicative harm even when legal thresholds are not met.

### 2.2.2 Increasing transparency in public communication

Transparency emerged across DIACOMET's empirical material as a foundational condition for accountability, trust, and meaningful participation. Participants highlighted persistent opacity regarding how decisions are made in public communication contexts, particularly in

relation to content moderation, algorithmic ranking, advertising practices, and institutional communication strategies.

The research shows that transparency deficits operate at multiple levels:

- *institutional transparency*, concerning decision-making procedures, financial oversight, and accountability arrangements;
- *procedural transparency*, concerning how rules are applied in practice; and
- *algorithmic transparency*, concerning the role of automated systems in shaping visibility and reach.

From a policy perspective, increasing transparency is not an end in itself, but a prerequisite for contestability and learning. Transparency enables affected actors to understand why decisions were taken, to challenge them where necessary, and to adapt their communicative practices accordingly. DIACOMET's findings caution, however, that transparency measures must be designed with usability in mind; information that is technically available but inaccessible or incomprehensible does not meaningfully enhance accountability.

Accordingly, a key policy direction is to promote *context-sensitive transparency mechanisms* that are tailored to the capacities and needs of different actors, and that are embedded in broader accountability processes rather than treated as isolated disclosure obligations.

### 2.2.3 Increasing inclusive participation within policymaking processes

Another recurring finding concerns the limited inclusiveness of policymaking and governance processes in the field of media and communication. While formal consultations and stakeholder mechanisms exist at both EU and national levels, many participants – particularly from civil society, smaller media organisations, and marginalised groups – reported barriers to meaningful participation.

DIACOMET's research suggests that participation deficits are not only a matter of access, but also of recognition and influence. Actors may be formally invited to contribute, yet lack the resources, expertise, or institutional standing to shape outcomes. Moreover, policymaking processes often privilege technical or legal expertise over experiential knowledge derived from everyday communicative practice.

A key policy direction is therefore to strengthen *inclusive and dialogic participation mechanisms* that recognise diverse forms of expertise and that lower barriers to engagement. This includes creating structured opportunities for reflection, dialogue, and co-learning between policymakers, regulators, professionals, and affected publics. Such

mechanisms are particularly important in rapidly evolving domains, where policy effectiveness depends on continuous feedback and adaptation.

#### 2.2.4 Ensuring and increasing access to public dialogue for marginalised groups

DIACOMET's findings underscore that access to public dialogue remains unevenly distributed. Structural factors – such as platform visibility dynamics, economic precarity, linguistic marginalisation, and exposure to harassment – systematically disadvantage certain groups and perspectives, even where formal rights to expression exist.

Importantly, the research shows that marginalisation is often contextual and situational, rather than confined to predefined categories of vulnerability. Journalists, educators, local officials, activists, and minority group representatives may all experience heightened exposure and reduced protection depending on issue salience, audience dynamics, and platform affordances.

From a policy perspective, ensuring access to public dialogue therefore requires moving beyond group-based approaches and addressing the structural conditions that shape who can speak, who is heard, and at what cost. DIACOMET's findings support policy directions that combine protection measures with *proactive support for participation*, including low-threshold accountability mechanisms, facilitated dialogue spaces, and ethical guidance that helps manage conflict without silencing dissent.

#### 2.2.5 Increasing public dialogue with media and media professionals

Finally, DIACOMET identifies a need to strengthen dialogue between media professionals and the public. Across countries, participants expressed concerns about declining trust in journalism and institutional communication, coupled with limited opportunities for constructive interaction, clarification, and mutual understanding.

The research suggests that existing accountability mechanisms in media organisations – such as corrections, complaints procedures, or ombudspersons – are often insufficiently visible or accessible, and rarely integrated into broader dialogic practices. At the same time, journalists and editors reported growing pressures that limit their capacity to engage in dialogue, including time constraints, harassment, and economic insecurity.

A key policy direction is therefore to support *accountability* arrangements that enable *reciprocal communication* between media professionals and publics. This includes strengthening institutional incentives for engagement, providing ethical guidance for managing interaction in hostile environments, and recognising dialogue as a core component of media accountability rather than as an optional add-on.

## 2.3 Resources: DIACOMET Outputs as Policy Instruments

Building on the key policy directions outlined above, this section conceptualises DIACOMET's core outputs as *policy instruments* that can support the implementation of existing regulation, enhance accountability, and strengthen democratic communication practices. Rather than functioning as stand-alone tools, these outputs are designed to operate as complementary instruments within multi-level governance frameworks.

### 2.3.1 Overview: DIACOMET outputs and their policy functions

DIACOMET's outputs fulfil distinct but interrelated policy functions:

DIACOMET output	Policy function
Principles for Dialogue-Supportive Communication <sup>11</sup>	Operational ethical standard and accountability benchmark
Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism <sup>12</sup>	Bridge between regulation and lived experience
Interactive online game “Dialogue Lab” <sup>13</sup>	Training and implementation tool for ethics and governance
Discussion forum <sup>14</sup>	Dialogic governance and participatory infrastructure
NGO network formation for ensuring the sustainability of the project's results <sup>15</sup>	EU-level coordination and support mechanism

Together, these instruments address the gap between formal regulation and everyday communicative practice by providing normative guidance, institutional support, capacity-building, and coordination.

### 2.3.2 Principles for Dialogue-Supportive Communication (PDC) as an operational ethical standard and accountability benchmark

The **Principles for Dialogue-Supportive Communication**<sup>16</sup> (PDC) constitute DIACOMET's core normative output. They articulate a shared ethical framework for public communication that is applicable across communicative domains and stakeholder groups.

<sup>11</sup> See at: D1.1 – Concepts; D2.2 – [Analytical Report: Principles for Dialogue-Supportive Communication](#).

<sup>12</sup> See at: D2. 3 – [Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism](#).

<sup>13</sup>See at: D1.2 – Didactics; and the [Dialogue Lab](#).

<sup>14</sup> See at: [Discussion Forum](#).

<sup>15</sup> See at: [NGO network](#).

<sup>16</sup> See at: D1.1 – Concepts; D2.2 – [Analytical Report: Principles for Dialogue-Supportive Communication](#).

### *Focus and function*

The primary policy function of the PDC is to serve as an operational ethical standard that can be incorporated into civic accountability mechanisms, organisational practices, and educational settings. Unlike abstract value statements, the PDC are designed to guide decision-making in concrete communicative situations, including those not covered by formal regulation.

### *Target groups and incorporation pathways*

- Digital platforms  
Platforms can incorporate the PDC into their Terms and Conditions and community standards, aligning content moderation rules and governance with dialogic and accountability-oriented principles. Similar to existing platform governance documents, the PDC can function as an interpretative layer that clarifies expectations beyond minimal legal compliance.
- Media organisations  
Media organisations can integrate the PDC into editorial guidelines, complaints procedures, and ombudsperson frameworks, strengthening transparency and dialogue with audiences.
- Civil society organisations  
Civil society actors can use the PDC as an advocacy tool, articulating expectations for ethical public communication and supporting accountability claims.
- Educational professionals and learners  
In educational settings, the PDC can inform curricula, classroom practices, and professional training, fostering ethical literacy and reflective communication skills.

### 2.3.3 Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism: bridging regulation and lived experience

The **DIACOMET Inclusive Accountability Toolbox** – Prototype of a Civic Accountability Mechanism<sup>17</sup> represents a novel institutional approach to civic accountability in public communication. Positioned between formal law, professional self-regulation, and civic participation, it provides a practical framework for addressing communicative harms and ethical dilemmas that frequently arise in public discourse but are not easily resolved through legal procedures alone.

<sup>17</sup> See at: D2. 3 – [Inclusive Accountability Toolbox – Prototype of a Civic Accountability Mechanism](#).

### *Focus and function*

The primary policy function of the Inclusive Accountability Toolbox is to support accessible, dialogic, and learning-oriented accountability processes. It helps individuals and organisations identify and articulate communicative harms, navigate existing accountability pathways, and engage in facilitated dialogue aimed at clarification, reflection, and resolution. In contrast to purely punitive approaches, the toolbox emphasises learning-oriented responses that strengthen communicative practices and mutual understanding among institutions and the public. By doing so, it bridges the gap between regulatory frameworks and the lived experience of communication actors in digital and mediated environments.

### *Target groups and incorporation pathways*

- Public institutions and regulators  
Public institutions and regulatory bodies can draw on the toolbox as a complementary mechanism for addressing communicative conflicts that do not reach legal thresholds but nevertheless affect public trust, participation, and democratic dialogue.
- Media organisations and professional communities  
Media organisations, journalists, and communication professionals can use the toolbox as a structured support mechanism for handling audience input and complaints, ethical disputes, and challenges emerging from digital communication environments.
- Civil society organisations and community initiatives  
Civil society actors can employ the toolbox to articulate concerns about communicative harm, facilitate dialogue between stakeholders, and strengthen civic participation in accountability processes.
- Educational institutions and training programmes  
In educational and professional training contexts, the toolbox can serve as a learning framework that enables students, educators, and practitioners to analyse real-world communication dilemmas, reflect on ethical responsibilities, and develop dialogic conflict-resolution skills.

### 2.3.4 “Dialogue Lab” – Training and Implementation Tool for Ethics and Governance

The interactive online “**Dialogue Lab**”<sup>18</sup> is designed as a *capacity-building instrument* that enables professionals, regulators, journalists, educators, and citizens to practice ethical reasoning in complex, real-world scenarios. By presenting participants with concrete

<sup>18</sup>See at: D1.2 – Didactics; and the [Dialogue Lab](#).

dilemmas drawn from public communication contexts, the tool encourages reflection on competing values, responsibilities, and consequences. Its policy function lies in supporting the implementation of ethical standards and governance frameworks by fostering a shared understanding of ethical trade-offs across different actors in the communication ecosystem.

### *Focus and function*

The primary policy function of the “Dialogue Lab” is to strengthen ethical awareness and decision-making capacity in situations where legal rules or organisational guidelines alone may not provide clear answers. By simulating communicative dilemmas – such as conflicts between freedom of expression and protection from harm, transparency and privacy, or editorial autonomy and platform governance – the game translates abstract norms into tangible situations that can be discussed and analysed collectively. In doing so, it complements formal training, professional guidelines, and regulatory frameworks by creating an interactive environment for learning, reflection, and dialogue.

### *Target groups and incorporation pathways*

- **Media professionals and journalists**  
News organisations and journalism training programmes can use the “Dialogue Lab” as a professional development tool that helps journalists reflect on ethical challenges emerging in digital and platformised communication environments.
- **Public institutions and regulators**  
Regulators and policymakers can incorporate the tool into training programmes or workshops aimed at strengthening ethical reasoning in areas such as content governance, public communication, and AI-mediated communication.
- **Educational institutions**  
Schools, universities, and training programmes in communication, media, and civic education can use the game as a pedagogical tool to develop ethical literacy, critical thinking, and dialogue skills.
- **Civil society organisations and citizens**  
Civil society organisations and community initiatives can employ the game to stimulate discussion about ethical communication practices and strengthen public understanding of the responsibilities involved in democratic communication.

### 2.3.5 Discussion Forum – Dialogic Governance and Participatory Infrastructure

The **DIACOMET Discussion Forum**<sup>19</sup> functions as a *deliberative infrastructure* designed to enable structured dialogue, mutual learning, and conflict-sensitive discussion among diverse stakeholders involved in public communication. By creating spaces where different actors can exchange perspectives, reflect on communicative practices, and jointly explore solutions, the forum supports more inclusive and responsive forms of governance. Its policy relevance lies in providing a structured environment for engagement that can inform policymaking processes, strengthen accountability, and foster trust between institutions and citizens.

#### *Focus and function*

The primary policy function of the Discussion Forum is to facilitate dialogic governance by enabling open yet structured conversations about ethical challenges, regulatory developments, and emerging communication practices. Unlike ad hoc consultations or reactive debates, the forum provides a recurring and moderated space for reflection and deliberation. It supports collective learning across stakeholder groups, helps identify emerging risks and tensions in public communication, and contributes to the development of shared understandings that can inform policy responses and organisational practices.

#### *Target groups and incorporation pathways*

- Public institutions and policymakers  
Public institutions and policymakers can use the forum as a consultative and deliberative platform to engage stakeholders when developing or implementing communication-related policies and regulatory frameworks.
- Media organisations and communication professionals  
Media organisations and professional communities can participate in the forum to exchange experiences, discuss ethical challenges, and reflect collectively on standards of responsible communication.
- Civil society organisations and community actors  
Civil society actors can use the forum to articulate concerns, share experiences of communicative harm, and contribute perspectives that may otherwise remain underrepresented in policy debates.
- Educational and research institutions  
Universities and research organisations can integrate the forum into teaching,

<sup>19</sup> See at: [Discussion Forum](#).

training, and research activities, supporting dialogue between academia, practitioners, and policymakers on evolving communication challenges.

### 2.3.6 European NGO Network – EU-Level Coordination and Support Mechanism

Finally, DIACOMET proposes the establishment of a **European NGO Network**<sup>20</sup> to ensure the sustainability and continued development of the project's results beyond the project lifetime. The network is conceived as a coordination and support mechanism connecting civil society organisations and accountability initiatives working on ethical public communication across Europe. Its policy relevance lies in strengthening cooperation, mutual learning, and continuity in the implementation of DIACOMET's normative and practical tools.

#### *Focus and function*

The primary policy function of the European NGO Network is to provide a transnational platform that supports the exchange of knowledge, the dissemination of good practices, and the coordinated development of civic accountability initiatives. By linking actors across Member States, the network can help maintain momentum for the Principles for Dialogue-Supportive Communication and related tools, while also creating a supportive environment for experimentation and adaptation in different institutional contexts. In this way, it contributes to the long-term consolidation of dialogic and accountability-oriented approaches to public communication governance.

#### *Target groups and incorporation pathways*

- Civil society organisations and advocacy groups  
Civil society actors can use the network as a platform for cooperation, sharing experiences, and jointly developing initiatives that promote ethical public communication and accountability practices.
- National civic accountability initiatives  
Existing or emerging accountability mechanisms at national or local level can connect through the network to exchange best practices, coordinate activities, and strengthen their institutional visibility and legitimacy.
- Public institutions and policymakers  
Public institutions and policymakers can engage with the network as a source of expertise and feedback, helping ensure that policy development reflects the experiences and needs of actors working in communication practice.

<sup>20</sup> See at: [NGO network](#).

- Research and educational institutions  
Universities and research organisations can participate in the network to support evidence-based development of accountability tools, contribute to training activities, and facilitate dialogue between research, policy, and practice.

Through these functions, the European NGO Network can act as an *intermediary layer linking EU-level policy frameworks with national and local accountability initiatives*, while supporting the practical implementation of the PDC across diverse communication environments.

### 3. Policy Recommendations

This section translates DIACOMET's empirical findings and key policy directions into actionable policy recommendations. It focuses first on the *EU level*, where enabling frameworks, coordination mechanisms, and minimum standards are set, and then outlines implications for *national implementation*, recognising the diversity of European media systems and governance capacities.

#### 3.1 EU-Level Policy Recommendations

##### 3.1.1 Current EU policy landscape: achievements and limits

Over the past decade, the European Union has developed an extensive policy and regulatory framework addressing digital communication, media governance, and data protection. Key instruments include the Audiovisual Media Services Directive (AVMSD)<sup>21</sup>, the General Data Protection Regulation (GDPR)<sup>22</sup>, the Digital Services Act (DSA)<sup>23</sup>, the Digital Markets Act

---

<sup>21</sup> Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities  
PE/33/2018/REV/1

*OJ L 303, 28.11.2018, pp. 69–92*

<sup>22</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance)

*OJ L 119, 4.5.2016, pp. 1–88*

<sup>23</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) (Text with EEA relevance)  
PE/30/2022/REV/1

*OJ L 277, 27.10.2022, pp. 1–102*



(DMA)<sup>24</sup>, the Artificial Intelligence Act (AI Act)<sup>25</sup>, and the European Media Freedom Act (EMFA)<sup>26</sup>. Together, these instruments represent a major achievement in setting binding obligations for platforms, protecting fundamental rights, and safeguarding media freedom and pluralism.

At the same time, DIACOMET's research highlights persistent limits in how these instruments operate in practice. While EU legislation increasingly addresses illegal content, market power, and systemic risks, it is less effective in tackling:

- participation conditions in digital public communication,
- cumulative and structural harms that do not reach illegality thresholds,
- and the everyday usability of accountability and redress mechanisms.

These gaps do not indicate regulatory failure but rather point to the need for *complementary policy instruments and supporting accountability mechanisms* that strengthen implementation, accessibility, and civic accountability.

### 3.1.2 Persistent policy gaps identified by DIACOMET

Across all thematic areas, DIACOMET identifies cross-cutting policy gaps relevant to public communication and dialogue:

- Participation conditions:** Many citizens and professionals formally enjoy freedom of expression, yet face practical barriers to participation due to harassment, exposure, algorithmic opacity, and lack of meaningful support for democratic engagement (policy, independent financial schemes, etc.).

