ABSTRACT
Media literacy target audiences are an important part of media policy. Other national media policy objectives, such as quality and responsibility of the mass media, safety, and sustainability of the media environment, are also related to society's media literacy. Aligning policy measures with the changing challenges of modern media use is not an easy task. Without systematic research, policy makers lack an in-depth understanding of the needs of media users and cannot be accurate in providing support mechanisms. By adopting a mediatization framework, this study seeks to dissect the symbiotic relationship between media and society within a mediatized context, paying particular attention to how media logic intertwines with various social subsystems and influences the trajectory of media policy development, specifically in the realm of media literacy. Drawing upon bibliographic data from the Mediadelcom project and conducting a meticulous content analysis of national media policy documents, we critically evaluate the media literacy policies in Austria, Bulgaria, Latvia, Romania, and Slovakia. The study aims to underscore how an overreliance on media logic and negligence of audience needs thwarts the efficacy of media literacy policies, ultimately hindering their capacity to fulfil their intended objectives. This research endeavours to illuminate these dynamics, providing valuable insights and recommendations for policymakers striving to enhance media literacy and foster a more informed, responsible, and resilient media landscape.

KEY WORDS
1 Introduction

To better understand the development of a policy, academic theories conceptualising the policy process propose to study a policy cycle – a set of stages and steps that allow a closer look at processes, decisions, and actors of policy making. In the various models, the first or one of the first stages is connected to the information, problem definition, and agenda setting. Jann and Wegrich describe the agenda setting process in the policy cycle as being attached to political attention: “As numerous studies since the 1960s have shown, problem recognition and agenda-setting are inherently political processes in which political attention is attached to a subset of all possibly relevant policy problems. Actors within and outside government constantly seek to influence and collectively shape the agenda (e.g., by taking advantage of rising attention to a particular issue, dramatising a problem, or advancing a particular problem definition). The involvement of actors (e.g., experts), the choice of institutional venues in which problems are debated and the strategic use of media coverage have been identified as tactical means to define issues.”

This shows how, at this stage, the policy process is not only profoundly interconnected with media activity by shaping the issue or problem, but media logic might influence the very definition of the problem or issue the policy is developed to handle. In the case of policy aimed at increasing media literacy in a country or media literacy policy data used to describe media audiences gathered for commercial means and strategic use of media coverage by actors involved can be considered as possible sources of influence.

Analysing the data used to develop the media policy documents, we found that the policy documents included quantitative data on media use, offering these data as a basis for discussion on audience media consumption change, digital technology use and disinformation. However, wide areas of the media literacy issues remained intact. Thus, politics defined media literacy in a way whereby some aspects of the complex of media related competencies are not envisioned in the policy and its implementation plan. In Latvia, for example, the same data were employed to assess society’s media literacy, public media development and media regulation priorities. In Romania, much of the effort and support of the state goes to disinformation recognition skills as part of the national defence policies. Austria places a strong focus on basic digital education as part of its school curricula, not least to prepare young people for the current demands of the labour market.

In our study, we hypothesise that understanding media audiences is important in defining media literacy issues, but media policies were developed by following general trends of media logic without linking media audience data to media literacy research data that are not always available for all areas of media related competencies.

For example, the data used to develop Latvia’s media policy reflect the structure, methods, and priorities of audience research available in Latvia. Since 2000, the Latvian media audience has largely understood by collecting the quantitative media consumption data which are designed to attract advertising investment to media organisations. The understanding of media audiences is based on data collected in the interests of the commercial media in other countries too, like for example “Media-Analysen” in Austria, obtained using uniform methods and presented descriptively. In many countries, there is a lack of research that would explain media perception,
societal attitudes towards the media and media effects in a more complex way that would form a fundament for policy makers. To build a conceptual framework for analysis of links between media policy development and societies we use a mediatization theory approach⁴, which helps to understand the relationship between media and society in a mediatized world.⁵

2 Theoretical Approach

In order to answer those questions we conceptualize media literacy and media literacy policy in the contemporary social world saturated by media.

2.1 Media Literacy from the Perspective of Mediatization Theory

Media exert an unprecedented and profound influence on our daily lives, shaping organisational processes and leaving their mark on every facet of society. This phenomenon, termed “mediatization”⁶, extends across various domains and societal levels. It manifests in public affairs, politics, social institutions, organisations, interpersonal relationships, gender dynamics, daily routines, employment, consumption patterns, and lifestyles. Much like other overarching processes such as globalisation and individualization, mediatization holds sway over society highlighting the importance of re-thinking and re-conceptualising – not only the governance principles in the mediatized world, but also the way we act as rational and responsible people and citizens.⁷ In other words, an analysis of contemporary society shows it, along with its subsystems, to be increasingly mediatized so that from every member of society a certain level of media-related knowledge and skills is required to participate in social life and follow his/her own goals. This is why media literacy has gained more and more attention as a fundamental part of contemporary literacy – a literacy for all. Not only must a media literate person possess knowledge about the role and functioning of media in contemporary society, especially in the context of democratic participation, opinion making and deliberation, media literacy includes access and practice, media related knowledge and skills, creativity and criticality. So if understanding of mediatization and mediatized society is an integral part of media literacy it must be achieved from inside media related practice.

