



SOCIAL MEDIA AND JOURNALISM IN MONTENEGRO

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1. INTRODUCTION

From Facebook's idea to connect Harvard students in 2004 to the interference of third parties in the election processes of other countries, social media have come a long way in the past almost twenty years and fundamentally changed both themselves and the world we live in. They got the name technological giants quite justifiably because of the number of users and their influence on almost the entire planet. With over three billion users, Facebook is undoubtedly the most significant community and, therefore, the most influential platform.

Montenegro did not remain unaffected by all these technological changes; on the contrary. The number of Facebook users at the beginning of this year was 92% of the total population, or 577,760. Other social media are less popular in Montenegro. Thus, Tik Tok is used by 5.9%, Instagram by 2.83%, Twitter by 2.08%, Pinterest by 1.25%, YouTube by 1.07%, and Reddit by 0.26% of the total number of inhabitants.

In January 2022, there were 521.2 thousand Internet users in Montenegro. The Internet penetration rate in Montenegro was 83.0% of the total population.

Social media platforms have played an increasingly important role in our lives and communication over the last two decades. In addition to the importance they have in our daily lives, social media have influenced the development of journalism and the change of some traditional reporting models. For traditional journalism, it was a unique challenge to deal with new technologies and the content that social media started to offer. Also, as some authors, such as McChesney, point out, "the internet has deprived commercial journalism of its economic base" since it represents "intense competition to advertising, which has traditionally financed most of the news media" [Mekčejšni, Robert V, 2015: 219]. As a result, journalism experienced significant changes due to social, cultural, economic, and, above all, technological transformations.

Social media have brought new features such as interactive dialogue and social interactions. Journalists can now have direct communication with their audience. Online debates have also been launched so that everyone gets a chance to express their opinion and position. Traditional one-way communication has turned into two-way conversations. In the first ten years of their existence, social media gave a new meaning to what we mean by freedom of speech.

On the other hand, in the last decade, social media have brought new challenges to all societies, specially developed democracies, which have become fertile ground for spreading all kinds of illegal content. Various disinformation and hate speech campaigns have characterized social media in previous years. They have transformed into a popular gathering and organizing place for extreme, radical, and even fascist and terrorist groups. Collecting all kinds of data from users and later trading, they cast a dark shadow on specific platforms and made many doubt the sincerity and sustainability of the story about freedom of expression and connecting people.

Despite being a small market, more than a hundred traditional media are active in Montenegro. In addition, the citizens of Montenegro are also significant users of social media. All these data show that, although a small market, Montenegro has a very dynamic media scene with a large number of users of social media and a significant number of traditional media. As everywhere else in the world, traditional media and social media have been connected multiple times and have created a kind of complex mutual conditioning and even dependence on each other. It should be emphasized that in such a symbiosis, social media profited many times over by taking away a large part of the marketing cake from traditional media and using, usually free of charge, the content produced by traditional media. To a large extent, they have taken over the readership or forced many users to go to their favorite media via social media.

In addition, in the past two decades, social media functioned virtually without any legal framework, which to a large extent, enabled them to become the wealthiest companies on the planet but also to enter various gray zones of illegal business. Social and traditional media are now irreversibly intertwined and will likely continue to coexist in greater or lesser symbiosis. Legislators have the difficult task of putting these powerful platforms in specific legal frameworks so that their work is legally regulated.

This study aims to offer the general public, and especially journalists, media, and users of media content and social media analysis of the role and challenges of social media in Montenegro, the ways in which journalists and the media use social media, and how they affect journalism and journalists in their daily work.

2. METHODOLOGY

For the purposes of this study, a working group was formed consisting of Aneta Spaić and Ranko Vujović in front of the Media Council for Self-Regulation, Paula Petričević, ombudsman of the daily newspaper Vijesti and weekly Monitor, and Ilija Jovičević, ombudsman of the daily newspaper Dan. The complete research lasted four months. During that time, 32 different media actors from Montenegro took questionnaires, and 20 were interviewed.

For research purposes, the working group prepared a questionnaire with 35 questions that addressed various aspects of the use of social media in our country and the relationship between social media, journalism, and the media in Montenegro. This questionnaire was emailed to 40 addresses. Out of the total sent, we received answers from 32 respondents.