---

<sup>24</sup> Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) (Text with EEA relevance)

PE/17/2022/REV/1

OJ L 265, 12.10.2022, pp. 1–66

<sup>25</sup> Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) (Text with EEA relevance)

PE/24/2024/REV/1

OJ L, 2024/1689, 12.7.2024

<sup>26</sup> Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act) (Text with EEA relevance)

PE/4/2024/REV/1

OJ L, 2024/1083, 17.4.2024

- b. **Protection from cumulative harm:** EU frameworks tend to address discrete violations, while cumulative effects – such as long-term harassment, reputational damage, and visibility suppression – remain insufficiently governed.
- c. **Efficient and inclusive accountability:** Complaint, redress, and oversight mechanisms are often fragmented, difficult to access, or perceived as ineffective, particularly for actors outside large organisations or dominant platforms.

These thematic pillars translate to **four policy domains:**

- I. data privacy and surveillance;
- II. information and content governance;
- III. artificial intelligence and algorithms; and
- IV. markets, pluralism, and competition.

The following subsections present EU-level policy recommendations organised by thematic pillar.

### 3.2 Data Privacy, Security, and Surveillance

#### Policy problem

Privacy is recognised in EU law and policy as a core democratic value, yet DIACOMET's research shows that privacy-related harms are not primarily experienced as abstract rights violations. Instead, they manifest as everyday constraints on *participation, safety, and voice*. Journalists, civil society actors, and citizens face cumulative risks arising from pervasive data collection, opaque recommender and moderation systems, and cross-border harassment practices such as doxxing. These dynamics contribute to self-censorship and withdrawal from public debate.

Effective policy responses therefore need to connect *data protection, anti-harassment measures, and accountability mechanisms*, rather than treating privacy as a siloed regulatory issue.

#### Policy gap

Despite the EU's advanced data protection framework, a persistent gap remains between formal compliance and lived experiences of privacy-related harm. Existing instruments effectively address legality and consent but are less equipped to tackle structural and cumulative harms that undermine democratic participation.

## Relevant EU legal and policy framework

- General Data Protection Regulation (GDPR)
- Digital Services Act (DSA)
  - Specifically: systemic risk assessment and mitigation (Articles 34–35)

## EU-level policy recommendations

### EU-1. Integrate participation-related privacy harms into DSA systemic risk governance

The European Commission and the European Board for Digital Services should interpret systemic risks under Articles 34–35 DSA to explicitly include participation-chilling effects, such as harassment-driven self-censorship, long-term traceability of digital speech, and privacy harms arising from recommender and moderation systems.

### EU-2. Operationalise privacy-by-design in recommender and moderation systems

Building on the GDPR's rights-based approach, the Commission should promote systematic application of privacy-by-design and data minimisation principles to recommender and content moderation systems used by Very Large Online Platforms and Search Engines (VLOPSEs), particularly where they affect civic actors and journalistic content.

### EU-3. Establish EU-level coordination for cross-border online harassment and doxxing

Using cooperation mechanisms foreseen in the DSA, the EU should support coordinated rapid-response pathways for cases of cross-border digital harassment targeting journalists, activists, and other exposed civic actors.

### EU-4. Require mandatory DPIAs for high-risk digital communication systems

Data Protection Impact Assessments should be mandatory for digital systems that significantly affect visibility, participation, or public discourse, ensuring that cumulative participation harms are identified and mitigated.

### EU-5. Support EU-wide civic digital safety infrastructures

EU funding programmes should support digital safety programs for journalists, NGOs, and vulnerable groups, combining training, legal support, and rapid-response mechanisms.

### EU-6. Recognise civic accountability bodies as privacy- and participation-sensitive intermediaries

The EU should support inclusive accountability bodies as complementary mechanisms that help individuals and organisations interpret and apply data protection and participation safeguards in concrete communicative contexts, in line with the PDC.

## National-level Implications

- Strengthen enforcement capacity and cross-border cooperation
- Provide support services to civic actors for digital harassment and exposure

### 3.3 Information and Content Governance

#### Policy problem

DIACOMET identifies digital information and content governance as a central democratic challenge. Structural incentives embedded in online platform governance, funding models, and design choices favour polarisation, fear-based narratives, and manipulation over informed, dialogic public debate. These dynamics are reinforced by the economic fragility of journalism and weak enforcement of ethical standards.

Failures in public communication governance undermine trust when citizens cannot influence and contest decisions, when accountability is symbolic, and when dialogue is crowded out by polarising formats. Across countries, there is strong demand for transparent rules, accountable content moderation, and inclusive dialogue spaces.

#### Policy gap

While EU policy increasingly targets illegal content and systemic platform risks, DIACOMET findings reveal a governance gap concerning the structural conditions under which information is produced, amplified, and contested, especially for lawful-but-harmful content.

Recent EU policy developments also signal a shift toward treating disinformation, polarisation, and foreign information manipulation as systemic threats to democratic participation and civic resilience. In particular, the European Commission's *European Democracy Shield* initiative<sup>27</sup> frames the protection of democratic processes as requiring coordinated measures that empower citizens and strengthen societal resilience, alongside regulatory enforcement. DIACOMET's findings align with this orientation by emphasising the need to complement platform risk mitigation and voluntary codes with citizen-facing accountability, dialogic capacity, and support mechanisms that reduce participation-chilling effects.

<sup>27</sup> See the JOINT COMMUNICATION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS European Democracy Shield: Empowering Strong and Resilient Democracies ([Brussels, 12.11.2025 JOIN\(2025\) 791 final](#)).

### 3.3.1 Resilience of legacy media and journalism

#### Relevant EU framework

- European Media Freedom Act (EMFA)
- Audiovisual Media Services Directive (AVMSD)
- European Democracy Shield initiative

#### EU-level policy recommendations

##### **EU-7. Safeguard media content handling by VLOPSEs through EMFA implementation**

The Commission should enforce the implementation of the guidance for EMFA Article 18 to protect media service providers against arbitrary removal, down-ranking, or shadow-banning.<sup>28</sup>

##### **EU-8. Institutionalise transparency and usability of media accountability mechanisms**

EU policy should promote minimum standards for the visibility, accessibility, and effectiveness of complaints and redress mechanisms in media organisations and on online platforms.

##### **EU-9. Support long-term EU funding for public-interest journalism**

The EU should develop stable, sufficient, and long-term funding instruments for independent and public-interest journalism, protected by strong guarantees of editorial independence.

#### National-level Implications

- Strengthen independence and transparency of national media accountability bodies (press councils, ombuds institutions).
- Develop stable funding mechanisms for independent, local, and public-interest journalism.
- Ensure transparent and fair allocation of state advertising and public media funding.

<sup>28</sup> Communication from the Commission – Commission guidelines on the implementation of the declaration functionality for media service providers pursuant to Article 18 (1) of Regulation (EU) 2024/1083 (European Media Freedom Act) C/2026/594 OJ C, C/2026/901, 11.2.2026.

### 3.3.2 Disinformation, polarisation, and hate speech

#### Relevant EU framework

- Digital Services Act (DSA)
- Code of Conduct on Disinformation<sup>29</sup>
- Code of Conduct on Countering Illegal Hate Speech Online<sup>30</sup>
- European Democracy Shield initiative

#### EU-level policy recommendations

##### **EU-10. Expand media literacy to include media regulation literacy**

EU institutions should support programmes that familiarise citizens and professionals with DSA, EMFA, and AVMSD mechanisms, enabling informed use of safeguards and redress tools.

##### **EU-11. Strengthen DSA Codes of Conduct through civic dialogue capacity**

When evaluating compliance pathways under DSA Codes of Conduct (e.g., disinformation and hate speech) and related democracy-protection initiatives (including the European Democracy Shield), the Commission should recognise and promote measures that build dialogue capacity and inclusive accountability, including adoption of the Principles for Dialogue-Supportive Communication, structured community moderation, and scenario-based training.

##### **EU-12. Support dialogic and community-based responses to polarisation**

EU democracy and media programmes should prioritise initiatives that foster dialogue, contextualised reporting, and inclusive participation in polarised debates.

#### National-level Implications

- Integrate media literacy and media regulation literacy into education and civic programmes.
- Support community-based dialogue initiatives and participatory communication forums.
- Strengthen cooperation between regulators, media organisations, and civil society to address lawful-but-harmful content and polarisation.

<sup>29</sup> See at: [The Code of Conduct on Disinformation | Shaping Europe's digital future.](#)

<sup>30</sup> See at: [The Code of conduct on countering illegal hate speech online + | Shaping Europe's digital future.](#)

### 3.4 Artificial Intelligence and Algorithms

#### Policy problem

AI and algorithmic systems increasingly shape visibility, participation, hence the trust in public communication. DIACOMET findings show that these systems are widely perceived as opaque, biased, and difficult to contest, amplifying sensationalism and manipulation while weakening journalistic quality and civic autonomy.

#### Policy gap

Although the EU has adopted the comprehensive Artificial Intelligence (AI) Act<sup>31</sup>, a gap persists between formal AI governance and the real-world impact of algorithmic systems on democratic communication. In addition, governance of AI-driven communication systems depends on access to, and oversight of, relevant datasets and data-sharing conditions. While not media-specific, the EU Data Act<sup>32</sup> is relevant insofar as it addresses structural asymmetries in access to and use of data in the internal market, which can support public-interest scrutiny and reduce dependency on dominant intermediaries.

#### Relevant EU framework

- AI Act
- Digital Services Act (DSA)
- Data Act

#### EU-level policy recommendations

##### **EU-13. Make contestability of algorithmic decisions a practical requirement**

Users and vetted researchers must be able to understand and contest AI-driven ranking and moderation decisions affecting visibility and participation in public communication.

##### **EU-14. Strengthen disclosure and labelling of AI-generated content**

The Commission should advance the implementation of clear standards for disclosure of AI-generated or manipulated content, particularly in political and journalistic contexts.<sup>33</sup>

<sup>31</sup> Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) (Text with EEA relevance) PE/24/2024/REV/1 OJ L, 2024/1689, 12.7.2024.

<sup>32</sup> Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act) (Text with EEA relevance) PE/49/2023/REV/1 OJ L, 2023/2854, 22.12.2023,.

<sup>33</sup> See: Code of Practice on marking and labelling of AI-generated content: [First Draft Code of Practice on Transparency of AI-Generated Content | Shaping Europe's digital future](#) (Dec 2025).

### **EU-15. Support independent and civic auditing of AI-driven communication systems**

EU policy should support durable capacity for independent and civic audits of AI-driven communication systems, combining DSA Article 40 data access, relevant provisions of the Data Act, and AI Act governance structures.

### **EU-16. Promote participatory governance of AI**

EU institutions should foster citizen and civil society involvement in shaping AI standards and oversight, enhancing legitimacy and trust.

### **National- level Implications**

- Capacity-building for civic actors, regulators and media organisations
- Digital regulation and AI literacy programmes

## 3.5 Markets, Pluralism, and Competition

### **Policy problem**

DIACOMET's diagnosis is that pluralism and diversity of public communication – especially of media-related communication and information provision – is not self-sustaining in platformised and algorithmic governed environments. Concentration of ownership, attention, and resources systematically disadvantages independent, local, and minority voices.

### **Policy gap**

Competition policy alone has proven insufficient to safeguard pluralism without a democratic conception of media diversity.

### **Relevant EU framework**

- Digital Markets Act (DMA)
- European Media Freedom Act (EMFA)

### **EU-level policy recommendations**

#### **EU-17. Align DMA and EMFA implementation to protect media pluralism**

The Commission should ensure coherent enforcement recognising pluralism and diversity as core concerns.

#### **EU-18. Mandate due prominence for public-interest and local content**

Large platforms (VLOPSEs) should ensure the findability of public service media, verified local news, and public-interest journalism.

## EU-19. Enhance transparency of platform–publisher relationships

EU-level transparency requirements should cover inclusive mechanisms for civic accountability regarding the governance of media content online.

### National implications

- Civic pluralism monitoring bodies (see at: Inclusive Accountability Toolbox)
- Strengthening of community and non-profit media

## 4. Implementation Pathways and Conclusions

### 4.1 From policy recommendations to implementation: closing the governance gap

DIACOMET's research demonstrates that the most pressing challenges to democratic public communication in Europe are not isolated phenomena, but mutually reinforcing dynamics shaped by platform governance, economic fragility of media, and political polarisation. Disinformation, foreign interference, and the normalisation of hostile public discourse thrive where trust is low, journalism is under-resourced, and digital infrastructures reward conflict-seeking communication, incivility, and attention maximisation over accuracy and dialogue.

At the same time, the research shows that *regulatory expansion alone is insufficient* to address these challenges. While recent EU instruments – such as the DSA, DMA, AIA, EMFA and GDPR – constitute a strong legal foundation, their democratic impact depends critically on implementation capacity, accessibility, and accountability in practice. The central governance gap identified by DIACOMET lies between formal rules and everyday communicative realities: between what is legally required and what individuals, organisations, and institutions can realistically apply, contest, and rely upon in daily public communication.

Implementation pathways must therefore *combine legal compliance with supportive, dialogic, and learning-oriented mechanisms* that enable actors to navigate ethical dilemmas, manage risk, and exercise rights without disproportionate burden.

### 4.2 Multi-level implementation: roles of the EU and Member States

DIACOMET's recommendations are intentionally structured to reflect the *multi-level nature of European media and communication governance*. EU-level action plays a critical role in setting minimum standards, ensuring cross-border coordination, and providing resources and guidance. At the same time, national and local implementation is indispensable for translating these frameworks into context-sensitive practices.

At the EU level, implementation priorities include:

- investing in civic implementation capacity of new regulatory instruments (DSA, EMFA, AI Act),
- ensuring coordination across regulatory domains (competition, media, data protection),
- supporting cross-border responses to online harassment, disinformation, and algorithmic harms,
- and providing stable operating conditions for public-interest communication and accountability infrastructures.

At the national level, implementation must account for:

- differences in institutional capacity and regulatory traditions,
- market size and language constraints,
- and existing accountability arrangements in media and communication sectors.

DIACOMET's focus on smaller European countries highlights that these contexts often experience *both heightened vulnerability and greater policy leverage*. Smaller systems are more exposed to platform dependency and external influence, but they may also be more agile in institutional experimentation and regulatory adaptation. This makes them particularly relevant sites for piloting and refining implementation pathways that can inform broader EU practice.

#### 4.3 DIACOMET policy instruments as implementation enablers

Section 2.3 conceptualised DIACOMET's core outputs as policy instruments. This section clarifies *their implementation function* within European multi-level governance and explains how they operationalise the recommendations outlined in Section 3. DIACOMET's instruments are not alternative regulatory regimes. Rather, they function as *implementation infrastructures* that enhance the usability, accessibility, and legitimacy of existing EU and national communication governance frameworks.

Across all four policy pillars, the research identified a persistent gap between formal regulation and lived communicative realities. While the expansion of EU frameworks – including the GDPR, DSA, DMA, AI Act, EMFA, and related policy instruments – has significantly strengthened legal obligations and rights, this normative architecture does not automatically translate into meaningful protection, participation, or accountability in practice. Individuals and organisations frequently lack practical guidance for navigating



ethical conflicts, accessible and usable redress pathways, structured dialogic spaces for participation, and visible institutional feedback mechanisms that demonstrate responsiveness.

DIACOMET's policy instruments are designed precisely to address this governance gap. They complement existing legal frameworks by strengthening implementation capacity, enhancing accessibility, and embedding reciprocal accountability into everyday communicative practice.

#### 4.3.1 Principles for Dialogue-Supportive Communication (PDC): Normative Operationalisation

The Principles for Dialogue-Supportive Communication (PDC) translate dialogic communication ethics into an operational benchmark applicable across professional, institutional, and civic contexts. Whereas EU regulatory instruments establish rights, obligations, and procedural safeguards – such as transparency requirements, data protection standards, and systemic risk mitigation duties – the PDC specify how these normative commitments should be enacted in everyday communicative practice.

The framework is structured around six interrelated domains: (1) informational self-determination and privacy; quality of information and deliberation; ethical conduct in situations of disagreement; equality, freedom, and safety in communication; active listening and inclusion; and constructive feedback. Together, these domains articulate the behavioural and relational dimensions necessary for ethical and dialogic public communication.

This structure enables policymakers and institutions to embed dialogic standards into concrete governance environments, including platform terms of service and content moderation policies, media organisational codes, public communication strategies, AI governance guidelines, and civic and professional education curricula. In this way, the PDC function as a *cross-pillar interpretative layer* that enhances coherence between legal obligations and communicative behaviour, ensuring that regulatory frameworks are supported by ethically grounded and practically applicable standards of interaction.

#### 4.3.2 Inclusive Accountability Toolbox: Institutional Bridge

Building on research into inclusive accountability and the DIACOMET Inclusive Accountability Toolbox, the project proposes institutional models that operate in the intermediate space between formal law, professional self-regulation, and civic participation. Rather than functioning as purely complaint-based mechanisms or replicating existing press council structures, these models are designed to strengthen the practical conditions under which accountability becomes meaningful in everyday communicative contexts. They emphasise a

close connection to lived communicative experiences, the active inclusion of underrepresented or marginalised groups, reciprocal institutional feedback, and adaptability across diverse societal and regulatory environments.