Another aspect is the changing media environment. The significance of traditional mass media based mediatization was challenged by the digital communication’s impact on society in the first decades of the 21st century where it became evident through the substantial increase in internet users and the expanding array of ways people use these technologies, significantly shaping their lives. Consequently, there is an increasing necessity for integrating the understanding and use of these technologies into our everyday routines and social interactions. Because of social media and the wide use of algorithms utilising metadata for retrieval of

information in user’s feeds, informed, responsible and competent usage by all communicators in on-line communication is in the common interest\(^8\) and a pre-condition for the functioning of deliberative democracy.

Media literacy is a complex and changing concept. The definition of it and the inclusion into the concept of competencies needed to deal with media and messages in everyday life is an increasingly challenging task. From access to media and skills of usage of media tools for message processing, to critical thinking and reading and critical attitudes towards any type of information, from understanding the modal specifics of a text to coding ability, from effectiveness to ethics, from protection to support – media literacy skills in general must include the critical use of any kind of media and acknowledgement of the role of both traditional mass and social media.

In addition the contemporary interpretation of media literacy is directly linked with an accent on access and the usage of media in social life.\(^9\) It means the media competent person is able to implement his/her ideas by taking active part in social life, using media as a source of information, but also a place where social linkages are made, and social life happens – a place of deliberation and discussion.

In sum, media usage in mediatized society requires appropriate competencies in dealing with old and new technologies in a critical way. The most urgent needs and combinations of competencies is a matter of discussion, deliberation and decision, but it is clear that depending on the respective political interests, perception of actual needs as well as plans and goals set, the media education’s focus can differ. Currently, for example, policies mostly focus on measures related to dealing with propaganda and disinformation, truth and untruth in the media, as well as skills, mostly digital ones, required in the working market, where, for example, at the end of last century multimodal (and visual) and multimedia skills were more in focus etc. Moreover, different types of government and non-government actors are involved to negotiate the agenda building for changing literacy policies – the respective sets of related competencies, institutional set-up, learning methods and environments – including academic researchers proposing their research data and conclusions to inform policy makers. This is the context in which research-based knowledge about media use and gaps in media related competencies of the population must be taken into account. One of the challenges is the problem of conceptualising the network of organisations involved in the implementation of policies itself. Policy makers have to think of directing a multi-level network of actors which act in research and monitoring of the media usage field, and which can identify problems translating them into lack of/gaps in competencies as well as in the field of implementation of foreseen actions. Interaction between different sub-fields like education and media industry is required. The place of media literacy policy is to mobilise resources from different fields to help individuals to deal with the above-described challenges.

In her article Media Literacy for All? On the Intellectual and Political Challenges of Implementing Media Literacy Policy Sonja Livingstone, who constantly advocated for media audiences being heard and taken in account in building knowledge based on media literacy pointed out another important aspect. Describing the inconsistency between goals and means in media literacy policy she stresses the complexity of the issue along with its urgency and the need of interactive involvement of different stakeholders and actors, e.g. schools and industry: “Some of these actions would serve to embed the means by which our ambitions for media literacy may be met. The thorough incorporation of media literacy objectives within the school curriculum. A commitment to elucidate, explain and support the public as they engage with both

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\(^9\) Media and Information Literacy. [online]. [2023-09-19]. Available at: <https://www.unesco.org/en/media-information-literacy>. 
publicly and privately provided media themselves. Both of these will require state support if they are deliberately to include and provide for those who are relatively disadvantaged in society. [...] It is crucial to find a means of limiting the potentially escalating requirements of media literacy and, therefore, the potentially escalating burden on individuals. Otherwise media literacy will never be accessible by all.”

But how to understand “all” in the context of media literacy to develop a media literacy policy that meets the needs of all different groups both separately and all together? The concept of all has an aspect of diversity, an aspect of totality and an aspect of multitude. In the context of mediatization one needs to think of a total number of all individuals making different choices upon media and content, having different opinions, needs and expectations both provoked and gratified by uses of certain formats involving media logic. It also means the maximal attention available for media messages in a given society that can be mobilised in a certain form of political capital.

One of the paradoxes or difficulties of the task of formulating and discussing with stakeholders a proper agenda for media literacy policy is the lack of proper knowledge of the quickly changing audience habits of everyday media use and the need for adequate media literacy measurement to assess literacy directly in the context of media usage; the other aspect is the model of policy making in the context that is transgressed by media logics.

The impact of mediatization on politics is widely discussed. In focus is the interaction and mutual impact of both political and media logic or news media logic understood as a specific format of media coverage driven by professional, commercial and technological factors. Several studies apply the concept of mediatization to the understanding of the development of policy including subfields of media and educational policy. But mediatization is a deep process. Besides the structural models of society in change that show the deep role media play, policy makers need more insight into mediatization processes from a media user’s everyday perspective – the emic perspective.

To help audiences to deal with the “media literacy burden” media literacy policy has to base its critical vision of media development and changing role in social transformation processes and of usage practices (whereby usage practices not only are determined by this development, but in a way shape the development itself) 1) involving more social actors to discuss their perspectives, 2) proactive, creative thinking and 3) design level innovations not being involved with existing media logics is an important task for media literacy policy makers.

