



CS2. Country case studies on critical junctures in the media transformation process in Four Domains of Potential ROs (2000–2020)

The aim of the second case study is to provide analysis of risks and opportunities concerning the diachronic changes in four domains defined by the project in the 21st century.

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GREECE

Critical junctures in the media transformation process

Evangelia Psychogiopoulou, Anna Kandyla
Hellenic Foundation for European and Foreign Policy

Executive summary

The present study seeks to identify risks and opportunities for deliberative communication in Greece and to flag critical junctures in the development of the media between 2000 and 2020 across the four domains covered by the MEDIADELCOM project: a) legal and ethical regulation, b) journalism, c) media usage patterns, and d) media-related competences. Among the major forces shaping the development of the media during the period under study, the economic recession that the country experienced between 2009 and 2018, and the spread of the internet, certainly stand out. Both these factors had a profound impact on media market structures and on journalism. The effects of digitalization are also evident in changing media use and supply practices. Overall, these forces create risks and opportunities for a media system whose development has been shaped by the close connection between the media and the political system.

1. Introduction

Greece has a population of 10.82 million inhabitants. Its official language is Greek. After a decade of heavy recession, the Greek economy has returned to a positive albeit weak growth rate. However, the containment measures implemented to hinder the spread of COVID-19 and the ensuing health crisis impacted on the country's progress towards recovery (OECD, 2020). Greece's real GDP per capita was 17 590 Euros in 2021.⁷³ Unemployment stood at 14.7% in 2021, the lowest level recorded since 2010.⁷⁴ The World Press Freedom Index ranked Greece 108th out of 180 countries worldwide in 2022, from 70th place in 2021. This ranking, the lowest of any EU member state, has raised a good deal of concern. However, the spokesman of New Democracy, the ruling centre-right party, in power since 2019, has questioned the methodology employed by the index.⁷⁵

The development of the Greek media system has long been intrinsically linked to the country's political system and the socio-economic interests vying for influence within it (Psychogiopoulou, Kandyla and Anagnostou, 2012). Its evolution has been profoundly marked by an essentially government-centred model of media policy-making, strong state intervention in the realm of the media, multiple interconnections established and perpetuated between media and domestic political forces, and wide use of the media for political or other ends (Psychogiopoulou, Kandyla and Anagnostou, 2014). This explains why Greece is considered to belong to the Mediterranean media system model identified by Hallin and Mancini (2004). Key features of this model include

⁷³ https://ec.europa.eu/eurostat/databrowser/view/sdg_08_10/default/table.

⁷⁴ <https://ec.europa.eu/eurostat/databrowser/view/tps00203/default/table>.

⁷⁵ <https://rsf.org/en/world-press-freedom-index-greek-government-spokesman-responds-poor-ranking-counterfactual-claims>.

media instrumentalization, low journalistic professionalism, and robust state intervention in the development of the media and media regulation.

Throughout the 20th century, the Greek press was a privileged venue for political antagonism, with newspapers tied to different political parties (Hallin and Mancini, 2004). Following the fall of the military dictatorship in 1974, democracy was restored and Greece became a Republic. While this created an enabling environment for freedom of expression, high levels of political parallelism persisted, with newspapers maintaining their partisan focus (Kalogeropoulos, Rori and Dimitrakopoulou, 2021). The deregulation of broadcasting in the late 1980s put an end to the state's monopoly over broadcasting (Papathanassopoulos, 1990), diversifying domestic structures for media supply – a key illustration of the effects of Greece's membership of the European Economic Community at the time. Commercial broadcasting fundamentally reshaped media ownership structures. It did not, however, erase the multiple dependencies between media and political elites. Existing media proprietors expanded their activities in the sector, while a new generation of media owners entered the market (Leandros, 2010; Papathanassopoulos, 1997). The latter did so not because they identified a profitable opportunity for business, but because media ownership could allow them to exert pressure on successive governments and influence domestic politics in favour of their entrepreneurial interests in other sectors of the economy. The advent of online media in the early 2000s, and the economic recession that Greece underwent from 2008, put what was essentially a distorted media market under the spotlight. The media were required to cope with the digital revolution, develop online services, and survive in an increasingly converged media environment (Psychogiopoulou, Kandyla and Anagnostou, 2012). The austerity measures implemented as part of the bailouts had a profound impact on both the media market and the resources available for journalism.

The first Greek case study report for the Mediadelcom project showed that media and communication has established itself as a field of study in Greece over the last 20 years, generating an important body of research that is relevant for the analysis of risks and opportunities for deliberative communication in the country. However, the field is characterized by substantive heterogeneity: while issues pertaining to legal regulation and journalism are relatively well researched, studies and data relating to aspects of media usage and users' media-related competences are limited.

The aim of this second case study report for the Mediadelcom project is to identify risks and opportunities for deliberative communication in Greece, and to flag critical turning points in media development. Against this background, the sections that follow discuss each of the four domains covered by the project: legal and ethical regulation; journalism; media usage patterns; and media-related competences. The analysis is based on desk research conducted into related publications, legal texts, and publicly available research and policy reports and data. Moreover, interviews with selected key experts have been conducted in order to triangulate the information gathered through these sources and provide further insights into the development of these domains over the 21st century. The final section offers some concluding remarks.

2. Risks and opportunities in the legal and ethical domain

2.1. Development and agency of change

Since the democratic transition of 1974, constitutional provisions guaranteeing freedom of expression and the right to information have provided the bedrock on which media laws and policies have developed. Naturally, following the country's accession to the EU, the Greek legal framework has also been responsive to pressures towards market liberalization, deregulation and re-regulation at the EU level. Still, in the period under study (2000-2020), no critical turning points of a nature and breadth capable of transforming and revolutionizing the legal framework for the media can be identified. Changes in laws and regulations did, of course, occur; indeed, the Greek legal order is characterised by regular and intense law-making. However, this does not necessarily indicate genuine reform or, more importantly, a chance to transform. Moreover, in the field of the media, as in other legal areas where laws and regulations flesh out and concretize fundamental rights standards, law-making is inherently complex. It is so because, in rendering safeguards for free speech and freedom of information tangible and real, it concurrently balances such protections with other rights and interests considered worthy of protection. Whatever legal changes took place, balancing exercises of this sort were recurrent during the period reviewed, without losing in complexity.

The formulation of media law and policy rests with state actors, though EU institutions also contribute to the design of domestic norms, especially in the audiovisual field and also in how media law interacts with other areas of law, such as data protection or copyright. European human right treaties such as the European Convention on Human Rights (ECHR) also assist in norm development. Entrusted with the application and enforcement of relevant provisions, domestic courts have a marked influence on the interpretation of the protections afforded to free speech and the right to information. Their decisions have at times been reviewed by the European Court of Human Rights (ECtHR), which has drawn attention to fundamental rights shortcomings in their reasoning. The media regulator and data protection authority also engage with interpreting the applicable rules.

2.2. Freedom of expression

Safeguards for freedom of expression are set forth in the Hellenic Constitution (Const.). Greece has also ratified the ECHR, and is bound by the free speech provisions of the Charter of Fundamental Rights (CFR) of the EU when acting within the scope of EU law. Article 14(1) Const. provides that '[e]very person may express and propagate his thoughts orally, in writing and through the press [...]' (Chrysogonos and Vlachopoulos, 2017; Dagtoglou, 2012; Karakostas, 2010; Vlachopoulos, 2017). Although it specifically refers to the press, it also applies to broadcasting and digital media (Igglezakis, 2011; Karakwstas, 2009; Mantzoufas, 2010; Papakonstantinou, 2018; Tassis, 2006). Article 14(2) Const. recognizes the freedom of the press and prohibits censorship and other preventive measures.

Article 15 Const. excludes radio and television from the constitutional provisions on press freedom, declaring that radio and television 'shall be under the direct control of the State'. Its aim is to ensure inter alia the 'objective and on equal terms transmission of information and news reports', and such control shall be exercised exclusively by the National Council for Radio and Television (NCRT) (Contiades, 2016; Dimitropoulos, 2017; Tsevas, 2009). The NCRT is constitutionally protected as an independent administrative authority, but its ability to discharge its duties has long been questioned on various grounds: legal shortcomings hampering its independence and operation, being entrusted thorny tasks, a 'policing' attitude towards the audiovisual sector, limited resources, etc. (Contiades, 2016; Kamtsidou, 2005; Mavromoustakou,

2006; Oikonomou, 2004, 2017; Psychogiopoulou, Casarosa and Kandyla, 2014; Tsevas, 2009; Oikonomou, 2017). More recently, the NCRT has sought to re-establish itself as an authoritative body charged with regulating the media in an effective manner.