Importantly, these mechanisms do not replace legal enforcement or formal oversight. Instead, they enhance the accessibility and usability of existing redress pathways, structure dialogue around communicative harm that may not meet legal thresholds, and promote non-punitive, learning-oriented responses. By creating visible and structured feedback loops between citizens and institutions, they foster mutual responsiveness and strengthen trust.

This institutional layer is particularly significant in contexts of shrinking civic space, where civil society actors and independent media increasingly operate under regulatory, financial, and reputational pressures. In such environments, inclusive accountability mechanisms can function as protective and supportive infrastructures that reinforce democratic resilience, enhance legitimacy, and safeguard participatory capacity – without introducing new coercive powers or expanding regulatory burdens.

#### 4.3.3 Dilemma-Based Learning: Ethical Implementation Capacity

The “Dialogue Lab” operationalises ethical reflection through scenario-based training rooted in dialogic communication principles. Its implementation function is capacity-building across sectors:

- journalists navigating algorithmic pressures,
- platform moderators managing lawful-but-harmful content,
- policymakers balancing freedom of expression and safety,
- educators addressing AI-generated content,
- civic actors responding to harassment.

Rather than prescribing fixed outcomes, the “Dialogue Lab” makes normative trade-offs visible, encourages anticipatory ethical reasoning, and fosters shared understanding across stakeholder groups with different responsibilities and power positions. By simulating complex real-world scenarios, it helps participants reflect on how legal obligations, professional norms, and communicative practices intersect in practice.

In rapidly evolving communication environments – particularly in the context of generative AI and automated content governance – such anticipatory capacity is essential for the meaningful implementation of obligations under instruments such as the AI Act and the DSA.



#### 4.3.4 Dialogic Forums and Listening Infrastructures

The DIACOMET Discussion forum<sup>34</sup> and several other toolbox concepts – such as the Listening Loop (Switzerland), Deliberative Local Forum (Hungary), and VaikutaSuomi.fi (Finland) – illustrate how structured dialogic infrastructures can translate individual experiences and concerns into collective insights that are institutionally usable. These models create accessible and organised pathways through which civic input is aggregated, deliberated, and communicated to relevant decision-makers, while also ensuring that institutional responses are made visible to participants.

In doing so, these infrastructures operationalise a central principle of democratic accountability: reciprocity. Accountability is not achieved merely through expression or complaint, but through structured exchange in which institutions respond transparently, and citizens can see how their contributions are acknowledged, interpreted, or acted upon.

Their policy relevance is evident across multiple regulatory domains. They can strengthen DSA systemic risk mitigation by providing structured civic input into platform governance processes; support EMFA implementation by fostering sustained media–public dialogue; enhance AI governance through participatory oversight and collective reflection; and contribute to pluralism monitoring by embedding inclusive deliberation into media and communication ecosystems.

#### 4.3.5 European NGO Network: Coordination and Safeguarding Civic Space

The proposed European NGO Network functions as a coordination layer linking national civic accountability bodies and related initiatives across Member States. In a context where civic space is increasingly under pressure – through regulatory constraints, financial precarity, and reputational attacks on independent actors – such transnational coordination becomes particularly important. The network would facilitate the exchange of good practices, support greater consistency in implementation across countries, strengthen independence through transnational solidarity, and connect grassroots accountability practices with EU-level policy processes.

By creating structured channels for mutual learning and cooperation, the network enhances democratic resilience without centralising authority. It respects the principle of subsidiarity by leaving implementation to national and local contexts, while promoting coherence, shared standards, and mutual support across Europe.

<sup>34</sup> See at: [Discussion Forum](#).



### 4.3.6 Cross-Pillar Implementation Logic

Taken together, DIACOMET's instruments form a coherent implementation architecture. The PDC operationalise ethical standards across communicative contexts; inclusive civic accountability mechanisms institutionalise participatory oversight and reciprocal engagement; the "Dialogue Lab" builds anticipatory ethical capacity among diverse stakeholders; dialogic forums and listening infrastructures create structured spaces for deliberation and feedback; and the European NGO Network ensures coordination and cross-border learning.

Collectively, these instruments enable a shift from predominantly compliance-driven governance toward dialogic, participatory, and resilience-oriented governance. Crucially, they operate within existing legal and regulatory frameworks, strengthening implementation capacity and democratic legitimacy without expanding regulatory burdens or introducing new coercive powers.

### 4.4 Conclusions

DIACOMET's research confirms that strengthening democratic public communication in Europe requires an *integrated governance approach*. Legal instruments addressing platforms, markets, and AI are necessary but not sufficient. They must be complemented by mechanisms that enhance participation, protection, transparency, and accountability in everyday communicative practice.

The policy recommendations presented in this deliverable translate DIACOMET's empirical findings into actionable guidance for EU and national decision-makers. By aligning regulatory frameworks with civic accountability instruments, capacity-building tools, and participatory infrastructures, they aim to support a more resilient, pluralistic, and dialogic public sphere.

Taken together, these recommendations demonstrate that democratic resilience in digital communication environments is not achieved through enforcement alone, but through *institutional empathy, ethical reflection, and sustained public dialogue*. DIACOMET's contribution lies in showing how these elements can be operationalised within existing European governance frameworks, offering pathways toward a more accountable and inclusive communication ecosystem. The final chapter includes the specific, national policy manuals to translate the overarching policy recommendations to the level of the countries involved in the DIACOMET project and to contextualise them in light of the prevailing conditions within each national media system.



## 5. National Policy Manuals

### 5.1 Austria

#### 5.1.1 National Context and Scope

##### *Media and communication landscape*

The Austrian media system is characterised by oligopolistic structures (Trappel, 2017) and has historically been shaped by strong political parallelism (Seethaler & Melischek, 2006), whose effects continue to influence the country's dual media landscape today. While Austria's media and communications system adheres to the fundamental principles of a democratic media system, it does exhibit notable structural tensions (Seethaler & Beaufort, 2024). These include high levels of media concentration, growing economic pressures, and increasing political polarisation, reflected in close interconnections between political actors and media organisations, as well as in various forms of instrumentalisation and pressure directed at journalists (Kaltenbrunner, 2021).

Whilst traditional media continue to maintain high reach, the importance of digital platforms and social media is growing, albeit at a comparatively low level by international standards (Gadringer et al., 2025). However, their algorithmic logic often prioritises attention-grabbing content, thereby exacerbating polarisation and fragmentation. This leads to a growing discrepancy between the normative expectations of public communication and its actual structure (Porlezza et al., 2026).

##### *Governance and regulatory framework*

Against this backdrop, there is a clear need for political action. The confluence of high media concentration, political and economic pressure, platform dominance, and the fragmentation of the public sphere shapes not only the media and communications landscape, but also the structural framework of journalistic work and the quality of public discourse.

#### **The key national authorities are:**

- the Austrian Communications Authority (KommAustria), which issues licences, regulates broadcasting, and supervises both public and private media services. As the national coordinator, KommAustria is also responsible for the Digital Services Act (DSA) and monitors platforms and intermediary services (RTR, n.d.-a).
- the Austrian Regulatory Authority for Broadcasting and Telecommunications (RTR, n.d.-b), which provides operational support to KommAustria by managing funding schemes for the media sector whilst also acting as an information, advisory and consumer arbitration body.

## Existing accountability and redress mechanisms

Self-regulatory bodies such as the Austrian Press Council, the Advertising Council and the Public Relations Ethics Council help to ensure ethical standards in journalism, advertising and PR. Professional associations such as the Presseclub Concordia promote dialogue on sectoral interests and industry practices, while domestic fact-checking initiatives (e.g., Mimikama and APA Fact Check) support the verification of public information. The Austrian Internet Ombuds Office, as an independent arbitration body, offers support on digital legal issues.

## Relationship with EU-level instruments

The Austrian Data Protection Authority (DSB, n.d.) accounts for the application of the GDPR, and thus enforces data protection law in Austria through complaint, investigation, and administrative penalty proceedings. The proliferation of Artificial Intelligence (AI) across the media sector – from content research to dissemination – poses critical questions regarding ethical deployment and accountability frameworks. An analysis of EU and Council of Europe policy documents reveals that explicit references to the media are scarce within AI regulatory frameworks. However, the focus predominantly centres on disinformation, data ethics, AI literacy, diversity, and social responsibility (Porlezza, 2023). Against this backdrop, Austria has established a structured system for managing AI developments. AI governance in Austria involves both governmental and non-governmental stakeholders. Key elements include the AI Policy Forum, the AI Advisory Board, and the AI Stakeholder Forum. This is complemented by the AI Service Desk, which provides information and supports the implementation of the AI Act (Austrian Federal Chancellery, 2024).

### 5.1.2 Key National Challenges

The Austrian findings of the DIACOMET project, which are based on a multi-stage empirical analysis<sup>35</sup>, reveal a complex picture of key problem areas that concern both structural and normative challenges in public communication. Austria is situated within a European communication ecosystem increasingly characterised by polarisation, diminishing public trust in media institutions, algorithmically amplified power asymmetries, and asymmetrical visibility across social groups.

<sup>35</sup> This comprises (a) a qualitative document analysis of 81 ethical codes and guidelines to identify normative patterns of inclusive accountability, (b) reflections on ethical conflicts in (semi-)public communication drawn from eleven focus group discussions with 70 individuals who actively participate (or wish to participate) in public discourse, as well as (c) the results of a three-stage Delphi study involving 47 experts from the fields of media, education, technology and regulation, which, in addition to identifying key challenges in dialogical communication, also generated solution-oriented approaches based on these findings.



The central challenge lies in the lack of genuine dialogical communication, which is indispensable for a functioning democratic public sphere. Although dialogue is certainly present as a topic in ethical codes and guidelines (Study a), from the perspective of those who actively participate (or wish to participate) in public discourse, public communication often remains one-sided, conflict-laden or fragmented (Study b). This significantly restricts mutual understanding, inclusion and democratic negotiation processes.

A critical dimension is the unequal opportunities for participation between urban and rural areas. Whilst urban regions offer comparatively diverse avenues for political and media participation, these are significantly more limited in rural areas (Study c). This further exacerbates existing social and political inequalities and results in opportunities for participatory dialogue being structurally unevenly distributed. This development is consistent with the findings of Kaltenbrunner et al. (2026), which point to a strong concentration of Austrian media funding on established print and existing media, thereby making market access for new, particularly regional and digital, players even more difficult.

At the same time, the results must be viewed in the context of structural barriers. Algorithmic platform logic substantially constrains dialogic communication, given its determinative role in shaping which content attains visibility and which is relegated to obscurity within the digital space. This logic does not serve the aim of promoting dialogue but is primarily geared towards maximising attention and engagement. Despite existing regulatory frameworks such as the Digital Services Act (DSA) or the AI Act, these systems remain largely opaque in their functioning and are therefore only partially comprehensible. This situation is exacerbated by fragmented and insufficiently interconnected accountability structures. Unclear responsibilities, power imbalances and hard-to-access complaint mechanisms limit the effectiveness of existing accountability processes and make it difficult, particularly for marginalised groups (Heikkilä & Tolonen, 2026), to access protection and enforcement mechanisms.

Based on the problem dimensions described above, the Austrian DIACOMET findings can be translated into concrete, multi-stage policy recommendations. These build on the policy recommendations from a transnational perspective (see Section 3 above), whilst also considering the specific potential of the national framework conditions.



### 5.1.3 Policy Recommendations

#### AT-1. Strengthening media pluralism and infrastructure

A sustainable understanding of media pluralism must not view it exclusively as the result of market dynamics but must understand it as a fundamental prerequisite for a democratic public sphere. This implies a need for targeted regulatory and funding measures, particularly to strengthen independent and public-interest media:

- the recognition of media diversity as a public duty, including targeted support for structurally disadvantaged media actors and the institutional involvement of NGOs as co-producers of public communication. Europe-wide NGO networks such as the DIACOMET NGO network should be regarded as key infrastructures in this context. By promoting media ethics, dialogue, and participation, they can make a significant contribution to strengthening trust in public communication and the democratic public sphere.
- structured dialogue formats, reinforced by targeted framework conditions (e.g., the cross-national *Principles for Dialogue-Supportive Communication* developed in the project) and capacity-building for conflict mediation (e.g., training of facilitators using the *Timeout method*<sup>36</sup>). At the same time, the promotion and further development of journalistic self-regulation, incorporating European approaches, appears central to sustainably strengthening quality, independence and trust (e.g., the TRACK model; Koene, 2025).
- A further key aspect is the advancement of inclusive communication infrastructures across all regional contexts to mitigate structural inequalities in public participation. The emphasis lies on ensuring equitable access for all citizens, irrespective of geographical location, to information resources, digital participatory opportunities, and discursive platforms. This helps to reduce social and digital inequalities, whilst ensuring pluralistic, representative public opinion-forming.

A concrete response to this challenge is provided by the prototypes of the *Inclusive Accountability Toolbox* developed as part of the project, which bridge the gap between regulation and lived experience. The Austrian proposals – the design of a democracy game (*“From the Duty of Democracy to the Will for Democracy”*) and a collaboratively developed Code of Conduct for public communication – shift the focus from individual ethical responsibility

<sup>36</sup> The Timeout method developed by the Finnish Timeout Foundation is an approach to structured dialogue that aims to foster respectful, inclusive, and constructive communication. It focuses on active listening, reflection, and the sharing of personal experiences, whilst argumentative debate is kept in the background. The aim is to promote understanding, rather than exacerbating conflicts. This method has proven its worth in the DIACOMET project: it has helped to create a culture of open dialogue and strengthen constructive dialogue processes between participants (Krakovsky, Lindmeyr & Konrad, 2025).

towards structurally embedded and institutionally supported forms of inclusive accountability.

- Addressee(s): national government, media organisations, public service media, policymakers for media subsidies at the national and federal levels.
- This recommendation is linked to the EMFA and The news initiative – EU support for the news media sector.
- Expected impact on participation, accountability, or trust: media pluralism and more inclusive participation across regional and social contexts.

## AT-2. Regulation of (algorithmic) platforms

---

Another key conclusion of the project is that the governance of digital communication spaces cannot rely solely on ethical self-regulation, but must be underpinned by binding institutional and regulatory frameworks. This gives rise to two prominent areas of action:

- further development of user-centred complaints procedures through transparent, comprehensible and accessible design, to increase their visibility and accessibility and to strengthen digital self-determination and democratic participation.
- strengthening the visibility, coordination and effectiveness of existing complaints and ombudsperson structures to ensure low-threshold and effective enforcement mechanisms, as well as expanding institutional monitoring and review capacities for the systematic evaluation of algorithmic systems and their societal impacts.

Overall, this requires a governance structure that clearly assigns responsibilities between the state, platforms, and media actors, thereby overcoming fragmented jurisdictions and regulatory grey areas.

- Addressee(s): digital (online) platforms, the European Commission and the digital services coordinator in Austria.
- This recommendation is linked to the AI Act and DSA.
- Expected impact on participation, accountability, or trust: improved digital self-determination, more effective enforcement mechanisms, and increased public trust in digital communication governance.

### AT-3. Clear responsibilities and resilience-oriented governance approaches

Effective reform of democratic communication in Austria necessitates the targeted expansion of sustainable dialogue structures and a consistent integration of regulatory competence, legal frameworks, institutional practice, and active, inclusive participation. Across the board, the central importance of education, media, and news literacy as the foundation of democratic resilience is evident. This includes the systematic integration of news literacy at all levels of education, the strengthening of established initiatives such as Saferinternet.at, and early democratic socialization in the use of social media. Similarly essential is increasing awareness of the functioning, associated risks and broader societal impacts of algorithmic systems, thereby sustainably enhancing the competence to engage critically with platform logic (e.g., the DIACOMET “Dialogue Lab”, an interactive online format in which users reflect on, discuss and weigh up different solution options for typical ethical communication conflicts).

- Addressee(s): digital (online) platforms, national education policymakers, educational institutions, NGOs.
- This recommendation is linked to the [European Democracy Action Plan](#) and the [Digital Education Action Plan](#).
- Expected impact on participation, accountability, or trust: stronger democratic resilience, improved media and digital literacy, and more critical engagement with platforms and algorithms.

Concurrently, the identified challenges underscore the insufficiency of exclusively national measures. A coordinated European approach is therefore essential, involving the development of common standards for transparency and accountability alongside a strengthened exchange of best practices, to effectively address and support the structural transformation of public communication. Overall, a transition to inclusive accountability is needed: an approach that not only sets rules but also fosters accessibility; that not only protects but also empowers; and one that does not merely exercise control but actively strengthens trust, participation and democratic co-determination.

## 5.2 Estonia

### 5.2.1 National Context and Scope

#### *Media and communication landscape*

Estonia (population of 1.3 million) has a liberal, EU-aligned media regulation characterised by high press freedom and limited state intervention. However, the pressure on freedom of expression and freedom of the press has increased in Estonia since the beginning of the second decade of the 21st century. Nevertheless, journalists have shown strong resistance to this pressure (Harro-Loit et al., 2025). The ownership structure of the Estonian media market is oligopolistic due to its very small size. By the end of the second decade of the 21st century, two large media corporations control the majority of the media market: *AS Ekspress Grupp* and *Postimees Grupp*. These groups own many media outlets also in the other two Baltic states.