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2.2 Making Media Literacy Policy in the EU

As discussed previously, changing media related competencies is an essential part of key competencies for involvement of an individual in social life, work, leisure, development, self-expression and active participation in the political processes of today. That requires permanent and flexible adaptation of the existing media and educational policies with the needs people have in their everyday media use. One of the first issues on the agenda is the list of competencies needed. Policy makers in the EU developed key competency frameworks. Many of them related to the domains of digital and civic competencies are required in the contemporary media environment – including information and data literacy, skills of communication and collaboration, general critical understanding of media specifics and functions of media in democratic society, digital content creation, safety, intellectual property, problem-solving, critical thinking, ethics, skills and competencies related to argumentation and participation in civic activities etc.\(^{18}\)

There are some other relevant EU documents that mark a longer history of expanding actions for media literacy development in society. As early as 2006 the Recommendation of the European Parliament and of the Council of 20 December 2006 on the protection of minors and human dignity and the right of reply in relation to the competitiveness of the European audio-visual and on-line information services industry\(^{19}\) was an important basis for development of further steps. Other documents include Decisions No 1718/2006/E, No 1855/2006/EC and No 1041/2009/EC.\(^{20}\) After 2006-2010’s period of activity in the field of media literacy this subfield of policy was moved under control of the Directorate of General Education and Culture from the Directorate General Information Society that pushed the actors to reformulate the focus towards more practical settings of formal and informal education – a level more connected to decisions on the national level.\(^{21}\) Regulation (EU) No 1295/2013 of the European Parliament and of the Council\(^{22}\) establishing the Creative Europe Programme (2014-2020) came with a new vision and created the basis for new developments. Important focusses were set by European Parliament resolution of 14 September 2017 on a new skills agenda for Europe (2017/2002(INI)) (95-97)\(^{23}\), on 16 March 2017 European Parliament Resolution of 16 March 2017 on e-democracy in the European Union: potential and challenges.\(^{24}\) They created the background for further activities.

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More recent focus is on a complex of competencies to stand against spreading on-line disinformation and fake news. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: Tackling Online Disinformation: a European Approach of 26.4.2018 especially stresses the need for the involvement and cooperation of stakeholders including public authorities, private (media) companies, platforms, advertisers, journalists, NGOs and others to achieve long term solutions. Special attention is given to educational settings. (Action Plan from 5.12.2018.) The Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 including Article 33a as an amendment to the existing Audio-visual Media Service Directive asks member states for concrete measures to act to develop media related competencies. It is also supported by setting of priorities for the Creative Europe programme 2021-2027 and other programs. However, as has been shown above, it is a very complex and dynamic task, especially, given the two-fold (media – education) structure of both conceptualising and implementation of media literacy policies that leaves some groups out of reach for the activities and measures and the many types and fields of primary activity of stakeholders and actors. Taking in account that EU policies were built on a rather reactive not proactive approach, and the following national policies come with certain time-lags, researchers critically observed a disconnection in EU media literacy governance. This disconnection, the gap between means and goals, the insufficient inclusion of all societal groups brought researchers to describe media literacy policy in Europe as “low level.”

2.3 Changing Media, Audiences and Media Related Competencies: What We Know Now and What We Don’t

The core of the problem might be the focus – the difficulty of the definition of media literacy in a media environment that is permanently in flux in terms of both technological innovation and usage and content formats followed by changing types and styles of use. The problem of definition is still a challenge because it must be relatable to all the most important aspects where possible problems can emerge and be fought by relevant skills and knowledge according to the concept of ML. The report of an expert seminar in 2013 pointed to the necessity of focussing the agenda on media literacy policy: “Strategically, there are advantages in formulating a focused agenda to incentivise politicians and other -makers to lobby for media literacy initiatives and funding.”


Translated into the complexity of ML it means to map the semantic field of ML in such a way that the most urgent needs and most threatful gaps of ML in society become remarkable. This is why in order to develop sustainable ML policy there is a need for nationally representative ML research based on methods that not only give an account on best practices and add self-reporting of uses and knowledge and skills of consumers, but assess multiple individual skills in the contexts media use and effectiveness of teaching interventions. Even if several assessment instruments are created and surveys of ML in different age groups undertaken, there is no comprehensive research done and no universal criteria negotiated.

To assess media literacy level in a country in general, several contextual aspects and sets of competencies must be taken in account. For policy purposes, there is a need to develop combinatory and comparative instruments that can assist policy makers to understand the impact of the various elements in play. One of the few surveys that can serve as a benchmark and is relevant to media attitudes is the Media Literacy Index. The Media Literacy Index is produced within the European Policy Initiative (EuPI) of the Open Society Institute – Sofia and assesses the potential for resilience against fake news in 41 European countries using indicators of media freedom, education and public trust. It combines several indicators and takes as one of the first indicators media freedom. Since the indicators have different importance, they have different weights in the model. Media freedom indicators have the greatest weight (Freedom House and Reporters Without Borders) along with education indicators (PISA), and literacy has the highest share among education indicators. The indicators of e-participation (UN) and trust in people (Eurostat) have less weight compared to the other indicators. The Media Literacy Index was first published in 2017 and included 35 countries, while the 2022 edition has added several more countries, bringing the total to 41 countries in Europe included in the assessment. The indicators are media freedom, education, trust and new forms of participation that have an indirect relationship with media consumption. The countries included in the scope of this article except Austria are from 2017 when the initiative was started, located in the middle and lower part of it. In the MLI 2023 they rank respectively as 14th (Austria), 18th (Latvia), 23rd (Slovakia), with Romania (34th) and Bulgaria (35th) completing the list of EU countries.