Article 14(1) Const. protects freedom of expression ‘in compliance with the laws of the State’, which enables the legislator to delimit free speech (Karakostas, 2010; Vlachopoulos, 2017: 287) and reconcile it with other protected rights and interests. Domestic laws do not appear to set unnecessary or overly broad restrictions. When it comes to the implementation of relevant rules, the balancing performed by domestic courts sometimes shows mixed results. Concerning privacy, for instance, reporting on purely private activities is generally prohibited, unless consent has been obtained or the publication is in the public interest (Garoufalia, 2006). With regard to public figures, it is acknowledged that they should have a lower expectation of privacy. Thus, domestic case law which condemned the media’s intrusion into the private life of a public figure by distinguishing between the publication of a news item in the public interest and complementary audiovisual material that infringed on the essence of the right to privacy was considered to be a move in the right direction (Vrettou, 2013). In contrast, domestic case law which sanctioned the violation of the privacy of a politician who was reported to have been involved in gambling while serving as the chairman of an anti-gambling inter-party committee was met with criticism (Alivizatos, 2010) and led to the ECtHR finding that Article 10 ECHR had been violated.⁷⁶ The ECtHR agreed with the Council of State that a news item which is in the public interest can be lawfully published, even if the source of the news item (a recording made using a hidden camera) is illegal, but concluded that the Greek judicial authorities had failed to give consideration to the fact that one of the videos broadcast had been filmed in public space, which weakened one’s reasonable expectation of privacy (Alivizatos, 2018). The use of existing laws and regulations to silence journalists through abusive proceedings, known as SLAPPs (*strategic lawsuits against public participation*), may also undermine free speech. Recent fact-finding missions in the country refer to this type of ‘legal threats’ against journalists as an issue that raises concern (Media Freedom Rapid Response, 2021).

With respect to the right to free development of one’s personality, Greek legislation provides for criminal liability in the case of insult,⁷⁷ defamation⁷⁸ and malicious defamation,⁷⁹ with some legal defences set forth in the Criminal Code.⁸⁰ Certain failings of the domestic courts, such as disproportionate sanctions in defamation proceedings, i.e. (suspended) prison sentences, disregarding a publication’s contribution to a debate in the public interest or ignoring wilful exposure to public scrutiny, have at times been deplored by the ECtHR (Anagnostopoulos, 2009; Psychogiopoulou and Kandyla, 2020). Civil law conflicts between freedom of expression and the right to one’s honour and reputation have also raised concerns about their resolution by the courts. It has been argued, for instance, that the use by civil law judges of criminal law defences

⁷⁶ Alpha Doryforiki Tileorasi Anonymi Etairia v. Greece App no 72562/10 (ECtHR, 22 February 2018).

⁷⁷ See the Criminal Code, Art. 361(1).

⁷⁸ Ibid., Art. 362.

⁷⁹ Ibid., Art. 363.

⁸⁰ According to Article 366(1) of the Criminal Code, defamation is not punished if it is based on true facts, unless it exclusively concerns aspects of private or family life that do not undermine the public interest. Proof of the truth of the statement does not preclude punishment for insult, if the intent to insult is proven beyond reasonable doubt (Art. 366(3) of the Criminal Code). However, criticism of scientific, artistic or professional activity; negative expressions in public documents related to the duties of public authorities; fulfilling a lawful duty; exercising lawful authority; safeguarding a legal right or pursuing a legitimate interest do preclude punishment, unless slanderous defamation or intent to insult can be proven beyond reasonable doubt (Article 367 of the Criminal Code).

removing liability for insult and defamation⁸¹ entails an undue criminalization of civil law proceedings (Akrivopoulou, 2015). There have also been instances where civil law judges have neglected or misapplied ECtHR balancing criteria, such as the contribution of the disputed expression to a debate in the public interest, the wider limits of acceptable criticism of politicians and public figures, the distinction between facts which can be proven and value judgments which are not susceptible of proof, the fact that a sufficient factual basis is also required for value judgments and contextualizing the disputed expressions (Akrivopoulou, 2015; Mitsiou, 2012; Tsakyrakis, 2011).

Regarding disinformation, the Constitution does not tolerate speech that deliberately disseminates false information, causing harm (Florou, 2020; Vlachopoulos, 2018b).⁸² Article 191 of the Criminal Code penalizes the dissemination of ‘false news’ (Spiropoulos, 2019). The provision was amended in 2019 to target anyone who publicly or via the internet spreads or disseminates false news ‘causing fear to an indefinite number of people or to a certain group or category of persons’, with the concomitant risk of causing damage to the country’s economy, tourism and defence capacity or of disrupting the country’s international relations. The limited case law pertaining to its application does not provide evidence of an expansive interpretation to the detriment of journalistic speech (Florou, 2020; Spiropoulos, 2021). However, the provision was amended in 2021 and now targets anyone who publicly or via the internet spreads or disseminates false news that is ‘capable of causing concern or fear to the public or of shattering public confidence in the national economy, the country’s defence capacity or public health’. Committing the crime repeatedly through the press or via the internet is an aggravating factor, and the publisher or owner of the media outlet responsible also faces criminal liability. The modified provision has been criticized by legal scholars (interview with Christina Akrivopoulou, 2022), advocacy institutions and domestic journalistic associations (Article 19, 2021; ESIEA, 2021; Media Freedom Rapid Response, 2021) for its vague wording, which could support the censorship of critical journalism and could lead to self-censorship.

Concerning the protection of personal data, Law 2472/1997 enacted to transpose Directive 95/46/EC⁸³ followed a maximalist approach, favouring the protection of personal data vis-à-vis other rights and interests, including freedom of expression (Akrivopoulou, 2017; Panagopoulou-Koutnatzi, 2016; Tsevas, 2013; Vrettou, 2020). The processing of personal data was prohibited without the data subject’s consent, and any exceptions allowed were interpreted strictly.⁸⁴ Moreover, although Directive 95/46/EC required Member States to introduce exemptions or derogations, particularly for ‘the processing of personal data carried out solely for journalistic purposes’,⁸⁵ so as to reconcile, if necessary, freedom of expression and the protection of person-

⁸¹ In particular, *safeguarding a legal right*, such as the right to freedom of expression and freedom of the press, or *pursuing a legitimate interest*, which covers the interest of the media and its professionals in informing the public on matters of public interest, as well as the interest of the public in information in the public interest.

⁸² Slanderous defamatory speech (i.e. speech disseminated with the purpose of spreading false facts that may harm one’s honour or reputation, with awareness of the falsity thereof) is akin to disinformation and, like disinformation, is not protected under the Constitution (Contiades, 2020; Vlachopoulos, 2019).

⁸³ Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data [1995] OJ L 281/31.

⁸⁴ Such as the exception detailed in Article 5(2)(e) of Law 2472/1997, which could be used for the processing of personal data for journalistic purposes. This enabled processing when the latter was necessary for the purposes of the legitimate interests pursued by the controller or by the third party or parties to whom the data was disclosed, on condition that such interests were not overridden by the interests and fundamental rights of the data subject.

⁸⁵ See Art. 9 of Directive 95/46/EC.

al data, the Greek legislature did so to only a limited extent (Tsevas, 2013).⁸⁶ Nonetheless, the Data Protection Authority (DPA) demonstrated balanced decision-making overall (Lytras, 2013; Panagopoulou-Koutnatzi, 2016; Vrettou, 2020). To avoid undermining press freedom, for instance, the DPA refrained from applying the legal provisions requiring its authorization for the journalistic processing of sensitive data relating to public figures,⁸⁷ arguing that this would have amounted to a preventive measure for the press (Panagopoulou-Koutnatzi, 2016; Tsevas, 2013). The DPA has also closely followed the criteria developed by the ECtHR for balancing the competing rights involved.

In the wake of the General Data Protection Regulation (GDPR, Regulation 2016/679),⁸⁸ Law 4624/2019 restores the balance between the protection of personal data and freedom of expression (Panagopoulou-Koutnatzi, 2019; Skondra, 2020; Vrettou, 2020; interview with Christina Akrivopoulou, 2022). In accordance with the powers afforded to the national legislator by virtue of Article 85 of the GDPR, Article 28(1) of Law 4624/2019 establishes the conditions under which the journalistic processing of personal data is permitted. This is allowed not only when the data subject has given their explicit consent, but also when the processing relates to personal data clearly made publicly available by the data subject; to satisfy free speech (and the right to information) when the processing relates to matters of general public interest or involves the personal data of public figures; and provided that processing is restricted to what is strictly necessary, especially with reference to specific categories of data (previously known as sensitive data)⁸⁹ and data concerning criminal prosecutions, convictions and related security measures, with account taken of the data subject's right to respect for private and family life.⁹⁰ In addition, Article 28(2) of Law 4624/2019 provides for certain derogations in the case of processing carried out for journalistic purposes, including derogations from most of the provisions of Chapter II of the GDPR (principles) concerning the prerequisites for the lawful processing of personal data, and Chapter III (rights of the data subject) in its entirety. However, the legislator has not specified the conditions under which the relevant derogations apply, with the DPA taking the view that their breadth could jeopardize the essence of the right to protection of personal data.⁹¹ Due to the recency of Law 4624/2019, the literature has not yet discussed its implementation sufficiently. In fact, case law in the field does not appear to have developed yet (interview with Christina Akrivopoulou, 2022). It has been argued, however, that the DPA enjoys access to a broad set of tools to inform the balancing performed, in particular the standards devised by the ECtHR which it has long integrated into its analysis (Vrettou, 2020).

As for copyright legislation, some of the exceptions introduced, in accordance with Article 5 of Directive 2001/29/EC⁹² on permitted copyright exceptions or limitations, enabling the use of protected works or other subject matter without the author's consent, could be seen as facilitating reporting. Article 25(1)(a) of Law 2121/1993 for example allows, in connection with the

⁸⁶ See for instance Art. 11(5) of Law 2472/1997, according to which there was no obligation to inform the data subject when the collection of personal data was exclusively carried out for journalistic purposes and concerned public figures.

⁸⁷ See Art. 7(2)(g) of Law 2472/1997.

⁸⁸ Regulation 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) [2016] OJ L 119/1.