#### **The main laws that regulate the sector are:**

- the Media Services Act (MSA) governing audiovisual media (TV, radio, on-demand services) in line with the EU Audiovisual Media Services Directive;
- the Estonian National Broadcasting Act regulates the public broadcaster (ERR);
- the Public Information Act guarantees access to public information, but since the GDPR came into effect, journalists' access to some information has become more complicated. Often, civil servants responsible for data protection are biased towards privacy or business secrets protection (Litvaitis et al., 2023).

Under Estonian law, individuals can seek protection against defamation by taking their case to court. Defamation is regulated in Estonia by the Law of Obligations. Hate speech is mainly regulated by the Estonian Penal Code.

In January 2024, Estonia had about 1.04 million active social media users, accounting for 78.7% of its total population. The largest social media platform in Estonia has been Facebook, with approximately 51.5% of the population using it. Streaming services are widely used in Estonia, with the leading platforms being Netflix (used by 45% of internet users). As Estonia does not participate in the pan-European digital media usage survey, the *Digital News Report*, there is no reliable data on the impact of digital platforms in Estonia (Harro-Loit & Loit, 2025).

#### *Governance and regulatory framework*

The Consumer Protection and Technical Regulatory Authority (TTJA) supervises audiovisual media services and broadcasting licences, ensuring compliance with national media law and EU audiovisual standards. The Data Protection Inspectorate (Andmekaitse Inspektsioon, AKI)

is responsible for overseeing privacy and personal data protection, as well as ensuring compliance with the GDPR. The TTJA supervises broadcasting and media service licences, while the AKI is responsible for GDPR enforcement and personal data protection supervision. The Estonian Competition Authority (Konkurentsiamet) is responsible for overseeing competition law, mergers, market supervision and regulated sectors.

### Existing accountability and redress mechanisms

The Estonian Press Council and the Council of Public Word (ASN) function as voluntary ethical oversight bodies that review complaints about journalistic conduct, accuracy, privacy violations, and breaches of professional ethics. Public service media (ERR Eesti Rahvusringhääling) also contains internal accountability structures. The media ethics adviser or ombudsman receives complaints and provides feedback concerning ERR's journalistic content. In relation to the European Media Freedom Act (EMFA), Estonia continues to apply its national media regulation and media self-regulation mechanisms while aligning with EU requirements concerning media independence, transparency, and protection of journalists.

### Relationship with EU-level instruments

Estonia has applied EU digital and media regulations primarily through existing national regulatory institutions and legal frameworks. The implementation of the Digital Services Act (DSA) involves the Consumer Protection and Technical Regulatory Authority and the Data Protection Inspectorate, which oversee platform accountability, user rights, and data protection obligations. Moreover, the Digital Services Coordinator is responsible for monitoring online platforms. Under the Information Society Services Act, the Consumer Protection and Technical Regulatory Authority has been designated as the competent supervisory authority for the DSA Regulation and as the Digital Services Coordinator in Estonia. Estonia is also adapting its digital governance framework to comply with the AI Act. The country's existing e-government infrastructure and digital administration systems provide the institutional basis for applying EU rules on Artificial Intelligence, risk assessment, transparency, and human oversight.

#### 5.2.2 Key National Challenges

Since traditional news media has historically been the primary force in shaping public communication, there is a long tradition of journalism ethics: journalism ethics is taught to journalism students in universities, and extensive case-based practice has developed through the work of the Press Council and the Council of Public Word. At the same time, a normative discourse on the ethics of public communication is lacking. Based on the experience of the trainings and conference related to the DIACOMET project in Estonia, it can



be argued that people need better skills to recognise ethical choices in communication, as well as agreements on good practices that support dialogical communication.

The results of the Q-sorting methodology and focus group interviews revealed four key problems in Estonia:

- People want to be heard but also actually involved in decision-making processes of the authorities (both local governments and state institutions) that affect them.
- People have expressed a desire for a stronger culture of listening and dialogic communication within organisations (this is also related to the issue of workplace bullying).
- Social media has shown that the overall culture of communication is important. In the age of social media, the quality of public communication is determined by people's competence in communication ethics and their motivation to communicate openly, respectfully and inclusively.
- People in Estonia perceive a decline in freedom of speech because publicly expressed opinions may lead to labelling and bullying.

### 5.2.3 Policy Recommendations

#### EE-1.

---

The Council of Public Word, which has so far dealt with complaints concerning journalism, should be reorganised, and a centre and a body should be established, whose purpose would be to advise people on ethics that support dialogical communication.

#### EE-2.

---

To guarantee the sustainability of the accountability institutions, the state should provide targeted, at least minimal financial support to respective councils (Council of Public Word, but also the small councils in local communities) that promote the principles of dialogic communication and also foster communication quality through case-based practice.

#### EE-3.

---

Promoting a dialogical communication culture in society requires a competence promoter and a council (or councils) that continuously keep communication ethics in focus and develop it within society. Since the development of communication culture in society is a very long process, EU attention and support are needed to promote dialogic communication education.

## 5.3 Finland

### 5.3.1 National Context and Scope

#### *Media and communication landscape*

While being a densely networked and digitalised nation, traditional news media, including public service media, omnibus regional press, and local newspapers, remain strong. In the absence of national newspapers, three Helsinki-based newspapers Helsingin Sanomat, Ilta-Sanomat (popular press) and Iltalehti (popular press), have a strong impact on the media output. The level of public trust in news in Finland is the highest in the Western world (RISJ). In the meantime, all media outlets struggle financially and find themselves compelled to adjust to commercial and technological pressures.

Approximately 75 per cent of Finns use social media. The most popular platforms are Facebook (49 %), Instagram (22 %) and Pinterest (11 %). Social media tends to have a strong effect on public communication, as there is a strong sentiment in politics and news media that social media platforms are in the pulse of public opinion. In the meantime, social media are often perceived as the culprit of many problems in communication culture: lowering quality of public discourse, trolling, manipulation, addictive behaviour, and excessive power of global platform companies.

Due to economic uncertainty, media ownership is highly concentrated. Despite this, the number of news media outlets has remained stable. In the meantime, public service media have been imposed to heavy austerity measures by the government. Privately owned media companies strive to maintain their status and economic efficiency by investing in and experimenting with new technology, such as AI.

#### *Governance and regulatory framework*

#### **The key national authorities are:**

- the Ministry of Transport and Communications is responsible for communications and broadcasting policy, and it oversees legislation on radio, television, frequencies, networks, and data security.
- the Finnish Transport and Communications Agency (Traficom) grants licences, supervises broadcasters, and enforces audiovisual rules.

#### **Existing accountability and redress mechanisms**

The self-regulation system in Finland is based on the Guidelines for Journalists, which function as national code of ethics. The Council for Media Ethics, which represents journalists, media management, and the public, interprets the ethical conduct by handling

complaints issued to the council. Similar procedures have been implemented in the field of advertising. In addition, social media influencers and information technology experts are in the process of drafting ethical guidelines, but it remains to be seen how these would be established.

### Relationship with EU-level instruments

Regarding DSA, Finland supports a fundamental-rights-oriented and transparency-based approach to platform regulation, consistent with Nordic media and digital-rights traditions. DSA is directly applicable, but it requires national legislation to assign authorities and enforcement powers. Finland endorses EMFA's goals of safeguarding media pluralism, editorial independence, and public service media autonomy, while being cautious of national over-regulation. It was an early advocate of "trustworthy AI". AI systems in journalism are generally not banned, but they must meet transparency obligations and are restricted where they pose risks to fundamental rights.

#### 5.3.2 Key National Challenges

Citizens feel that the toll of public participation is becoming too high due to the instability and commercially driven logic of the digital media environment. The Finnish WP3 report (Tolonen & Heikkilä 2025) reports the following: Engaging in public communication in this environment was described as a form of entrapment, which one podcaster likened to an intractable arms race:

*"It is a vicious game-theoretical predicament where all actors feel compelled to survive. It resembles the nuclear arms race: as you cannot trust others to disarm, you must keep maintaining your arsenal." (Male, podcaster)*

This problem stems from the underlying dynamics in political communication in a hybrid media environment, which cannot be governed by policies and legislation alone. Rather, it points out the necessity to clarify ethical standards for all stakeholders in public communication, both institutional and non-institutional. The implementation of ethical codes cannot be effective if these remain organisation-based or profession-based only. Thus, coordination and resources will be required to help networks of self-regulation to emerge.

The opportunities to record and extract data from personal histories prevent people from behaving freely, even in context outside of public communication. This sort of vulnerability curbs especially actors with high attention capital, such as politicians, public experts, and celebrities, but this also affects young people and minors. A quote from the WP3 report: Youth workers noted that many adolescents have started to avoid even the most innocent activities, such as school events or and giving school presentations, for fear of viral shaming.

*"At some discos, the organisers tend to ban mobile phones or collect them at the door. Kids still come to these events, but they barely dance because they are so terrified of being recorded by someone and that the clip would then go viral." (Female, youth worker)*

Policy measures to privacy protection seek to strike balance between largest freedom possible and most limited form of control to ensure security. In this framework, privacy is understood either as space or commodity (information). While this constellation is important, it tends to omit other relevant conceptual facets of privacy, and more specifically to one of them, dignity (Heikkilä 2020, 254).

### 5.3.3 Policy Recommendations

For each priority challenge, provide concrete, actionable recommendations, structured as follows:

#### **FI-1. Coordination of ethical codes**

Even if there is growing interest in the field of public communication to conceive and update codes of ethics their implementation cannot be effective if these remain organisation-based or profession-based only. Thus, coordination and resources will be required to help networks of self-regulation to emerge.

- Addressee(s): Professional unions, press council (CMM), media organisations, independent media workers, NGOs.
- Description of measure(s): Organised negotiations between interested group of actors, public events to discuss communication ethics, join declarations and public campaigns to demonstrate commitment to ethical communications.
- This recommendation is linked to [The European democracy action plan](#) and [The news initiative – EU support for the news media sector](#).
- Expected impact on participation, accountability or trust: Growing awareness of ethical responsibilities that public communicators have carried and are committed to develop to match with growing challenges in the digital media environment.

#### **FI-2. Protection of dignity**

In policy making, privacy is often understood as right to property (space or information). This framework, as implemented through GDPR, fails to pay adequate attention to ethical aspects of privacy. Therefore, more emphasis should be paid to dignity as fundamental value in public and interpersonal communication.

- Addressee(s): Legislators, data protection office, experts consulting policy makers.

- This recommendation is linked to the EC on DSA enforcement re: data protection on platforms, European Data Protection Supervisor to issue EU-wide guidelines.
- Expected impact on participation, accountability or trust: Deepening the conceptual understanding of privacy in policy making.

## 5.4 Hungary

### 5.4.1 National Context and Scope

#### *Media and communication landscape*

After 2010, the Hungarian media and communication ecosystems have undergone profound changes; during the former ruling party's 16-year reign, they brought nearly the entire system under their control. Structural problems of the Hungarian media system have been well-documented and widely acknowledged: extreme ownership concentration, a distorted media market, concentrated state advertising, state propaganda, harsh political and economic pressure, a strongly polarised media system, and a low level of trust in the media are the most significant problematic phenomena. Fidesz built up its "own" media organs with the help of some loyal business entrepreneurs, while transforming the PSM into state propaganda channels. Attempts to silence or restrict independent voices were also evident, as the attacks against independent media outlets were intensified, including the use of spyware. The erosion of the editorial and financial independence of critical media, attempts to eliminate independent bodies, including the media authority, and the deterioration of democratic values and principles characterised the last 16 years. The problem of media freedom in Hungary is well-illustrated by the fact that, according to the RSF's Press Freedom Index, Hungary had ranked 23rd globally in 2010; by 2026, it had dropped to 74th. However, these worrisome trends increased resilience, solidarity and professionalism amongst independent actors. They also give rise to creative and innovative forms of survival and resistance in which the media and civil society find common ground.

As a global phenomenon, while older generations prefer traditional media, younger generations prefer online and new media content. According to a 2023 survey, while just under a quarter of young people regularly get their information from television, 80% of people aged 60 and over regularly get their information from television. The proportion of people in all cohorts who get their information from the internet is around 70%. Symptoms of crisis, such as the collapse of traditional business models, the dominant role of tech giants can be observed in Hungary too, as well as the even wider spread of AI-generated or manipulated and misleading content, which has heightened concerns about information manipulation.

While foreign investors and media owners have been leaving the Hungarian media market in droves over the past few decades – most recently, for example, with the Swiss company Ringier selling its Hungarian media portfolio – investors close to the previous government continue to hold a dominant position in the media market. State advertising was used as an instrument to transform the Hungarian media market, and the market-distorting mechanism of state advertising spending helped pro-government media companies survive. Although

the tax rate for the advertising tax introduced by the previous government remains at 0%, it hangs over media companies like the Sword of Damocles; therefore, its removal from the legal system is required.

### *Governance and regulatory framework*

#### **Key national authorities**

The National Media and Infocommunications Authority (NMHH) and the Media Council are the two major bodies related to the supervision of the Hungarian media landscape and regulation. The independence and the functioning of the media authority were questioned by the European Commission, which stated: “[...] in practice these rules have not prevented the governing party from nominating all five members of the Media Council. The Monitor registers medium risk (53%) in terms of the independence and effectiveness of the Media Council.” (European Commission, 2020). The independence of the National Authority for Data Protection and Freedom of Information (NAIH) and the Hungarian Competition Authority (GVH) is questionable, as such restoring the autonomy of independent institutions and strengthening the system of checks and balances is essential and should be a top priority for the new government. The Sovereignty Protection Office (SPO) must be dissolved immediately, and the legislation governing it must be repealed.

#### **Existing accountability and redress mechanisms**

The system of self- and co-regulation in Hungary is weak; in fact, this institutional framework has never managed to take a sufficiently firm root in the Hungarian regulatory environment. Citizen oversight is practically nonexistent, while regulated oversight of public media is overly politicised and lacks substantive action or results. Discussions on media ethics are sporadic and ad hoc, linked to individual major public scandals, but do not form part of a trend-setting agenda. Control over the media is primarily exercised through legal proceedings, but the enforceability of lawsuits for correction and privacy rights lawsuits is also problematic.

#### **Relationship with EU-level instruments**

In Hungary, the National Media and Infocommunications Authority was designated as the Digital Services Coordinator. Its Internet Hotline, a legal aid service maintained by the National Media and Infocommunications Authority, is the sole trusted flagger. This is interesting because the authority, which is the so-called “digital services coordinator” under the DSA, has designated its own legal aid service to be the trusted flagger. Full and unambiguous implementation of EMFA and the AI Act has not yet been achieved.

## 5.4.2 Key National Challenges

Media polarization in Hungary is not a side-effect or collateral damage: entrenching political polarization was a main objective of the previous government in accordance with its broader strategy of creating a stable majority for its policies within the Hungarian electorate. Since 2010, the Orbán government has introduced new measures in the media sphere as part of its mission to establish a new type of hybrid, illiberal political system. Market interventions, regulatory measures, administrative decisions, and business instruments have together resulted in a distorted, highly polarised media market. Only a small, free and independent segment of the media maintains a traditional journalistic ethos in this hostile environment.

These phenomena have a serious effect on the standards of ethical public communication, journalism and media reporting. As a consequence, these issues were reflected during our focus group discussions, mainly, but these were repeatedly mentioned in the first two rounds of the Delphi study as well.

Following the general elections of April 2026, the Hungarian public sphere is entering a potentially transformative period. While the structural challenges of the past decade remain deep-seated, there are emerging signals of a shift in public discourse and a renewed demand for institutional integrity.

This “post-election window” offers a unique opportunity to move beyond the diagnosis of media capture and towards a constructive roadmap for recovery. Consequently, the following policy recommendations are framed not merely as a critique of past failures, but as actionable benchmarks for reform. They are designed to support a transition towards a more resilient, transparent, and ethically grounded communication ecosystem, leveraging the potential for positive change in the new legislative cycle.

## 5.4.3 Policy Recommendations

### **HU-1. Institutional renewal**

Over the past decades, the state has effectively taken control of parts of the Hungarian media, particularly public media institutions, including the state news agency and the relevant regulatory, supervisory, and licensing authorities, above all the Media Council. It is necessary to restore the autonomy of these institutions, guarantee their independence, ensure their operation in accordance with EU standards, and appoint leaders who act impartially without any political or other influence and/or pressure.

- Addressee(s): national government, regulator, EU institutions.
- This recommendation is linked to the DSA and EMFA.



- Expected impact on participation, accountability, or trust: Predictable and manageable operations within the media and communication ecosystem, increased trust, and compliance with EU regulations.

## **HU-2. Radical overhaul of the public service media (PSM)**

Over the past decade and a half, public service media have come under the direct control and influence of the government. The ruling parties have used their various platforms as tools for propaganda, causing them to lose their professional credibility, competence, and trust, while using a budget of billions of Hungarian forints. The “Media of Power” model has prioritised political control over public dialogue.

It is necessary to rethink the entire public service media institutional system, restore editorial independence, ensure operations in accordance with the public service code and ethos, and spend public funds in a transparent and accountable manner; and to initiate the necessary dialogue on all of this with the involvement of citizens. This move would serve as a “shared ground” for the entire nation, reducing polarisation and countering foreign disinformation (e.g., Russian narratives) through reliable information.

