MEDIA PLATFORMISATION AND FINLAND

HOW PLATFORMS HAVE IMPACTED ON THE FINNISH MEDIASPHERE AND PUBLIC LIFE

Edited by
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and Irina Grigor
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EXECUTIVE SUMMARY

Platformisation: The penetration of infrastructures, economic processes, and governmental frameworks of digital platforms in different economic sectors and spheres of life as well as the reorganisation of cultural practices and imaginations around these platforms has changed media landscapes dramatically in the past decade—not only globally but also, particularly, in small nations. This policy brief gives an overview of related challenges as well as empirical accounts of the role of platformisation in different aspects of the Finnish media landscape that highlight policy challenges related to platformisation. Finally, it offers 13 policy recommendations for policymakers and other stakeholders.

Global challenges

The rise of the internet and the subsequent global reach of digital platforms has, on the one hand, provided entirely new participatory opportunities for citizens and created new types of content and services in both national and global media landscapes. On the other hand, with the rise of platformisation, related challenges have become increasingly apparent. In terms of media markets, monopolies of online platforms, specifically the rise of online advertising, have especially disrupted the business model of journalism. In terms of political impact, global platforms have been enabling the viral spread of misinformation due to their algorithmic recommendations and the business model related to algorithms. At the same time, the technology giants, such as Google, Apple, Facebook, Amazon, and Microsoft, lobby vigorously for self-regulation and against any accountability, e.g., in compensating legacy news organizations for news content or curbing hate speech. These phenomena
impact social and cultural spheres by diminishing the content diversity, not only by crowding out local and national news providers but also, for instance, by creating personalised bubbles of content filtered by algorithms. Legal solutions for these challenges are few. The loss of legal sovereignty in relation to platforms does not only concern the small European countries but the EU as a whole in its role as an economic and political entity.

**Finland in the Nordic context**

Because of their excellent track records in the fields of media, communication, and democracy as well as a long shared history and close cultural ties with each other, Denmark, Finland, Norway, and Sweden are commonly categorised as media welfare states, which understand communication services as public goods and foster freedom from editorial interference, cultural policies for media pluralism, and consensual solutions between stakeholders. However, three decades of media and communication policy decisions aimed at improving the international competitiveness of Finland as well as offering pragmatic solutions to everyday problems have given the Finnish media landscape a distinct shape in comparison to other Nordic countries. When the direct press subsidies were abandoned, the remaining indirect support favoured papers with the largest circulations. This accelerated the ownership concentration of the Finnish newspapers, which is now higher than in the other Nordic countries. In Finland, dependency on mobile solutions has resulted in much slower and less reliable internet connections than in Sweden, Norway, and Denmark, which have all invested more public money in fixed networks. As Finland now seems to be among the winners in the global race for new data centres, the social and cultural consequences of the expansion of digital platforms and platformisation of media should be taken into account when considering new communication policy approaches.

**EU regulation**

The key issue in platform regulation in the EU (and elsewhere) is the liability of intermediaries. In the early days of the internet, the ethos of freedom affected regulation, being viewed mainly from a technological perspective, as in the case of debates about net neutrality. However, in the past decade, the internet and social media in particular have taken the spotlight in debates on the freedom of speech. The current (Fall 2021) EU regulation of the E-Commerce Directive (ECD, 2000) stipulates that digital or online platforms are not legally responsible for hosting illegal content, although they are required to remove such material once it has been flagged. In general, various other EU initiatives
feature a desire for legal safeguards but do not require related practical measures. The current proposals for the Digital Service Act (DSA) and Digital Markets Act (DMA) are complementary to each other but do not supplement the ECD. According to the proposals, practically anyone can flag any content as being illegal, and the hosting company must then remove it or disable access to it. In addition, authorities can give some entities trusted flagger status, which means that their flagging has a higher priority. The DSA defines different platform categories: very large platforms (over 45 million users in Europe or 10% of EU consumers), platforms, hosting services, and small platforms. Very large platforms have more obligations, while their very small counterparts are exempt from the majority of obligations. When implementing the EU law in Finland, there are a few national features that should be considered. One is that the regulation of digital environments is quite fragmented and the legislative process is divided between the government, parliament, and committees. Another is that the Finnish Constitution requires a much clearer definition of competences and legal guarantees than EU law. This may cause problems, for example, when trying to delegate public administrative tasks to platform companies.

**Finns as platform users**

Some global challenges become evident when examining Finns as platform users. Finns are active on the internet, and social media is an integral part of their everyday lives. Nevertheless, user age remains significant in regard to the frequency of using online platforms and services. On average, Finns trust social media significantly less than EU citizens on a whole. While online environments provide opportunities for political debates and action, encounters with hateful speech about certain groups are quite common. In general, global social media platforms are more frequently used in Finland for socialising as well as by younger people in general, as sites offer information about brands and consumption, than for political participation or civil society activism. Even so, almost one-third of Finns note that social media services excessively guide how they receive information. Unsurprisingly, young people’s news consumption is especially strongly tied to online and mobile news as well as news shared by peers and influencers. Young people’s overall trust in legacy media is low, and mainstream journalism is criticised for its market-driven imperatives. Yet, their trust in specific outlets and sources is strong and they appreciate public service broadcasting. The policy challenges with regard to platformisation pertain to, on the one hand, the safety of online environments for political and civic participation, and, on the other hand, on providing quality news on different platforms to reach all (including young) audiences.
Populist tendencies

Platformisation has brought about the proliferation of populist communication in Finland. Blog forums have been essential to creating the Finnish anti-immigration community, but, during the 2010s, YouTube, Facebook, and Twitter in particular have been used by radical and extreme right actors. Social media has been especially important to The Finns Party (Perussuomalaiset). The party may use Twitter to gain public attention but the most extreme actors prefer their own discussion forums and Facebook groups. This has led to so-called “double speech”, meaning that more constructive comments are given by politicians in mainstream media to attract larger voter groups and more extreme statements are made on own forums to appeal to more radical supporters. Despite an increasing amount of provocations, hate speech, trolling, and hacking, among others, no systematic “third-party” interventions in Finnish election campaigns on social media platforms have yet been indicated. Still, the increasing role of social media and the success of populist rhetoric in political communication evoke contradictory demands regarding the freedom of speech.

Impacts on Finnish media business

Platformisation has affected the structure of the Finnish media industry and audience share as well as the composition of the advertising market. Despite its growth over the last couple of years, the total volume of the media market, even before the COVID-19 pandemic, was still slightly lower than at the beginning of the decade. The increase in the prominence of online activities, from e-commerce to streaming, has changed advertisers’ investments and, consequently, the media landscape. Finland has witnessed mergers, concentration, and consolidation in the media industry over the last couple of decades. The market position of the largest newspaper groups, especially in the regional media markets, has strengthened. Concurrently, major newspaper publishing companies have consolidated local newspapers titles within a single company and centralised their back-office activities. Moreover, many newspaper publishers have responded to challenges related to media market changes by expanding to other media or new business areas to strengthen their market position and revenue base.

Platforms and journalism

In Finland, the traditional news media has retained its good audience position even in the online environment, with the reach of digital-born news sites being low. One reason might be that national traditional news companies
introduced their online offerings early on. In Finland, more often than in many other countries, people head straight to the web pages or applications of news media organisations. Yet, the new online environment has compromised the news media’s position as a privileged gatekeeper and attention broker. Social media, the blogosphere, and professional more or less journalism-like corporate communications have turned journalism into just one of the many possible sources of timely information. There are signals that people no longer recognize, for instance, journalism’s role as a gatekeeper that distinguishes true from false and acceptable from non-acceptable. These challenges pertain to the role of social media in news distribution, as noted before, especially for young audiences, as well as to both the profitability and legitimacy of legacy journalism in online environments.

Platforms and the public service broadcaster Yle

The role of Yleisradio (Yle), the public service broadcaster (PSB) in Finland, is relatively strong compared to PSBs in many other European countries. In terms of news, Yle leads in weekly reach regarding radio, TV, and print news, and its online services are the third most popular among Finnish audiences, right after the two tabloids, Ilta-Sanomat and Italehti. During the pandemic (Spring 2020), Yle was by far the most trusted news provider, with 90% of Finns trusting its news coverage. At the same time, Yle, like many other PSBs, is under pressure from both politicians and commercial competitors, with commercial competitors in many European countries having raised competition complaints with the European Commission. In Finland, this has led to a proposal for a new public service broadcasting law. The proposal would limit Yle’s text-based online content and highlights the broad policy dilemma for PSBs in Finland and elsewhere: What should their role be in the online environment (including their relationships with commercial platforms that may be needed to provide universal services to different audience groups, including young people)?

National opportunities

Platformisation does not allow easy, independent regulatory or policy solutions for small nations. Even so, there are several approaches that Finland has been known for internationally, including media literacy efforts and related pioneering fact-checking activities. Finland is one of the very few countries with a governmental media education authority. The National Audiovisual Institute (KAVI) has the legal task of promoting media education, children’s media skills, and the development of a safe media environment for children. In
addition, many organisations promote media education in Finland, including The Finnish Society on Media Education, The Finnish Library Association, and child and youth organisations. Media companies and associations are also active in media education, especially Yle. Additionally, Finnish universities are active in media education research and international cooperation, with media education also connected to several different subjects at schools.

Media and digital information literacy is also at the heart of fact-checking, that is, the systematic verification of publicly made claims for their truthfulness. In Finland, established news organisations that include fact-checking in their efforts include the largest newspaper, Helsingin Sanomat; regional newspapers like Aamulehti and Satakunnan Kansa; online news media, such as Uusi Suomi, and the public broadcaster, Yle, as well as one independent fact-checker, Faktabaari. Founded in 2014, Faktabaari conducts fact-checking during election debates and spearheads media education efforts under a separate Faktabaari EDU project. Faktabaari has also been widely active internationally, e.g., in the drafting of the International Fact-Checking Network’s (IFCN) code of principles in 2016. Currently, Faktabaari and the University of Helsinki are engaged in a two-year project – NORDIS – aimed at establishing a Nordic hub for combating disinformation.
Our report indicates that private platforms have had a great impact on the media sphere and public life in Finland. We suggest that Finland should build a comprehensive plan to regulate such platforms, acting in line with the EU regulations currently taking shape, as follows:

**Communication rights of citizens**

1. Since platforms have become crucial nodes of public life, debate, and communication, access to these technologies and services should be ensured for all citizens. This includes speeding up governmental policy regarding state aid for the construction of high-speed broadband (Act 1262/2020).

2. Citizens should have guaranteed access to accurate information on these platforms, meaning that hate speech, political manipulation, and other illegal and harmful content should be banned while still maintaining the widest possible freedom of expression. This can require respective changes in the penal code as well.

3. Citizens should have the means to control the use of their personal data that has been collected by the digital platforms and a right to define the limits of their privacy. This requires a new one-stop tool that allows for easy access for citizens to all data that digital platforms have on them as well as the means to control the use of that data.

4. Citizens must have the right to be educated to understand the logic and limits of platforms and their impact on everyday life. This requires a concentrated effort to increase digital literacy within all levels of education, with a special emphasis on life-long and other continuous learning programs.

**Politics and regulation**

5. Finland should start to work proactively – even before the implementation of the EU acts at the European level – to build effective platform politics and regulations.

6. Finland should claim that the moderation of content should be efficient and transparent – including in small languages like Finnish and the minority languages in Finland.
7. Finland should further develop age-inclusive educational policies that add digital information literacy to the goals of media literacy education and engage multiple stakeholders, including fact-checkers, teachers, and legacy media, among others.

Media economics

8. Finland should follow the examples of several other countries (Australia, Spain, etc.) and find ways to make the platforms compensate legacy media for the use of professional journalistic content.

9. Finland should join these countries, mentioned above, in demanding that platforms should pay (part) of their taxes to the countries in which they operate depending on their number of users.

10. Finland should support small startups entering in the field of platforms and journalism, especially if they are operating in Finnish or minority languages in Finland.

11. Finland should support the development of technologies and concepts for non-commercial, publicly owned platforms to secure and strengthen the communicative rights of citizens.

12. Finland should support independent fact-checking projects and organizations to function as content watchdogs, especially regarding topics such as elections and various types of crises. This could take place, e.g., via collaboration between academic institutions, independent fact-checkers, and media companies with the state’s financial support.