⁸⁹ These are data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

⁹⁰ On this, see opinion 1/2020 of the DPA, https://www.dpa.gr/sites/default/files/2020-01/gnomodotisi%201_2020.pdf.

⁹¹ Ibid.

⁹² Directive 2001/29/EC of the European Parliament and of the Council of 22 May 2001 on the harmonisation of certain aspects of copyright and related rights in the information society [2001] OJ L 167/10.

reporting of current events, the reproduction and communication to the public of works seen or heard in the course of an event. For the purpose of providing information on current events, Article 25(1)(b) of Law 2121/1993 also permits the reproduction and communication to the public of political speeches, addresses, sermons, speeches before the court or other similar works, as well as summaries of or extracts from lectures, provided the said works are delivered in public and the source and name of the author is indicated wherever possible. Article 26 of Law 2121/1993 focuses on the occasional reproduction and communication to the public by the media of images of architectural works, visual art works, photographs or works of applied art, which are located permanently in public places. In turn, Article 19 of Law 2121/1993 allows the quotation of short extracts from a lawfully published work, provided that the quotation is in accordance with fair practice and the extent required by the specific purpose pursued, and that the source is indicated, along with the author's and publisher's names when they appear on it. Admittedly, some of these provisions have a restricted scope of application (Synodinou, 2007). The exception relating to quotations, for instance, covers quotations in support of an opinion advanced by the person making the quotation, or to engage in criticism of the author of the work; it does not cover quotations for other purposes, including informatory purposes. Moreover, since Article 25(1)(a) of Law 2121/1993 refers to the reporting of 'current events', the exception does not cover use of a work for providing information which may be in the public interest but is not linked to an event that has recently occurred. For its part, Article 25(1)(b) of Law 2121/1993 only focuses on works of oral speech, though the judiciary has favoured an expansive interpretation of the latter, bringing photographs within its scope (Synodinou, 2007; Stamatoudi, 2005).

2.3. Freedom of information

Article 5A Const. safeguards the right to information and provides for the right 'to participate in the Information Society' (see indicatively Kiki, 2013; Papachristou *et al.*, 2006; Vlachopoulos, 2017). Article 10(3) Const., revised in 2001, recognizes the right of access to information and documents held by public authorities. Article 5(1) of the Code of Administrative Procedure (Law 2690/1999, CAP) provides any 'interested person' with the right to access administrative documents created by public services, including reports, studies, minutes, statistical data, circulars, administrative responses, opinions and decisions. Article 5(2) CAP provides persons demonstrating a 'special legal interest' with the right to access private documents held by public bodies.

Restrictions on the right to information can be imposed 'only insofar as they are absolutely necessary and justified for reasons of national security, of combatting crime or protecting rights and interests of third parties'.⁹³ The right to access administrative documents does not apply when the requested document concerns a third party's private or family life.⁹⁴ Domestic authorities can refuse a request if access could substantially obstruct investigations carried out by judicial, administrative, police or military authorities.⁹⁵ Secrecy provisions persist,⁹⁶ however, and authorities can deny access when the requested document refers to Cabinet discussions.⁹⁷ Overall, the existing regime does not appear to comply with standards of maximum disclosure and has been designed without the media's democratic function in mind (Global Right to Information Rating, 2015; Voulgari, 2007).

⁹³ See Art. 5A(1) Const.

⁹⁴ See Art. 5(3) of the Code of Administrative Procedure.

⁹⁵ *Ibid.*

⁹⁶ *Ibid.*

⁹⁷ *Ibid.*

Regarding tensions between access to administrative documents and the protection of personal data, domestic rules do not give outright precedence to personal data protection concerns (Veneris, 2017; Vlachopoulos, 2019). The DPA has held in the past that access to administrative documents in accordance with Article 5 CAP should come within the scope of data protection rules allowing for the processing of personal data when this is required in order for the data controller to comply with a legal obligation.⁹⁸ Providing access to administrative documents was considered to be a legal obligation incumbent on public services. The DPA has developed detailed guidelines on the application of the rules on access to administrative documents,⁹⁹ and these guidelines remain relevant post-GDPR. Law 4624/2019, adopted following the GDPR, stipulates that the application of Article 5 CAP remains unaffected.¹⁰⁰ Empirical studies focusing on journalists' use of the legal framework on access to administrative documents are still missing, as is case law revealing direct conflicts between journalists' access to administrative documents and the protection of personal data (interview with Christina Akrivopoulou, 2022). However, the procedures available for seeking redress when necessary are rather ineffective.¹⁰¹

Turning to the protection of journalistic sources, this mostly stems from case law rather than the legal framework (Kargopoulos, 2007).¹⁰² The Constitution does not expressly refer to the protection of journalistic sources, and Article 8(3) of Presidential Decree 77/2003 only provides for a limited legal recognition of the right to the protection of journalistic sources. Thus, while journalists have the right not to disclose the source of information they have obtained in confidence, this only applies to radio and television news and current affairs programmes. In addition, criminal law does not list journalists among the professionals whose professional secrecy is safeguarded.¹⁰³ No less importantly, journalists are not included among those professionals who have committed an offence when they are in breach of professional secrecy,¹⁰⁴ and their obligation to testify is not waived.¹⁰⁵ Greek courts have yet long recognized that the protection of journalistic sources is an intrinsic aspect of the freedom of the press (ELSA, 2016; Kargopoulos, 2007).

Whistleblowing through the media is linked to the protection of journalistic sources. Greece lacks a targeted whistleblower law (OECD, 2018a; Psychogiopoulou and Kandyla, 2021; Transparency International, 2013) and has not yet transposed the EU's Whistleblower Directive (Directive 2019/1937),¹⁰⁶ which recognizes direct disclosures to the public as worthy of protection, under conditions.

⁹⁸ See Art. 5(2)(b) of Law 2472/1997.

⁹⁹ See

https://www.dpa.gr/index.php/el/enimerwtiko/thematikes_enotites/dimosiostomeas/dimosiadioikhsh/xorigijsi_dimosiwn_eggrafwn_se_tritous.

¹⁰⁰ See Art. 42(1) of Law 4624/2019. Article 5 CAP thus continues to govern access to administrative documents with simple data. For access to administrative documents with so-called special category data (formerly known as sensitive data), use can be made of other provisions of Law 4624/2019 and the GDPR, in particular Arts. 22-23 of Law 4624/2019 and Art. 9 of the GDPR (Grivokostopoulos, 2021; Igglezakis, 2020).

¹⁰¹ Mediation by the Greek Ombudsman (Art. 3 of Law 3094/2003), who does not issue binding decisions and cannot impose sanctions, coupled with 'requests' issued by the public prosecutor for the administration to provide access to documents (Art. 25(4)(b) of Law 1756/1988) do not suffice to safeguard (and facilitate) the media's role in providing information to the public.

¹⁰² Note that, pursuant to journalists' own code of conduct, the protection of journalistic sources is both a journalistic right and a duty. See Art 2(h) of the Code of Conduct of the Journalistic Profession.

¹⁰³ See Art. 212 of the Code of Criminal Procedure.

¹⁰⁴ Ibid, Art. 371.

¹⁰⁵ Ibid., Art. 209.

¹⁰⁶ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law [2019] OJ L 305/17.

Turning to the protection of trade secrets, this has been derived for many years from various legal acts (EUIPO, 2018), but empirical studies into the implementation of the relevant rules and their implications for the right to information have not materialized. Case law is also negligible in this area (interview with Christina Akrivopoulou, 2022). Law 4605/2019 transposed the Trade Secrets Directive¹⁰⁷ by including a new set of provisions in the Greek Patent Law (Law 1733/1987). Article 22A(2) of Law 1733/1987 states that the provisions enacted are without prejudice to the exercise of the right to freedom of expression and information, as set out in the Constitution and the CFR, including respect for the freedom and pluralism of the media. Article 22B(7) of Law 1733/1987 provides that an application for judicial protection for the grant of remedies and compensation against the unlawful acquisition, use and disclosure of trade secrets is dismissed when the disputed acquisition, use or disclosure of the trade secret was carried out in the exercise of the right to freedom of expression and information. Other provisions of the law stipulate that competent authorities shall, when deciding cases on precautionary measures as well as injunctions and corrective measures against the alleged trade secret infringer, take into account the principle of proportionality and the specific circumstances of the case, including, where appropriate, the safeguarding of fundamental rights.¹⁰⁸ It remains to be seen how the Greek courts will apply the relevant provisions.

Finally, concerning media ownership transparency, domestic legislation does not require legacy and digital news media to disclose their ownership structures directly to the public. However, for inclusion on the Registry of the Regional and the Local Press held by the General Secretariat of Communication and Information (GSCI), regional and local newspapers must provide information on their owners on their first pages. To register with the GSCI's Registry of Online Media, applicants must disclose information on their ownership. Audiovisual media and radio operators have long been required to disclose their ownership details to the NCRT (Deloitte and Smit, 2010; Psychogiopoulou and Kandyla, 2020; 2021). Pursuant to Article 37 of Law 4779/2021, which transposed the revised Audiovisual Media Services (AVMS) Directive,¹⁰⁹ media service providers established in Greece are under duty to register with the Business Register of the NCRT, which requires the provision of information on their ownership status (European Commission, 2021). Law 4779/2021 has, however, held back from requiring media service providers to themselves provide information on their ownership structures, including their 'beneficial owners', as envisaged by Article 5(2) of the AVMS Directive.