- Addressee(s): national government, regulator, EU institutions.
- This recommendation is linked to the EMFA.
- Expected impact on participation, accountability, or trust: Impartial and independent operation, diverse media content, public trust, and genuine public service

## **HU-3. Restoring ethical integrity**

Current institutional frameworks suffer from a “regulatory capture” and an “ethical vacuum”, making professional accountability a personal risk. Recommendation: Utilise the new legislative cycle to re-institutionalise ethics. This includes reforming the Media Council into a truly independent body and establishing a “National Ethics Compact” for public institutions to restore predictable, expert-led governance.

- Addressee(s): national government, regulator.
- This recommendation is linked to the EMFA.
- Expected impact on participation, accountability, or trust: raising ethical standards, institutionalising ethical accountability, fostering civic engagement, and ensuring impartiality and independence.

#### **HU-4. Rebuilding trust in journalism and media ethics**

Focus group discussions revealed deep disillusionment with Hungarian journalism. Participants described a media environment dominated by sensationalism, political polarisation, and a lack of fact-checking. Both state-controlled and independent outlets were seen as contributing to the erosion of journalistic integrity — the former through propaganda, the latter through click-driven reporting.

Recommendation(s): (a) support the institutionalisation of fact-checking mechanisms (e.g., an independent Fact-Checking Hub or Ethics Council); (b) introduce mandatory ethical and source-verification training for journalists as part of continuous professional development; and (c) reform the state media into a genuine public service media, with transparent funding and editorial independence tied to professional and pluralistic performance standards.

- Addressee(s): national government, regulator.
- This recommendation is linked to the EMFA.
- Expected impact on participation, accountability, or trust: dramatic improvement in trust in the media and news, strengthening of reliable news sources and media outlets, a reduction in media polarisation, and a decrease in the volume of information distortions.

#### **HU-5. Enhancing media and information literacy and critical thinking**

Participants frequently emphasised that citizens lack the tools and motivation to evaluate information critically. Confirmation bias and emotional engagement dominate public discourse, enabling the spread of misinformation and polarising narratives. According to the Reuters Institute Digital News Report 2025, the proportion that have received some education or training about the news is the lowest in Central and Eastern Europe, Hungary had the least (16%).

Recommendation(s): (a) integrate media literacy education into both school curricula and adult education, focusing on source evaluation, fact-checking and (d-/)misinformation detection; (b) launch public awareness campaigns on ethical communication and hate-speech recognition, using accessible language and practical examples; and (c) involve local governments and civil society organisations in community-level dialogue programs that teach citizens how to engage with controversial topics constructively.

- Addressee(s): national government, regulator, formal and non-formal educational institutions.
- This recommendation is linked to the EMFA.

- Expected impact on participation, accountability, or trust: development of critical thinking across all age groups, improved information security, enhanced media, information and AI literacy, and a reduction in the number of instances of information distortions.

## **HU-6. Countering populism and fear-based narratives**

Across discussions, participants described the Hungarian communication environment as shaped by systematic fear appeals and enemy constructions in political discourse. Populist messaging exploits insecurities and fosters hostility toward minorities, undermining empathy and trust in democratic institutions.

Recommendation(s): (a) encourage pluralistic and inclusive narratives through public communication grants and civil media initiatives (e.g., community radios, documentary projects); (b) require hate-speech prevention protocols for public broadcasters and major news outlets, including editorial guidelines that prohibit stigmatising or dehumanising language; and (c) align national communication standards with EU-wide ethical frameworks, such as the Digital Services Act and European Democracy Action Plan, to ensure accountability and democratic safeguards.

- Addressee(s): national government, regulator.
- This recommendation is linked to the EMFA, DSA and [The European democracy action plan](#).
- Expected impact on participation, accountability, or trust: the emergence and strengthening of democratic political communication, and its becoming an integral part of public communication.

## **HU-7. Fostering dialogue culture and empathy in public communication**

Participants highlighted the erosion of constructive dialogue and empathy in public debate. Communication often turns confrontational and moralistic, leaving little room for mutual understanding. Many felt that respectful conversation — not only regulation — is essential to restoring dignity and ethical responsibility in the public sphere.

Recommendation(s): (a) establish structured public dialogue platforms where citizens with different viewpoints can engage in moderated discussions on social and ethical issues. (b) introduce empathy and communication training within civic education, journalism, and teacher training programs, emphasising listening and perspective-taking. (c) promote responsible political communication, discouraging moral panic and divisive rhetoric through voluntary codes and peer monitoring among public actors.

- Addressee(s): national government, regulator.
- This recommendation is linked to the EMFA, DSA and The European democracy action plan.
- Expected impact on participation, accountability, or trust: improving the quality of democratic communication through fact-based, inclusive, and diverse dialogue.

## 5.5 Lithuania

### 5.5.1 National Context and Scope

Lithuania faces a compound media and communication challenge. Though it appears that many important reforms have been implemented in media and communications policymaking to secure plurality, transparency, and accountability, the overall information space and the communication conditions created by the new workforce – actors, such as journalists, influencers, and media entrepreneurs engaged in media content production, are facing increasing challenges arising from evolving business models and shifting supply-and-demand conditions.

The ongoing transformations within the media landscape, and policy responses developed to address these – from state support to economically fragile journalism and to developing new systems (registers) aimed at increasing media ownership transparency (see, for example, Jastramskis, 2025) – are now converging with a new set of threats. These include increasing media dependence on digital platforms, the rise of hostile information, and shifting audience relationships with information sources, especially amid the increasing power of global platforms and the algorithmic structuration of content.

Among the key characteristics of the contemporary media and communications sphere in Lithuania is its increasing reliance on digital technologies by all media to sustain pluralism and diversity of voices. As a small media market, Lithuania is structurally prone to oligopolistic tendencies, as evidenced by the dominance of a few strong media owners in each of the classical sectors: broadcast, print, and Internet media channels. The increasingly competitive character is defined by so-called “natural” restrictions, namely market size and the national language.

The Lithuanian language is among the few languages that are spoken least outside the national context and geography. In fact, a language factor also becomes restrictive in the era of AI-mediated communications. For small nations and languages, the capacity to develop and train efficient national-language models remains underdeveloped. This creates a structural disadvantage for smaller languages: large technology companies are favouring dominant languages that are already mature for AI-mediated systems. Such a technology-inspired move results in reshaping the functioning of the whole media system in smaller countries by increasing the dependence of all of their media outlets on foreign infrastructures, specific visibility rules, and algorithmic content distribution.

Furthermore, in small markets, including Lithuania, media concentration seems inevitable. While concentration might result in stronger editorial efforts’ consolidation to produce quality content (such as journalistic investigations and fact-checking), the negative effect of



the trend is that, in fact, very often it is the business-side which gets consolidated rather than the quality of content (see, for example, Rožukalne et al., 2025). For Lithuania, the consolidated efforts of business groups were especially noted in the most recent case of national public service media policymaking, when media business lobby groups came up with a proposal to impose stronger means on the idea of “public service” content by leaving popular entertainment and sports programs in the sphere of commercial companies. Especially troubling is the growing role of the Association of the Internet Media – a body representing major Internet media groups – which becomes an additional force acting against the PSM alongside political powers.

In 2025-2026, the growing political influence over and around public service media emerged as both a particularly worrying and emblematic development in Lithuania's increasingly conflictual media environment. It became a significant challenge not only for public service media itself, but for the wider media ecosystem. The case, initially framed as one of economic mismanagement, has gradually turned into a classic example of the growing politicisation of the public broadcaster. Business lobby groups, concerned with their own media business interests, have also criticised the PSM as an increasingly rich media company that fails to meet public aims. This case has not been finalised, and it appears it will continue despite strong criticism, activism, and pressure from civil society. We add this example as especially illustrative of a critical issue in Lithuania: a political culture that still lacks mature mechanisms for managing competing interests.

As a matter of fact, the issue of political culture appears especially worrisome, especially amid intensifying geopolitical threats, unstable economic conditions and people's public sentiment. To address these instabilities, it is necessary to pay greater attention to the overall communication culture and information environment, which are increasingly central factors shaping public moods, perceptions, expectations, and role models. For democratic resilience, the professional news media – including both public service media and commercial media outlets – must be seen not only as an information provider but also as a system for national information resistance. Effective measures are therefore needed to sustain this role, such as dedicated funding programs that support the production and distribution of essential public-interest information, including specific media literacy training and guidance on verifying information and avoiding manipulative content, which is already increasingly dominant on alternative channels, including social media.

It should be noted that Lithuania has taken significant steps to advance legal thinking and institutional transparency, particularly through the establishment of VIRSIS, which is an innovative national system designed to increase transparency in media ownership. However, the effectiveness of legal acts and innovative systems remains limited by a broader political culture that still lacks stable and constructive mechanisms for managing conflicts of interest.

## 5.5.2 Key National Challenges

Based on the DIACOMET project results, we have identified three major national challenges. We frame these developments in relation to both long-standing and emerging transformations in communication. The older issues include unresolved concerns about securing the independence of professional newsrooms and strengthening journalistic authority. The newer challenges are linked to intensifying geopolitical threats and rapid technological developments, and their social implications.

Among these challenges, we outline three trends that are especially significant because they affect the character of epistemic welfare within Lithuania's transforming media environment and changed public communication:

- **the weakening conditions under which news media operate, alongside the declining authority of professional journalism**, which are resulting in the limited diversity of voices, insufficient plurality, and marginalisation of perspectives in the public sphere (LT-1).
- **a lack of effective accountability, quality-assurance and public/community control mechanisms** to address public communication challenges, including the rise of hostile content, hate speech, and conflicting views (LT-2).
- **the increase and dominance of manipulations**, driven by both foreign and domestic malicious actors, which is also reinforced by algorithmic opacity and uncertainty about how to govern platform- and AI-mediated communication (LT-3).

Obviously, each of these trends carries its own risks and consequences.

As we have found in our project's practical analysis, which included focus groups organised with civil society members and representatives of professionals (specialists of various professions, media experts, analysts, policymakers), for all of the studied groups, news media and journalism are often among the usual targets of public discontent. Traditional media are frequently accused of bias, while social networks are criticised for enabling algorithmic and AI-managed communication, anonymity, online attacks, trolling, the canceling of different views, and the rewarding of conflict, visibility, and emotional intensity. The mainstream media is criticised for biased news coverage, orientation to profit, and decreasing commitment to facilitating public good. In return, participants call for more transparency and balanced reporting, greater accountability and a renewed commitment to journalistic ethics. On the other hand, social media platforms are also considered problematic, especially for vulnerable groups, due to their emotional charge, attention-seeking practices and algorithmic modus operandi.



Focus groups' participants reported a pervasive sense of disorientation and uncertainty as they navigate a constantly changing and transforming public communication landscape, where conventional norms and standards have become increasingly ambiguous and difficult to enforce (Balčytienė et al., 2026). Many discussions focused on major disruptive trends in society, such as political polarisation and societal divides (us vs. them), hate speech, the phenomenon of “cancel culture”, power abuse, and inequalities. These issues are driving people further apart, as they become entrenched in their positions, unwilling to understand or empathise.

For public dialogue and democratic engagement to flourish, participants called for a more holistic and inclusive approach to public communication to foster common understanding, empathy, and a shared sense of community. In order to promote public dialogue and inclusive communication practices, media literacy and critical thinking are considered of paramount importance for all. The responsibilities of safeguarding democratic values and the fundamental principles of public dialogue should be shared by professionals, governmental institutions, the private sector, the media, and society at large. Therefore, a holistic approach is needed to address the ills of contemporary public communication, with close, genuine collaboration among various actors and institutions at its center.

Similar results were reported with the group of experts in the design-thinking session. The experts (data analysts, media experts, educators, and representatives of the creative industries) proposed an inclusive civic accountability mechanism: the concept of continuous learning. We, too, suggest that the prototype of lifelong learning, framed as continuous learning, is a tool for growth at individual, professional, and societal levels. Promoting values and competencies often overlooked in ever-changing, technology-driven environments, the idea of lifelong learning highlights the importance of “dialogicality” in communication – training for and practically nurturing the capacity to seek information, to listen, to make decisions, to give and address feedback, and the like.

All things considered, our project shows that, for everyone, the most evident concern is the deepening polarisation in society. But as scholars, we conclude that it is essential to understand that polarisation is not simply the outcome of message circulation or the clash of various opinions. Most recently, our analyses reveal that societal polarisation must first be perceived as a structural problem, arising from unequal communicative conditions (see “Žurnalistikos integralumo veiksnys supriešintoje visuomenėje”, 2026; Balčytienė et al., 2026): who can access communication channels, whose voices are heard, which issues are placed on the public agenda, and who is given the opportunity to speak.

Addressing these, as we call them “communicative challenges” and their outcomes, including relational polarisation features, requires more inclusive public communication, more



nuanced and balanced journalism, more empathy in public discourse, a stronger sense of community, and broader development of media awareness, media literacy, and critical thinking. While strengthening the accountability of global media platforms remains a key factor in European policy frameworks, existing efforts to manage and regulate their operations have so far yielded insufficient results. Hence, in our efforts on the national level, we seek to emphasise features that we, as communication scientists and active citizens, find least addressed in contemporary policy models.

### 5.5.3 Policy Recommendations

#### *Towards collaborative problem solving, or the whole-of-democracy approach*

Below, we propose two directions for recommendations to address the challenges outlined in the context of public communication in Lithuania.

#### **LT-1. Strengthening the legitimacy of journalism and ensuring greater plurality and inclusion of voices**

---

- Addressee(s): national government, media authorities, media organisations, civil society.
- Strengthening the legitimacy of journalism is directly linked to the EU regulatory framework. The EMFA directly answers such a call by supporting editorial independence, media pluralism, public service media, and transparency of media ownership. The AI Act adds another layer by addressing transparency obligations for AI systems, which is increasingly important as news visibility, distribution and public debate become shaped by algorithmic and generative AI systems.

#### **LT-2 and LT-3. Developing instruments to address manipulative conditions and hostile acts leading to the dominance of hate speech**

---

- Addressee(s): national government, media authorities, media organisations, civil society.
- The recommendation is linked to the EU framework through a rights-based and systemic-risk approach. Under the DSA, manipulative content and hostile speech are not treated only as isolated harmful messages, but as part of broader risks generated by platform infrastructures, recommender systems and online amplification.
- For this recommendation to take action, a rethink of public communication is required: to shift attention from content to creating the right conditions for quality communication to emerge. Likewise, policies must be designed around inclusion, participation, and accountability; also, these must be focused on long-term aims, not isolated interventions; built on an infrastructure for dialogic communication, which

means also supporting media, embedding dialogic competence at all levels, developing ethical standards.



## 5.6 The Netherlands

### 5.6.1 National Context and Scope

#### *Media and communication landscape*

The Netherlands is typically classified within the Democratic Corporatist Model<sup>37</sup>. This model is characterised by an early development of press freedom, high state intervention, political parallelism, and professionalism in journalism. Increasingly, the Dutch media landscape is characterised by strong media concentration<sup>38</sup>. It consists of a diverse and well-established public broadcasting system at the national level (Nederlandse Publieke Omroep), alongside thirteen regional public broadcasters, and over 200 local broadcasters operating at the municipal level. The private media market is highly concentrated: commercial broadcasting is largely dominated by RTL Nederland and Talpa Network, and the majority of the Dutch print media is owned by Belgian publishers DPG Media and Mediahuis.

Media consumption in the Netherlands is increasingly digital, with devices, platforms and content becoming ever more intertwined. The proportion of Dutch people using AI applications for news on a daily basis rose from 8% in 2024 to 18% in 2025<sup>39</sup>. With major tech companies dominating information dissemination, access to Dutch journalism directly is declining, threatening the media's democratic function<sup>40</sup>. In 2024, the Dutch Media Authority (DMA) warned that the shift towards social media and streaming services among media consumers poses a risk to the consumption of Dutch quality news<sup>41</sup>. They called on legislators and media companies to ensure that reliable Dutch journalism is clearly visible and easy to find.

For a long time, trust in the news in the Netherlands was relatively high and stable. However, the global trend of declining trust in the news is now also evident in the Netherlands. In 2025, half of the population say they trust most of the news, one-third is neutral, and 20 percent do not trust the news, meaning that trust is at its lowest since the DMA started measuring it in 2018<sup>42</sup>.

<sup>37</sup> Hallin, D. C., & Mancini, P. (2004). Comparing media systems: Three models of media and politics. Cambridge University Press.

<sup>38</sup> Commissariaat voor de Media. (2025). Digital News Report 2025.

<sup>39</sup> Nationaal Media Onderzoek. (2025). NMO Mediatrends 2025.

<sup>40</sup> Wetenschappelijke Raad voor het Regeringsbeleid. (2024). Aandacht voor media: Naar nieuwe waarborgen voor hun democratische functies.

<sup>41</sup> Commissariaat voor de Media. (2024). Mediamonitor 2024.

<sup>42</sup> Commissariaat voor de Media. (2025). Digital News Report 2025.