Some of the countries analysed here are also included in the Digital News Report. The Reuters Institute has conducted a survey every year since 2012, which in recent years has reached the scope of 46 countries. This survey offers a wealth of information covering population statistics, internet consumption, leading media brands, data on media ownership, media consumption, media trust and social media use. Evaluating media literacy positions, for example, in 2018, it was discovered that Romania and Bulgaria are among the countries with the highest self-reported exposure to completely made-up news stories.

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3 Methodology

This paper is developed as a part of the MEDIADELCOM (mediadelcom.eu) research project which has as one of its goals to discover the capability or incapability of the research on media and journalism in the first two decades of the 21st century in 14 EU states to monitor the risks and opportunities in the related fields for deliberative democracy. Media related competencies was one of the fields included in the study. Therefore, methodologically, the paper is based on the results of the countries’ case studies and analysis of bibliographical databases.

To explore varieties of interrelations between state driven media literacy policies and citizens’ media use we have set the research questions as follows:

RQ1: How was the national media literacy policy developed (including agenda identified, context, objectives, actors, and factors that have been involved in consultations and discussions and influenced the conceptual design of the country’s media literacy policy and its translation into practical instruments and programs of implementation)?

RQ2: What kind of research data were available / were used by policy makers? Was there a political discussion of the agenda?

RQ3: What are possible gaps in policy vision resulting from the media logic-based media literacy policy?

4 Results from National Case Studies

Following the defined RQs, the chapter summarises the media literacy policy processes of five countries, analysed in the context of available research data.

4.1 Case Study: Austria

In Austria, media literacy and media education have played crucial roles in research and teaching for many years. However, with the rise of digital media, these fields have evolved into central disciplines with a cross-disciplinary approach. Public institutions, including universities and university colleges, primarily conduct research on media literacy. Private initiatives, often supported by the federal ministry, implement various measures to enhance media competencies. Non-university efforts and projects receive support from private institutions and organisations, often funded by the Federal Ministry of Education, Science and Research. These initiatives also provide resources for teachers to use in the classroom.

Austria’s policy relies on various sources, including international data from organisations like the OECD, Eurobarometer, and PISA, and domestic sources like Statistics Austria.

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41 Autors’ note: See the RTR Media Competence Atlas to get an overview of current projects, available at: <https://medienkompetenz.rtr.at>.


43 Statistics Austria. [online]. [2023-08-30]. Available at: <https://www.statistik.at/en/>.
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responsible for federal statistics, or the recently published *Media Literacy Report* by the Austrian Broadcasting and Telecom Regulation (RTR). Austria’s involvement in the *Digital News Project* since 2015 further contributes to the availability of valuable data.

The primary legal reference in this domain is school curricula. In addition to EU-level initiatives, the mandatory subject “Basic education in digital skills” (*Digitale Grundbildung*) has been introduced for lower secondary education students from the 5th to the 8th grade.

Since this achievement represents a pioneering role across Europe, the media reported on it. Apart from that, media literacy is usually only discussed in the media when it comes to fake news or cyberbullying. As for the gaps in the political vision resulting from media literacy policies based on media logic, there is no doubt about the simplistic approach of contemporary media education policy, which increasingly focuses on digital competencies.

4.2 Case Study: Bulgaria

In Bulgaria, non-governmental organisations play a major role in media literacy initiatives. One of the first attempts to supplement media literacy campaigns with concrete empirical data is the 2022 study presented by the Media Literacy Coalition, which is also a major driving force behind organising initiatives to increase media literacy among both students and teachers and the elderly. In 2022, the organisation presented the results of the first national survey of digital media skills of high school students in Bulgaria. The study was carried out in partnership with the Centre for Assessment in Pre-school and School Education at the Ministry of Education and Science and with the support of the “Active Citizens” Fund within the framework of the “Integral Approach to Developing Students’ Media Literacy” project. The study was conducted among 4,300 students across the country, with two tests that measure cognitive skills according to the European DigComp 2.0 framework.

A national representative survey of the Bulgarian Centre for Safe Internet from 2016 analyses the digital media competence of Bulgarian children between 9 and 17 years of age on the basis of their behaviour on the Internet. Bulgarian children use the Internet often and in a more mobile way, which helps them develop their technical abilities, according to the *Digital and Society Index* (DESI). Most of them have digital identities and claim to be able to protect themselves from inappropriate content. A large percentage of children even claim to use programming languages.

Some of the research regarding early training in media and digital literacy are related to conducting various initiatives for the creation of such skills in students and to collecting data on the habits and attitudes of children and young people. They also contain specific recommendations and proposals that will lead to an increase in their media competencies. The basic idea is that media and digital literacy is becoming a mandatory part of the notion of literacy per se and early training is necessary and important for development, adaptation, education and successful socialisation in the future. Every year the *Coalition for Media Literacy* organises the campaign “Media Literacy Days.”