2.4. Accountability system

2.4.1. Development and agency of change

Greece was a latecomer in terms of the development of media accountability instruments. In recent decades, some efforts have been made to introduce accountability instruments, but no critical point can be identified in this respect for the period under study. That is because there is still no coherent media accountability system capable of addressing the multiple challenges facing contemporary journalism. Greece lacks a press council and media accountability at the professional level rests with journalists' unions. These include the regionally organized unions: the Journalists' Union of Athens Daily Newspapers (ESIEA), the Union of Journalists of Daily

¹⁰⁷ Directive 2016/943/EU of the European Parliament and of the Council of 8 June 2016 on the protection of undisclosed know-how and business information (trade secrets) against their unlawful acquisition, use and disclosure [2016] OJ L 157/1.

¹⁰⁸ See Article 22ΣΤ(2)(η) and Article 22Η(1)(η) of Law 1733/1987.

¹⁰⁹ 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 [2018] OJ L 303/2018.

Newspapers of Macedonia-Thrace (ESIEMTH), the Journalists' Union of Thessaly, Central Greece and Evia (ESIETHSEE), and the Journalists' Union of the Peloponnese, Epirus and the Islands (ESIEPIN). There is also the Periodical and Electronic Press Union (ESPIT) which represents journalists who work for magazines, non-daily newspapers and online news media. They are all members of the Panhellenic Federation of Journalists (POESY). As far as instruments of media accountability at the organizational level are concerned, these have not taken off in Greece. In the field of audiovisual media, statutory media accountability instruments are in place; their implementation rests with the media regulator.

2.4.2. Existing media accountability instruments and an evaluation of their effectiveness

Self-regulation for journalists was introduced in the late 1990s when the *Code of Conduct of the Journalistic Profession* was adopted by the ESIEA. It was then ratified by POESY (POESY, 1998). The Code stipulates that journalists should provide information that is true, accurate and objective; that they should treat citizens without discrimination; and that they should respect the personality and private life of individuals. It also proclaims the duty of journalists to defend journalistic freedom and to denounce state authoritarianism and abuses by media owners. Support for union activities and respect for professional solidarity are also included among its principles. The formulation of the code was supposed to lead to the establishment of a Press Council; the plan did not materialize, however, and the monitoring of compliance with the ethical rules laid down therein has since rested with the unions' disciplinary councils. These are mandated to investigate allegations of code breaches by journalists who are their members, either ex officio or following complaints; they can impose sanctions on the journalists involved.

This system has not proved effective in ensuring that ethical standards are enforced. Clearly, one of the main issues impacting on its effectiveness is that it does not include publishers in its structure (Psychogiopoulou, Kandyla and Anagnostou, 2014: 231) and places responsibility solely on the individual journalist. But there are other shortcomings: for instance, the unions' oversight is limited to unionized journalists and does not extend to everyone who practices the profession. Furthermore, the unions have done little to foster public awareness of the complaints procedure. Earlier research has shown that the majority of cases examined by the ESIEA's first-instance disciplinary council were based on complaints submitted by other journalists and related to breaches of those provisions of the code pertaining to union and professional solidarity (Psychogiopoulou, Kandyla and Anagnostou, 2014: 225). Whether this has changed in recent years and a tendency towards increased citizen participation has emerged cannot be assessed, due to the lack of publicly available data on the cases handled.¹¹⁰ In any case, the unions do not really engage in ex officio reviews on ethics violations. Recent research suggests that there have been numerous code violations which the unions took no action over (Komninou, 2017; Papathanassopoulos *et al.*, 2021: 208).

At the organizational level, instruments of media accountability are marked by their absence: leading private media have not established internal self-regulatory instruments such as codes of conduct or ombudspersons (Papathanassopoulos *et al.*, 2021: 209-211). Nor has the Hellenic Broadcasting Corporation (ERT), the public service broadcaster, set up instruments to deal with complaints about editorial and/or journalistic content.¹¹¹ At the collective level, the Code of Ethics adopted by the Internet Publishers Association (ENED) in 2016 represents the first, and to date only, accountability-related initiative (ENED, 2017). The Code is allegedly self-binding on the Association's members (some of the major digital news content producers), but its for-

¹¹⁰ ESIEA is the only Union, which publishes the decisions of its disciplinary council on its website.

¹¹¹ In 2015, ERT's Board decided to set-up an Ethics Committee to support the management with regard to respect for ethical standards; it was, however, dismantled a year later (see <https://www.esiea.gr/epistoles-tis-esiea-stin-ert-gia-to-org/>).

mulation has not been accompanied by the establishment of procedures for handling complaints or monitoring the standards applied in its members' reporting.

In line with the constitutional provision that broadcasting is under the “direct control of the state”, ethical standards for journalism in the audiovisual media are also prescribed by statutory instruments (Law 3592/1995, Presidential Decree 77/2013). The monitoring of compliance with relevant provisions is assigned to the NCRT, which also enjoys the power to impose fines in case of violations. However, the Council has not proved effective in performing this role. This is due, firstly, to its suffering from a long-standing shortage of resources, which prevents it from diligently monitoring broadcasting content, especially at the local/regional level (Psychogiopoulou, Casarosa and Kandyla, 2014: 224). The NCRT has repeatedly raised this issue itself in its annual activity reports, noting that violations are mainly detected through complaints (see indicatively, NCRT 2020: 14, 34); however, the NCRT does not consistently report on the number and subject matter of the complaints it receives. Secondly, the NCRT has not managed to establish itself as an authoritative body which supports media accountability. Rather, it has exhibited an overly legalistic attitude which relies on sanctioning (Contiades, 2016; Kamtsidou, 2005), and has not shown any interest in working with broadcasters to help them clarify and embed ethical principles into their work.

3. Risks and opportunities in the journalism domain

3.1. Development and agency of change

The deregulation in the late 1980s of the state monopoly in the audiovisual sector stands out as a critical turning point in the development of the media market, the structure of media ownership, and the development of journalism. The fact that the advent of private audiovisual media did not come about through a media policy strategy, but through the so-called ‘occupation of the airwaves’ (Papathanassopoulos, 1997), had a marked impact on the state of journalism. The profound economic crisis that started in 2008 and the advent of digital media also played a major role in shaping journalism, creating new risks and opportunities for media professionals to perform their role (interview with Lambrini Papadopoulou, 2022).

In formulating market- and labour-related policies, the state has played a key role in defining the framework within which journalism operates. Private media outlets have had to face important challenges affecting their economic sustainability and their capacity to produce and provide quality journalism. At the same time, they have been unable or unwilling to sever their close links with the political system. ERT, for its part, has never really managed to establish itself as a true public service operator, mainly due to a lack of legal safeguards of its independence.

3.2. Market conditions

The particularistic relationship between the state and broadcasting media that emerged through the ‘haphazard’ deregulation favoured the development of a crowded commercial audiovisual media market. Scholars emphasize that even though advertising revenues had been on the rise throughout the 1990s and 2000s (Chairetakis, 2010), the broadcasting market was not financially sustainable. Many outlets operated at a loss and were maintained as a tool for proprietors to exercise political pressure (Leandros, 2000). Similar observations have been made about business models in the newspaper market. The sales of Athens-based national newspapers had been declining since the advent of commercial broadcasting, and yet new titles kept being launched (Bakounakis and Papathanassopoulos, 2010).

The recession had important ramifications for market conditions. Private and public sector advertising decreased from 2,669 billion € in 2008 to 1,279 billion € in 2014 (Skamnakis, 2020). The decline in revenues affected all legacy media types, but it was the newspaper market that was hit the hardest (Skamnakis, 2020). There can be no doubt that digitization and the advent of social media played their part here. It is indicative that, despite the downturn in overall advertising expenditure during the period of the crisis, online internet advertising expenditure grew (Papathanassopoulos, 2020: 133) prompting the emergence of several digital-native news media. The decline in economic revenues and lack of recourse to bank loans resulted in the bankruptcy of some 'historic' publishing groups, with the closure of numerous newspaper titles, TV channels and radio stations of local/regional range (Papathanassopoulos, 2020: 134).

The structure of media ownership in Greece at the turn of the 21st century had been largely shaped by the entry of large-scale industrial and merchant capital into the newspaper business (Leandros, 2010: 890). By the 2000s, this new generation of media owners, together with traditional publishers who had in the meantime expanded their activities into commercial broadcasting, had come to dominate the media. In the context of particularistic relationships between the media and the state, the restructuring of ownership patterns from small and medium-sized enterprises to large media conglomerates led to a substantial degree of mono-media and cross-media market concentration for the media of national range. In 2008, the combined audience share of the five leading national private TV channels was 68.5%, while the circulation share of the top four national newspapers was 69% (Psychogiopoulou, Anagnostou and Kandyla, 2011: 17).

The economic crisis also affected media ownership structures. Some leading national media ceased operation, and some new media entered the market (Papathanassopoulos, 2020). Patterns of media ownership did not, however, change substantively. Shipping industry magnates and influential businessmen with ties to political parties still own some leading mainstream media of national range (interview with Lambrini Papadopoulou, 2022). At the same time, a number of new alternative media outlets were set-up as cooperative enterprises by networks of journalists and other media professionals who had been laid off collectively. These media outlets, most of which are active to the present day, aim to provide independent news and cover socially-relevant topics neglected by mainstream media outlets (Boucas and Iosifidis, 2020; Touri *et al.*, 2016; Siapera, Papadopoulou and Archontakis, 2015; Boucas and Iosifidis, 2020). In any case, high media ownership concentration persists, with media ownership remaining in the hands of a few media enterprises (Papathanassopoulos *et al.*, 2021: 180-181). It should be noted, however, that the data needed to assess the degree of concentration is either not publicly available (audience data and advertising revenues are collected by private companies) or is not collected at. Data on the share of non-national ownership is also not publicly available.