## Governance and regulatory framework

### Key national authorities

The Netherlands has a long-standing tradition of press freedom, underpinned by the Media Act 2008. The Dutch Media Authority is responsible for supervising compliance with the Act, with the aim of protecting the independence, plurality, and accessibility of audiovisual media. Fair competition between businesses and the protection of consumer interests are ensured by the Netherlands Authority for Consumers and Markets (ACM). The Autoriteit Persoonsgegevens (AP), the Dutch data protection authority, is responsible for defending the right to the protection of personal data.

### Existing accountability and redress mechanisms

The existing system of media accountability in the Netherlands is based on voluntary and professional self-regulation. Major media organisations and journalist associations operate under formal ethical guidelines and codes to maintain professional standards. These are formulated by the Association of editors-in-chief and the national press council. In addition, many news organisations have their own more detailed ethical guidelines. Media organisations have sought to provide the public with greater insight into how journalism works by implementing various instruments, such as the appointment of ombudspersons, correction columns and the opportunity to write to the editor-in-chief. The Netherlands Council for Journalism is an independent body of self-regulation for the media, charged with the examination of complaints concerning violations of good journalistic practice.

### Relationship with EU-level instruments

A set of key EU regulatory frameworks, including the Digital Services Act (DSA), the European Media Freedom Act (EMFA), and the AI Act, is increasingly shaping governance of the Dutch Media landscape. These frameworks introduce new obligations around platform transparency, editorial independence, media pluralism and the use of algorithmic systems. Implementation and enforcement lie predominantly with existing domestic regulators, such as the ACM, the Dutch Media Authority and AP, and remain ongoing.

#### 5.6.2 Key National Challenges

Based on DIACOMET findings, we identified two interrelated priority challenges that pressure a healthy public debate in the Dutch media landscape. This is concerning, as a robust public debate is a fundamental prerequisite for a well-functioning democracy.

Firstly, the rapidly evolving and increasingly fragmented media environment poses a challenge to existing accountability frameworks. The Dutch media landscape has undergone a significant transformation, with a growing number of actors shaping public debate,

including platforms, influencers, new journalistic initiatives, and citizens who can create and share information themselves. Accountability instruments have developed over the past two decades, yet they were designed for a more traditional media landscape and are insufficiently equipped to address this expanding range of actors. Aligning these instruments across such a diverse field constitutes a further challenge, one that is particularly pronounced in the Dutch context given the strong reliance on self-regulation.

Secondly, our findings suggest that many citizens do not feel heard in public communication and are not well informed about how their perspectives influence decision-making. Although media organisations and public institutions in the Netherlands have attempted to address this through greater transparency – by explaining editorial decisions, correcting errors, and providing insight into their professional practices – these efforts remain one-directional and do not automatically translate into meaningful public engagement. As the focus group discussions involving a broad range of civil society actors highlighted, the core issue is not only how the media and public organisations operate, but also whether they acknowledge and reflect societal concerns and lived experiences. This creates a gap between accountability as a means of explanation (“telling how it works”) and accountability as a means of engagement (“responding to what matters to society”).

Taken together, these challenges highlight a broader systemic issue: accountability mechanisms have not kept pace with the structural changes to the media environment, nor the evolving expectations of the public. As the landscape fragments and the range of actors shaping the public debate expands beyond what existing frameworks were designed to handle, the risk grows that no one is meaningfully held to account. When citizens simultaneously feel unheard and disengage, the conditions for constructive public debate deteriorate. Ultimately, this affects the quality of our democratic society. Addressing this requires interventions at multiple levels – from institutional frameworks to organisational practices and everyday professional routines.

### 5.6.3 Policy Recommendations

#### **NL-1. Embed public engagement in codes of ethics and guidelines for public communication**

Media organisations, public institutions and self-regulatory bodies should formally recognise the public as an active participant in shaping public communication. This means explicitly embedding the relationship between journalists and the public in professional codes of ethics and editorial guidelines, recognising the public not only as an audience but as a stakeholder whose input actively shapes communication practices.

- This recommendation is linked to the EU Better Regulation Policy framework.

- Expected impact on participation, accountability, or trust: Strengthen inclusive accountability by institutionalising engagement with the public as a core professional norm rather than an optional practice.

## **NL-2. Integrate structural and recurring formats for public participation**

Media organisations and public institutions should develop and embed structural, rather than incidental, participatory practices within journalistic workflows to ensure the continuous inclusion of citizens' voices in public communication processes. These practices should be part of standard operations, supported by dedicated resources, and designed to reflect diverse societal perspectives.

- This recommendation is linked to the EU Media and Audiovisual Action Plan (MAAP) and The news initiative – EU support for the news media sector.
- Expected impact on participation, accountability, or trust: Enhance inclusion and participation by ensuring that input from the public is structurally integrated within organisational structures, rather than incidental.

## **NL-3. Ensure reciprocal and continuous feedback loops with the public**

Media organisations and public institutions should establish transparent feedback mechanisms that treat accountability as a cyclical process, not only gathering input from citizens but clearly communicating how that input shapes editorial and policy decisions. This includes reporting back to participants and maintaining ongoing dialogue with the public.

- This recommendation is linked to the EU Media and Audiovisual Action Plan (MAAP) and The news initiative – EU support for the news media sector.
- Expected impact on participation, accountability, or trust: Strengthen trust, participation, and accountability by creating a visible and continuous exchange between institutions and citizens.

## **NL-4. Invest structurally in local community-oriented journalism**

Public funders and policymakers should commit to structural, long-term investment in local community-oriented journalism to enable media organisations to take on a more active community role through sustained local presence. Community-oriented journalism requires the time, presence, and contextual knowledge that only stable funding can secure.

- This recommendation is linked to the EMFA and The news initiative – EU support for the news media sector.
- Expected impact on participation, accountability, or trust: Citizens are more likely to feel heard and represented when journalists are embedded in their local context and

familiar with the issues that shape everyday life. This strengthens trust in media and public institutions, broadens the voices reflected in public debate, and creates more meaningful conditions for accountability as engagement rather than explanation.

## 5.7 Slovenia

### 5.7.1 National Context and Scope

#### *Media and communication landscape*

The Slovene media market is relatively small, highly concentrated and characterised by complex media ownership structures<sup>43</sup>. There is a lack of transparency in the advertising market, as neither the industry nor individual media outlets provide specific information on advertising spending in the country. Additionally, the country is characterised by particularly low trust in news media with 26.3% of the population trusting the news media, which is below the OECD average of 38.9%<sup>44</sup>.

Slovenia's media market faces economic strain from a decline in revenues, audience and consumption in connection to the rise of digital media and streaming platforms<sup>45</sup>. The number of employed journalists fell to 2,203 in 2024, the lowest level in the past four years<sup>46</sup>. The state of the Republic of Slovenia provides mostly project-oriented subsidies and measures of media support.

While most people in Slovenia still depend on traditional media for news about politics and current affairs, the amount of younger people using social media as a news source has overtaken the amount of younger people relying on traditional media<sup>47</sup>. Slovenia has not introduced a national digital services tax targeting large technology companies. There is also a lack of policies aimed at rebalancing power between news publishers, online platforms, digital intermediaries, and generative AI providers.

<sup>43</sup> Civil Liberties Union for Europe, The Peace Institute. (2025). *Liberties Rule of Law Report 2025: Slovenia*. [https://www.mirovni-institut.si/wpcontent/uploads/2025/03/Liberties\\_Rule\\_of\\_Law\\_Report\\_2025\\_Slovenia-1.pdf](https://www.mirovni-institut.si/wpcontent/uploads/2025/03/Liberties_Rule_of_Law_Report_2025_Slovenia-1.pdf)

<sup>44</sup> OECD. (2026). *Building More Competitive Regions in Slovenia, OECD Multi-level Governance Studies*. <https://doi.org/10.1787/7dd44220-en>

<sup>45</sup> Milosavljević, M. & Biljak Gerjevič, R. (2025). *Monitoring media pluralism in the European Union: results of the MPM 2025. Country report: Slovenia*. Centre for Media Pluralism and Media Freedom (CMPF). <https://hdl.handle.net/1814/92908>

<sup>46</sup> Statistični urad Republike Slovenije. (2025). *Delovno aktivno prebivalstvo po skupinah poklicev (SKP-08) in spolu, Slovenija, letno*. <https://pxweb.stat.si/SiStatData/pxweb/sl/Data/-/0764803S.px/table/tableViewLayout2/>

<sup>47</sup> OECD. (2024). *Lessons from the 2023 OECD Trust Survey in Slovenia, Building Trust in Public Institutions*. [https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/11/lessons-from-the-2023-oecd-trust-survey-in-slovenia\\_eb92fa4e/261ac7b2-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/11/lessons-from-the-2023-oecd-trust-survey-in-slovenia_eb92fa4e/261ac7b2-en.pdf)

## *Governance and regulatory framework*

### **Key national authorities**

The Agency for Communication Networks and Services of the Republic of Slovenia (AKOS) is Slovenia's key communications regulator, performing regulatory and supervisory tasks related to radio, television and electronic communications. The Slovenian Competition Protection Agency (AVK) is the national competition authority with the role of overseeing competition issues, such as market concentration, mergers, and anti-competitive practices. The Information Commissioner of the Republic of Slovenia is the national supervisory authority for personal data protection under the GDPR and Slovenian law, and matters concerning access to public information.

### **Existing accountability and redress mechanisms**

In Slovenia, media accountability is organised through several mechanisms, including the rights of correction and reply under the Mass Media Act (ZMed-1), ethical self-regulation under the Code of Journalists of Slovenia enforced through the Journalistic Honorary Arbitration Court, regulatory supervision, and judicial protection. concerning access to public information.

### **Relationship with EU-level instruments**

The DSA in Slovenia was implemented through the Act Implementing Regulation (EU) on a Single Market for Digital Services (ZIUETDS), adopted in 2024, which designates AKOS as Digital Services Coordinator. The AI Act was implemented through the Act on the Implementation of the (EU) Regulation on Harmonised Rules on Artificial Intelligence (ZIUDHPUI), adopted in 2025, which establishes the competent supervisory framework at the national level. The European Media Freedom Act has been integrated through the new Mass Media Act (ZMed-1), adopted in 2025, which the Ministry of Culture presented as aligned with EMFA and DSA standards.

#### 5.7.2 Key National Challenges

Based on DIACOMET research findings and corresponding to previously identified EU-level policy gaps in areas of information and content governance, Artificial Intelligence and algorithms, and markets, pluralism, and competition, two broad challenges concerning Slovenia can be identified:

- **Insufficient regulation of platform power, disinformation, and generative AI:** Slovenia faces a growing challenge in responding to the role of digital platforms and

AI systems in shaping political communication, news visibility, and disinformation risks. This includes limited transparency of platform governance, unresolved questions around the use of journalistic content, and the absence of a more coordinated national approach to disinformation and AI-related risks.

- **Uncertain conditions for the sustainability and independence of media:** Slovenian media sector continues to face structural vulnerabilities related to economic pressure, platform dependence, concentration risks, and unresolved issues of state ownership. At the same time, the practical effects of new support schemes and concentration rules remain uncertain, which raises broader concerns about editorial autonomy, fair competition, and long-term media sustainability.

### 5.7.3 Policy Recommendations

#### **SI-1. Strengthen regulatory and supervisory oversight of generative AI**

The rapid development of AI tools, especially generative AI, calls for closer and more timely regulatory and supervisory attention. This particularly applies to the need for clearer rules on the use of generative AI in elections and political communication, and for more precise standards for implementation under DSA, especially regarding the definition of illegal content, platform responsibilities, and responses to disinformation campaigns.

- Addressee(s): national government, regulator.
- This recommendation is linked to the AI Act and DSA.
- Expected impact on participation, accountability, or trust: This measure would strengthen accountability in the use of generative AI in political communication and media and help protect public trust in electoral processes and digital information environments.

#### **SI-2. Develop a comprehensive national strategy against disinformation**

A comprehensive and coordinated national strategy against disinformation should be developed and implemented, while bringing together key public institutions, regulators, media, civil society, and educational actors.

- Addressee(s): national government, regulator, media organisations, civil society.
- This recommendation is linked to DSA and EMFA.
- Expected impact on participation, accountability, or trust: This measure would improve the effectiveness of national responses to disinformation, strengthen institutional accountability, and help build public resilience and trust in the information environment and electoral processes.

### **SI-3. Address the relationship between domestic media and global digital platforms**

A more active role in addressing the relationship between domestic media and global digital platforms is needed, including issues such as financial compensation for the use of journalistic content, the effects of platform advertising dominance on media revenues, and the use of media content for AI systems.

- Addressee(s): national government, regulator, platforms.
- This recommendation is linked to the AI Act.
- Expected impact on participation, accountability, or trust: This measure would improve accountability and fairness in the digital media environment and strengthen the economic sustainability of domestic media.

### **SI-4. Monitor the new framework on media concentration**

The new framework on media concentration under the Mass Media Act (ZMed-1) should be closely monitored in practice, as important questions remain open, specifically concerning the competence of the competition authority, the absence of clear thresholds, and the predictability and transparency of decision-making.

- Addressee(s): national government, regulator.
- This recommendation is linked to EMFA.
- Expected impact on participation, accountability, or trust: This measure would increase accountability in the application of media concentration rules, while protecting media pluralism and transparency of ownership.

### **SI-5. Address state ownership of media**

State ownership of media is still not adequately addressed in the Mass Media Act (ZMed-1), despite the existence of state-owned media in Slovenia. The issue should be regulated more explicitly to ensure editorial autonomy and journalistic independence of such outlets.

- Addressee(s): national government.
- This recommendation is linked to EMFA.
- Expected impact on participation, accountability, or trust: This measure would strengthen safeguards for editorial independence and reduce risks of political influence on state-owned media outlets.

## 5.8 Switzerland

### 5.8.1 National Context and Scope

#### *Media and communication landscape*

Switzerland is a multilingual and federal state located at the heart of Europe, with a population of 8.8 million people (Federal Statistical Office, 2024). It is officially composed of 26 cantons and four national languages, German, French, Italian, and Romansh, reflecting a cultural and linguistic diversity. About 26% of the population are foreign nationals (Federal Statistical Office, 2024). This demographic and linguistic composition is central to understanding the heterogeneity of communicative experiences and public discourse in the Swiss context.

In addition, it is necessary to consider Switzerland's political system when it comes to policy recommendations: the country's political system is defined by its federalism and direct semi-direct democracy. The seven-member Federal Council functions as the government and executive branch and ensures representation across linguistic and political groups. This model fosters political stability and consensus, with power distributed across the Confederation, cantons, and communes according to the principle of subsidiarity. Citizens regularly participate in decision-making through regular referenda and initiatives, which influence policy. The political landscape in Switzerland is traditionally characterised by both stability and pluralism. However, while the institutional framework remains robust, emotional rifts and political polarisation between political groups have grown (Scherrer et al., 2025). Overall, the country is an example, if not a "model" (Stämpfli, 2007), for the rise of populist political rhetoric, which is not only due to the rise of right-wing parties (Bernhard, 2017), but also to direct democratic instruments such as popular initiatives, which provide ideal structure for populist political communication (Ernst, Engesser and Esser, 2016).

Switzerland's media landscape is shaped by a complex interplay of structural constraints and sociopolitical particularities. As a small country, Switzerland has a limited media market. Its multilingualism further fragments the market into distinct linguistic regions, making it difficult for media outlets to operate at a national level. Moreover, Switzerland is strongly influenced by foreign media, especially from large neighbouring countries (Germany, France, and Italy) that share its official languages (Porlezza, 2024). Additionally, Switzerland is strongly influenced by the so-called *next-door giants'* phenomenon (Künzler, 2013): media and political developments from neighbouring countries (especially Germany, France, and Italy) shape both the media economy, regulation, and public discourse. Additionally, neighbouring countries are often more relevant in the editorial coverage, and decisions

taken at the European level often have indirect regulatory implications for Swiss media, despite the country's non-membership in the EU.

Switzerland's media environment is undergoing profound transformations driven by both structural constraints and global technological developments. Swiss news organisations face mounting economic pressures: leading to greater market concentration and reductions in journalistic capacity, particularly in the press sector. Major players such as Tamedia, Ringier, and CH Media dominate much of the media market, raising questions about pluralism. Despite these concerns, the 2023 Media Monitor Survey finds that no single media company holds a dominant position that would threaten opinion diversity. Moreover, even though the Swiss media sector has faced a decline in economic resources in recent years, "journalistic standards remain relatively high" (Eisenegger and Vogler, 2022, 14).

There is a strong public service media (SRG SSR), although there are increasing political as well as economic pressures. Recently, Swiss citizens rejected a popular initiative to cut the licence fee to 200 Swiss Francs. However, the Swiss government decided to lower the license fee gradually from currently 335 to 300 Swiss Francs until 2029.

Swiss audiences increasingly rely on smartphones and social media as their main access point to news, and podcasts have gained notable traction, particularly among younger demographics (Udris and Eisenegger, 2024). This has contributed to growing news avoidance, disaffection, and distrust toward journalists and news institutions. Moreover, the group of "news-deprived" individuals, those with very limited news repertoires, now makes up over 40% of the population, underscoring the challenges of public engagement (Fög, 2023).