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13. In general, platform policies should be considered comprehensively, including assessments of the impact of platforms on the media and communication landscape in Finnish society, in conjunction with issues like employment and sustainable development.
A key challenge for current policymaking is that the power held by certain players in the platform economy transcends our current understanding of market power. The power exercised by some digital platforms is not limited to control over markets or control over the price and quality of products and services offered to consumers. Digital platforms are now also acting as gatekeepers of public interests through their ability to impose their own rules on how businesses can innovate and reach consumers via their services, their ability to steer consumer behaviour and consumer choice, and their ability to influence democracy through the algorithmic curating of public discourse and through their control over how human rights and freedoms can be exercised.

– EC Expert Group¹

Considering the ubiquity of digital platforms in our everyday lives, there is little research specifically focused on their influence on Finnish public life. The aim of this report is to offer background information to assess how the advance of the platforms – or the process of platformisation – is reflected in Finland. Although the provision of news and journalism-related content is only

a small part of these platforms’ activities, it will be the focus of this report. We will be asking the following questions: What kind of media policy Finland has practiced compared to other countries, what kind of national regulative frameworks have been used in Europe to control the problems caused by platforms, how the Finns evaluate the platforms used in everyday life, how Finnish youth find the trustworthiness of legacy media and social media, how the platforms have impacted on Finnish politics, especially on the rise of populism, what kind of changes the Finnish media market faced due to the rise of platforms, how the operational environment of news media and public service broadcasting has changed after the processes of platformisation and what the state is of media education and fact-checking processes in Finland.

We also want to evaluate further what kind of effect does platformisation have on such values as diversity and the plurality of news sources. Does platformisation promote more civic participation and citizens’ influence on decision making? Does it enhance openness and democratic deliberation in public discussions?

We start with what we mean by platforms and platformisation. One well-accepted definition, by Poell, Nieborg & van Dijk, states that platforms are “(re-) programmable digital infrastructures that facilitate and shape personalised interactions among end-users and complementors, organised through the systematic collection, algorithmic processing, monetisation, and circulation of data” 3. When discussing digital media platforms specifically, the focus is usually on the so-called GAFAM companies (also FAANG; including Google, Apple, Facebook, Amazon, Microsoft, Netflix and Tencent), which all operate in the media business. This group is distinct from such companies as AirBnB, Uber, Trip Advisor, LinkedIn, Tinder and Wikipedia, which are part of the much wider field of the platform economy.

The history of digital platforms is still short. Of the existing major social media platforms, Google (first as a search engine) entered the market in 1997, followed by LinkedIn in 2003, Facebook in 2004, YouTube in 2005 and Twitter in 2006. In financial terms, the growth of GAFAM companies exploded in the latter part of the 2010s together with the extension of their operations to

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3 Poell, Platformisation, 3.
the global scale. Today Facebook is estimated to have 2.8 billion users around the globe; YouTube has 2.3 billion, Instagram 1.4 billion and TikTok 730,000 users.\(^4\) In Europe, it is estimated that as much as 78% of the population has registered for Facebook, whereas the number on Twitter is 7.3%.\(^5\) For Finland, the figure for Facebook is 49% and Twitter is 20%.\(^6\)

By any measure, the rapidness of the digital platforms’ global rise has taken all major actors – governments, international organisations, media and communications industries – by surprise; thus, the major implications of platformisation have not been foreseen. In this report, we will first assess the implications of this platformisation in eight separate chapters with policy proposals. We will conclude the report with proposing some further measures to enhance the democratic control of digital media platforms. Our focus will be on small European countries, especially Finland, as it is the case in question.

The ten chapters in this report and their policy recommendations reflect the main concerns of the Finnish research community about the implications of the non- or under-regulated platformisation to the Finnish society and to the European small countries in general.

- First, in his **Introduction** *Four aspects on the impact of platforms* Hannu Nieminen evaluates the economic, political, social and legal consequences of platforms on Finnish public life.

- The section **Where we are now** includes eight chapters. In the chapter *Finland as a media welfare state*, Marko Ala-Fossi gives an overview of the Finnish media and communication policy and offers a comparison with other Nordic countries.

- Riku Neuvonen assesses the present stage of the European regulatory framework in media and communication in *Regulation of platforms in Europe*.

- In *Media platformisation and social media audience-users* Minna Horowitz discusses the challenges caused by our increasing dependence in everyday life on the social media platforms. She explores also how

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young Finns evaluate platforms in *Young people, platforms and trust in news*.

- In *Populism and platforms*, Juha Herkman explores how the skills in using social media for promoting populist politics developed from the early 2010s to today.

- In *The media business environment*, Mikko Grönlund and Katja Lehtisaari show the challenges that platformisation poses to the economies of news media and journalism.

- Esa Reunanen and Reeta Pöytäri discuss the changes that journalism has met when facing the competition from social media platforms in the chapter *The platforms of journalism*.

- In *Platforms and public service broadcasters*, Jockum Hildén and John Grönvall review the recent, often heated debates on how public service broadcasters, such as Yle in Finland, should or should not deploy social media in their activities.

- In the section *New Horizons*, Janne Matikainen, in the chapter *Media education*, looks at the changing media landscape and assesses how the traditional actors in the field have responded to the challenges posed by social media platforms.

- The chapter on *Fact-checking* by Irina Hasala offers an account on the state of the increasingly important area of research: how to ensure the truthfulness and facticity of news-related content in digital platforms.

- In the last section, *Recommendations*, the concept of communication rights is operationalised to build tentative ideas and suggestions as to how Finland should start to regulate the media platforms in line with EU regulations.

This report is produced by the research consortium *Communication Rights in the Age of Digital Disruption* (CORDI), funded by the Academy of Finland. It is based on collaboration between media and communication studies and legal scholarship at the universities of Tampere and Helsinki, https://cordi.blog/.
INTRODUCTION: FOUR ASPECTS ON THE IMPACT OF PLATFORMS

Hannu Nieminen

This introductory chapter aims to offer a general background to the chapters that follow. It covers four broad areas: the impact of platformisation on the economy, politics, society and culture, and the regulatory framework. From the economic point of view, the leading platform companies have gained monopolistic or near-monopolistic positions in their global market areas. This is reflected in their yearly profit rates: in 2020, Amazon’s annual revenue was USD 386 billion, from which the gross profit was USD 153 billion; Apple’s annual revenue in 2020 was USD 275 billion, from which the gross profit was USD 105 billion; and Facebook’s annual revenue in 2020 was USD 86 billion, from which the gross profit was USD 69 billion. These figures can be compared, for example, with the GDP of smaller European Union (EU) countries: Lithuania’s GDP was USD 42.50 billion in 2020; Slovenia’s was USD
49.50 billion; and Bulgaria’s was USD 69 billion. With the combined gross profits of the three platform companies, the national economies of Lithuania, Slovenia and Bulgaria could be financed for two years.

The dominance that the platforms have in the online economy has major implications for news media and journalism (see chapters on Media business environment and The platforms of journalism). As a result of platformisation, advertising has increasingly moved from newspapers and television to the online media platforms. This means that the media landscape has been transformed in a fundamental fashion, especially in small countries where the media markets are limited in many ways. This has also created a vicious circle: as the audiences shrink, the advertising income shrinks too. In addition, the lost income is accumulated abroad – in the global tax havens – which means that it is not invested to develop domestic news media and contribute to its role in democracy. In Finland it is estimated that online advertising now accounts for 53% of all media advertising, and out of this, 60% goes to Facebook, Google and other big-platform companies. As a result, traditional news media organisations struggle for survival, and their domestic competition intensifies.

After several years of political struggles, in 2021 it seems that governments are finally taking some steps to rein in the economic and political influence of the digital media platform companies. This includes, first, the pressure by the Australian government to have Google and Facebook remunerate the Australian news media for the use of their journalistic content, which eventually led to an agreement between the companies about both the principle of remuneration and the level of compensation. Second, the US Congress started to discuss the division of the GAFAM (Google, Amazon, Facebook, Apple and Microsoft) into smaller companies on the basis of the US antitrust legislation, following the example of the telephone businesses in the early 1980s. Third, the EU aims to improve its regulatory regime with the proposed Digital Services Act package that aims to stipulate basic regulatory standards for digital media services and

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to set them obligations for controlling the content of their services (see the chapter on *Regulation of platforms in Europe*).¹²

**Political impact**

The political influence of the GAFAM companies has several layers. They have invested significantly in lobbying political decision-makers not to make regulations that would be economically detrimental to their businesses.¹³ This includes campaigning aggressively against corporate taxes on the profits gained in Europe¹⁴; resisting compensating the news media for the content that they utilise in their services¹⁵; and fighting attempts to make them legally responsible for their content services. At the same time, however, the same companies have offered their platforms for anti-democratic purposes, including the disinformation campaigns linked to Brexit and the US elections, allegedly led by Russia and China; QAnon and anti-vaccine movements; and Trump’s “Big Lie” crusade.¹⁶ Similar symptoms can be found in Finland, too (see the chapter *Populism and platforms in Finland*).¹⁷

The companies were criticised for years not only for allowing their platforms to be used for anti-democratic purposes but also for actually enhancing ultra-

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right propaganda through their algorithmic recommendations.\textsuperscript{18} After the US presidential elections in autumn 2020 and the crusade by ex-president Trump to alter the election results, culminating in the insurrection and the attempted occupation of the Capitol Building in January 2021, Facebook and Twitter finally blocked Trump’s accounts, which was then followed by several other social media services. This was a response to the calls among the US political elite to force the companies to be accountable for the public content of their services. Until now, the famous Section 230 of the Communications Decency Act has offered the platforms immunity in questions concerning their content: “No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider”\textsuperscript{19} (see also the chapter Regulation of platforms in Europe). The hot issue today is the question of whether it is right to leave all decisions about content to the platforms and their self-regulation or, in light of recent events, whether the law should be changed, and the platforms treated not as mere technical conduits, as the law stipulates, but in a similar manner to media publications (newspaper, television, radio), which would make them legally responsible for the content.\textsuperscript{20}

In reining in the political influence of social media platforms, the EU has largely been a bystander, because the companies are under US jurisdiction and the EU has limited political and legal means to control their activities. The big EU member countries (France, Germany and Spain) have been able to challenge Facebook and Google in some cases, but this has not helped the position of small EU members, like Finland, that do not have the same negotiation power as the big countries.\textsuperscript{21} However, in fighting disinformation, the EU has been active from the mid-2010s, including implementing the worldwide Code of Practice on Disinformation that aims to set self-regulatory

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standards for the industry, which was signed by all major online platforms and parts of the advertising industry.²²

From the viewpoint of democratic media policy, the problem is how the mandate for the platforms’ self-regulation is defined and implemented. As recent history and the aforementioned examples show, the platforms are using significant opinion power; thus, their interpretation of freedom of speech has major influences on public life. Unlike the traditional news media organisations that have subscribed to high ethical and democratic values, which form the basis for their arguments for freedom of speech, the online platforms have not subscribed to any such ethical and democratic values. Their activities are guided primarily by market value and commercial gains, regulated by the US antitrust legislation and the EU’s competition law.²³

The situation with the online media looks quite different when observed from the viewpoint of citizens in authoritarian countries, such as China, Turkey, Belorussia and Russia. For them, the internet and online platforms have long offered a (relatively) free and open channel for communication and information exchange. When other forms of media are under political and ideological control, the internet, through its online services, has offered relatively free opportunities to both receive news and other information from the outside and to inform the outside world about the situation and repression on the inside.²⁴

²² Signatories include Facebook, Google, Twitter, Mozilla and TikTok.


INTRODUCTION: FOUR ASPECTS ON THE IMPACT OF PLATFORMS

Social and cultural implications

The social and cultural implications of platformisation reach widely into public life. One of its often-recognised effects is the individualisation of media use, which refers to the diminished role of the (news) media and journalism as an intermediary and gatekeeper between the content service and the user. In the case of an online platform, the individual media user fulfils the gatekeeping functions – “performing the filtering, mediating, and disclosing roles that all are integral parts of the practice of journalism”. Furthermore, individualisation is seen as an important factor in the increasing distrust in traditional news media. As the media users are increasingly using different social media applications for their news supply, professional journalism, with its ethical standards, becomes devalued. Quality journalism, which is necessary for a functioning democracy, is treated as being on an equal footing with different, openly partisan opinions or “alternative truths” spread through social media platforms.