While Athens-based media of national range have become the most influential, local media have a long and important history in Greece. Following deregulation, a number of local radio and television stations started up; at the turn of the 21st century, practically every region in Greece had at least one radio station and TV channel which, like the nationwide broadcast media, was operating without valid licenses. However, since many had been launched by local businessmen primarily as a means of exercising local influence, rather than as business ventures proper, they tended to operate on a low budget and without much investment (Panagiotopoulou, 2010). These local media were also impacted by the economic crisis, as a result of which several local dailies, radio and TV channels ceased operation (Skamnakis, 2018: 12-23). Nonetheless, the market still includes an important number of local media outlets (General Secretariat for Information and Communication, 2021a; NCRT, 2021).

3.3. Public service media

Market liberalization was not accompanied by changes that would have enabled ERT to define its mission within a dual broadcasting system. ERT's news output was perceived as lacking credibility at the time, while its overall programming lacked variety. Successive governments tried to reform ERT. Then, in June 2013 in an unprecedented move, the government, a coalition of centre-right New Democracy, social-democratic PASOK and centre-left DIMAR, announced the overnight disbanding of ERT: its channels and website would be shut down until the launch of a new public service broadcaster. The explanation given was that ERT was mismanaged and it was too costly to operate at a time when the government needed to cut public spending in order to comply with the terms of the bailout deal it had reached with the Troika/creditors (Iosifidis and Katsirea, 2015: 9; Psychogiopoulou and Kandyla, 2013: 141-142). A new, leaner organization named "New Greek Radio Internet & Television" (NERIT) was established. It operated until January 2015, when newly-elected SYRIZA re-established ERT. ERT enjoys a broad public service remit which includes safeguarding pluralism and sustaining citizenship through, inter alia, the provision of impartial information, educational, entertainment and cultural programming.¹¹² ERT is financially independent, deriving income through a license fee levied on electricity bills as sums of no less than 3€ per month per bill.

The re-establishment of ERT did not, however, adequately address longstanding issues of management or take steps to ensure its Board's independence from ruling parties (Iosifidis and Papathanassopoulos, 2019). ERT's charter foresees that ERT will be managed by a board comprising seven members: the President, the Managing Director, two representatives of ERT's employees, and three members with special knowledge and expertise appointed for five-year terms which can be renewed only once. The President, the Managing Director and the three expert members are appointed as follows: The minister responsible for the media launches a call for applications, selects the candidates and subsequently reports on them to the Hellenic Parliament's cross-party Committee on Institutions and Transparency. The latter invites the nominees to speak at a public hearing and then delivers a report stating its opinion. The Parliament's role is thus limited to the Committee formulating and reporting its opinion. As the decision is taken by the minister responsible for the media, the possibility of partisan appointments of the sort that have troubled ERT in the past (Papathanassopoulos, 2010) cannot be precluded, posing a risk that ERT may not be able to perform its public service mission and contribute to deliberative communication in society.

3.4. Production conditions

Earlier studies show that the Greek media have remained attached to 'traditional' models of news organization and production for a long time. Until the late 2000s, multi-platform delivery and other technological affordances associated with digitization and convergence were not fully developed among Greek newspapers (Doudaki and Spyridou, 2014). By and large, journalists viewed the internet as a tool that empowered them to perform their (traditional) jobs better, but were reluctant or unwilling to capitalize on the potential it provided to engage in new and innovative news production practices (Spyridou *et al.*, 2013). More recent studies do, however, show that digital resources have gained currency in Greek newsrooms, affecting journalistic practices. For instance, online news media appear to have embraced the use of search engine optimization techniques, such as algorithms and audience metrics, while Greek journalists often use web analytics to check the online visibility of their stories (Giomelakis and Veglis, 2020). At the same time, however, data-traffic-driven news decisions are considered an emerging problem, in so far as they change the way news content is selected and created.

¹¹² Law 4173/2013 as amended by Law 4324/2015.

Greece does not have an investigative journalism tradition, and the decline in revenues during the economic crisis seriously limited the news media's ability to fund investigative news (Papathanassopoulos *et al.*, 2021: 224-225). However, scholars emphasize the potential for investigative journalism created by the emergence of alternative, mostly digital native, media outlets set up by networks of journalists and other media professionals during or in the aftermath of the crisis (Boucas and Iosifidis, 2020; Papadopoulou, 2020). Some of these organizations are explicitly devoted to the pursuit of investigative stories, funded through audience subscriptions, collaborations with foreign media and international grants schemes (interview with Lambrini Papadopoulou, 2022).

3.5. Journalists' agency

Journalists' position in the labour market can be taken as a factor indicating the agency of news professionals. Yet official data on the number of people who work as journalists in Greek news media, and on their average salaries, is not available. Collective agreements between journalists and employers (public and private) do exist, but they do not cover freelancers, and there is some doubt as to whether they are respected in practice. In any case, taking into account the impact of the financial recession on journalists' working conditions (see below), there is little reason to believe the labour market is strong and thriving for journalists.

The professionalization and autonomy of journalists are two other factors that might support their agency. Greece appears rather problematic in this respect, with the political parallelism of the media preventing the emergence of journalism as an autonomous profession (Papathanassopoulos, 2001). On the one hand, the end of the state monopoly over broadcasting, the expansion of the commercial media market in the 1990s and the ensuing need to attract audiences meant the Greek media had to loosen their close ties with political parties (*ibid.*). As a result, journalism became less clearly partisan than it had been throughout the 20th century. Nonetheless, media instrumentalization remained strong. Journalism continued to serve a model of advocacy in line with the political orientation and interests of the owners of the particular media organization (Papathanassopoulos *et al.* 2021: 189). At the same time, journalists themselves have often displayed a clearly partisan ideology, with some playing an overtly active role in political life or even running for political office (Psychogiopoulou, Anagnostou and Kandyla, 2014: 228). Others have become entangled in relations of multiple dependence on party officials, or on the public and commercial enterprises which invest or advertise in their media outlet (*ibid.*: 228).

3.6. Journalists' working conditions

The financial crisis of the 2010s had a profound impact on journalists' employment conditions and job security. As mass redundancies took place, the size of the employment market for journalists shrank, with the unemployment rate climbing to 50% in 2017 (Skamnakis, 2018: 12). In addition, journalists who stayed on the job had to accept pay cuts and, often, extended delays in getting paid (Papathanassopoulos, 2020: 133-134; Skamnakis, 2018: 12). Today, it seems that working conditions remain rather unsatisfactory, potentially impacting on the profession's ability to provide quality journalism. In 2019, the Union of Journalists of the Athens Daily Newspapers (ESIEA) informed the Prime Minister that working conditions for journalists were still highly precarious, and that a large number of journalists were employed on temporary contracts (ESIEA, 2019); 10% of ESIEA members were unemployed at the time. As far as types of employment are concerned (full-time, part-time, temporary, freelancer, etc.), there is not publicly-available data. However, research suggests that short-term contracts and freelancing have become the norm (Papathanassopoulos *et al.*, 2021: 219).

Challenges with regard to journalists' safety have also been noted. The latest Mapping Media Freedom report (Media Freedom Rapid Response, 2021) lists 22 incidents of threats and attacks against journalists in Greece. Overall, police and law enforcement were responsible for 41% of these incidents, many of which were recorded at demonstrations. In addition, 2021 was marked by the assassination of the crime journalist, Giorgos Karaivaz. The police noted that the "professional" style of the shooting indicated the involvement of organized crime groups.¹¹³ 2010, another journalist, Socrates Giolias, was murdered by masked assailants in front of his house. A terrorist group claimed responsibility for the murder, but no one has been arrested to date. Worryingly, harassment is also recorded as occurring in the workplace. Based on a survey of a representative sample of journalists conducted in 2010, Kodellas *et al.* (2014) found that almost one in five journalists had experienced physical victimization, including physical violence and harassment, in the workplace.

3.7. Intra-organizational diversity of human resources

Workforce diversity within journalistic organizations is assumed to support diverse reporting/coverage and enhance the ability of news media to provide for deliberative communication in society. Yet, official data and representative survey research that would enable a comprehensive assessment of human resource diversity and the representation of different age, class, education and cultural groups in newsrooms is grossly lacking in Greece. Nevertheless, research into aspects of gender equality raises some concerns. For instance, the 2021 Media Pluralism Monitor reports that the Greek PSM lacks a comprehensive gender equality and diversity policy (Psychogiopoulou and Kandyla, 2021). According to the European Institute for Gender Equality (EIGE) data for 2021, women are underrepresented in key decision-making positions within the PSM.¹¹⁴ With regard to private media, pay and career inequality seems to be an issue (Kyriazi *et al.*, 2008), although it tends not to be acknowledged as such by management (Papathanassopoulos *et al.*, 2021: 188, 195).