The questionnaire consisted of several different groups of questions. From basic information about the respondent, how frequently and in which way social media are used, to how many positive and negative experiences there were in working with these platforms. The questionnaire included a set of questions about threats and insults that come through these platforms, as well as a group of inquiries related to the perception of transparency in the functioning of social media.

In the first phase of the research, in which the survey was conducted, 14 women and 18 men answered the questionnaire, which is 80% of the total number of sent questionnaires. Most of them were journalists, but there were editors-in-chief, media directors, media theorists, influencers, bloggers, social media analysts, and one representative of fact-checking organizations on social media.

In the second phase of the research, we organized 20 individual interviews. We talked to 9 women and 11 men. The structure of the interviewees was similar to that of the questionnaire/survey.

3. TRADITIONAL MEDIA AND SOCIAL MEDIA – RIVALRY OR ALLIANCE?

The question of the relationship between professional media and social media, i.e., the relationship between Internet users and professional journalists, is the subject of numerous studies that have been conducted globally [One of them is the study conducted by Elina Noppari, Ari Heinonen, and Eliisa Vainikka (2014), cited in Prokopović's paper, *Internet Social Networks and Traditional Media*, TEME, Mr. XLII, no. 4, October-December 2018, pp. 1081-1105, pp. 2, 7, 8, 22]. Both the lay public and the professional public often start from the assumption that the relationship between professional media and social media is a "clash of cultures" or a "clash of discourses." Our research – through the conducted survey and interviews – points to the frequently neglected aspect of the need for complementary coexistence or cohabitation of these two forums of action.

In the conducted survey, the answers to 11 of the 35 designed questions point to the complex nature of the relationship between traditional media and social media. Although none of the questions asked in the title correspond to the opposing dilemma of rivalry or alliance between these two models of information dissemination, implicitly, through questions of importance, choice of content, ways of accessing the media, the importance of social media for visibility, transparency, we reach conclusions that will be the basis for the further purposeful direction of traditional media so that the established goals of journalism prevail over the prosaic, superficial, legally prohibited contents that are a significant component of the content of social media.

The transformation of traditional media, which does not stop only at technological, but also implies sociological, cultural, and even civilizational change – an audience that actively participates in the creation of news – that blogs, tweets, conveys its attitudes and convictions, "is part of the postmodern paradigm in which it dominates interactive, hybrid, cooperative, fluid, non-linear and infinite communication" [Mihajlov Prokopović, 2018:3]. Taking into account the already established habits of the audience to frequently and continuously use social media and often use them as sources of news, traditional media should approach this topic in a systematic and planned manner. It is clear from the respondents' answers that digital technologies have caused the creation of an "ecology of new media" [Postman, N., *Technopoly*, 1993:18] and that traditional media in the age of digital technologies must develop in different – new circumstances [Mihajlov Prokopović, 2018:1081-1105]. One of the interviewed respondents suggests that social media, as a traffic generator, represent a part of socially engaged journalism – user-generated journalism – a platform for various types of communication that gives the microphone to everyone, "like in the past radio journalism, yet with a significant difference: at that time, you could take the microphone away..."

Our interlocutors in this survey are unanimous in their opinion that the emergence of social media affects the essential attributions of journalism, confirming the already known conclusions of professional and scientific studies. Bossio, in his research from 2017 [Bossio, D., 2018:7], suggests that the emergence of social media affects “the standards of journalistic professionalism, the behavior and role of journalists, the audience, the editorial practices and functioning of media houses, the professional identity of journalists, methods of distribution and the very products of journalistic work, i.e., news.” The traditional tools of journalism – news verification, journalist autonomy, and objectivity deviate from classical and well-established ways of acting [Bossio further argues that “objectivity turns to authenticity, information verification turns to transparency, and professional autonomy of journalists turns to cooperation”]. One of our interlocutors says that such disordered social media – “legally and institutionally disordered – represent the collapse of the media and the value system, but also the concept of the media and what the media represents... We cannot subsume social media under the media. It is necessary to distinguish between what is media and what is social media. Social media do not formally have media status but essentially enter the public space as media. I consider it a really serious danger for the professionalism and credibility of the real media.” Another respondent points out that “social media are the main agitators of misinformation, and that the absence of editorial supervision and control significantly affects the quality... Every form of anonymity is an additional generator of misinformation, hate speech, and other controversial content...”