Related to this is the long-standing process of the withering of traditional news media, accentuated by the ascendancy of social media platforms. In many countries, this has led to the creation of “news deserts” as local and regional news outlets have died away. Starkest is the situation in the United States, where it is estimated that some 2,100 newspapers have been lost after 2004, and about 1,000 more are struggling (as of 2019). The absence of local and/or regional news media means that there are fewer outlets for the community members to access relevant local information and to develop a sense of community. This loss is exacerbated by the expansion of “digital deserts”, which refers to areas where no broadband access is available. Although predominantly a problem in the US, similar developments are taking place in Europe too. One of the means to fight this is public funding of the media, which is applied in different forms in most European countries. For example, in Sweden the state aid to the media in 2020 was EUR 138 million, which is EUR

13,400 per inhabitant; in Denmark the figures were EUR 74 million and EUR 12,800 per inhabitant. Finland is an exception from the other Nordic countries as there is no general state subsidy policy, although in 2020 a temporary sum of EUR 7.5 million was distributed as Covid-19-related compensation to the media.29

An additional claim found in many studies is that social media platforms create “opinion bubbles” or “echo chambers” as people with similar attitudes and opinions gather in their own virtual communities with little interaction between people outside their bubbles. Algorithms that social media platforms apply to recommend their users information and contacts that match with their preferences enhance this effect.30 However, the “filter bubble” effect is moderated by counterevidence that takes into consideration people’s wider social and mediated environment (see chapter Media platformisation and social media audience-users). According to this, the social media platforms are not the only factor influencing people’s attitudes and opinions; how important they are depends on many other influences. One major contextual factor is the polarisation of societies that has taken place around the globe, which is reflected in, among other things, the formation of the digital divide between the less-well-off and the well-to-do social groups.31

Social media platforms today are increasingly used in many countries either as the sole or an additional source of news. In spring 2020, the proportion of the population who used social media as a source of news was 47% in the US and the UK; in Germany, the proportion was 39%. Online news is increasingly accessed through smartphones only: in the US, the figure is 59% of all users; in the UK, 62%; and in Germany, 58%. At the same time, newspaper readership – either in print or online – has continued its decrease in all age groups, especially among the younger age groups – a trend that has continued for many


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years. Although the same development is taking place in Finland and other Nordic countries, it is less pronounced, because the status of traditional media – both television and newspapers – as news sources is still higher in the North than in most other European countries. However, there is growing concern, especially among the traditional media companies, about how to survive in the competition with the global media platforms.

Impact on legal culture

Especially for smaller European countries, the problem is how to address the multiple challenges that digital media platforms present in the fields of the economy, politics, culture and society. Traditionally, the control over the national media and communication system has been important for cultural sovereignty. Even in the conditions of expanding economic and political globalisation, the language barrier and the small size of their media and communications markets have culturally protected many countries – Finland among them.

However, with the escalation of digital media and social media platforms, the situation has changed. First, the surge of neoliberal deregulation in the 1990s opened the national media and communications systems to global market competition; second, in their policies concerning freedom of speech, the social media companies adopted the legislation of their home country, the US. The national media regulation in Europe traditionally emphasised the principle of public interest and the media’s service for democracy, but these principles have now been replaced by the market-based values of competition and profits. This is the case in the Finnish legislation on media and communications, too. This loss (or even erosion) of legal sovereignty does not only concern the small European countries but the EU as a whole in its role as an economic and political entity. The bigger EU member countries (Spain, Portugal, Italy, and the UK) have also been affected by the same trend.

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France and Germany) are able to make bilateral contracts with social media companies, leaving the EU and its small members much like bystanders.\(^{35}\)

The EU’s answer to the challenges of the digital media platforms described above has been fragmented, based mainly on updating the existing media regulatory framework plus reacting to the situation with some new acts (see the chapter *Regulation of platforms in Europe*). The existing framework consists primarily of the Audiovisual Digital Services Act, Copyright in the Digital Single Market, General Data Protection Regulation and Open Internet Regulation.\(^{36}\) However, there are several areas that these guidelines do not cover, but which are crucial for the EU to regulate the platforms effectively. Some of the core issues, already debated for many years, include establishing effective taxes on the companies’ profits generated in Europe; preventing the platforms from using private information for aggressive targeted advertising; holding the platforms accountable for dis- and misinformation that is spread through their applications; and obligating the platforms to compensate the news media for the content disseminated through their services.

At the time of writing, the first issue – setting up and harmonising a global corporation tax that would also cover the social media companies – seems to be moving forward as an initiative of the G7 countries.\(^{37}\) The prevention of aggressive targeted advertising is included in the EU’s newly proposed Digital Services Act, although it will be forcefully resisted by both advertisers and social media platforms\(^{38}\). Making the platforms legally responsible for the content of their services is similarly included in the EU’s Digital Services Act; however, the platforms oppose it as an infringement of freedom of speech.\(^{39}\)


What the companies suggest is better self-governance, which would leave the judgement to the companies themselves; how this would improve the present situation is unclear. With respect to the proposed obligation of the platforms to pay the news media for the use of news content on their platforms, the situation is still country-dependent. Australia is still the only country that has used a legal threat to gain a bargain between Google and Facebook and the Australian news media.\footnote{Lucinda Southern, “State of play: Where the battle with Google and Facebook to pay for news is hottest,” Digiday, September 7, 2020 https://digiday.com/media/state-of-play-where-the-battle-with-google-and-facebook-to-pay-for-news-is-hottest/}

**Conclusion**

Finland is a small country with a relatively low population and a restricted market, isolated both geographically and linguistically from the big Central European countries. This makes Finland less interesting for the big global media companies: the costs of entering the Finnish market are rather high compared to the financial gains that can realistically be expected. This position might be assessed from both positive and negative points of view: on the one hand, there are fewer challenges to Finnish cultural identity than in many other small European countries; on the other, the political and economic weight of Finland may be lesser than some other European countries of the same size.

In the beginning of this report, we asked what kind of effect platformisation has on such values as diversity and the plurality of news sources, whether platformisation promotes more civic participation and citizens’ influence on decision making, and whether it enhances openness and democratic deliberation in public discussions. We will come back to these issues in the concluding chapter of this report. Here it is sufficient to briefly state that:

- There is contradictory evidence regarding the impact of platformisation on diversity and pluralism. On the one hand, in its present form, platformisation has meant the withering of local and regional media. At the same time its algorithmic recommendation system has seemingly amplified the effects of social polarisation and political and ideological divisions. On the other hand, social media platforms have offered millions of people new opportunities not only to access news and information but also for social communication and self-expression.

- Similarly, platformisation has obviously not only extended the democratic potential for traditional forms of civic participation and associational
activities but has created novel and innovative ways to engage in political and cultural life, as shown by multiple campaigns and movements applying the potential of virtual networks. At the same time, platforms are used for anti-democratic and criminal activities, of which there are an increasing number of examples.

• Perhaps the most difficult aspect to assess is whether platformisation in its recent form has enhanced openness and democratic deliberation in public discussions. It is a different thing to state that the internet and the platform services have much improved our access to official documents than to claim that this has increased our knowledge and understanding of the reasons and implications of public policies and policymaking. As the sovereignty of nation states is gradually eroding, both because of economic and political integration and enhanced security issues, most decisions are progressively withdrawn from the realm of national public discussions. Obviously, this is not only because of the influence of the digital media platforms, but they could be part of the solution if it were so decided.
2

WHERE WE ARE NOW

2.1  FINLAND AS A MEDIA WELFARE STATE

Marko Ala-Fossi

In most international indexes and comparisons (e.g., the EIU Democracy Index; World Press Freedom index; Reuters Digital News reports), Finland is usually among the top performers together with its Nordic neighbours. Because of these excellent track records in the field of media, communication and democracy as well as a long shared history and close cultural ties, the four largest Nordic countries (Denmark, Finland, Norway and Sweden) are commonly categorised as media welfare states, which means they understand communication services as public goods, foster freedom from editorial interference, cultural policies for media pluralism and consensual solutions between the stakeholders.41

Indeed, Finland has had strong geopolitical motives to identify itself as a Nordic country, especially right after World War II, when the idea of a Nordic welfare state offered “a third way” between communism and capitalism. Solutions and policies, first mostly developed in Sweden, were eagerly adopted and adapted by its neighbouring countries. Although in Finland the Social Democratic Party never reached the same kind of hegemony as in Sweden and

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Norway, by the end of the 1980s the Nordic countries had developed rather similar media and cultural policy solutions, including support systems for pluralistic media markets.

The traditional Nordic system of press subsidies was designed to support media diversity and the plurality of opinions with a combination of direct support for selected titles and an indirect tax support in the form of reduced or zero-rate VAT for newspapers and magazines. However, unlike its Nordic neighbours, Finland decided to gradually abolish direct press subsidies in the early 1990s. The official reason for this was the deep fiscal crisis of the state after the sudden collapse of trade with the Soviet Union. After this turn, the Finnish media and communications policy decisions have not followed the principles of the media welfare state model nor the new policies of its Nordic neighbours.42

This was because the economic recession of the 1990s accelerated the transition from welfare state to competition state in Finland when compared to the other Nordic countries. Finland also got the opportunity to seek new markets as well as stability and security through deeper Western European integration. While both Finland and Sweden became EU members, only Finland also joined the Eurozone. And after a single company at the edge of the mobile revolution literally pulled the Finnish economy out of recession by the end of 1990s, Nokia had established a unique position as an enormous international corporation in a small country.

In this new context, Finland adopted a British model for the digitalisation of television and financed the transition by selling the national broadcast infrastructure to a foreign company, instead of making additional public investments in state-owned broadcast infrastructure as was done in Norway and Sweden. On the other hand, while the UK started to auction the spectrum for mobile use in 2000 (instead of licensing it for free as before) and the other Nordic countries soon adopted the same practice, Finland was the last in the EU to follow. Nokia had been lobbying against auctions throughout Europe. When the mobile operators did not have to pay for the spectrum, they had more money for network equipment.

Towards nationwide mobile internet

This policy had interesting consequences for Finnish broadband development. Telecom companies made big investments in mobile networks based on the free spectrum, but they were less interested in building fixed fibre networks even

with public funding. Thanks to extensive new nationwide mobile networks, in 2010 Finland was the first country in the world to make broadband internet connection part of the universal service obligation (USO). Mobile broadband has been relatively cheap to use in Finland, but dependency on mobile solutions has also resulted in much slower and less reliable internet connections than in Sweden, Norway and Denmark, which all invested more public money in fixed networks.

In the age of internet platforms, the Nordic countries have become a very attractive market for new data centres. A cool climate, disaster-free environment and stable societies with a reliable and cheap power supply, together with a high quality digital infrastructure, is a winning combination in the global competition for data centre investments. Although Finland was, in 2020, the digital leader in Europe according to the EU Digital Economy and Society Index (DESI), Denmark and Sweden were ranked as the best places in the world for data centres by Investment Monitor, mainly because of their faster and higher capacity internet connections. Finland was ranked fifth after the US and the Netherlands.43

By the turn of the century, Nokia was the most important taxpayer and employer in the country, with a larger turnover than the annual budget of Finland. The impact of Nokia’s changing strategies can be seen for example in the digitalisation of television and radio. Several new digital broadcast technologies were introduced before the rest of the world as part of a national project to make Finland a digital leader. In addition, certain technologies were also rejected before the rest of the world, such as digital broadcast radio, while Norway and Denmark have continued to invest in it. Finland has also adopted a unique point of view on the release of the TV broadcast spectrum for mobile use. It ended up voting in support of this idea at the World Radiocommunication Conference in 2015, against not only its Nordic neighbours, but all the rest of the EU member states.

Three decades of media and communication policy decisions aimed at improving the international competitiveness of Finland as well as offering pragmatic solutions for everyday problems have given the Finnish media landscape a distinct shape.

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pragmatic solutions for everyday problems have given the Finnish media landscape a distinct shape. When the direct press subsidies were abandoned, the remaining indirect support favoured papers with the largest circulations. This, in turn, accelerated the ownership concentration of the Finnish newspapers, which is now higher than that of the other Nordic countries. Most of the remaining newspapers are doing relatively well, because they also own the majority or all the local papers in the surrounding area. This means that although Finland is a very sparsely inhabited country, there are practically no “news deserts” even in the northernmost parts.

Finland also has the highest mobile data usage per subscription in the world, partly because a large proportion of the households are still completely dependent on mobile broadband. After the public service media company Yleisradio (Yle) was turned from license-fee funding into a tax-financed service, it has shifted resources from broadcasting to online, creating world-class online audio-visual news and media services free of charge. This has caused the Finnish newspaper industry to repeatedly campaign for new limitations on both Yle remit and funding as well as writing, up till now, two separate complaints to the competition department of the EU Commission.