3.8. Journalistic competences, education and training

Access to the journalistic profession is open in Greece, and no specific academic qualification or training is required to practice the profession. While official data on journalists' educational background is not available, the recent Worlds of Journalism survey suggests that the educational level of Greek journalists is quite high (Dimitrakopoulou, 2017). Of the journalists surveyed, 37.5% held a Bachelor's degree, 21.4% a Master's Degree and 1.5% percent a Doctoral diploma. Note that media and journalism degrees have been offered at the university level in Greece since the late 1990s. Currently, there are four university departments in Greece offering bachelor's and master's degrees in media and journalism.

Professional development and training have never been fully embedded into Greek media organizational culture (Papathanassopoulos *et al.*, 2021: 222-223). It is indicative that ERT does not provide standard training courses for new recruits and does not offer regular professional development programmes (Papathanassopoulos *et al.*, 2021: 222-223). Within private media, some prominent groups formerly provided training courses for staff journalists, but the economic crisis impacted negatively on their ability to invest in such training on a regular basis (*ibid.*). Journalists' unions run occasional training courses on topical issues.¹¹⁵

¹¹³ <https://europeanjournalists.org/blog/2022/04/08/greece-remembering-giorgos-karaivaz-one-year-later-targeted-killing-remains-unresolved/>.

¹¹⁴ See https://eige.europa.eu/gender-statistics/dgs/indicator/wmidm_med_pbrc_wmid_media_pbrc_exec.

¹¹⁵ See, for example, <https://www.esiea.gr/category/seminaria-epimorfosis/>.

With the gradual implementation of new technologies in Greek newsrooms, digital skills have acquired the status of core professional competences for journalism. University journalism and media departments in Greece have included mandatory courses on the use of various ICTs in their curricula since the early 2000s (Lappa and Veglis, 2005). At the same time, issues related to journalists' ICT and internet knowledge and skills in relation to the gathering, production and dissemination of news have gained salience within the academic and professional discourse. Research suggests that journalists themselves recognize that ICT technical skills are vital (Dimitrakopoulou, 2017). In 2005, Greek journalists already regarded the ability to surf the web, to use e-mail and word processing software effectively, and to search online databases as necessary professional skills (Giannakoulopoulos and Kodellas, 2005). Greek professional journalists appear to have embraced ICTs and new technologies (Veglis and Pomportsis, 2014; Spyridou *et al.*, 2013). They are competent users of most common software packages and basic internet tools and services, and perceive themselves as fully capable of performing well in new technologies (*ibid.*). However, they appear to fall behind when it comes to more advanced ICT (i.e. sound and video editing) and Web 2.0 skills (such as blogs, wikis, Twitter and podcasts) (Veglis and Pomportsis, 2014). Moreover, journalists feel they have insufficient knowledge and resources to engage in data journalism (Veglis and Bratsas, 2017).

3.9. Professional culture and role perception

The multiple dependencies between the media and politics have affected journalists' professional culture along with their perception of their role. When polled in a 2002 representative survey, the majority of journalists reported that Greek journalism is not independent of political parties, the state and political elites (69.5%), and/or media ownership and commercial interests (82.8%) (VPRC, 2002). A majority of respondents in the same survey reported that instances of corruption were common within the profession (48.1%) (*ibid.*). Besides, the financial recession has also been credited for weakening professionalism by making journalists prone to practices of self-censorship (Boucas and Iosifidis, 2015). Within the context of particularistic relations between media and politics, research suggests that journalists, especially those working in mainstream media houses that followed a "pro-memoranda" editorial line supporting government policies, engaged in self-censorship in order to avoid getting fired (Iordanidou *et al.*, 2020; interview with Lambrini Papadopoulou, 2022). The recent Worlds of Journalism study, fielded in 2015, indicates that some of these trends persist. For instance, almost half of the journalists who took part in the study reported that the managers and owners of news organizations had a major influence on their work (47.7% and 42.2% respectively) (Dimitrakopoulou, 2017).

These developments, along with the advent of digital and social media, appear to have fed into a period of profound reflection within the profession. Studies suggest that Greek journalism is going through a profound crisis and journalists themselves acknowledge that a change of paradigm structured around core professional values is needed (Karadimitriou, 2020). It is perhaps telling that when asked by the Worlds of Journalism survey what they thought about their societal roles, Greek journalists considered it most important to, firstly, report things as they are (96.8%) and, secondly, allow people to express their views (86.1%). The findings also showed strong support for the 'fourth estate' roles of journalism: i.e. providing analysis of current affairs (80.2%) and the information people need to make political decisions (71.6%), plus monitoring and scrutinizing political leaders (65.3%) and business (57.2%) (Dimitrakopoulou, 2017). Indeed, the crisis facing Greek journalism has the potential to open up new opportunities and lead to a bottom-up renewal, feeding into new journalistic practices and initiatives (Siapera, Papadopoulou and Archontakis, 2015; interview with Lambrini Papadopoulou, 2022). Whereas the extent to which this potential will materialise will most likely depend on political, economic and social factors that are external to journalism, no going back to the previous status quo appears desirable (Siapera, Papadopoulou and Archontakis, 2015).

4. Risks and opportunities in the domain of media usage

4.1. Development and agency of change

Digitalization stands out as the main turning point with reference to media usage. The advent of digital media and the emergence of alternative news operators have diversified the media on offer, influencing media consumption in unprecedented ways. The identification of relevant trends in the field of media usage rests on data collection and analysis carried out by domestic academics, market research companies and research consortia at the European level. Research and business interests evidently impact on the methodologies, media and users targeted, which means that any insights gained into the state of the field will be fragmented and may not cover every relevant dimension.

4.2. Agency of media users and analysts

In the absence of a comprehensive media usage study conducted regularly for the entire media sector, the available data does not enable the identification of ‘active’ versus ‘passive’ groups of media users, taking factors such as gender or age into account. Audience and readership data compiled by market research bodies may have a demographics component, but is not publicly available.

According to Eurostat data (2021) with regard to internet users specifically, by the end of 2021, seven out of ten individuals aged 16 to 74 used the internet daily (up from 7% in 2003 and 47% in 2013). Two main reasons explain not using the Web: a lack of interest in/usefulness of the internet (46.7%) and a lack of technical knowledge/confusion with technology (35.7%). Other less significant reasons include not possessing an access device (4.4%), inability to bear the connection cost (4.2%), and lack of time (1.4%) (Tsekeris *et al.*, 2020). Data from the World Internet Project reveal that Greek internet avoiders are mostly married (69.7%) women (57.7%); they belong to the 65+ age group (59%), they do not have a job (84.1%; 61.7% are retired), and they have a family income of up to 1,000€ per month (60.2%) (*ibid.*).

Most Greeks identify themselves as quite experienced internet users, with an average of approximately 12.5 years of user experience (*ibid.*). Internet use is close to 100% in the age groups under 35 years. Numbers drop for older age groups (for instance, down to 22.8% for people over 65, according to data from the World Internet 2019 round). This points to a significant intergenerational gap, but internet use is increasing across all age groups. In the first quarter of 2021, nine out of ten individuals aged 16-74 years (90.4%) used the internet to read the news (Hellenic Statistical Authority, 2021). Studies confirm the success of the internet as a gateway to news among the young, too (Spyridou and Veglis, 2008).

4.3. Access to news and other media content

The liberalization of the broadcasting market in the late 1980s had a marked influence on media access. According to data from the NCRT registry, in 2001, 39 commercial TV broadcasters (ten of national range), 20 commercial radio operators in the Attica region and 16 commercial radio outlets based elsewhere in the country had informed the media regulator that they were operational (NCRT, 2002: 21). In 2010, the official NCRT data refers to 135 TV broadcasters (eight of national range; 75 of regional range; 52 of local range) and 988 radio operators (NCRT, 2011: 16).

In 2015, there were a total of 120 TV broadcasters (nine were national operators) and 918 radio operators (NCRT, 2016: 35-36). In 2021, there were nine national TV broadcasters (eight of which qualified as news media), 100 regional TV broadcasters (86 of which qualified as news media), and 867 radio operators (255 of which qualified as news media) (NCRT, 2021a; 2021b).

Available NCRT data also indicates there were two pay-TV providers and five content providers who delivered their programming via broadband networks (NCRT, 2020: 14).

The press market featured 66 national newspapers in 2000 (of which 27 were dailies, 14 weeklies, 20 Sunday papers, and 5 newspapers focused on economic affairs) (Athens Daily Newspaper Publishers Association, 2021). In 2010, the numbers had not dramatically changed: there were now 66 national newspapers (of which 21 were dailies, 15 weeklies, 24 Sunday papers and 6 financial papers) (ibid). By 2015, the impact of the financial crisis could be seen more clearly: there were 44 national newspapers (of which 13 dailies, 11 weeklies, 17 Sunday papers and 3 financial papers) (ibid). Towards the end of 2021, there were a total of 39 national newspapers (of which 16 were dailies, 7 weeklies, 15 Sunday papers and 1 financial paper); there were 226 local newspapers (General Secretariat for Information and Communication, 2021a).

The registry of online news media, which was introduced in 2015, listed 1335 digital outlets in 2021 (General Secretariat of Information and Communication, 2021b). By 2021, the share of households in Greece with internet access had risen to 85%, from 12% in 2002 and 54% in 2012 (Eurostat, 2021). The Hellenic Statistical Authority (2021) confirms the upward trend (85.1% in 2021 from 50.2% in 2011), as does the OECD data (OECD, 2021a) (85.1% in 2021, up from 21.7% in 2005). Mobile broadband subscriptions have also increased, from 11.5% in 2010 to 85.1% in 2019 (OECD, 2021b). Internet access still differs by degree of urbanization: households in cities, towns and suburbs have higher internet access rates compared to households in rural areas (Eurostat, 2021). Digital subscriptions for news increased from 7% in 2016 to 12% in 2021 (Reuters Institute, 2016; 2021).