National policy on media literacy is still underdeveloped in normative terms. The first legal document related to media literacy is the *Preschool and School Education Act*, but the law does not contain an official definition of media literacy, and media education is not explicitly linked to the allocation of resources. Media literacy is only implicit in this new law. Media literacy was introduced in the curriculum of formal education in Bulgaria in 2018 with the

44 *Der Medienkompetenz-Bericht 2022*. [online]. [2023-09-11]. Available at: <https://www.rtr.at/medien/aktuelles/publikationen/Publikationen/Medienkompetenz-Bericht.de.html>.

45 *Digital News Project*. [online]. [2023-08-30]. Available at: <https://reutersinstitute.politics.ox.ac.uk/digital-news-project>.

amendment of Ordinance No13 of 21.09.2016 on civic, health, environmental and intercultural education. However, for the development of media literacy and competence only ten school hours are provided for the twelve-year course of secondary education in Bulgaria. At the end of 2020, the requirements of the Audiovisual Media Services Directive were transposed into Bulgarian legislation for the introduction of measures to promote and develop media literacy of citizens of all ages and for all media (Article 32, para. 24 and Article 33a of the Radio and Television Act amends SG No. 109/2020, in force since 22 December 2020). Although civil society organisations, such as the Media Literacy Coalition, actively organise and conduct media literacy training, including for teachers and the elderly, such initiatives cannot offset the need for systematic education.

Data from the surveys related to media literacy and media competencies are mostly from the period 2016-2021 and they have been increasing in recent years. They are mainly the work of non-governmental organisations and scientific researchers. Research, publications and studies that address media competencies usually take a complex approach – both qualitative and quantitative analysis.

A lot of research and initiatives in Bulgaria related to addressing media literacy are available on the Internet. The main emphasis is on the importance of media literacy in the modern world and the need to work to improve the skills and competencies of media content users. Most studies are not done systematically, but register the processes for a certain period of time, although there exist studies and analyses in recent years, which are carried out annually.

The analysis outlines the need for more periodic and systematic studies of the level of media competencies of the audiences in the context of characteristics such as education and social status and, accordingly, of criteria for assessing the quality of information. Greater specification of media literacy policy is needed in terms of audience demographics, educational characteristics, and greater emphasis on critical thinking and selection of information sources to identify fake news.

4.3 Case Study: Latvia

The structure and content of media literacy (ML) policy development in Latvia mirror the critical junctures that have affected Latvian society and the media environment in the last decade. Among them, the most significant are the effects of digitization, influence of disinformation, school curriculum reform, the global pandemic, and Russia’s full-scale invasion of Ukraine. Media literacy implementation in Latvia has been driven by influential global and EU organisations whose evaluation criteria and research instruments (PISA test of OECD, UNESCO educational initiatives and ML conceptualisation, EU media literacy mapping project, etc.) define the state’s task to create a constructive response that concerns the development of media and information literacy (MIL).

In 2016 media literacy was included as one of four important priorities in Latvia’s first ever mass media policy guidelines 2016-2020. The concept chosen in policy documents combines information and media literacy (MIL). The ML implementation plan aims to allocate resources to the studies of society ML via regularly monitoring the public’s self-assessment of media

use and media influence, as well as the ability to recognize misinformation being researched.\textsuperscript{51} However, these studies, which are based on respondents’ self-assessment data,\textsuperscript{52} do not provide a full insight into the public’s media literacy. This means that policy makers have an insufficient understanding of the public’s media related competencies, such as resilience against disinformation and digital skills.

The media policy, the continuation of which was not developed and adopted until 2023, focused on improving the MIL knowledge of individuals, including MIL in educational content, the aim to educate MIL teachers,\textsuperscript{53} and preparation of learning materials for MIL training at all levels of education. Children and young people, following representatives of older generations in 2022,\textsuperscript{54} are the main groups of society whose quantitative and qualitative research data on media use and media perception have been used to determine the target groups of MIL policy.

The political discourse and policy documents in the ML context are dominated by the task of ensuring the security of individuals by developing critical thinking and media usage skills, as well as the development of a responsible and safe media environment.

The activities defined in the first media policy determined that professional media, with the help of projects financed by the Media Support Fund, were encouraged to regularly offer content dedicated to ML to the audience, paying special attention to debunking disinformation, fact-checking materials, and media criticism.

The second direction of Plan for Implementation of the Mass Media Policy Guidelines of Latvia 2016 – 2020 (hereinafter – the Plan)\textsuperscript{55} included improving the understanding of ML across various social groups, including librarians, youth and children, specialists in youth affairs of local governments.

The main actors\textsuperscript{56} who have promoted the introduction of media literacy in the discourse of politics and society are the University of Latvia, the National Library of Latvia, the National Council of Electronic Media (responsible for implementation of EU Audiovisual Media Services Directive), and the UNESCO National Committee. At the government level, MIL falls under the responsibility of the Ministry of Culture and the Ministry of Education and Science.

Since EU policy initiatives and the changes in media use and media environment have also determined the development of ML, it was initially influenced by the technological determinism approach\textsuperscript{57} in political discourse, but nowadays is mostly characterised by normativism, and the dominating understanding of media literacy is related with a protectionism approach. Thus, in the political and professional discourse, media literacy skills are mostly associated with individual/society security issues, which lead to the inclusion in ML of the use of digital media and devices, protection against disinformation, war propaganda and cybercrimes.