Following the global release of generative AI systems such as ChatGPT, debates about the societal impact of AI and its role in news production have intensified both internationally and in Switzerland (Porlezza, 2024). Swiss news organisations, particularly the larger publishers and the public service media, have increasingly integrated AI technologies into content selection, creation, and distribution processes, driven by cost-cutting imperatives and the pursuit of efficiency (Goldhammer et al., 2019). However, these developments have raised ethical concerns and fuelled public scepticism. Research shows that Swiss audiences, much like their global counterparts, remain wary of AI-generated content, perceiving it as detrimental to news quality and credibility (Vogler et al., 2023).

Switzerland's relevance to the broader DIACOMET project lies in its distinctive combination of institutional stability, civic participation, linguistic plurality, and complex media ecology. The intersecting pressures mentioned above – technological disruption, economic

pressures, and market characteristics – make the Swiss media ecosystem a unique site for examining the ethical challenges and communicative dilemmas facing democratic societies today. The focus group data analysed in this report reflect how civil actors in Switzerland perceive and respond to these trends, and how they articulate the tensions between trust, participation, and technological transformation in public communication.

### *Governance and regulatory framework*

#### **Key national authorities**

The Swiss Constitution provides a robust legal foundation for public communication. Key rights include freedom of expression (Art. 16; Art. 10 ECHR), freedom of information (Art. 16.3), freedom of the media (Art. 17), and political participation and voting rights (Art. 34). These rights protect individuals, but they also sustain the democratic public sphere. Freedom of expression is therefore not only understood negatively, as absence of censorship, but also positively, as implying a state responsibility to secure conditions for a plural, inclusive, and non-distorted public debate, especially before elections and referenda.

Swiss media regulation is comparatively liberal but differentiated. Broadcasting is regulated more tightly through the Federal Act on Radio and Television and the Radio and Television Ordinance, which define public-service obligations, licensing, advertising and sponsorship rules, fee allocation, must-carry provisions, and program standards. Art. 93 of the Constitution requires radio and television to contribute to education, cultural development, opinion formation, and entertainment, while reflecting Switzerland's linguistic and regional diversity. By contrast, the printed and online press are not subject to licensing and are governed mainly through general law, including provisions on personality rights, defamation, data protection, copyright, unfair competition, and advertising transparency.

The key national authority for media is OFCOM, the regulator which supervises radio and television, manages licenses and frequencies, monitors compliance with broadcasting rules, and administers elements of public media support. The Federal Data Protection and Information Commissioner supervises compliance with data protection law, increasingly relevant for audience analytics, platform infrastructures, targeted advertising, and automated content systems, but with less sanctioning power compared to other (European) countries. The Competition Commission monitors in particular mergers and potentially dominant market positions, including in media, advertising, telecommunications, and platform-related markets, where concentration can affect pluralism. However, COMCO examines only whether the merger creates or strengthens a dominant market position

capable of eliminating effective competition (Art. 10 Cartel Act). The consideration of other public interests – such as plurality or diversity – is reserved to the Federal Council.

### Existing accountability and redress mechanisms

Accountability and redress mechanisms combine law, co-regulation, and self-regulation. In Switzerland, accountability can be seen as an ecology of instruments rather than a single dominant mechanism. The Swiss Press Council applies the *Declaration of Duties and Rights of Journalists* and handles complaints on journalistic ethics, its decisions are not legally binding but carry professional and reputational weight. In broadcasting, complaints usually pass first through ombudsman offices and may then reach the Independent Complaints Authority for Radio and Television (UBI/AIEP), which decides on program complaints and issues concerning access to Swiss broadcasting services. Additional remedies include editorial corrections, user comments, media journalism, while more formal procedures include civil actions for personality violations, criminal complaints for defamation, and data protection complaints.

### Relationship with EU-level instruments

Switzerland is not an EU member, so instruments such as the Digital Services Act, European Media Freedom Act, and AI Act do not apply automatically. However, Swiss media governance is strongly shaped by EU developments because platforms, advertisers, users, and media organisations operate in a European digital environment. Switzerland often adopts comparable rules with a “Swiss finish”: selective adaptation to its political and economic context. This is visible in current debates on very large platforms, where the Federal Council is considering *DSA-inspired* obligations on transparency, fairness, user rights, and accountability, without copying and pasting the entire act.

#### 5.8.2 Key National Challenges

A first challenge is **hate speech, harassment, and participation chilling effects**. Online attacks, incivility, and hostile communication as well as propaganda can push targeted users, especially minorities, women, journalists, and politically active citizens, to withdraw from public debate. This reduces diversity and civic engagement. DIACOMET research underlines that harmful online communication does not affect all citizens equally: those targeted by hate speech or harassment may withdraw from public debate, thereby reducing diversity of voices and limiting civic engagement. This is particularly problematic in Switzerland, where deliberation around referenda and elections depends on broad participation across linguistic, regional, and social groups. The corresponding policy gap concerns the limits, or better, non-existence of platform governance such as the EU's Digital Services Act. However,

currently there is an ongoing political debate on the regulation of very large platforms, grounded on the benchmark of the DSA. Online harassment and incivility is also targeted through the National Action Plan (NAP) on the safety of journalists in Switzerland, which has been developed by the regulator OFCOM, in close cooperation with the media industry. The NAP comprises nine specific measures in the areas of awareness-raising and prevention, protection and support in cases of violence and threats, and also examines the legal framework.

A second challenge is **algorithmic opacity, weak regulation and accountability of platforms**. Platforms shape visibility through recommender systems, content moderation, advertising infrastructures, and opaque amplification logics. DIACOMET findings suggest that users often lack clear knowledge of how content is selected, ranked, recommended, or suppressed. This is particularly consequential in Switzerland, where public debate is structured by multilingualism and frequent referenda. Since Switzerland is not an EU member, the DSA does not directly provide a domestic enforcement framework for Swiss users, regulators, or researchers. It nevertheless functions as an important reference point for the current Swiss debates on how to regulate very large platforms. The policy gap is therefore the absence of an equivalent Swiss framework compared to the DSA guaranteeing transparency, redress, researcher access, and accountability for platform-mediated public communication.

A third challenge is the **economic fragility and declining relevance of journalism**. Newsroom cuts, media concentration, declining advertising revenues, and dependence on platform attention economies weaken journalistic quality, local coverage, and investigative capacity. DIACOMET research indicates that journalism is under pressure from declining advertising revenues, platform dependency, and the need to adapt to digital attention economies. These pressures may reduce depth, time, quality, investigative capacity, local coverage, and the ability of newsrooms to connect with younger audiences. In Switzerland's small and multilingual media market, economic fragility can quickly become a democratic problem due to growing media concentration processes and the decreasing diversity: if journalistic infrastructures weaken, citizens have fewer diverse and reliable sources through which to understand political issues. This is linked to growing "news deprivation," especially among younger users who primarily encounter information through social media. The corresponding policy gap concerns the limited capacity of existing regulatory instruments to secure the material conditions of pluralistic journalism: in 2022, voters rejected a direct public support of news media even if the Federal Council and the Parliament had recommended its adoption. Besides the license fee, public financing of the media remains thus limited to indirect press subsidies such as the reduction of VAT for news media



products, and the subsidies to reduce the costs for the delivery of regional and local press titles by the Swiss postal services.

A fourth challenge is **AI-assisted disinformation and risks for journalistic work**: AI systems can support journalistic production, but they also introduce risks related to synthetic content, automation bias, misinformation, deepfakes, and opaque data use. For Swiss public communication, the problem is not only technological but institutional: AI-generated or AI-amplified content may circulate rapidly during referendum campaigns, while citizens may find it difficult to assess provenance, reliability, or manipulation. The algorithmic infrastructure of digital platforms remains opaque. Users are not always aware of how content is selected or filtered, and Swiss regulatory capacity over foreign platforms is weak (Pranteddu et al, 2025; Federal Office of Communication, 2021). Overall, Switzerland needs better protection against harassment, stronger platform regulation, more sustainable support for news media and journalism, and stronger AI governance and literacy.

We have seen in the DIACOMET findings that civil society members have expressed concerns about the lack of transparency, and polarising effects of algorithm-driven content on platforms. Journalists have also expressed concern about the impact of AI on journalism's role and authority. And as previously mentioned, the absence of specific Swiss regulation on digital intermediaries makes platform governance a legal grey area. However, despite these challenges, the Swiss public communication system remains quite resilient. Institutional protections, civic traditions, and a participatory political culture provide strong foundations.

### 5.8.3 Policy recommendations

#### **CH-1. Strengthen protection against any form of online harassment and hate speech**

There is a lack of fundamental reflection on the phenomenon of cyberviolence in order to recognise and raise awareness of online behaviors. The absence of a shared definitional basis has consequences for legislation, documentation, and knowledge of the phenomenon. There is a need to clearly identify the phenomenon in order to carry out legislative, judicial, and scientific work, which currently still lacks any legal basis. For example, Switzerland has no specific legal provision on cyberbullying. Nor does Switzerland have specific regulations on deepfakes or hate speech. Hate speech on the internet may fall under the criminal provisions that also apply to statements made in the offline world. The same applies to non-consensual sexualised deepfakes. The question therefore arises as to whether the existing norms are sufficient, or whether specific regulation of cyberviolence and non-consensual sexualised deepfakes is required. Additional difficulties in applying existing norms arise above all from the cross-border nature of internet services. If there is no connecting factor to Switzerland, the application of Swiss law is only possible to a limited extent due to the territoriality principle. The Federal Council therefore sees no need to introduce new criminal-

law provisions. People should be able to defend themselves effectively and with low-threshold access against illegal content that discriminates against individuals, incites hatred, agitation, or violence against a particular group, or depicts sexualised and other forms of violence.

- Addressee(s): Federal government, cantons, law enforcement, OFCOM, media organisations, platforms, civil society.
- This measure is consistent with the Council of Europe's Recommendation CM/Rec(2016)4 on the protection of journalism and safety of journalists, which calls on member states to act in prevention, protection, prosecution, information, education, and awareness-raising. It also responds to the DSA as a benchmark, while recognising that the DSA is not directly applicable in Switzerland.
- Expected impact on participation, accountability, or trust: The measure would reduce withdrawal from public debate, protect vulnerable speakers, and strengthen trust in journalism and the democratic public sphere.

## CH-2. Create a Swiss regulatory framework for platforms

Adopt a Swiss regulatory framework for very large platforms and search engines that establishes obligations on transparency, recommender systems, content moderation, advertising repositories, complaint handling, and access to data for vetted researchers. The EU has decided to regulate online platforms through the Digital Services Act (DSA) and the Digital Markets Act (DMA). In October 2025, the Swiss Federal Council submitted a draft law on the regulation of social media and search engines for consultation. The draft law creates an urgently needed framework to protect fundamental rights and democracy online and to hold the tech companies behind platforms accountable. However, for the regulation to be effective, it still requires some additions such as the obligation for providers to mitigate systemic risks and to report on these mitigation measures. The proposed measures should also be expanded to ensure users' self-determination and to protect vulnerable groups, particularly children and young people. The use of generative AI systems/algorithms should be made transparent where they are used as search engines or social media platforms, or where they are integrated into them. And an effective data access for research and civil society should be guaranteed.

- Addressee(s): Federal Council, Parliament, OFCOM, platforms, research institutions.
- The DSA should be treated as an external benchmark. Its provisions on transparency, accountability, VLOPs/VLOSEs, and researcher access are relevant reference points.

- Expected impact on participation, accountability, or trust: This would close the Swiss regulatory gap on platform-mediated public communication, improve accountability, support independent research, and give users more effective redress mechanisms.

### **CH-3. Secure the material conditions of pluralistic journalism**

Switzerland should strengthen a technologically neutral support through public subsidies for journalism, news media-related infrastructures, investigative journalism funds, and for newsroom innovation.

- Addressee(s): Federal government, OFCOM, media organisations, public-service media.
- The European Media Freedom Act is not binding in Switzerland, but it offers a useful benchmark because it aims to protect media pluralism and editorial independence in the EU. Swiss policy should translate this principle into viable instruments.
- Expected impact on participation, accountability, or trust: The measure would strengthen local and regional coverage, protect diversity in a small multilingual market, and reinforce citizens' access to reliable information.

### **CH-4. Establish AI transparency and AI literacy rules for public communication**

Create sector-specific AI guidelines for journalism and political communication. These should require disclosure of AI-generated or substantially AI-assisted content, provenance standards for synthetic images, audio, and video, editorial responsibility for automated outputs, and internal newsroom protocols for verification. During referendum and election periods, platforms and political actors should be expected to label synthetic or AI-manipulated political content clearly.

- Addressee(s): Federal government, OFCOM, media organisations, platforms, public-service media, educational institutions.
- The EU AI Act is not directly applicable in Switzerland, but it provides a relevant benchmark for transparency obligations around generative AI. These principles should be adapted to Swiss constitutional protections for expression and political participation.
- Expected impact on participation, accountability, or trust: The measure would improve citizens' ability to assess provenance and reliability, reduce AI-assisted disinformation, and strengthen trust in journalism and democratic decision-making.

## References

Austrian Data Protection Authority (DSB). (n.d.). *Tasks and responsibilities of the Data Protection Authority*. <https://dsb.gv.at/>

Austrian Federal Chancellery. (2024). *AI Organisation in Austria*. <https://www.digitalaustria.gv.at/themen/kuenstliche-intelligenz/ki-organisation.html>

Austrian Regulatory Authority for Broadcasting and Telecommunications (RTR). (n.d.-a). *The Communications Authority Austria (KommAustria)*. [https://www.rtr.at/medien/wer\\_wir\\_sind/KommAustria/KommAustria.de.html](https://www.rtr.at/medien/wer_wir_sind/KommAustria/KommAustria.de.html)

Austrian Regulatory Authority for Broadcasting and Telecommunications (RTR). (n.d.-b). *Organisation*. [https://www.rtr.at/rtr/wer\\_wir\\_sind/Organisation/Organisation.de.html](https://www.rtr.at/rtr/wer_wir_sind/Organisation/Organisation.de.html)

Balčytienė, A. et al. (2026). A human-centered approach to understanding citizens' responses to public communication challenges. *Communications: The European Journal of Communication Research*.

Bardoel, J., & d'Haenens, L. (2004). Media Meet the Citizen: Beyond Market Mechanisms and Government Regulations. *European Journal of Communication*, 19(2), 165-194. <https://doi.org/10.1177/0267323104042909>

Bernhard, L. (2017). Three faces of populism in current Switzerland: Comparing the populist communication of the Swiss People's Party, the Ticino League, and the Geneva Citizens' Movement. *Swiss Political Science Review*, 23(4), 509–525.

Byman, D. (2024). Writing policy recommendations for academic journals: A guide for the perplexed. *International Security*, 48(4), 137–166. [https://doi.org/10.1162/isec\\_a\\_00485](https://doi.org/10.1162/isec_a_00485)

Eisenegger, M., & Vogler, D. (2022). *Yearbook 2022: The quality of the media – Main findings: Increasing news deprivation has a negative impact on the democratic process*.

Forschungszentrum Öffentlichkeit und Gesellschaft (fög), University of Zurich.

[https://www.foeg.uzh.ch/dam/jcr:e38aba0b-4d51-4b89-a087-ec7d346ed317/JB\\_2022\\_online\\_gesamt\\_20220923.pdf](https://www.foeg.uzh.ch/dam/jcr:e38aba0b-4d51-4b89-a087-ec7d346ed317/JB_2022_online_gesamt_20220923.pdf)

Eisenegger, M., & Vogler, D. (2023). Main findings – Swiss population skeptical towards the use of artificial intelligence in journalism. In Forschungszentrum Öffentlichkeit und Gesellschaft (fög), *Yearbook quality of the media 2023* (pp. 1–20). Forschungszentrum Öffentlichkeit und Gesellschaft (fög), University of Zurich.

[https://www.foeg.uzh.ch/dam/jcr:40dd3a23-50d0-4505-9173-464d78f78788/JB\\_2023\\_I\\_Main\\_findings\\_final.pdf](https://www.foeg.uzh.ch/dam/jcr:40dd3a23-50d0-4505-9173-464d78f78788/JB_2023_I_Main_findings_final.pdf)

Ernst, N., Engesser, S., & Esser, F. (2016). Switzerland: Favorable conditions for growing populism. In T. Aalberg, F. Esser, C. Reinemann, J. Strömbäck, & C. H. de Vreese (Eds.), *Populist political communication in Europe* (pp. 151–164). Routledge.

Federal Office of Communications (OFCOM). (2021). *Intermediaries and communication platforms: Implications for public communication and approaches to governance*. Federal Department for the Environment, Transport, Energy and Communications (DETEC).

Federal Statistical Office. (2024). *Key population figures, 1950–2023*. Federal Statistical Office. <https://www.bfs.admin.ch/bfs/en/home/statistics/population.assetdetail.32374813.html>

Freedman, D. (2008). *The politics of media policy*. Polity Press.

Gadringer, S., Sparviero, S., Trappel, J., & Holzapfel, M. (2025). *Digital News Report Austria 2025. Detailergebnisse für Österreich*. Fachbereich Kommunikationswissenschaft, Universität Salzburg. <https://doi.org/10.5281/zenodo.15675025>

Goldhammer, K., Dieterich, K., & Prien, T. (2019). *Künstliche Intelligenz, Medien und Öffentlichkeit: Scientific report for the Swiss Federal Office of Communication*. Federal Office of Communication.