4.4. Relevance of news media

ERT, the public service media operator, operates on different media platforms and through an online presence that is growing stronger and stronger. However, its ratings traditionally rank below those of commercial operators (Arianna, 2021). According to data from the Reuters Institute (2016-2021), in the period 2016-2021, the weekly reach of ERT's news bulletin ranged from 31% to 38%,¹¹⁶ with the occasional commercial TV broadcaster that featured first in audience preferences obtaining a share within the range of 50-55% (Reuters Institute, 2016-2021).

The internet has had a powerful impact on media consumption. According to the 2021 Reuters Institute Digital News Report (DNR), 89% of respondents consume news through the internet and more than two-thirds (69%) specifically through social media; 67% get their news through TV and 22% through the press (Reuters Institute, 2021). Eurobarometer data shows that in 2020-2021, the daily use of TV – both on a dedicated TV set and through the internet – stood at 73% and 14% respectively; the daily use of radio and the written press stood at 42% and 11% respectively, while 79% used the internet on a daily basis and 64% made use of social media specifically (Eurobarometer, 2021). TV viewing and website traffic increased during the Covid-19 pandemic (Chaimada, 2020). An increase in the average duration of daily radio listening in the regions of Attica and Thessaloniki was also noted over the same period (AEMAR, 2020).

Studies reveal high rates of alternative digital news consumption in Greece (Kalogeropoulos, Rori, Dimitrakopoulou, 2021). Data from the Reuters Institute confirms that in recent years, the online news outlet with the highest audience share was indeed a digital-native outlet (Newsbomb.gr) (Reuters Institute, 2016-2021). During the same period, Skai News, Ant1 News and Alpha News topped domestic audiences' weekly offline news media consumption (ibid.)

However, Greece also manifests high levels of news avoidance. According to the 2017 and 2019 Reuters Institute DNRs, the majority of respondents (57% and 54% respectively) said they

¹¹⁶ It was 38% in 2016; 36% in 2017; 31% in 2018; 33% in 2019; 36% in 2020 and 38% in 2021.

sometimes or often avoid the news (Reuters Institute, 2017: 41; 2019: 25); significantly, they did so on all platforms. According to studies into news avoidance practices, contextual factors (i.e. levels of media freedom, political freedom and stability, the characteristics of the domestic media environment, etc.) shape news habits and behaviour, along with individual factors such as demographics, political attitudes and news genre preferences (Toff and Kalogeropoulos, 2020).

4.5. Trust in media

Data from a broad range of sources reflect high levels of media distrust in Greece. According to the 2021 DNR, only 32% of respondents trust the news. For EBU's Net Trust Index (EBU, 2020), the majority of citizens in Greece (54%) have low or no trust in the media.¹¹⁷ Eurobarometer (2021) data and data from the Hellenic Statistical Authority (2021) reveal a similar trend.¹¹⁸ According to the Reuters Institute, trust in news on social media has remained steady at around 21-22% over the past four years.¹¹⁹

Lack of trust in the media is mostly attributed to perceptions of the news being biased, the journalism being low quality, and the content confusing, sensationalist and misleading (Kalogeropoulos, Rori and Dimitrakopoulou, 2021). Research into alternative news use associates trust in social media with plurality in the supply of information, the perceived independence of the news sources, and the self-empowering dimension of social networks in so far as they enable discussion, cross-checks and news coverage comparisons (ibid). Data from the European Broadcasting Union indicate that citizens perceive the public service operator to be subject to comparatively high levels of political pressure (EBU, 2020).

5. Risks and opportunities in the media-related competences domain

5.1. Development and agency of change

Media literacy entered the Greek public policy agenda in the 2000s, very much under the influence of EU and Council of Europe activity in this field; the country still lacks a well-developed media literacy policy, however (Psychogiopoulou and Kandyla, 2020). It would be, perhaps, more accurate to speak of sets of measures and actions undertaken by state bodies rather than a media literacy policy as such. Progress has been slow and, there have been no critical turning points, albeit the volume of relevant actions has increased with the diffusion of the internet and the intensification of media convergence. Responses have built on two approaches: one concerned with media literacy in formal education, and one that views media literacy as part of the media and digital policy agenda. This distinction is also reflected in the governance structure for media literacy. The Ministry of Education and Religious Affairs takes charge of media literacy in formal schooling, focusing on three dimensions: accessibility, critical use and understanding, and creative content production (interview with Sofia Papadimitriou, 2022). The GSCI and the Ministry of Digital Governance deal with media literacy as a lifelong learning skill within the context of audiovisual, media and digital policies. The establishment of the National Centre of Audiovisual Media and Communication (EKOME) in 2015 could potentially lead to a turning point in this domain. Currently under the auspices of the GSCI, the EKOME serves as a national

¹¹⁷ Respectively, 62% tended not to trust the radio, 78% tended not to trust the TV, 68% tended not to trust the written press, 44% tended not to trust the internet, and 59% tended not to trust social networks.

¹¹⁸ Respectively, 49% and 48.6% of respondents.

¹¹⁹ 22% in 2018-2019 and 2021; 21% in 2020.

representative and expert to the EU and on other media literacy fora. It has also been assigned the role of a ‘national hub’ for media, film and digital literacy within lifelong learning and the creative industries. Since its founding, it has promoted media literacy through projects, campaigns and partnerships with the Ministry of Education, other public stakeholders and civil society organizations active in the field.

5.2. Overview of media related competences in policy documents

The definition of media literacy in official documents in Greece has been closely aligned with the definition developed at the EU level. Since 2007, Greece had adhered to the general definition of media literacy set out in the Commission Communication on a European approach to media literacy in the digital environment (Andriopoulou, Papadimitriou and Kourti, 2014: 7). More recently, the law transposing the revised AVMS Directive in 2021 includes a provision on media literacy which mandates the GSCI, the NCRT, audiovisual service providers and video sharing platforms to take initiatives that “contribute to the development of citizens’ critical skills and knowledge, so that they are able to use media effectively and safely and to evaluate their contents”.¹²⁰

EKOME, for its part, adopts a wider definition which includes ‘media and information literacy’ (MIL). In its 2018 White Paper, EKOME puts the focus on those media and information literacy skills which allow citizens to “adopt an active and critical attitude towards news agendas, making wiser choices and contributing to the quest for high quality media content, all characteristics of a strong and competitive media” (EKOME, 2018: 4). Media and information literacy skills comprise basic skills (e.g. safe access storage and (re-)use in the digital environment), advanced skills (critical evaluation and analysis, content (re-)creation), and vocational skills (e.g. education and lifelong learning procedures for media professionals with regard to new trends in the audiovisual and digital media in the creative industries) (ibid: 5).

5.3. Information about the media literacy programs in formal and non-formal education

Media literacy education is not fully integrated into formal education in Greece. It is, nonetheless, included in the school curriculum, albeit not as a stand-alone or compulsory subject. Primary and secondary education curricula include elements of media literacy both as a cross-curricular subject and embedded within ad hoc school projects under various subjects (EMEDUS, 2014). Since 2006, media literacy education is also included in primary and lower secondary education as an optional subject under the ‘Flexible Zone of Inter-Curricular and Creative Activities Programme’ (ibid). Also, as of September 2022, a new module, Skills Labs, has been added to the primary and lower secondary education curriculum, featuring elements of digital literacy within distinct subjects for schools and teachers to choose to work on (interview with Sofia Papadimitriou, 2022).¹²¹ Besides these, the Educational Radiotelevision and Digital Media under the auspices of the Ministry of Education provides students with opportunities and tools to engage in multimedia content production, such as for instance, the Fotodentro i-create project (ibid).

Informatics and computer courses, which have been compulsory in primary and lower secondary education since the early 2000s, incorporate elements of ICT skills and digital competences. Moreover, in recent years, a number of steps have been taken towards the integration of ICTs into the school teaching and learning process. The Digital School Strategy, for instance, was

¹²⁰ Art. 35 of Law 4779/2021.

¹²¹ <http://iep.edu.gr/el/psifiako-apothesis/skill-labs>.

launched in 2010 and has since developed a digital repository infrastructure with high-quality, interactive content for teaching purposes (Megalou and Kaklamanis, 2018). These resources formed the backbone of the synchronous and asynchronous teaching delivered during the shift to remote teaching from spring 2020 on and through much of 2021 due to the COVID pandemic (OECD, 2020). Yet, as the Education and Training Monitor 2020 remarks, many school still suffered from infrastructure impediments related to connectivity and ICT technical support.¹²²

While media and digital literacy education have gradually entered formal schooling, teacher training in media and digital literacy is not provided systematically. That said, the Ministry of Education, in cooperation with other public bodies or NGOs, has organized training seminars for in-service teachers who wish to familiarize themselves with the use of media and the incorporation of critical skill development into content learning in the classroom (DIMELI4AC, 2019). In-service training on media literacy-related subjects for primary and secondary education teachers has also been offered through the online ‘Platform 21’ (since 2000)¹²³ and the thematic network on “Media Literacy: Television, Internet, Cinema” (since 2021).¹²⁴ A number of civil society organizations active in the field of audiovisual and cinema also organize training seminars on an ad-hoc basis (interview with Sofia Papadimitriou, 2022). Still, overall, efforts to train in-service teachers are mainly focused on the development of ICT knowledge and the application of digital technologies to teaching practice (DIMELI4AC, 2019). In any case, since participation in most of these training schemes is voluntary, it is debatable whether they have succeeded in building a solid foundation for the successful integration of elements of media literacy education into the classroom.