Although Finland (and the other Nordic countries) have consciously violated most of the basic principles of a media welfare state, institutionalised editorial freedom has been well protected in Finland and in all the other Nordic countries. Interestingly enough, the most recent serious dispute in Finland happened in 2016 between a mobile technology millionaire turned politician, Prime Minister Juha Sipilä, and the public service media, Yle. Sipilä sent a series of oppressive emails to a Yle journalist who had written about a contract awarded by a state-owned company to the relatives of the Prime Minister. As a result, three Yle journalists resigned in protest because they felt they had not been supported. The head of Yle News was able to keep his position but was soon forced to resign after another public row. Even the CEO of Yle, a former head of Nokia corporate communications, Lauri Kivinen, left his position prematurely in 2018.

Until 2008, Nokia created more added value in the Finnish economy than any other company, but currently it is no longer even among the 10 most significant companies in Finland.44

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POLICY CHALLENGES

- Finland does not yet actually have a specific media and communication policy approach to the business of the digital platform companies. Once again, the entire issue has been treated mainly as part of the national industrial policy of attracting more international investors.

- As Finland now seems to be among the winners in the global race for new data centres, the social and cultural consequences of the expansion of digital platforms and media platformisation tend to be forgotten.

- To what extent is an algorithm-driven digital platform economy a threat to the existing form of the Nordic model? If a separate Nordic media platform economy would be possible, would Finland be interested in supporting its development?

2.2 REGULATION OF PLATFORMS IN EUROPE

Riku Neuvonen

The internet and social media in particular have taken the spotlight in debates over freedom of speech during the past decade. The internet has been a utopia for many freedom of speech activists and a nightmare for regulators because it is decentralised and open in its nature. It has been regulated from a technological point of view. For example, net neutrality between service providers and users and between service providers is a topical issue.

The technical standards are authored by two non-profit organisations: the Internet Engineering Task Force, which is part of Internet Society, and the non-profit Internet Corporation for Assigned Names and Numbers (ICANN). Development of the World Wide Web (WWW) is controlled by the World Wide Web Consortium (W3C), founded by the inventor of the web, Tim Berners-Lee, and now has over 400 members. It is another independent organisation based on co-operation. The WWW is an information system where documents and other web resources are identified.

The key issue in platform regulation is the liability of intermediaries. In the early internet, the ethos of freedom also affected regulation.45 In the

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The key issue in platform regulation is the liability of intermediaries.

US, Title V of the Telecommunications Act of 1996 (as well The Communications Decency Act), with its famous section 230, guarantees exemption of liability to intermediaries from third-party acts if the intermediary has acted in good faith. This is known as the ‘Good Samaritan’ principle. In the EU, Article 14 of the E-Commerce Directive (2000, ECD) states that digital or online platforms are not legally responsible for hosting illegal content, although they are required to remove such material once it has been flagged. This obligation only applies to certain content. Article 15 of the ECD prohibits general monitoring of content but allows monitoring of specific content as well as voluntary monitoring by platforms. The key questions are whether the exemption requires the passive nature of an intermediary and to what extent social media platforms are simply platforms and do not actively disseminate information.

European regulation developing

The European Commission has stimulated voluntary removal of content in, for example, the Code of Conduct on Hate Speech (2016), Communication on Tackling Illegal Content (2017) and the 2018 Recommendation on Measures to Effectively Tackle Illegal Content Online. EU initiatives include a desire for legal safeguards but do not require practical measures. In 2018, the European Parliament adopted a report pushing for content monitoring to be outsourced to hosting services under the pretext of the fight against terrorism. In this context the hosting service provider is a provider of information society services consisting of the storage of information provided by and at the request of the content provider and of making the stored information available to third parties. This regulation has two dimensions. First, the competent authorities of member states issue content removal orders, requiring content to be taken down within one hour. Second, hosting service providers are required to take effective and proportionate proactive measures. Safeguards are based on transparency, and content producers have the right to complain and, when appropriate, human oversight and verification. In 2018, the renewed Audiovisual Media Service Directive (AVMSD) began requiring video-sharing


platforms to take appropriate measures to protect minors and the public from content that contains incitement to violence or hatred directed at a group of persons, public provocation to commit a terrorist offence, offences concerning racism and xenophobia and offences concerning child pornography.

The European Commission proposal for the Digital Service Act (DSA), submitted to the European Parliament and the European Council on December 15, 2020, is the latest development. On the same day, the Commission also submitted a proposal for the Digital Markets Act (DMA). The two proposed laws address issues that are tangent to each other. The DMA targets the lack of competition in digital markets and only affects platforms with at least 45 million monthly active users. The DSA applies to all intermediaries and imposes additional requirements on those used by more than 10% of EU consumers. The European Commission will be responsible for enforcing the DMA, while national regulators will be responsible for applying the rules of the DSA.

These new Acts do not supplement the ECD, although they are complementary, and the DSA proposal reproduces the old Articles 12-15 of the ECD into Articles 3, 4, 5, and 7 of the DSA. In addition, the DSA provides some additional clarifications and maintains a principle of liability when a company is not aware of its illegality. The biggest change is that practically anyone can flag any content as being illegal, and therefore the hosting company must remove the content or disable access to it. In addition, authorities can give some entities status as trusted flaggers, which means that their flagging has a higher priority. The proposal includes the idea of an independent dispute settlement body to monitor content removals. The DSA defines different platform categories: very large platforms (over 45 million users in Europe or 10% of the EU consumers), platforms, hosting services (such as cloud and webhosting services and platforms that facilitate consumer-to-consumer and business-to-consumer sales through its website) and small platforms (for example, those with fewer than 50 employees and whose annual turnover does not exceed EUR 10 million). Very large platforms have more obligations, while very small ones are exempt from the majority of obligations. Therefore, the cost of expanding the size of a platform might increase through higher regulatory costs. It follows that the platforms with the most controversial content are often small.

**National and regional examples**

One of the first national laws on platforms was Sweden’s Electronic Bulletin Boards Responsibility Act (Lag om ansvar för elektroniska anslagstavlor [1998:112]), which to some extent applies to platforms other than Bulletin
Board Systems (BBS) for which it was intended. Platforms are required to supervise content and, if content breaks the law, obliged to delete it. The definition of illegal content is based on criminal law, for example, racial agitation, child pornography or copyright infringement.\textsuperscript{48} A more recent example of such national laws is Germany’s Network Enforcement Act 2018 (Netzwerkdurchsetzungsgesetz). The law targets large social media platforms with more than two million German users. These are defined as internet platforms that seek to profit from providing users with the opportunity to share content with other users and the broader public. Platforms providing individualised communication services, as well as those that offer editorialised content, are explicitly excluded from the scope of the law. The law requires platforms to have a mechanism for users to submit complaints about content that they believe to be illegal. Once a complaint is received, platforms must investigate whether the content is actually illegal, and, if it is found to be ‘manifestly unlawful’, the content must be removed. Platforms that fail to comply risk fines of up to EUR 50 million.\textsuperscript{49}

In addition to national legislation the European Court of Human Rights (ECtHR) sets standards for moderation and monitoring of professional news sites. In the case of Delfi versus Estonia (16.6.2015), the Grand Chamber of the ECtHR ruled that Estonia had not violated Article 10 of the European Convention on Human Rights. The background to the case is that Delfi had reported that one ferry company had destroyed several ice roads from the Estonian mainland to offshore islands. Delfi offered readers the right to respond to the article, and the resulting comments were very offensive and directed personally at a board member of the ferry company. The ECtHR stated that, although Delfi’s portal had filtering, and the insulting messages had been deleted through a notice-and-takedown procedure, Delfi had not specifically done enough because it was a professional news site. However, in the MTE and Index versus Hungary case (2.5.2016) anonymous users had posted offensive comments. A commercial company runs Index.hu Zrt, and MTE is a non-commercial website. The Strasbourg Court argued that, unlike in the Delfi case, the comments did not constitute clearly unlawful speech. In the Pihl versus Sweden (9.3.2017) case, a post on a small, non-profit association’s blog accused the plaintive of being involved in a Nazi party. The ECtHR referred to the criteria set in the MTE and Index cases. Consequently, the ECtHR is creating a distinction between freedom of speech in small, non-profit websites, and


freedom of speech in the context of commercial internet websites, which are required to monitor content and delete all unlawful material.

These examples demonstrate that as early as in the 1990s the problems with early social media were recognised and in Sweden national legislators took matters into their own hands.

**POLICY CHALLENGES**

The regulation of digital environments in Finland is quite fragmented. From the viewpoint of the DSA, the most important laws are the Criminal Code (39/1889) and the Act on the Exercise of Freedom of Expression in Mass Media (460/2003), the latter being specifically the law on media liability. Both laws are national legislation. The proposed DSA and DMA will have a greater impact on legislation implementing EU law, for example, the Act on Electronic Communications Services (917/2014) and the Act on the Provision of Digital Services (306/2019).

In the Finnish system, one must consider two special features in the implementation of EU law. Firstly, the Finnish Government does not have the power to decide on Finnish positions alone. The Grand Committee of the Parliament of Finland is responsible for the scrutiny of EU legislative proposals. The Government is required to communicate to the Grand Committee all EU proposals that fall within the competence of the Parliament according to the Finnish Constitution. The Grand Committee usually deliberates on EU matters based on statements provided by the sector committees of Parliament. In the case of the DSA and DMA the most important sector committee is the Constitutional Law Committee.

Secondly, from a constitutional point of view, Finland’s specialty is Section 124 of the Constitution. The DSA in particular delegates responsibilities to platform companies and so called “trusted flaggers”. This can be problematic for Section 124, which states that a public administrative task may be delegated to others than public authorities only by an Act or by virtue of an Act, if this is necessary for the appropriate performance of the task and if basic rights and liberties, legal remedies and other requirements of good governance are not endangered. Therefore, the Finnish Constitution requires a much clearer definition of competences and legal guarantees than EU law or many other constitutions.
2.3 MEDIA PLATFORMISATION AND SOCIAL MEDIA
AUDIENCE-USERS: AN OVERVIEW

Minna Horowitz

While platformisation has changed our lives in a multitude of ways, from mobile banking to eHealth, this section gives an overview specifically on the role of social media and the audiences regarding uses, trust and societal participation.

Frequency and intensity

In general, Finns are active on the internet. In 2020, some 92% of Finns had used the internet within the past three months and over 90% of 16-54-year-olds use it many times a day. Additionally, over 90% of that age range, and 82% of all Finns, use the internet via mobile phone. Media consumption via the internet is very common and has been on the rise.\(^{50}\)

Similarly, social media are an integral part of the everyday life of Finns. Almost 70% had used social media within the past three months. Unsurprisingly, the pandemic has increased their use, especially for internet calls. In addition, more older people took on social media use. Even so, age remains significant for the frequency of using online platforms and services, as can be seen in Figure 1.\(^{51}\)

WhatsApp and Facebook are the most popular social media applications, used daily by well over 50% of Finns, although Facebook is steadily losing users, particularly amongst the young. In contrast, while 16-24-year-olds are the most prolific daily users of many forms of social media, they prefer YouTube and Instagram, and especially Snapchat and TikTok are platforms clearly dominated by this age group.\(^{52}\)

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51 OSF Official Statistics of Finland, Use of information and communications technology by individuals.
Figure 1. Internet use and frequency of some uses in Finland in 2020, % of the population – (*) within the past 3 months.53

Trust

Concerns about diminishing societal trust and the polarising effects of media use have typically been associated with online environments, and particularly with social media. Social media platforms have often been criticised for confining users to networks of like-minded people that filter out news and information that does not correspond with their pre-existing views.54 While these claims have been contested by studies indicating that most users are, in fact, exposed to a relatively wide range of information sources in the course of

53 OSF Official Statistics of Finland, Use of information and communications technology by individuals.

their online networking and news consumption\textsuperscript{55} the critical notion of (media-induced) “bubbles” has become part of the public debate.

To be sure, Finns trust social media significantly less than EU citizens on average.\textsuperscript{56} In a survey study on trust in the legacy and social media in Finland no less than 21\% of the respondents agreed with the claim that “I feel like I am living in a social media bubble,” and an even larger share, 31\%, agreed that “Social media services excessively guide how I get information”. While media-induced bubbles were by no means a marginal concern among the respondents, this issue paled in comparison to fake news and disinformation. Being “worried about fake news” was a personal sentiment recognised by 76\% of the respondents, and 87\% agreed that “Information operations can be used to manipulate people’s opinions,” (see Figure 2).\textsuperscript{57}

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{figure2.png}
\caption{Opinions of social media and fake news (%).\textsuperscript{58}}
\end{figure}

\textsuperscript{55} E.g., Elizabeth Dubois and Grant Blank, “The echo chamber is overstated: the moderating effect of political interest and diverse media.” \textit{Information, Communication & Society} 21, no. 5 (2017): 729–745.