In Latvia MIL research is fragmented and has depended on the lack of resources and the interests of individual researchers. Nevertheless, MIL studies address a much wider range of MIL issues, than those used for ML policy building purposes, for instance, by providing

\textsuperscript{51} Latvijas iedzīvotāju medijpratība. [online]. [2023-09-12]. Available at: <https://www.km.gov.lv/lv/prezentacijas-un-petijumi>.


analysis of the relationship between media and media messages and the individual’s mental and emotional cognitive processes, which have a direct impact on the individual’s thinking, behaviour, attitude formation, values understanding.\textsuperscript{58} Parallel to policy priorities, ML studies in Latvia also offer a broader perspective on media and society relations, emphasising power factors and interdependence relations, as well as on significant aspects of ML pedagogy\textsuperscript{59} ans have been studied during the last two decades.

In fact, ML research analysis identifies that the scientific articles as well as the strategic and visionary documents for national development and education policy (2000 – 2010) display a wide-ranging terminological and conceptual disagreement about ML. This political and conceptual discrepancy has led to the fact that only in 2020 was media literacy clearly defined as a mandatory part of digital literacy in Latvia’s basic and secondary education standards. The one-sided and fragmentary nature of ML policy and its implementation, and the efforts of its various actors have not led to the development of media literacy policy in Latvia.

\subsection*{4.4 Case Study: Romania}

Romania introduced an officially sanctioned definition of media literacy and what competencies it entails only in June 2023. The Law on Pre-University Education defines media education as “the capacity to critically analyse the information provided by the mass media and social media and establish its accuracy and credibility. Media education includes a critical approach to the quality and the accuracy of the content, focusing on the capacity to evaluate information, manage advertising on various platforms and aptly using the search machines.”\textsuperscript{60} There is no state-sanctioned policy in this respect yet.

There is little reliable, longitudinal information available in Romania regarding the media competencies of the citizens and all comes from international sources such as Media Literacy Index or EU Kids Online. They depict a rather grim picture: Romania ranks 31 among the 41 countries included in the MLI, while PISA tests reveal that 41\% of the students are almost functionally illiterate (OECD, 2018), meaning they have difficulties in grasping the meaning of what they read.

Despite these worrying figures, the authorities have not engaged in developing comprehensive media literacy plans. Their actions are scattered and not strategic, sometimes just the result of European obligations or quick fixes to conjunctural situations. For example, when Romania transposed the Amended Audio-Visual Media Directive in the national legislation, it allotted the media literacy prerogatives provided by the Directive to the National Council for the Audiovisual, with no preparations and no additional budget allocated for these.

The topic of media competencies in Romania has been mainly discussed in the context of disinformation and national resilience. Thus, fighting disinformation and consolidating the people’s needed media competencies were included in the National Defence Strategy. Therefore, the defence and intelligence community gained attributions in this domain, including monitoring the media to spot hostile and damaging content. All the same, the law-enforcing institutions gained attributions in educating the critical thinking of the Romanians. This is particularly sensitive as, over recent years, there were attempts at creating what can be perceived as official versions of the truth and at sanctioning whoever is erring from them. This was visible especially in the


\textsuperscript{60} \textit{LEGEA nr. 198 din 4 iulie 2023}. [online]. [2023-09-12]. Available at: <https://legislatie.just.ro/Public/DetaliiDocumentAfis/271896>.
context of the Covid-19 pandemic and, later on, of the war in Ukraine, when the authorities urged people to get information only from “official sources” and when alternative reports (sometimes as innocuous as social media posts of regular people) prompted threats with criminal prosecution. In March 2022, the Government invited NGOs to cooperate in screening social media, identifying disinformation and propaganda and providing this info to the state bodies. Among the search terms included in the concept of the platform as a marker of disinformation was any combination of the term “government” with “corruption” or “theft”. In June 2023, the Foreign Affairs Ministry opened a bid to purchase an AI-based system able to monitor social media and online media, as well as influencers and detect disinformation and propaganda. These examples demonstrate the persistence of the authorities in promoting themselves as the only legitimate guardians of truth, despite their claims of cooperation with the civil society.

In Romania, media competencies are often overlapping and even confused with the digital skills, which restricts the education field and links it exclusively to technology. Even so, Romania does not excel in educating these skills. A study in 2022 showed that the average Romanian student is “minimally functional”, able to independently perform simple tasks. Creativity and civic participation scored low. Only 25% of the students ranked as “highly functional”. The pandemic and the swift introduction of remote schooling brought to light the lack of digital skills of teachers. Therefore, in July 2022, the Education Ministry issued an order describing the digital competencies required for education professionals. Introducing media literacy as a topic of formal education is a work in progress. The 2023 education law does not include any other reference to media education beyond the definition. There are efforts to this avail, but they are led mainly by the CSOs. Some, such as the Centre for Independent Journalism, entered a partnership with the Education Ministry to educate teachers. There is an increasing number of activities of an informal nature mainly addressing ML as part of democratic competencies. Valuable as they are, the CSOs’ efforts are punctual, non-coordinated and opportunistic, heavily depending on international donors.