Harro-Loit, H., & Loit, U. (2025). *Estonia EurOMo country report 2025*. Euromedia Ownership Monitor (EurOMo). <https://doi.org/10.25598/EurOMo/2025/EE>

Harro-Loit, H., Parder, M. L., Rožukalne, A., Juurik, M., & Skulte, I. (2025). Press Freedom and Freedom of Expression in Estonia and Latvia: The Role of Agents. *Central European Journal of Communication*, 18(1(39)), 51-81.

Heikkilä, H. (2020). Beyond moral coupling: Analysing privacy in the era of surveillance. *Media & Communication*, 8(2), 248-257.

Heikkilä, H. & Tolonen, E. (2026). *Milestone 3.9 Empowering vulnerable groups*. DIACOMET Milestone. [internal document]

Just, N., & Puppis, M. (Eds.). (2012). *Trends in Communication Policy Research: New Theories, Methods and Subjects* (1st ed.). Intellect. <https://doi.org/10.2307/j.ctv36xvj36>

Kaltenbrunner, A. (2021). *Seemingly transparent: Advertisements and press subsidies by the Austrian federal government*. Delta X.

Kaltenbrunner, A., Lugschitz, R., Luef, S., Strobl, W., & Noster, A. (2026). *Journalism funding in Austria: Options for reforming media funding*. Medienhaus Wien.

Krakovsky, C., Lindmeyr, M., & Konrad, H. (2025). *Deliverable D3.3, Focus Group Country Report Austria*. [https://diacommet.eu/publications\\_type/focus-group-country-reports/](https://diacommet.eu/publications_type/focus-group-country-reports/)

Künzler, M. (2013). *Mediensystem Schweiz*. UVK.

Litvaitis, D., Harro-Loit, H., Tetarenko-Supe, A., Vyšniauskas, K., & Allik, H.-L. (2023). *Disputes over access: A study on journalists' practices and freedom of information policies in the Baltics*. Balticada Investigations Studio. [https://disputesoveraccess.eu/wp-content/uploads/2024/02/Disputes\\_over\\_Access\\_2023.pdf](https://disputesoveraccess.eu/wp-content/uploads/2024/02/Disputes_over_Access_2023.pdf)

Mansell, R., & Raboy, M. (2011). Introduction: Foundations of the theory and practice of global media and communication policy. In R. Mansell & M. Raboy (Eds.), *The handbook of global media and communication policy* (pp. 1–20). Wiley-Blackwell. <https://doi.org/10.1002/9781444395433.ch1>

Michalis, M. (2014). Focal Points of European Media Policy from Inception till Present: *Plus Ça change?*. In K. Donders, C. Pauwels, & J. Loisen (Eds.), *The Palgrave Handbook of European Media Policy*. Palgrave Macmillan, London. [https://doi.org/10.1057/9781137032195\\_8](https://doi.org/10.1057/9781137032195_8)

Milosavljević, M., & Poler, M. (2019). Legal analysis in media policy research. In H. Van den Bulck, M. Puppis, K. Donders, & L. Van Audenhove (Eds.), *The Palgrave handbook of methods for media policy research* (pp. 519–539). Palgrave Macmillan. [https://doi.org/10.1007/978-3-030-16065-4\\_30](https://doi.org/10.1007/978-3-030-16065-4_30)

Napoli, P. M. (2023). What is media policy? *The ANNALS of the American Academy of Political and Social Science*, 707(1), 29–45. <https://doi.org/10.1177/00027162231211387>

Popiel, P., Pickard, V., & Lloyd, M. (2017). Media Policy Research and Practice: Insights and Interventions – Introduction. *International Journal of Communication*, 11, 4697-4701. [https://repository.upenn.edu/asc\\_papers/74](https://repository.upenn.edu/asc_papers/74)

Porlezza, C. (2023). Promoting responsible AI: A European perspective on the governance of artificial intelligence in media and journalism. *Communications*, 48(3), 370–394. <https://doi.org/10.1515/commun-2022-0091>

Porlezza, C. (2024). Switzerland. In A. K. Schapals & C. Pentzold (Eds.), *Media compass: A companion to international media landscapes*. Wiley. <https://doi.org/10.1093/obo/9780199756841-0295>

Porlezza, C., Amigo, L., Juurik, M., Milosavljević, M., Parder, M.-L., Rathmann, M., Rozgonyi, K., & Harro-Loit, H. (2026). Tackling the challenges of artificial intelligence for public communication: Governance and accountability discourses about the responsible use of AI. *New Media & Society*. <https://doi.org/10.1177/14614448261445061>

Pranteddu, L., Porlezza, C., Amigo, L., & Mazzoni, P. (2025). Great AI ethics expectations: Governance in European public media – A comparative study of Switzerland, Germany,

Finland and France. In E. Broudoux, G. Charton, & B. Epron (Eds.), *Information et intelligence artificielle – Opportunités et risques* (pp. 65–75). De Boeck Supérieur.

Psychogiopoulou, E. (2007). The Integration of Cultural Considerations in EU Law and Policies. <https://doi.org/10.1163/ej.9789004162396.i-402>

Psychogiopoulou, E. (2015). *Cultural governance and the European Union: Protecting and promoting cultural diversity in Europe*. Palgrave Macmillan.

Psychogiopoulou, E. (2021). The Audiovisual Media Services Directive and the promotion of European works: Cultural mainstreaming revisited. In P. L. Parcu & E. Brogi (Eds.), *Research handbook on EU media law and policy*. Edward Elgar. <https://doi.org/10.4337/9781786439338.00008>

Puppis, M. (2010). Media Governance: A New Concept for the Analysis of Media Policy and Regulation. *Communication, Culture & Critique*, 3, 134-149. <https://doi.org/10.1111/j.1753-9137.2010.01063.x>

Puppis, M., & Van den Bulck, H. (2019). Introduction: Media policy and media policy research. In H. Van den Bulck, M. Puppis, K. Donders, & L. Van Audenhove (Eds.), *The Palgrave handbook of methods for media policy research* (pp. 3–21). Palgrave Macmillan. [https://doi.org/10.1007/978-3-030-16065-4\\_1](https://doi.org/10.1007/978-3-030-16065-4_1)

Raats, T. (2019). Writing policy reports. In H. Van den Bulck, M. Puppis, K. Donders, & L. Van Audenhove (Eds.), *The Palgrave handbook of methods for media policy research* (pp. 611–625). Palgrave Macmillan. [https://doi.org/10.1007/978-3-030-16065-4\\_35](https://doi.org/10.1007/978-3-030-16065-4_35)

Ranaivoson, H., Micova, S. B., & Raats, T. (2023). *European audiovisual policy in transition*. Routledge.

Rozgonyi, K. (2023). Accountability and platforms' governance: The case of online prominence of public service media content. *Internet Policy Review*, 12(4). <https://policyreview.info/articles/analysis/accountability-and-platforms-governance-public-service-media>

Schneider, M. D., Slanickova, H., Rubin, H., Heesen, R., Schwenkenbecher, A., Bortolus, A., Chukwu, E. E., Hewitt, C. L., Kaufer, R., Schwindt, E., Sogbanmu, T. O., Woolaston, K., & Yu, L. (2025). Revisiting the base in evidence-based policy. *Political Studies*. Advance online publication. <https://doi.org/10.1177/00323217251320728>

Seethaler, J., & Beaufort, M. (2024). *Monitoring media pluralism in the digital era: Application of the Media Pluralism Monitor in European member states and candidate countries in 2023*:



Country report Austria. European University Institute.  
<https://data.europa.eu/doi/10.2870/98299>

Seethaler, J., & Melischek, G. (2006). Press concentration in Austria in a European comparison. *Austrian Journal of Political Science*, 35(4), 337–360.

Scherrer, I. N., Schuler, I., & Wäspi, F. (2025). *Polarisierte Gesellschaft, gefährdete Demokratie? Polarisierung in der Schweiz*. Pro Futuris & Stiftung Mercator Schweiz.  
<https://www.polarisierung.ch>

Stämpfli, R. (2007). Populism in Switzerland and the EU: from vox populi to vox mediae. In C. H. Church (Eds.), *Switzerland and the European Union* (pp. 99-116). Routledge.

Trappel, J. (2017). Market structure and innovation policies in Austria. In H. van Kranenburg (Ed.), *Innovation policies in the European news media industry*. Springer.  
[https://doi.org/10.1007/978-3-319-45204-3\\_2](https://doi.org/10.1007/978-3-319-45204-3_2)

Udris, L., & Eisenegger, M. (2024). Switzerland. In N. Newman, R. Fletcher, C. T. Robertson, A. Ross Arguedas, & R. K. Nielsen (Eds.), *Reuters Institute Digital News Report 2024* (p. 108). Reuters Institute for the Study of Journalism. <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2024>

Vlassis, A. (2021). Global online platforms, COVID-19, and culture: The global pandemic, an accelerator towards which direction? *Media, Culture & Society*, 43(5), 957-969.  
<https://doi.org/10.1177/0163443721994537>

Vogler, D., Eisenegger, M., Fürst, S., Udris, L., Ryffel, Q., Rivière, M., & Schäfer, M. S. (2023). Künstliche Intelligenz in der journalistischen Nachrichtenproduktion: Wahrnehmung und Akzeptanz in der Schweizer Bevölkerung. In Forschungszentrum Öffentlichkeit und Gesellschaft (fög) (Ed.), *Jahrbuch Qualität der Medien* (pp. 33–46). University of Zurich.  
<https://www.foeg.uzh.ch/de/jahrbuch-qdm/gesamtausgabe.html>



## Annex 1: Template for the National Policy Recommendations

### Title page

#### **DIACOMET National Policy Annex – [Country name]**

Project: DIACOMET

Date:

### 1. National context and scope

#### *Media and communication landscape*

- Key characteristics of the national media system
- Role of digital platforms and algorithmic intermediaries
- Economic conditions affecting journalism and public communication

#### *Governance and regulatory framework*

- Key national authorities (media regulator, data protection authority, competition authority)
- Existing accountability and redress mechanisms
- Relationship with EU-level instruments (DSA, EMFA, AI Act, etc.)

### 2. Key national challenges identified

Based on DIACOMET findings and national inputs, identify *2–4 priority challenges*, for example:

- participation chilling effects and harassment,
- accountability gaps and weak redress,
- economic fragility of journalism,
- algorithmic opacity and AI-related risks,
- marginalisation of specific groups or voices.

Each challenge should be briefly linked to:

- DIACOMET research findings,
- and the corresponding EU-level policy gap.

### 3. National policy recommendations

For each priority challenge, provide *concrete, actionable recommendations*, structured as follows:

#### Recommendation [N-1]: [Title]

- Addressee(s): national government, regulator, media organisations, platforms, civil society
- Description of the measure
- Link to EU framework (DSA, EMFA, AI Act, etc.)
- Expected impact on participation, accountability, or trust

Recommendations should:

- align with Section 3 EU-level recommendations,
- reflect national institutional realities,
- and identify implementation responsibilities.

## Annex 2: Summary and Synthesis of National and WP-Level Inputs Received for the DIACOMET Policy Recommendations

### Purpose and scope of the annex

This annex provides a structured synthesis of national and work package-level inputs that informed the development of DIACOMET's policy recommendations, as well as the preparation of Milestone 8, complementing the project's core research activities across the different work packages. The synthesis draws on national partner contributions outlining country-specific challenges and priorities, WP2 outputs including the expert Delphi study, focus groups, and the analysis of ethical codes, WP3 research on digital vulnerabilities – particularly participation, information, protection, and accountability – and internal project discussions and iterative feedback during the preparation of Milestone 8.

The inputs were analysed thematically and comparatively using the four analytical pillars adopted in the main report. Particular attention was paid to recurring patterns across countries, divergences linked to differences in media system size and regulatory capacity, and cross-cutting issues affecting multiple pillars. Across national contexts, the contributions revealed several shared concerns, including perceived accountability gaps in digital public communication, widespread awareness of participation-chilling effects, recognition of the limitations of purely content-based regulation, and a strong demand for accessible, dialogic, and supportive accountability mechanisms. At the same time, differences emerged in relation to institutional capacity to implement EU policies, the role assigned to professional self-regulation and ethical standards, and the availability of resources for training, civic engagement, and public dialogue.

The synthesis presented in this Annex underpins the prioritisation and formulation of the policy recommendations in Sections 3–5. It demonstrates that the recommendations respond to empirically identified needs and are sensitive to national diversity, while remaining anchored in shared European policy objectives.

### Pillar 1: Data Privacy and Surveillance

Privacy emerges as a core democratic value across the material, but it is articulated and governed unevenly. A recurring tension appears between privacy as informational self-determination and the competing demands of transparency, safety, and accountability in digital public spheres. This tension is intensified by platform-based governance models that combine extensive data collection with limited user control, producing asymmetrical power relations.

Across contexts, privacy-related concerns are experienced less as abstract legal violations and more as everyday constraints on participation, safety, and voice. These concerns include

intrusive monitoring, doxxing, online harassment, the illusion of anonymity, and the opaque reuse of personal data and digital traces. In some contexts, privacy is framed primarily as an ethical issue of respectful communication; in others, it is linked to broader climates of intimidation, control, and self-censorship. Taken together, these findings suggest that privacy and surveillance are best understood as structural conditions affecting participation and protection.

Effective policy responses therefore need to connect data protection, anti-harassment measures, and accountability mechanisms, rather than treating privacy as a siloed regulatory issue.

## **Pillar 2: Information and Content Governance**

Information and content governance is identified as a central democratic challenge across countries. Common concerns include the limits of platform self-regulation, weak or symbolic enforcement of ethical standards, and the economic and political incentives that drive misinformation, polarisation, and sensationalism. At the same time, there is a consistent demand for transparent rules, accountable moderation, and inclusive dialogue spaces, combined with media literacy and civic empowerment.

The findings point to structural weaknesses in how information is produced, moderated, and contested. Ethical standards are often present but weakly enforced, while platform moderation is frequently perceived as ineffective, inconsistent, or politically distorted. In several contexts, journalism is under pressure from economic precarity, political influence, and declining trust. More broadly, information vulnerabilities arise from commercial and algorithmic pressures, the erosion of journalistic ethics, and unequal access to reliable information. Disinformation is therefore widely perceived not merely as a literacy problem, but as a structural incentive problem.

These findings indicate that failures in information and content governance undermine trust when ethical norms lack enforcement, when citizens cannot contest decisions, and when dialogue is crowded out by polarising formats. Civic accountability mechanisms must therefore combine co-regulation, independent oversight, and participatory formats.

## **Pillar 3: Artificial Intelligence and Algorithms**

AI and algorithmic systems are widely perceived as powerful but opaque actors reshaping visibility, participation, and trust. Across the material, they are associated with the amplification of sensational and polarising content, declining journalistic quality, manipulation risks, and a growing loss of autonomy. Ethical governance of AI is widely seen as underdeveloped in comparison to its social and democratic impact.



The findings show that AI-related concerns extend beyond technical design to broader questions of democratic accountability. Algorithmic ranking, moderation, and targeting systems shape communicative power in ways that are difficult for users to understand or contest. At the same time, participants express concern about manipulative uses of AI, including deepfakes, bots, and other forms of synthetic or amplified communication. AI is also seen as intensifying existing vulnerabilities by reinforcing disinformation, polarisation, and unequal visibility.

Across contexts, AI governance deficits are therefore not only technical but democratic. There is a shared demand for transparency, auditability, meaningful human control, and citizen-facing explanations, combined with clearer avenues for contestation and participatory oversight.

#### **Pillar 4: Markets, Pluralism and Competition**

The findings converge on the diagnosis that pluralism is not self-sustaining in market-driven and platformised communication environments. Concentration of ownership, attention, and resources systematically disadvantages independent, local, and minority voices, while market logics often reward speed, repetition, and visibility rather than verification, diversity, or quality.

Across contexts, participants point to concentrated ownership, distorted advertising markets, precarious funding of independent media, and the marginalisation of local or low-visibility voices. Commercial and algorithmic pressures reinforce these tendencies by concentrating attention and amplifying already dominant actors. In some settings, market distortion is also closely linked to political capture and weakened editorial independence. Even where market issues are less explicit, communication inequalities are often tied to broader imbalances in power, access, and visibility.

Taken together, these findings suggest that pluralism requires active structural support through funding models, regulatory safeguards, and design obligations that counterbalance market and algorithmic concentration. Competition policy alone is insufficient without a democratic conception of media diversity.

#### **Concluding Cross-Pillar Observations**

Across all four pillars, a shared pattern emerges: civic accountability deficits are structural rather than episodic. They arise from the interaction of market incentives, platform architectures, regulatory gaps, and weakened ethical enforcement. Vulnerability appears as relational and dynamic, affecting not only traditionally marginalised groups but also

journalists, professionals, and civic actors operating under conditions of visibility, dependency, and hostility.

These findings support policy recommendations that link regulation with participation and accountability, strengthen institutional responsiveness and transparency, and embed safeguards for voice, protection, and redress across digital communication systems. Together, they provide the empirical and conceptual basis for DIACOMET's policy recommendations and stakeholder-oriented policy instruments.