\textsuperscript{58} Matikainen et al., \textit{Media ja yleisön luottamuksen ulottuvuudet}. 

In addition, almost no respondents considered social media services, such as YouTube (6%), Twitter (4%), Facebook (3%), and Instagram (2%), to be reliable as news sources, and Facebook was clearly viewed as the most unreliable platform. Various chat forums did not fare any better: only 3% of respondents found them to be reliable news sources. The reliability of social media as a news source has declined from 2007 to 2019, except for Twitter, for which reliability has slightly increased. With little trust in the assessments and recommendations of their friends and peers, most online users appear to see themselves as being largely on their own when trying to assess the reliability of information.59

The context of COVID-19 has only reinforced these tendencies regarding social media. A survey from April 2020 shows that the pandemic not only produced great trust in health-care providers and other experts but also significantly intensified the credibility of legacy media. In addition, the crisis notably deepened the trust gap between legacy and social media. To be sure, compared to the COVID-19 experiences of some countries, Finland has fared well in terms of trust. As an example, the amount of false information that the survey respondents reported having encountered on different digital platforms was significantly less than, for instance, the amount in Spain, South Korea, the United Kingdom and the United States. Still, in every country social media seem to be the most prolific source of content that audience-users identify as false (see Figure 3).60

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59 Matikainen et al., *Media ja yleisön luottamuksen ulottuvuudet*.
60 Matikainen et al., *Media ja yleisön luottamuksen ulottuvuudet*. 

Finns trust social media significantly less than EU citizens on average.
Figure 3. Proportion of individuals who say that they have seen “a lot” or “a great deal” of false or misleading information about the coronavirus on each platform in the last week (%).\textsuperscript{61}

**Participation via social media**

Finland has excelled in early Information Society policies and created, among many, a particularly successful e-participation initiative, based on a 2012 amendment to the constitution, that has made it possible for citizens to submit initiatives to Parliament. Even so, global social media platforms are in Finland mainly used for socialising, as well for younger people as sites for information about brands and consumption. They are not widely used for political participation or civil society activities by any age group.\textsuperscript{62} As an example, Twitter tends to remain a forum for dialogues between the members of the political and media elite.\textsuperscript{63}

Additionally, online space, including social media, can be adversarial and hostile communication arenas. Some two thirds of young people, almost as

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\textsuperscript{61} Matikainen et al., *Media ja yleisön luottamuksen ulottuvuudet.*


many young adults, and almost half of all 35-44-year-olds in Finland have encountered hateful speech about certain groups on social media. One third of 16-24-year-olds and one fourth of 25-34-year-olds have been subject to inappropriate behaviour online (see Figure 4).  

![Figure 4](image_url)

**Figure 4.** Experiences of hateful messaging and harassment online (%). (*) within the past 3 months. 

64 OSF Official Statistics of Finland, *Use of information and communications technology by individuals.*

65 OSF Official Statistics of Finland, *Use of information and communications technology by individuals.*
POLICY CHALLENGES

Notwithstanding the advantages of social media in terms of positive social encounters as well as fast and effective content distribution and for instance crowdsourcing, new challenges for audiences have been posed by platformisation and social media. In addition to the logic of the digital attention economy that is geared toward collecting data, social media platforms have created a treacherous communication environment – and one that can be widely manipulated by only a few actors. While active online, Finnish audience-users are quite aware of the limited possibilities as well as harms that social media and other platforms pose to them. The experiences of social media bubbles, of harassment and hateful speech, and of possible disinformation all create more scepticism and distrust, not only towards platforms but also to one another, and thus diminish audience rights as informed citizens who can, and would like to, engage in public discussions and decision-making regarding common issues.

2.4 YOUNG PEOPLE, PLATFORMS AND TRUST IN NEWS

Minna Horowitz

Young people’s relationship with the news has been a cause of concern, especially due to the role of social media as a source and as a central component of their lives, often seen as a prominent cause of the declining trust in the news. But is the equation so simple? Are young people independently acquiring their knowledge from alternative news sources online?

Research confirms, unsurprisingly, that young people are a distinct segment of news consumers. Experiences of trust in the media as an institution, trust in specific news sources, trust based on issues, and trust determined by one’s disposition all impact the way young people view and consume news. Young people are both more accepting of different types of news sources, as well as more critical of them, than older generations.

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Young people, peer reliance and distrust of institutional media

To start with, research shows the clear differences between age groups in terms of perceptions of news and social media. The sense of living in a social media bubble and excessive social media influence in terms of exposure to information is more widely shared by younger respondents than by those aged 30 years and above. At the same time, their peers and other people on social media are a more significant news source on social media for young people (see Figure 5).

![Figure 5](image)

**Figure 5.** Selected statements about news, online and social media, by age (scale 1=do not agree, 5=fully agree, n=1053).

While the above results may not be surprising, a qualitative study illustrates a significant difference between attitudes toward legacy journalism and news via non-traditional sources. Young people almost unanimously condemn the power of legacy media in society and note their declining credibility. In contrast, peer-to-peer news dissemination, source criticism, and their own research activities are often mentioned as their own news consumption practices. This means that trust in the legacy media as an institution is not high. Source trust is often referred to in relation to their close social circles or

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“interesting individuals”. The criticism of legacy news seems to be based on rational arguments (possible bias, commercial rather than purely journalistic aims, click-bite journalism) while trust in individuals as sources, often on social media, relies on personal disposition and relationships, often emotional, toward friends or other individuals worthy of trust.

Young people’s real news preferences

The above paints quite a grim picture of Finnish youth and news media but the same surveys and qualitative material also indicate significant contrary tendencies. When asked about dissatisfaction with the way the news media operates in Finland, the age group of 18-49-year-olds is practically equally dissatisfied (a remarkable 60-63%) – and those older are even more dissatisfied with Finnish legacy news. Yet, at the same time, all age groups express very little distrust in legacy media. Research also indicates that Finnish young people rely on legacy news sites and the respective mobile applications over any other source of news. Based on the survey of 2019, young people under 30 years old trust social media only slightly more than older respondents, whereas the older audiences trust the Finnish PSB and the main commercial TV news somewhat more. Yet, as can be seen from Figure 6, the level of trust in legacy media is quite high.

Young people are just as likely as older groups to express concern about the spread of fake news and misinformation online. Despite some differences based on demographic variables, Finnish young people are relatively homogeneous in their views on trust in the media. There are no significant differences in media coverage by age, gender and education – except that the political and economic coverage is particularly low in vocational education.
Figure 6. Trust in selected news media and sources, by age (scale 1=do not trust at all, 5=trust fully, n=1053). 68

Mediated corona crisis and young people

The contrasting and contradictory views on news media is perhaps the most pronounced in the case of the corona coverage. To be sure, 50% of young people surveyed in November 2020 noted that the media has exaggerated the crisis. Even so, only some 10% of Finnish young people found the news media untrustworthy regarding information dissemination about the pandemic. The figures for the government and for the politicians were 20% and 25%, respectively. The online and mobile news of legacy media were by far the most significant news sources for Finnish youth, followed by information on authorities’ websites and television news (see Figure 7). To be sure, printed news and journalism is not consumed by this age group. But despite the critical opinions on trust and mediated power, coupled with claims of trustworthiness of individual experiences, Finnish young people strongly lean on traditional sources of journalism and authorities in the time of crisis. News on social media and online discussions are not as important for them as, for instance, TV news. 69

69 Horowitz and Matikainen, “Power, Trust, and Crisis: Multidimensionality of Finnish Youth’s Experiences of News”.

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Figure 7. Importance of selected news sources during the pandemic (%; n=300).

Horowitz and Matikainen, “Power, Trust, and Crisis: Multidimensionality of Finnish Youth’s Experiences of News”.

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70 Horowitz and Matikainen, “Power, Trust, and Crisis: Multidimensionality of Finnish Youth’s Experiences of News”.

POLICY CHALLENGES

Young people’s general trust in legacy media is low, and mainstream journalism is criticised expertly using conventional quality criteria and awareness of market-driven imperatives. Trust in specific outlets and sources, in contrast, is strong. As with other age groups, during the beginning of the pandemic, public broadcasting in particular but also other legacy sources and television experienced a peak in trust. However, already in Autumn 2020 it seemed that individual sources outside conventional news journalism, peers included, had regained prominence. In terms of specific issues, young people generally consider news quite comprehensive. Young people are also relatively satisfied with how the news covers most topics, with the notable exception of news that address topics specific to young people.

The findings do not confirm the worst fears of moral panic about growing distrust and news avoidance by young people. Rather, the research suggests a willingness of young news consumers to “do their research” and fact-checking with legacy and alternative news sources. The policy challenges are: 1) how to support the availability of quality news content online, in platforms and networks where young people interact and consume media; and, consequently, 2) how to support them as critical but trusting news audiences who feel included in the public discussions.

2.5  POPULISM AND PLATFORMS IN FINLAND

Juha Herkman

There is no unanimous view in academic fields about the concept of populism, but most definitions emphasise a strong antagonism between “us” (or “the people”) and “them” (or “elites”, minorities, various outgroups) in the very core of populism. Thus, populism refers to a political process in which a group of people identifies itself as a representative of “the people” and attacks their alleged enemies.

In Finland, political populism is commonly linked to the Finns Party (Perussuomalaiset, PS), a successor to the agrarian populist party, the Finnish Rural Party (Suomen maaseudun puolue, SMP), which was dissolved in 1995. PS became electorally popular during the 2000s only after its long-standing
leader Timo Soini (1996–2017) started to flirt with nationalist agitators. In the 2011 “big bang” parliamentary elections PS gained a 19.1% share of the vote and has since then been among the three most popular parties in Finland. Since 2017, PS gave up its agrarian populist roots and became a clear representative of nationalist right-wing populism and the European radical right party family with its new leader Jussi Halla-aho.

Soini became known as a typical “charismatic” populist leader who challenged other politicians with his provocative statements and witty comments. He was also famous because of his blog writings in which he strengthened his image as “the people’s voice”. However, it was Halla-aho and other nativist right-wing actors who brought the social media platforms into the focus of PS’s political communication and identity formation. Halla-aho’s Scripta blog created a leading forum for anti-immigration discussion which turned into Homma, the major online discussion forum for the Finnish nativist radical right community since 2008 (https://cms.hommaforum.org/). Halla-aho was condemned by the Finnish justice system for demagogy and attacking freedom of worship in his blog-writing in 2012 after a four-year court case, but this did not prevent his successful political career as a MP, MEP and party leader. Halla-aho resigned as party leader in the summer of 2021 and was succeeded by Riikka Purra, Halla-aho’s favorite candidate.

Platforms as part of mobilisation strategies

The blog forums have been essential for creating the Finnish anti-immigration community, but during the 2010s, also other social media platforms, YouTube, Facebook and Twitter in particular, have been extensively used by radical and extreme right actors. Humour and memes have especially been applied in social media anti-immigration rhetoric. Thus, using online media platforms in their various forms has been part of PS’s “populist toolkit”, as Tuukka Ylä-Anttila has called the different populist communication and mobilisation strategies.

In addition to bottom-up communication, PS has learned to use social media platforms strategically during the 2010s, following the general increase in the use of social media in campaigning (Figure 8). This is typical of the radical right that especially benefits from social media in its identity building and mobilisation, because mainstream news media in Western democracies in general is critical towards its nativist

Using online media platforms in their various forms has been part of PS’s ‘populist toolkit’.

and authoritarian approaches.\textsuperscript{72} Ruth Wodak\textsuperscript{73} has called “the right-wing populist perpetuum mobile” a dynamic in which radical right actors can set the public agenda with their provocations and norm violations.