In the context of this challenge, the most significant number of respondents in the survey – 20 of them – answered that they go directly to portals, 3 to social media, while the rest stated that depending on the topic being advertised, they opt for one or the other way of accessing media content. Several interlocutors told us that the most significant number of visits to portals is through social media and that this confirms the trend of strengthening social media: “social media are important and will be even more important, unfortunately, or fortunately, especially because of the comments that are generated, while not being subject to regulation...” Three respondents stated in the surveys that “when it comes to the black chronicle...I go directly to the portals, while for other areas, I get information through social media.” One interlocutor stated that he follows certain media “directly because I believe they are relevant...”

About 80% of respondents answered that social media represent one of the critical factors for media visibility and content. In comparison, only 19% of respondents claimed that social media do not play a key role. 90% of respondents who were asked the question of the benefits of using social media for the promotion of media content responded with at least one of the three reasons listed: visibility, speed, and a wider audience.

More than 30% of respondents also presented the benefits of possible direct interaction with consumers of media content. One of the respondents stated that the benefits are "very small," while one answered that "it can harm the media, that it appears on the same level as many others, so that the audience may perceive it only as a part of the generally hostile and unprofessional noise." In addition to this negative aspect that one respondent reported (in survey number 16), the use of social media, from the point of view of the majority of about 90% of our respondents, also implies the accessible publication and spread of misinformation, unverified information, hate speech, insults, manipulation of public opinion, propagandistic content, and irresponsible speech.

[Some of the consistently accepted comments given in the survey are: easy placement and publication of unverified information, disinformation, manipulation, reduced quality of the information placed, reduction of qualitative criteria of journalistic work, lack of credibility, activation of anonymous users, bots, non-selectivity, deficiency in regulating comments on media, the way social media function requires quick and short information, without too much analytics, which shapes the media in a way, low level of media and digital literacy, uncritical consumption of such content, the problem of indiscriminate transmission of such content in established media, flooding with comments, accurate and more often those belonging to a bot, which divert attention from the essence of the content, i.e., from the essence of the message of the title and excerpt from the content, so that the potential visitor will not open the link despite the original intention, a vast space is open for comments, which often contain hate speech, insults, impossibility of content and redistribution control and its possible misinterpretation and contextualization, the possibility of abuse, additional bullying and harassment of authors, the low level of media and digital literacy that leads to the fact that many of them uncritically consume these contents, even those created by anonymous authors/media. The problem is more significant if such content, without verification or with insufficient argumentation, is further transmitted by journalists and other media, the impossibility of adequately monitoring the audience's comments on the content they publish; for social media, it is necessary to simplify and reduce the content, which often means a compromise in relation to quality, superficiality, uncontrolled audience, the possibility of manipulation, lack of moderation of comments on media accounts on social media, which are often a source of insulting and hateful speech, lack of interest of the media in Montenegro to take responsibility for user/third party comments and lack of better engagement/communications with the audience/users, through media interaction - one-way communication, the spread of fake news, the possibility of attacking and insulting the authors of relevant content from anonymous profiles, lowering expectations from the media content, making brands meaningless.]

- **53% of respondents do NOT believe that social media are more important than traditional media today**
- **43% believe that social media are more important than traditional media**

In our survey, to the question, "Are social media more important than traditional media today?", 53% of the respondents gave a negative answer, 43% thought it was, while one respondent answered that he could not say. [According to the aforementioned research, "Americans have little trust in information from social media. Only 5% of adults in the U.S. have full confidence in the information they get from social media..."] The interviewees gave us the following answers: "At this moment, the influence of social media cannot be compared to classical media, but the influence that can be exerted over them is huge."

"I assume that the digital virtual world will take on a role and importance, I don't know... they are now channels for the placement of information and the place from which we get information. Their influence on the creation of public opinion is enormous... traditional media are the foundations - the walls that return to reality in relation to the information found in the virtual world of social media..."

Nevertheless, due to the importance of social media and the even more significant role that is expected of them in the future, one of the interlocutors related that "the public service is planning to form a newsroom for social media that will take responsibility for the overall placement of content on social media and that, in this sense, an additional training of journalists is necessary... social media as a place for disseminating information must be regulated and thus given greater overall attention..."