The target audience of the media literacy projects is formed overwhelmingly by children and youths. Adults are targeted only if their profession allows them to turn into disseminators themselves, such as teachers and librarians. Although identified as one of the groups most vulnerable to disinformation, the elderly are not expressly targeted by any training or awareness raising initiatives.

Academic research on the matter of media competencies is scattered and conducted on small groups, but the topic is more and more frequently addressed.

4.5 Case study: Slovakia

In Slovakia, media audience research on media literacy is conducted with a focus on relatively narrow target groups. Most of them are oriented towards students and young people. The most up-to-date data is provided by the EduMediaTest survey conducted in 2021 by

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63 The Development of the First Digital Literacy Assessment Test in Romania. [online]. [2022-08-01]. Available at: <https://uiopathfoundation.com/automation-and-digitalisation>.

64 ORDIN nr. 4150 din 29 iunie 2022 pentru aprobarea cadrului de competențe digitale al profesionistului din educație. [online]. [2022-08-01]. Available at: <https://juridicijs.eu/ORDIN%20nr%204150%202022.pdf>.
the Slovak media regulator, the Media Services Council. 1,317 Slovak high school students participated, and the study showed that young people in Slovakia are the most competent in the technological and digital aspects of media literacy. On the other hand, they showed the greatest reserves in critical analysis of media content as well as in detecting fake news. However, a risk factor for examining the level of media audiences in Slovakia is the absence of representative research aimed at better understanding the level of media literacy of the adult population. The last representative survey focused on this target group was conducted by the Faculty of Mass Media Communication at the University of St. Cyril and Methodius in Trnava in 2014. The results of the research focused on the level of media literacy of the adult population in the Slovak Republic showed that the most pronounced division in this area is related to age differences. Data from the research showed that with increasing age we can observe a decreasing level of media competence and critical thinking of the respondents. The need to increase media literacy of different target groups appears in several strategic materials and related action plans. These materials are part of the latest report on measures to promote and develop media literacy skills prepared by the Media Services Council for the European Commission in 2023. However, this report only refers to the above-mentioned research from 2021 and 2015. Therefore, an important recommendation around raising the level of knowledge of media literacy is the implementation of longitudinal research focusing on age and social groups of the population in Slovakia.

5 Discussion

In most countries, national policymakers act almost exclusively or at least in part following EU-level documents and requirements, and those countries who are lagging in national level policies in introducing legal frameworks for ML development at the end of the second decade of the 21st century (like Romania and Bulgaria) rank the lowest in MIL. Media literacy should be viewed as a vibrant and evolving concept, one that arises from the communicative exchanges among various participants in a swiftly changing landscape. Throughout Europe and in other regions, numerous innovative endeavors are underway to enhance the media literacy of specific populations. These projects are often met with great enthusiasm and can provide enriching experiences for those involved. Yet, such initiatives seldom possess the capacity to be expanded to a broader, national or international scale. Moreover, despite the many positive outcomes attributed to these projects, independent evaluations of their effectiveness are infrequent. Concurrently, the realm of media literacy exhibits a substantial disparity between its objectives and actual execution, as the resources allocated are typically inadequate to achieve the desired goals.

Mostly considered were available statistical data on media usage, primarily prepared for media company commercial interests and following the logic of existing media, not thinking of other logic to be implemented in people's interests. For example, debates around the necessity


67 Report of the Council for Media Services to the European Commission on Measures to Promote and Develop Media Literacy Skills Pursuant to Article 33a (3) AVMSD. [online]. [2023-10-10]. Available at: <https://rpms.sk/sites/default/files/2023-04/Media_Literacy_Report_Slovak_CMS.pdf>.


of teaching coding in formal education and allowing open code software solutions at school was not making it into policy agenda setting discussions. On the contrary, in order to ensure a systemic approach, creative and free uses of media have rather diminished its importance in the discourse on ML policy visions. It is remarkable that the latter is mostly based on the protective attitude of policy makers stressing safety over the creativity or freedom that is typical for developments of internet governance in general and stands in accord with mediatized politics where politicians can propose the agenda of ML pointing to real risks of safety.

The problem of conceptualising ML or MIL in national policies is connected to the difficulty of definition of ML, but since the discussion during the first decade of the century enjoyed a lot of enforcement of theoretical work also in national languages done by academics and public intellectuals, it can be concluded that policy makers did not use this source to stay in line with the complexity of ML when developing policy vision. However, these discussions were also marked by moral panic. That again is a context where political agenda finds its focus in the public discourse on safety.

Thus, media literacy sometimes serves surreptitious agendas. For example, in Romania, the state agents used the avenue of media-related competencies to increase control over the society and media, in a rather patriarchal, controlling mode. This tendency is even more clear in the so-called post-truth years after 2016 and in the context of Russia’s war in Ukraine neighbouring 3 of 5 countries. Disinformation, countering propaganda, cybersecurity, and online safety are obviously essential and legitimate issues. However, when they become the focus of media education, the authorities may promote control and coercion instead of deliberative communication. In order to meet the requirements of a society based on deliberation and democracy, societies need to include civic engagement as part of media competencies (as intended in the UNESCO approach to ML).