<table>
<thead>
<tr>
<th></th>
<th>2007 (N=1,997)</th>
<th>2011 (N=2,315)</th>
<th>2015 (N=2,114)</th>
<th>2019 (N=2,468)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Websites</td>
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<td>69</td>
<td>61</td>
<td>80</td>
</tr>
<tr>
<td>Blogs</td>
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<td>Facebook</td>
<td>-</td>
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<td>-</td>
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<tr>
<td>Instagram</td>
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<td>-</td>
<td>13</td>
<td>41</td>
</tr>
<tr>
<td>Other social media</td>
<td>-</td>
<td>-</td>
<td>13</td>
<td>15</td>
</tr>
</tbody>
</table>

\textbf{Figure 8.} Candidates with online campaign presence in Finnish parliamentary election campaigns, 2007–2019 (%).\textsuperscript{74}

Scandals linked to PS members caused by their insulting provocations and norm-transgressions have appeared in Finland. Many of these scandals have also had legal consequences for PS MPs and city councillors but have not affected the popularity of the party. Some of these insults have been intentional provocations, some rather drunken accidents, but almost all of them have originated in social media platforms. Twitter is often important in originating and dramatising the scandal, but Facebook and discussion forums in particular serve as platforms for continuing the scandal with opposing views, including those supporting scandalised populist politicians.\textsuperscript{75}

Even though they use Twitter to gain public attention, most extreme actors prefer their own discussion forums and Facebook groups. This has led to so-called double speech in PS, meaning that more constructive comments are given in mainstream media to attract larger voter groups while more extreme statements are made in their own forums to appeal to the radical supporters.


The radical groups have also developed different strategies in responding to racism accusations both in news and social media.\textsuperscript{76}

In spite of the increasing provocations, hate speech, target acquisition, trolling, system hacking and use of bots, no systematic “third party” interventions in Finnish election campaigns on social media platforms have been indicated. In fact, election research found social media to be rather marginal in elections in the 2000s, and it was no earlier than in the late 2010s when the influence of social media on election results increased, particularly among the younger voter groups.\textsuperscript{77} However, the (algorithmic) logic of social media platforms tends to establish the extreme ends in Finnish political communication – not only the radical right but also its “anti-populist” opponents of the extreme left, green and/or feminist groups.\textsuperscript{78}

\section*{POLICY CHALLENGES}

\begin{itemize}
  \item The increasing role of social media and the success of populist rhetoric in political communication elicit contradictory demands of freedom of speech and a need for control of hate speech, personal insults and micro-targeting campaigns in social media.
  \item What could be potential regulatory actions in social media political communication?
\end{itemize}


\textsuperscript{77} Kim Strandberg and Tom Carlson, “Media and politics in Finland” In \textit{Power, Politics and Communication in the Nordic Countries}, eds. Eli Skogerbo, Øyvind Ihlen, Nete Norrgaard Kristensen, and Lars Nord (Gothenburg: Nordicom, 2021), 69–89.

\textsuperscript{78} Niko Hatakka, \textit{Populism in hybrid media system}, (Turku: University of Turku, 2019).
2.6 MEDIA BUSINESS ENVIRONMENT

Mikko Grönlund and Katja Lehtisaari

Platformisation has become an integral part of the development of the media market in Finland. It has affected the structure of the media industry and audience share as well as the composition of the advertising market. Despite digitalisation and platformisation, most newspapers are still dependent on print revenues. In order to support the media industry in the digitalising business environment, the government has set media policy goals and invited researchers to inform policymaking.79

Between 2010 and 2019, the total volume of the mass media market80 in Finland made wave movements, declining and rising alternately. In 2016, the media market turned to slight growth again and, in 2019, it was approximately 3.9 billion euros. Despite growth over the last couple of years, the total volume was, even before the COVID-19 pandemic, still slightly lower than at the beginning of the decade. During the same period, the share of the mass media in the GDP has fallen from 2.1% to around 1.6%. However, when assessing the development of the overall market, it is important to remember that there are significant differences in developments in the various subgroups of the media. Electronic media has grown significantly, while the volume of print publishing has fallen steadily in size.81

According to the data provided by Statistics Finland, the total number of companies in the mass media industries has increased during the 2010s by approximately 11% from 2,830 to 3,143 companies in 2019. The number of companies has especially increased in the audio-visual programme production and web portals. In contrast, in the publishing industry the number of companies has fallen by 11%. For example, according to the National Library's

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80 This figure includes newspapers, free papers, magazines and periodicals, books, television, radio, internet advertising, audio recordings, video recordings, and cinemas. Sales are at the end user level. The figures include domestic production and imports.

81 Marko Ala-Fossi, Mikko Grönlund, Heikki Hellman, and Katja Lehtisaari, Media- ja viestintäpolitikan seurantaraportti.
Free Copy Bureau statistics, the number of newspaper titles has fallen during the 2010s from 247 to 208 titles in 2019 (-16%). The number of daily newspaper titles (4-7 times per week) has declined by almost one third from 52 to 36. Abolitions and mergers with other newspaper titles and reduction of the weekly issues can explain this development.

Mass media statistics of Statistics Finland\(^8^2\) indicate that, in 2019, approximately 23,000 people were working in mass communication companies. The decline in the total number of employees in the mass media sector in the 2010s has been about 12% and it represented only about 1.5% of all employed. Because of staff reductions in the publishing industries in the 2010s, the total number of employees in the publishing sector has fallen by almost a fifth to about 13,900 people. Due to redundancies and still ongoing negotiations in various companies, the total number of staff in publishing is expected to continue to decline. The development curve of the total number of personnel in radio and television operations has also clearly declined in the 2010s and the total number of employees has dropped by a fifth from 4,900 to approximately 4,000.

**Changes in media usage**

The fast spread of ICT and the rise of the internet, the digitalisation of information and the dissipation of boundaries between media platforms has all changed the socioeconomic field in which newspaper publishers operate.\(^8^3\) Digital distribution platforms in Finland have gained popularity while traditional distribution channels have lost ground.\(^8^4\) This change in consumer media usage has influenced and reallocated advertisers’ investments and, consequently, the media business environment. Concurrently, the internet and the emergence of free-of-charge online news have affected people’s willingness

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84 Marko Ala-Fossi, Mikko Grönlund, Heikki Hellman and Katja Lehtisaari, *Media- ja viestintäpolitiikan seurantarakortti*. 

to pay for journalistic contents. Since 2014, the proportion of people who pay for online news has varied between 14 and 18%. For example, according to the Reuters Institute Digital News Report country report of Finland, even though the proportion of Finnish people who pay for online news is somewhat higher than average internationally, still only one fifth (20%) of Finns paid for online news in 2021.

However, people are already accustomed and willing to pay for other digital content, such as various streaming services. In addition, it is likely that streaming services will create a price image of digital services among consumers/audiences, which affects their acceptable price level for news media products.

The change in consumer media usage has changed advertisers' investments and, consequently, the media landscape. Advertising has traditionally been one of the main revenue sources of both print and electronic media. For example, Finnish newspapers are still significantly dependent on print advertising revenues and therefore the industry is quite sensitive to changes in amount and targeting of advertising. During the 2010s the growth in media advertising was quite moderate and, in 2020, the total value of media advertising was, due to the drop caused by COVID-19 pandemic, only somewhat over EUR 1.1 billion. i.e., at about the same level as at the turn of the millennium. On top of this, the share of media advertising in the GDP has dropped distinctly from 0.82% to approximately 0.5%. In a broader perspective, the redistribution of all marketing communication efforts is one of the key forces that change the business environment of all media companies. Advertisers have, at least to some extent, shifted their focus from traditional advertising, which has been dominated by legacy media companies, to other means of marketing communication, such as digital marketing, events and self-promotion.

At the beginning of the 2010s, printed newspapers’ share of total media was still approximately 38%. By 2020, the share of advertising in printed newspapers has declined to just over 16%. It can be noted that most provincial newspapers, and especially local newspapers, have digital revenues that are less than one tenth of their total revenues. Concurrently, during the 2010s,

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87 Marketing communication refers to the means adopted by the companies to convey messages about the products and the brands they sell, either directly or indirectly to the customers with the intention of persuading them to purchase. Marketing communication includes, for example, advertising, sales promotion, events and experiences (sponsorship), public relations, direct marketing, word-of-mouth marketing and personal selling.
online advertising has continued to grow strongly and its share of total media advertising in 2020 was already almost half (47%). Statistics\(^8\) by the Finnish Advertising Council and Kantar TNS indicate that two major international players, Google and Facebook, collect the majority of the digital advertising revenues in Finland. Even though the total media advertising decreased by 11.3% in 2020, online advertising was growing (+2.2%). Within online advertising the biggest tumours were social media (+8.4%) and search advertising (+4.7%). In 2020, social media and search engine advertising accounted for almost two-thirds (63%) of all digital advertising.

Finns spend quite a lot of time following the media. According to the TNS Atlas Intermedia study, in 2019, Finns aged 15–69 used daily over 8 hours watching, listening or reading different media. Finns used seven and half times more time on electronic media compared to print media. The internet alone, including magazine online services, social media, music, and movie streaming services, accounted for half (50%) of all media usage. In comparison, the share of print newspaper reading is only 4% or 20 minutes per day.

**How Finns use platforms**

According to the 2020 survey by Statistics Finland\(^9\) on use of information and communications technology by individuals, 82% of the population, aged 16 to 89, used the internet several times a day. Finns most commonly use the internet for communication, following the media, shopping and everyday tasks. Online newspapers and television companies’ news pages are among the most commonly followed media.

Effective economic competition includes the freedom of undertakings, within the boundaries of legislation, to enter the market and the right to determine freely its conduct and means of competition. On the other hand, consumers must be able to choose the options that they prefer. Effective competition encourages market participants to continue to operate and the development of new products and services. There have been a lot of mergers, concentration and consolidation in the media industry over the last couple of decades. In addition, for example, many newspaper publishers have responded to the challenges of media market changes by expanding to other media or new business areas to strengthen their market position and revenue. In 2019, Sanoma Corporation was, in terms of turnover, by far the largest media

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8 Kantar TNS (prev. TNS Gallup Group) *Media Advertising in Finland* (different years).

company in Finland. Its turnover was approximately EUR 913 million. The second largest media company was the public broadcaster, Yleisradio Oy (€478 million), followed by Otava Oy (€286 million), Alma Media Oyj (€250 million) and Keskisuomalainen Oyj (€231 million).90

Concentration is likely to continue

Concentration and consolidation of the newspaper market has continued for a long time and in 2021 almost a third (30%) of all member publications, both newspapers and city papers, of the News Media Finland belonged to the Keskisuomalainen Group. The five largest newspapers groups, measured by number of titles, own more than half (57%) and the ten biggest groups two-thirds (68%) of all member titles. The market position of the largest newspaper groups, especially in the regional media markets, has strengthened. Concurrently, major newspaper publishing companies have collected local newspapers titles within a single company and centralised their backoffice activities. Bauer Media Oy and Sanoma Media Finland Oy dominate commercial radio markets. Together, their share of the radio advertising markets is four-fifths (81%), and only one-fifth is distributed among all other actors in the market. The largest magazine publishers are Sanoma Media Finland Oy, Otavamedia Oy and A-lehti Oy.

Due to the economic downturn in 2009, the profitability of companies publishing newspapers turned to a clear decline, after which it has generally developed negatively. In the 2010s, the median profitability of daily newspaper publishing companies has been slightly better than that of nondaily newspaper publishers. In 2019, the median net profit margin of the daily newspaper publishing companies was 6.1%. The respective figure for the local newspaper publishing companies was 4.6%.91 When thinking of the future prospects, one of the scenarios for local media is that the boundaries between journalism and other communication will become totally blurred and news media business strategies will draw heavily from content production for social media and other platforms.92

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90 These figures were collected from company annual reports and other company data.
91 These figures were calculated based on a comprehensive dataset of Finnish newspaper publishing companies’ annual statement data that was collected from Bureau van Dijk’s Orbis database.
POLICY CHALLENGES

The policy challenges are connected to the question of building a sustainable economic environment for the media in the future. While the media use and advertising move towards digital platforms, it is crucial to find ways to support Finnish journalism that still depends heavily on income from print. However, as previous research has shown, supporting the current media model and status quo might not be the best solution. More innovative approaches are needed, for example, to lower the threshold for start-ups to enter the field of journalism and social media, and to support diversity in content production.

2.7 THE PLATFORMS OF JOURNALISM

Esa Reunanen and Reeta Pöyhtäri

In the digital transformation, the operational environment for the news media has become more competitive. There are many kinds of news producers on the internet, and the news circulates rapidly. Social media has become an important site for finding and consuming news. Even though the news circulating in social media is typically produced by traditional news media organisations, in social media these pieces of news are simultaneously recontextualised and commented on with different voices.

The integration of journalism into social media has compromised journalism’s ability to control public attention and the agenda of public discussion. In addition to sharing, commenting and challenging news journalism, the actors in social media (e.g., organised interests, politicians, active citizens) can independently bring up issues and controversies. In this new kind of publicity, mass media and social media logics intertwine and form a media environment that can be called a hybrid media system. In the hybrid media system, journalism must react to the initiatives made by other


actors in social media, and it has become more dependent on the real time
time changing interest of the audiences, which it also surveys attentively.95

In this chapter, we analyse this development with some results from Reuters
Institute Digital News Report 202196 with a special focus on to what extent
people get their online news straight from online sites and applications of
traditional news media organisations, and to what extent they get news from
social media sites and other online sites offering news contents. Internationally,
there are great differences in this, and it can be assumed that traditional news
media and journalism have a stronger position in countries where people
mostly find their online news from the sites and applications of the traditional
news media.