At the same time, increasing attention has been paid to media literacy in non-formal education over the years. Several media literacy projects and activities have been implemented outside the context of formal schooling by civil society organizations and public bodies, often in collaboration. For instance, two non-profit organizations (NGOs)-the Media Literacy Institute (MLI) and Journalists About Journalism (JAJ)-organized an annual ‘media literacy week (2017-2019) in cooperation with the Aristotle University of Thessaloniki’s Department of Journalism and Mass Media. Also, a handful of NGOs and civil society initiatives are currently engaged in the production of media literacy educational material and the organization of media and filmmaking activities for students and teachers (Andriopoulou *et al.* 2014: 17).

5.4. Media literacy initiatives: target groups

While there have been several media literacy initiatives in Greece over the last 20 years, there is no comprehensive information about the segments in society targeted by these activities and interventions. Mapping exercises for media literacy initiatives that would allow the identification of risks and opportunities in terms of reach and coverage are largely lacking. Nevertheless, evidence suggests that, for the most part, the focus of such initiatives remains on a limited set of core target groups. For instance, the European Audiovisual Observatory (2018) reports that the most significant media literacy projects implemented in Greece in 2010-2018 primarily addressed students and professionals (i.e. teachers, care and youth workers, academics). Of course, journalists and journalism students also feature among the main target audiences of media education and literacy workshops and seminars organized by the relevant university departments and journalists’ unions.¹²⁵

¹²² See <https://op.europa.eu/webpub/eac/education-and-training-monitor-2020/countries/greece.html>.

¹²³ See <https://elearning.iiep.edu.gr/study/course/index.php?categoryid=62>.

¹²⁴ See <https://www.edu4media.eu/>.

¹²⁵ See for instance, <http://pjl.jour.auth.gr/media-literacy-week-library-covid/>; <https://esiemth.gr/imerides-se-thessaloniki-ke-kavala-gia-ton-engrammatismo-sta-mme/>.

5.5. Assessment of citizens' media related competences

While the importance of empowering media users and enhancing their media and literacy skills as well as their cognitive abilities is receiving increasing recognition at both the scholarly and policy level in Greece, no systematic system-level efforts are in place to collect relevant individual-level data and monitor the state of the field. Data collected by European and international sources do provide a basis for assessment, albeit a relatively limited one.

For instance, it appears that the cognitive abilities and skills of the Greek population are rather poor. According to the OECD's survey of adult skills, Greece ranks relatively low in terms of information-processing skills (OECD, 2015). As regards literacy, measured as the ability to understand and respond appropriately to written texts, 26.5% of adults in Greece were found to have poor skills (at or below Level 1 in literacy), which is far above the OECD average of 18.9%. The share of adults in Greece who score at the highest levels of proficiency in literacy stands at around 5%, which is also lower than the OECD average (10.6%). Differences in skills proficiency which relate to sociodemographic characteristics do exist, but these are not particularly pronounced, especially among age-groups. Students' performance is also alarming. In the 2018 PISA study, the mean reading score of Greek students was 457 on the PISA scale, which is lower than the OECD average of 487. A downward trend has also been noted: the average reading performance achieved by students at the age of 15 seems to have reached its peak in 2009, and to have been steadily declining since (OECD, 2018b). When it comes to digital skills across the population, levels have improved, though Greece is consistently below the EU average. According to Eurostat, the proportion of citizens with basic or below basic digital skills in Greece was 51% in 2009 (EU average, 58) compared with 44% in 2015 (EU average, 55).¹²⁶

6. Conclusion

Since the democratic transition of the mid-1970s, the development of the Greek media has been closely associated with the structure of the country's political economy and the trajectory of the interconnections between the domestic political system and the media. This has defined how the media operates as well as the ways in which journalists engage in reporting and, more generally, perceive their role. Media regulation and the sector itself have transformed over time in line with changing economic conditions and the new possibilities introduced by digitalization and technological evolution. The liberalization of the broadcasting sector in the late 1980s stands out as a turning point in the development of the Greek media. Over the past twenty years, the economic recession, digitalization, and processes of convergence have emerged as forces creating new risks and opportunities for the operation of the media. However, they have not affected all of the four domains under study to the same extent.

In the legal domain, constitutional provisions provide guarantees for freedom of expression, recognize the freedom of the press, safeguard freedom of information, and define the values that the media should serve along the lines of the public interest and other normative principles. Regular and intense law-making, which is a key characteristic of the Greek legal order, has fleshed out the constitutional guarantees thus set forth. Legal amendments seek to respond to present-day conditions along with technological and other challenges, often following EU regulatory action in the field. In designing and implementing laws and regulations for the media, the balancing that takes place between freedom of expression, freedom of information, and other rights and interests seeks to reconcile competing positions without curtailing freedom of expression and the right to information. Nevertheless, some risks can be identified. This is the

¹²⁶ See https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=isoc_sk_dskl_i&lang=en.

case, for instance, with the recent amendments made to the Criminal Code to combat disinformation, which have been criticized for clearing the way to censorship due to their vague wording. Greece also appears to lack a genuine freedom of information legal framework: the material scope of existing legislation is restricted to access to administrative documents, access requests have to be justified, and there is no independent oversight body with binding decision-making powers and the ability to impose sanctions. Judicial practices in media-related cases have also, at times, been found by the ECtHR to result in unnecessary restrictions.

In the domain of ethics, the problems are longstanding. Approaches to accountability are patchy and do not address the dynamics and challenges of the digital age. The system of professional accountability rests with the journalists' unions and does not involve the media organizations. As such, it cannot guarantee that ethical standards are being applied and respected in reporting. Similarly, accountability instruments are also lacking at the organizational level, since the Greek media have generally refrained from engaging in individualized or collective self-regulation. All these present serious risks for the domain of media accountability.

The impact of the economic recession and digitalization has been felt more strongly in the domain of journalism. These have had far-reaching repercussions on the context in which journalism has operated, affecting media market structures, working conditions and reporting practices. Economic hardship has threatened the fragile sustainability of the media market and put journalists' employment conditions under strain, narrowing the space for journalistic autonomy. Digital transformation is often cherished by Greek journalists for its potential to help them perform better and more efficiently. However, it has also created new burdens on the practice of the profession, as journalists are now required to master ICT tools and skills and adapt their reporting practices accordingly. The precise effects of such developments have yet to crystallize, though journalism does appear to be in a state of transition with journalists and the media having to redefine their role in this context.

In the domain of media usage, the preceding analysis shows that digitalization and the diffusion of the internet has had a profound impact on media access, increasing diversity in terms of the media on offer. Media supply has expanded with the addition of online media outlets and alternative news sources. However, patterns of low trust in the media persist, and this also applies to the public service broadcaster. The latter has not been able to gain credibility, with citizens deploring political pressure on its operation. Certainly, the major source of concern in this domain is the absence of comprehensive data collection structures, which prevents the regular assessment of the entire media sector in terms of users' media access. The data compiled is fragmented, which undermines efforts to gain knowledge on the state of the field.

In the domain of media-related competences, media literacy has been gradually institutionalized in response to EU-level developments and the challenges introduced by digitalization. This is also reflected in the incorporation of elements of media education in the school curriculum, although the emphasis is mainly on ICT skills and digital competences. All in all, a thorough media policy strategy has yet to be developed. Civil society is active in the field, where it has implemented numerous initiatives, often in collaboration with public actors and within the framework of EU projects and networks. This creates a dynamic that could be further bolstered by streamlining and coordination, so as to ensure that all target groups are covered and the impact maximized. Efforts should also be made to improve the collection of individual-level data on user competences. Existing data covers a limited set of aspects and does not allow the risks and opportunities relating to media-related competences and user autonomy in the changing media environment to be identified.

Concerning the influence of different actors in driving risks and opportunities in the domains under study, the role of the state cannot go unremarked on. State actors obviously play an important role in defining the legal context in which free speech and freedom of information can

be exercised. EU-level rules and international human rights also contribute to the design of the legal framework. State influence is also clearly discernible in the domain of journalism. Media policy-making has been highly centralized, reflecting efforts to keep a close eye on the operation of the media. This has impacted journalistic professionalism, fed into the marginalization of the public service broadcaster, and undermined the role of the media regulator. Nonetheless, the latter has recently taken steps to revitalize its regulatory activities; the transposition of the revised Audiovisual Media Services Directive in July 2021 has also increased its competences. For their part, commercial news media have in general refrained from investing in quality journalism. It is to be noted that the Greek media have not set up media accountability instruments, and that they do not participate in the existing system of professional self-regulation. The latter involves only the journalists' unions and their members. The analysis also shows that several other actors engage in data collection and research into aspects of journalism, media usage and media-related competences, while civil society is much involved in media literacy initiatives. This does not, however, suggest that these actors play an important role in driving risks and opportunities for the Greek media.

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Skype Interview with Lambrini Papadopoulou, Assistant Professor, Department of Communication and Media Studies, National and Kapodistrian University of Athens. 27 October 2022.

Telephone Interview with Christina Akrivopoulou, Doctor in Constitutional Law (Aristotle University of Thessaloniki). 2 November 2022.