The involvement of state institutions in the creation of ML policy and activities set new side effects in societies that are not free from the attitude created by authoritarian regimes towards state initiatives and the role of the media as channels of political propaganda in their collective memory and current experience. The data describing the audience of Bulgaria, Latvia, and Romania on media use and trust in the media show that mistrust among certain audience groups is related to mistrust of the state. Thus, the efforts of state institutions to promote public understanding of the importance of ML for the education of modern countries’ citizens meet with an attitude similar to resistance. For example, in a survey, more than half of the Latvian population admitted that they are not interested in media literacy, demonstrating the so-called buffer culture in relations with the state. This is another risk that threatens the positive efforts of individual countries to develop ML policies and shows that unified policies may fail to be successful. Nevertheless, in a globalised and networked environment, supranational efforts regarding media literacy are undoubtedly crucial. However, overcoming this risk depends on regular research of the media audience and the development of studies not limited to testing specific ML skills, because the ML of society is also determined by data on the level of civic

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engagement, the perception of media accountability and the assessment of the quality of democracy.

Another problem connected to our interpretation of mediatized contexts is the fact that the research is not sufficient to allow policy makers to understand where additional support and innovation is needed. In most of the countries testing and assessing of ML is not systematic and involves not all groups of competencies. For example, if digital competencies, critical thinking and reading as well as recognition of fake news is included in tests, ability to act and talk argumentatively and express rationally as well as communicative ability including ethics of communication and knowledge about media as a social sub-system is rarely tested. Another problematic aspect is the fact that not all the groups are tested. Mostly, as stated by Slovakian and Romanian examples, systematic research only covers children and youth that is accessible through the formal education framework. Much less is known about older generations (who significantly differ in terms of media usage patterns), specific ethnic, gender, sub-cultural groups etc. Since mediatization reaches out to every segment of social life, media related competencies must be studied on site – in the environment where they are used by different individuals using tactically different media and following both general trends promoted by media logics and their own goals. This perspective – a perspective of a person thriving and surviving in his/her media environment of life, fighting with the “ML burden posed on them” is not used either by researchers, or – following them – in policy. Relocating both back to the mediatized social lifeworld is an important task for the future.

Moreover, there is no academic research about the impact of policies, institutional set-up, effectiveness of methods, competencies and sufficiency (in numbers) of teachers of MIL. Who is teaching MIL? Are there enough teachers/trainers/facilitators with a solid background in media education and human rights? What kind of competencies are/ are not included into the teaching content? These are questions that are still waiting for a comprehensive and coherent answer, based on reliable research.

Media and digital literacy are perceived as an effective remedy against the spread of fake news and misinformation, as a tool for creating and training critical and analytical thinking. Media skills help people to judge, analyse, and verify information, and digital literacy allows them to navigate the web and fully participate in digital life. These competencies have become a criterion for defining a person as “literate”. Due to the development of new technologies and easier access to information, the concept of “media literacy” is becoming increasingly complicated and even more requirements have become necessary. This highlights the need to continuously update training and enrich it with the acquisition of new skills, which are also necessary for the full integration of people from all demographics and social strata, given the digitization of all spheres of public life.

6 Conclusion

The analysis of Mediadelcom’s bibliographic data shows that the research on media literacy in the studied EU countries doesn’t provide sufficient data on all aspects and media – related knowledge groups and all groups of society, and there is no systematic survey to measure the dynamics of audience media competencies.

The comparative analysis of case study results shows that both ML policy measures and the research on media related competencies in the countries analysed can be described as non-systematic, one-sided, fragmented, and insufficient almost in all countries. There are sporadic initiatives by institutions and individuals, often on an NGO basis and some innovations in the formal education content. However, there needs to be a connecting policy based on systematic and systemic monitoring of competencies and involved actors in teaching, testing, researching and promoting ML, including all areas and aspects of this complex task. Even in Austria, where
Media education has a longer tradition and is accompanied by research and policy activities, there are oversimplified models in the policy vision and an over-focus on digital skills and competences, which creates the risk that other areas of ML will be underdeveloped. A national media literacy policy is predominantly based on something other than research data that would allow defining the main problems of the media audience in the context of existing media literacy gaps and needs – be it EU requirements, media usage research data collected for commercial goals, media coverage of media illiteracy based social problems or political reaction emerging from ideological reading of all mentioned. Consequently, media literacy policy is primarily based on a political agenda driven by media logic and associated leading political ideas and economic interests. Problem-specific research data hardly plays a role. The conclusion is, therefore, that media literacy policy is aimed at a media audience whose composition and needs for politics still need to be better understood. This is shown by the contradictions between media literacy policy ideas and their implementation. Even in cases where countries focus on children and young people as a target group and policy makers have data, media literacy content is introduced into school programs very slowly and inconsistently. In sum, media literacy policies in researched countries are very general, as their implementation depends more on political will and political capital than on stakeholders’ involvement or a clear implementation plan. Thus, the current politics cannot respond in a targeted and complex manner to deficits and gaps in society’s media literacy and, thus, adequately address contemporary media use dynamics.

Most policies and actions have been reactive, declarative and geared toward restrictions and control, containing the currently known effects of disinformation. A more forward-thinking approach may be needed to guarantee that media education is able to cope with fast-paced innovation in the media fields and remains relevant for the future.

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