In Finland, the traditional news media has retained its good audience
position even in the online environment (Figure 9). The online news sites of
traditional television and newspapers companies have an 81% weekly reach,
which is more than in any other country in the survey. At the same time, the
reach of social media as a news source is 45%, which is clearly less than in most
of the other countries. In addition to Finland, the online reach of traditional
media is also quite high in the other Nordic countries. On the other hand, the
reach of digital born news sites is low in all the Nordic countries.97 One reason
might be that the most popular international digital born publications do not
have editions in Nordic languages and that national traditional news companies
have introduced their online offerings early enough.

The strong audience position of traditional news media sites in Finland is
also obvious when comparing people’s gateways to the news online (Figure
10). In Finland, more often than in the other countries in the survey, people go
straight to the web pages or applications of news media organisations (71%).
Correspondingly, the share of those using social media, search engines or news
aggregators is lower than the average (47%).

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95 Emily Bell and Taylor Owen, *The Platform Press. How Silicon Valley Reengineered Journalism*
(New York: Tow Center for Digital Journalism, 2017), https://doi.org/10.7916/D8R216ZZ; Axel Bruns,
*Gatewatching and News Curation. Journalism, Social Media and the Public Sphere* (New York: Peter
Lang, 2018); James Meese and Edward Hurcombe, “Facebook, news media and platform dependency:
The institutional impacts of news distribution on social platforms,” *New Media & Society* (2020),
https://doi.org/10.1177/1461444820926472; Rasmus Kleis Nielsen and Sarah Anne Ganter, “Dealing
with Digital Intermediaries: A Case Study of the Relations between Publishers and Platforms,” *New

96 Uutismedia verkossa. Reuters-instituutin Digital News Report – Suomen maaraportti (Tampere
and Helsinki: Tampere University and Media Industry Research Foundation of Finland), http://urn.

97 In Finland, *Ampparit* and *Uusi Suomi* were given to respondents as examples of these “other news
outlets”.

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Those using social media for news in Finland mostly use Facebook for that purpose (Figure 11). The use of it has been quite constant in the last seven years. Instagram and WhatsApp, for their part, have increased their popularity.

The new online environment has compromised the news media’s position as a privileged gatekeeper and attention broker. The social media, blogosphere, and professional, more or less journalism-like corporate communications have turned journalism into just one of the possible sources of timely information. There are signals that people no longer recognise as well as earlier journalism’s role as a gatekeeper who distinguishes true from false and acceptable from non-acceptable. For example, in a recent study some leaders of Finnish local media said that local companies, communities and people do not always recognise this independent role of the local news media.98

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Figure 10. Gateways to online news 2021.

Q10. Thinking about how you got news online (via computer, mobile or any device) in the last week, which were the ways in which you came across news stories? Please select all that apply. N=all the respondents in each country.

The new online environment has compromised the news media’s position as a privileged gatekeeper and attention broker.
Accordingly, the results of the Digital News Report show that most people in all the surveyed countries want the news media to be neutral and not to weigh different opinions according to how well reasoned they are (Figure 12). This implies that – at least when asked this way in a survey – people do not want to let the journalist evaluate different arguments on their behalf. Instead, they want to get information from different sources and evaluate it themselves.
**Figure 12.** Opinions about the neutrality of the news outlets.

Q. IMPARTIAL3_2021: Thinking about the news in general in your country, when news outlets report on social and political issues, which of the following comes closest to your view?

<table>
<thead>
<tr>
<th>Country</th>
<th>News outlets should give equal time to all sides</th>
<th>News outlets should give less time to sides they think have a weaker argument</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Japan</td>
<td>54</td>
<td>20</td>
<td>25</td>
</tr>
<tr>
<td>Republic of Korea</td>
<td>58</td>
<td>34</td>
<td>7</td>
</tr>
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<td>Spain</td>
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<td>Norway</td>
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<td>Finland</td>
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<td>United States</td>
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<tr>
<td>Croatia</td>
<td>82</td>
<td>13</td>
<td>5</td>
</tr>
</tbody>
</table>

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POLICY CHALLENGES

Even though the good audience position of the news media sites lessens their need for presence in social media, this is nonetheless an issue for the Finnish news media. The news media companies must decide to what extent they actively share their contents through social media channels like Instagram and Facebook for reaching the younger audiences in particular.

Another challenge is how to remain profitable in the online environment. While in advertising the international platforms are getting the largest share of profits, the strategy seems to be focusing more on subscriptions and tightening paywalls. If it succeeds, this might be good for journalism, because in order to attract paying subscribers, the news outlets must invest in original journalistic work and newsroom resources. Paying or otherwise registered users also enable sharper targeted advertising.

The third challenge concerns journalism’s legitimacy and trustworthiness in the new media environment. As one of journalism’s main tasks has been to evaluate trustworthiness and importance of different opinions and issues, in the current environment the audiences may no longer recognise these tasks. According to surveys, they instead want to compare different views and evaluate for themselves what is trustworthy information or what are acceptable opinions. The question is how the news media can convince audiences that it can present a fair picture of issues based on journalistic considerations. Or, instead, should journalism abandon its neutrality and choose to be more opinionated and promote certain values and opinions for like-minded audiences?
2.8 THE FINNISH PUBLIC SERVICE BROADCASTER YLE’S RELATIONSHIP WITH THE PLATFORMS

Jockum Hildén and John Grönvall

Public service broadcasters (PSB) are increasingly engaging in developing their online services to better reach audiences and fulfil their public service remits. In doing so, the public service broadcasters are engaging and coping with online platforms provided by the big technology companies.99

The question of how a PSB should tackle the question of what level of engagement with the online platforms is suitable and what is necessary differs within and across the PSB. Where some might see it as a prerequisite in order to reach younger audiences,100 others are more critical of contributing to these actors’ economic bottom lines by creating content for the platforms.101 Can a publicly funded media actor guided by the principle of universality and the stated goal of providing diverse viewpoints and opinions stay true to its mission on the online platforms?

PSB attitudes to online platforms are ambivalent. The inherent risks in engaging in content production, distribution and audience engagement on online platforms are often noted within the PSB, but at the same time it is widely regarded as necessary to use these means to reach audiences. For example, research shows that for Yle and other PSBs, online platforms can sometimes be the main channel for distributing content for younger audiences in particular,102 whereas the PSB’s own media platform is simply used to archive the content. This, can be termed “nuanced universality”, where personalised content streams are motivated on the basis that some audiences will not be reached by the general output of the PSB on their main channels – either online or as broadcasts.103 Taken a step further, not only is the content distributed and recommended to individual users, but also produced only for these platforms. While catering for these audiences, concerns have been raised as to the fact that the PSB’s goal to also expose audiences to diverse viewpoints


is undermined by increased personalisation and individualised recommendations.

Concurrently, PSB are under political pressure as politicians are presenting legislative proposals that limit the scope of what services they can provide online. Commercial competitors in many European countries have raised competition complaints with the European Commission.

In Finland, the newspaper industry has been campaigning for new limitations on both the Yle remit and its funding. The complaint has led to the proposal for a new public service broadcasting law, which in its current iteration would limit text-based online content. While PSB presence on online platforms has not been directly challenged in competition complaints, if these initiatives could be thought to encroach on the territory of commercial media companies, it is possible that these activities will be also subjected to scrutiny.

How to deal with fragmented audiences

The policy problem can be summarised as follows. It appears to be the case that some audiences would only access PSB content on social media platforms. To reach these audiences, the options available appear to be either to accept the caveats of producing content on for-profit online platforms and reach the audiences, or to attract these audiences with new products or new channels of distribution, which is both costly and extremely difficult. So far, PSB in the Nordic countries have primarily engaged in the former strategy, producing content for YouTube and Instagram and succeeding in reaching younger audiences on these platforms.

While the PSB were more inclined to experiment with online bulletin boards and other new media in the more nascent days of the internet, few appear to be willing to engage in creating online platforms of their own. The risk with having audience relationships on external platforms is of course that the PSB might just be seen as a content producer among many, thus losing its special status. Having to “bow down to the platforms” when redirecting the attention of the younger audience, means that the PSB lose control of the data generated and thereby risk the connection to the public, as also found in in study on the US and UK PSBs.104

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104 Erik Martin, "Can Public Service Broadcasting Survive Silicon Valley? Synthesizing Leadership Perspectives at the BBC, PBS, NPR, CPB and Local U.S. Stations".
Apart from the question of whether it is morally or even legally defensible that PSB use the tools of online platforms that allow the platforms to gain access to personal data of the audiences of PSB, a thorny issue is connected to the age-old question of whether PSB are allowed to generate economic value. In a recent policy report, the economist Mariana Mazzucato and colleagues105 pointed out the “dynamic public value” the BBC produces in the UK, where investment and innovation connected to the PSB produce ripple effects in the rest of society. When a PSB contributes to the funding of an autonomous audiovisual industry few are critical of the fact that public money goes to private pockets, but the same cannot be said when PSB are producing content for online platforms run by American technology companies.

Since these companies are dominant in their respective markets and their earnings astronomical, the relationship between specifically the media and these platforms is not viewed as an economic transaction between a service provider and a distributor. This element of online platforms was perhaps best demonstrated by the policy debates that were generated in response to Australia’s proposed news bargaining code, which in its early version included a requirement that the online platforms should distribute part of their advertising earnings to the Australian publishers, because the platforms were indirectly benefiting from this content that was shared by Australian users. While the online platforms likely made very little money directly from the presence of online news on their services, the political sentiment was that news publishers were entitled to parts of their profits by virtue of the public value that news provides. Other websites were not included as beneficiaries of this redistribution of Google’s and Facebook’s wealth.

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POLICY CHALLENGES

• The policy question for PSB is to what degree participation and activity on online platforms should be encouraged or restricted, and to what extent these approaches should be formalised in clear company guidelines. Where interviews with PSB employees frequently demonstrate that the core values of the PSB guide their approaches to using online platforms, such an approach can hardly be deemed systematic.

• The policy question for politicians contemplating the goals of PSB is to what extent the use of online platforms should be formally recognised in the legislative frameworks – be it PSB laws or charters or contracts – or if the arm’s-length principle dictates that this is an operational matter that should not be politicised.
3.1 MEDIA EDUCATION

Janne Matikainen

Finland is one of the very few countries with a governmental media education authority with a long history. The National Audiovisual Institute (KAVI), with its Department for Media Education and Audiovisual Media (MEKU), has the legal task of promoting media education, children’s media skills and the development of a safe media environment for children. In practice, media education is connected to several different subjects studied at school.

In addition, many organisations promote media education in Finland, including The Finnish Society on Media Education, The Finnish Library Association and child and youth organisations. Media companies and associations are also active in media education, especially the Finnish Broadcasting Company, Yle. Finnish universities are active in media education research and international cooperation. The field of media education research is multidisciplinary and covers a large variety of topics.

There are many successful and long-standing examples of Finnish Media Education practices: Media Literacy Week, National Games Day, Newspaper Week and Media Education Forum for Professionals. Successful examples

106 National Audiovisual Institute, *Finnish Media Education*. Helsinki: Kavi.fi
are based on cooperation between the different organisations and actors. Finnish media education has emphasised media and information literacy. Correspondingly, restrictions are not a central part of media education, but age limits have traditionally been used in Finland, for example, in cinemas.

In spite of the success of media education, Finland has, like other countries, confronted many challenges due to media platformisation. The media logic has changed, with, in particular, the audience becoming more active and the media landscape as a whole is profoundly different. As a result, media education faces many challenges.

The field of media education research is multidisciplinary and covers a large variety of topics.
POLICY CHALLENGES

First, traditional media literacy has been developed for mass media, especially for newspapers. Instead of receiving media content, audiences themselves nowadays actively produce different kinds of content for social media. This calls for more than merely media literacy because it requires the skills and knowledge of producing content. Moreover, content production and distribution demands responsibility. A lack of responsibility is a topical problem almost everywhere, and has led to an increase in hate speech. Finnish media education has reacted exemplarily to the change in media logic and audience. New educational materials, campaigns and courses are being developed to enhance content production skills and responsibility.

The second challenge is that the size and nature of media companies have changed. Earlier, most media companies were national, but social media companies are international, and most originate in the United States. This challenges the cooperation between media education and media companies. Social media companies are quite hidden, and they do not reveal user data or algorithms, which would be essential for media education and for media education research in particular.

The third challenge is that new practices and services are needed. In Finland, some new forms and services have already been developed. For example, fact-checking is necessary in the age of social media (see more on fact-checking in the next chapter). Someturva is an example of an online application that allows the user to anonymously ask for help in unpleasant online situations, such as bullying, intimidation and sexual harassment. Troll Factory107 is in turn a game that shows how information operations, such as fake news, emotive content and bot armies, work on social media.

In the future, more resources will be necessary for developing media education, particularly for adults and senior citizens. New legislation and services will be needed, especially to protect victims of hate speech. Altogether, cooperation with social media companies will be crucial for creating a more responsible and secure social media environment.

3.2 FACT-CHECKING

Irina Hasala

Finnish people’s trust in news media remains at a high level but there are some worrying signals. Trust in the accountability of Finnish journalism grew weaker between 2007 and 2020. Audiences are less convinced that fact is clearly separated from opinions and fiction. The importance of transparency as the building material of trust has been brought up by both audience members and media professionals.108

One remedy for the rise of disinformation and the decline in trust in the news is what has become known as fact-checking. Fact-checking can be viewed as a journalistic process or genre. It can be used to describe the act of verifying information in news media’s own content prior to publication, or when publicly-made claims in content are evaluated for their truthfulness.109

Here we focus on the latter definition. Fact-checking often examines political actors’ statements, comparing their claims with information from independent sources, such as academic studies, statistics or expert interviews. The genre’s origins are commonly located in the United States, where the nonprofit website Factcheck.org was launched in 2003 and another similar project PolitiFact was awarded the Pulitzer Prize in 2009. These sites aim to inform the public of possible misinformation in the political debate by publishing journalists’ evaluations of claims, making use of true-false scales unique to the publisher. In the 2010s, the concept became highly popular, with the global number of sites actively conducting fact-checking rising from 44 in 2014 to 300 in 2020, according to the Duke Reporter’s Lab. The aforementioned US trailblazers were affiliated with a larger media outlet, but many independent organisations sprang up as well. In 2018, of 126 fact-checking organisations, 74 were affiliated with a larger media outlet and 52 were independent.110

In Finland, established news organisations incorporate fact-checking in their efforts, including the largest newspaper Helsingin Sanomat, and regional newspapers such as Aamulehti, Satakunnan Kansa, and online news media such as Uusi Suomi and the public broadcaster Yle.

Finland has one independent fact-checker, Faktabaari. Founded in 2014, Faktabaari has mostly conducted fact-checking during election debates but

108 Janne Matikainen et al., Media ja yleisön luottamuksen ulottuvuudet: instituutiot, journalismi ja mediasuhde.
it has also been active in education efforts under a separate Faktabaari EDU project. Besides its domestic efforts, Faktabaari has been actively networking with colleagues abroad. It participated, for example, in the drafting of the International Fact-Checking Network’s (IFCN) code of principles in 2016 and, to some extent, in the IFCN’s Corona Virus Facts Alliance in 2020.\footnote{111}

Both legacy media and Faktabaari have received criticism for their fact-checking practices that do not always fully adhere to the IFCN code of principles.\footnote{112} Indeed, due to the lack of resources, Faktabaari has not qualified as an official signatory of the IFCN since 2018, when a requirement for weekly fact-checking content was introduced.

The importance of the strengthening of independent fact-checking capacity has been recognised by the European Union. In June 2021, Faktabaari, together with the University of Helsinki, joined the formation of NORDIS (NORDic observatory for digital media and information DISorder), a Nordic consortium of researchers and fact-checkers partly funded by the European Commission for a two-year period. The consortium’s work will focus on understanding, monitoring, and countering the spread of misinformation in and across the Nordic countries, through academic research, fact-checking and efforts to strengthen media and information literacy in the region, and will thus at least temporarily provide support for the development of Finnish fact-checking practices.

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\textbf{POLICY CHALLENGES}

Similar to other independent fact-checking organisations around the world, Faktabaari has not had stable financing and has relied on a variety of revenue streams including fixed-term grants and crowdsourcing. Given this situation, it is difficult to envision the establishment of other independent fact-checkers in Finland. In addition, the lack of institutional and policy support hinders opportunities for collaboration between independent and established legacy media.

\footnote{111} Petra Piitulainen-Ramsay, Informaatiohäiriöiden kotimaisilla jäljillä. (Helsinki: Faktabaari, 2021), https://faktabaari.fi/assets/Sisa%CC%88isen_disinformaation_ja%CC%88ljilla%CC%88_selvitys04022021.pdf.

There are several recent reports and articles that discuss which general principles the regulation of platforms should be built on. Applying human rights in the online world also requires co-operation between state regulators and platforms. “The sheer quantity of online, transborder content means that it is out of both the technical and jurisdictional range of most states to regulate or protect”.113 The platforms “alone have the technical capacity to ensure rights are protected and fulfilled”.114 There are also many initiatives that try to formulate new recommendations and principles for governing media platforms. For example, the report of the working group of the Forum of Information & Democracy outlines twelve main recommendations ranging from transparency requirements, new models of regulation and new design standards and measures that limit the virality of misleading content to better notification mechanisms for illegal content and appeal mechanisms for users that are

banned from services.\textsuperscript{145} The forum recommends that platforms should follow a set of human rights principles for content moderation based on international human rights law: legality, necessity and proportionality, legitimacy, equality and non-discrimination.\textsuperscript{146}

Instead of focusing solely on international human rights laws, such as the United Nations Universal Declaration of Human Rights, a group of Finnish scholars\textsuperscript{147} have built their thinking on national media systems and policy traditions:

\textit{We provided a model to analyse communication rights in a framework that has its foundation in a specific normative but also empirically grounded understanding of the role of communication in a democracy.}\textsuperscript{148}

They base their concept of communication rights on the vital importance of shared epistemic commons. With their concept, communication rights should preserve and remove restrictions on the epistemic commons and public deliberation. The group understands the following as central to these tasks:\textsuperscript{149}

1. Access: citizens’ equal access to information, orientation, entertainment and other content serving their rights.

2. Availability: equal availability of various types of content (information, orientation, entertainment, or other) for citizens.

3. Dialogical rights: the existence of public spaces that allow citizens to publicly share information, experiences, views and opinions on common matters.

4. Privacy: protection of every citizen’s private life from unwanted publicity, unless such exposure is clearly in the public interest or if the person decides to expose it to the public, as well as protection of personal data (processing, by authorities or businesses alike,


\textsuperscript{118} Marko Ala-Fossi, et al. “Operationalizing communication rights,” 2.

\textsuperscript{119} Marko Ala-Fossi et. al. “Operationalizing communication rights,” 4.
must have legal grounds and abide by principles, such as data minimisation and purpose limitation, while individuals’ rights must be safeguarded).

When combining communication rights with the technical features of online platforms, we can illustrate some of the major problems that the platforms have posed to the communication rights of citizens:

1. In terms of citizens’ equal access to platforms, new signs of the digital divide can be seen developing. First, access to technologies – access to broadband connections, mobile networks and advanced phones and computers – is dependent on the economic and social resources and technical skills that citizens have. These inequalities in access to broadband connections still exist, for example, in rural Finland, and user skills differ significantly among citizens, even within the younger age groups. Second, there are differences between individuals regarding how they are accepted by the companies to use the platforms. Evidently affluent users are more welcome and treated better on advertising-based platforms.

2. The availability and variety of content depends highly on the user profiles based on the data collected from the use of platforms. The algorithms guiding the content are built to personalise the content to each user according to the data collected. In this sense, technology commercial platforms make every effort not to offer the same information, entertainment or advertising to all. When these platforms are used to obtain information in general, the consequences can turn out to be detrimental to public deliberation and even to the democratic process.

3. On the one hand, the platforms have offered public (commercially functioning) spaces for citizens to share information, experiences, views and opinions on common matters. On the other hand, the data-based profiles of users are fed with emotionally engaging and controversial content. This is to urge citizens to keep using the platforms, not to foster informed dialogue. This emotionally guided engagement is in fact the effect of the business model of platforms and easily creates tensions and controversy. The continuous tension between like-minded communities shows that there are real problems to be solved in this area.
4. When it comes to the privacy of users, the dominant business model based on the collection of user data for targeted advertising has led to the exploitation of user data in various ways. This strengthening of data harvesting has not included the right of users to monitor and decide how their data is being collected and used. The gathering processes of data and the applications of these data have remained unknown to users.

In summary, without access to social media platforms, it is difficult to maintain and form new social connections and a social presence. Social media platforms are also important channels for citizen communication, participation and feedback to authorities on public matters. Thus, in a sense, the platforms are essential in the citizen-official dialogue. The question is, then, how can we offer access to platforms to all, regardless of their lack of connections or digital skills? The uneven availability of shared information due to the personalisation of content streams creates another problem. If people are using, for example, social media sites as primary sources of information, their views on certain issues can become skewed or biased. In Finland, this has become visible in various debates concerning, for example, migrants, COVID vaccinations, etc. The possibility of citizens governing the use of their data has so far been limited. The GDPR is a first and very modest step towards this possibility. Digital resignation,120 the condition produced when people desire to control the information that digital entities have about them but feel unable to do so, is spreading. The discourse on the communication rights of citizens121 does not focus on the systemic or economic problems that the platforms have caused for Finnish media businesses. Finland should actively seek solutions to the problems of taxation and determine how the platforms can compensate Finnish media companies for their use of journalistic content.

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121 Marko Ala-Fossi et al. “Operationalizing communication rights”. 
RECOMMENDATIONS

In summary, the private platforms have had a great impact on public life and the media in Finland. The CORDI research project suggests that Finland should develop a comprehensive plan to regulate platforms, in line with the EU regulations that are currently taking shape.

In the following, some of the principles are listed, partially based on the concept of communicative rights:122

Strengthening the communication rights of citizens is essential for developing platform politics:

### Communication rights of citizens

1. Since platforms have become crucial nodes of public life, debate, and communication, access to these technologies and services should be ensured for all citizens. This includes speeding up governmental policy regarding state aid for the construction of high-speed broadband (Act 1262/2020).

2. Citizens should have guaranteed access to accurate information on these platforms, meaning that hate speech, political manipulation, and other illegal and harmful content should be banned while still maintaining the widest possible freedom of expression. This can require respective changes in the penal code as well.

3. Citizens should have the means to control the use of their personal data that has been collected by the digital platforms and a right to define the limits of their privacy. This requires a new one-stop tool that allows for easy access to citizens to all data that digital platforms have on them as well as the means to control the use of that data.

4. Citizens must have the right to be educated to understand the logic and limits of platforms and their impact on everyday life. This requires a concentrated effort to increase digital literacy within all levels of education, with a special emphasis on life-long and other continuous learning programs.

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122 Marko Ala-Fossi et al. “Operationalizing communication rights”.

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Regarding **politics and regulation**,

5. Finland should start to work proactively—even before the implementation of the EU acts at the European level—to build effective platform politics and regulations.

6. Finland should claim that the moderation of content should be efficient and transparent—including in small languages like Finnish and the minority languages in Finland.

7. Finland should further develop age-inclusive educational policies that add digital information literacy to the goals of media literacy education and engage multiple stakeholders, including fact-checkers, teachers, and legacy media, among others.

Regarding **media economics**,

8. Finland should follow the examples of several other countries (Australia, Spain, etc.) and find ways to make the platforms compensate legacy media for the use of professional journalistic content.

9. Finland should join these countries, mentioned above, in demanding that platforms should pay (part) of their taxes to the countries in which they operate depending on their number of users.

10. Finland should support small startups entering in the field of platforms and journalism, especially if they are operating in Finnish or minority languages in Finland.

11. Finland should support the development of technologies and concepts for non-commercial, publicly owned platforms to secure and strengthen the communicative rights of citizens.

12. Finland should support independent fact-checking projects and organizations to function as content watchdogs, especially regarding topics such as elections and various types of crises. This could take place, e.g., via collaboration between academic institutions, independent fact-checkers, and media companies with the state’s financial support.

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13. In general, platform policies should be considered comprehensively, including assessments of the impact of platforms on the media and communication landscape in Finnish society, in conjunction with issues like employment and sustainable development.\(^{123}\)

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\(^{123}\) See, Christoph Busch et al., *Uncovering blindspots in the policy debate on platform power. Expert Group for the Observatory on the Online Platform Economy.*