A characteristic component of the change in the way traditional media functions and the deviation from the usual methods of creating news is the use of social media as a source of news. In our survey, except for one respondent who stated that he does not use social media as a source of information, almost 98% of respondents said that "social media can only be a direct source of information in certain circumstances, so any information that has social media as a source requires additional verification due to the abundance of possibilities for content manipulation." All respondents stated that their media has a page on one of the social media and that they personally have profiles on one of the social media. Two respondents did not answer this question because they did not work for the media.

When asked about the guideline of the Code of Journalists, which stipulates that when using social media as a source, an increased verification of facts is required, all respondents gave a uniform answer that additional verification of any information published on social media is considered necessary.

[Thus, the interviewed journalists state: "...all information should be checked before publication"; "I check the information collected from social media not against 2 but 4 sources and I am always quite skeptical about the information collected from these platforms"; "... social media can only be the initiator of a story, one should never take everything that is offered there for granted, the information must then be verified through official means or a 'strong' unofficial source"; "... I use media exclusively as a source idea for the topics I deal with or intend to deal with. When it comes to specific information, I check its credibility before using it as news or information within the text or in some other form"; "... by checking several relevant sources"; "... media cannot be the main source of information"; "Regardless of the way of information, whether it is through social media or traditional communication channels, it is the duty of every journalist to check every piece of information against as many reliable and objective sources as possible. For any information to be published, it should go through basic fact checking procedures"; "... social media are seductive, but unreliable"; "this is one of the principles of due journalistic attention and ethical standards of our profession, and of course both I and the media where I work check in detail every piece of information we get through social media - checking the source of the information, the authenticity of the information..."; "I believe that it would be useful for the media to establish cooperation with fact-checking organizations if they are not able or still do not have the capacity to do this work independently"; "Strengthened fact-checking should be the standard, both for individuals as consumers of content and for journalists and newsrooms"; "We are a specific fact-checking portal, so our purpose of existence is to perform enhanced fact-checking"; "This wording is useful, but it should be extended by the media's obligation to moderate user comments on social media in order to direct these communications to better quality debate and reduced hate speech, offensive speech, and the spread of misinformation."]

One of the interviewees told us that traditional media could use "social media as a source of information, as an indication of information, as a channel for monitoring trends and the popularity of a certain topic... on the other hand, in a way, as competition, but not only in terms of distracting attention towards that side..." In the end, he concluded that "traditional media are in danger of losing the battle with social media, which without any control, filter, and severe and responsible approach produce an effect as strong as information based on the relevance of the source... "Similar answers are offered by a global survey conducted by the Reuters Institute for the Study of Journalism in 36 countries back in 2017, stating that more than half of the respondents use social media as a news source. Facebook is the first in this, while significant growth of this trend is recorded on Twitter.

The number of media followers on social media was also one of the questions considered in the survey. Four of the 30 respondents stated that they did not know the number of page followers; several answered descriptively, while 24 provided exact numbers ranging from 2.000 to 611.306, specifying the numbers on different social media. Several interviewees told us that social media are content traffic generators – the strength of which is predominantly measured by the number of followers.

Publishing articles on social media is a very different and uneven practice of our media. Thus, the respondents' answers were varied: from one to a hundred articles, according to (un)established criteria for selecting current texts. One of the interviewees answered that 100% of media production is published on social media, which could correspond with editorial decisions and media development planning. One part of the respondents (five of them) answered that it is not in the domain of their work.

The question of the impact of the use of social media on income from marketing did not meet with significant interest from our respondents, on the contrary. Namely, out of 32 respondents, 25% did not answer. Twelve respondents answered positively, 7 gave a negative response, while four responded that they could not provide a solution because it is not part of their job.

Comparative research studies often state that citizens see the media as "gatekeepers" who "restrict free discussion when they want to protect their interests, financiers, and do not want to share their power" [MihajlovProkopović, 2018:17]. Our respondents were primarily people employed in the media, so this perception of media consumers and non-journalists social media was absent. Nevertheless, we believe that this topic cannot be looked at in such a one-sided way, but respecting the new context and the necessary adaptation of traditional media to the demands of the new digital environment, it is expedient to take a responsible look at the coexistence of these two forums of action. In this sense, it seems necessary to detect models in which social media will contribute to content placement and visibility of traditional media. In the systemic and broader strategic planning of placing traditional media content on social media, cooperation in the operation of these forums is more than desirable and necessary.

[78% of the respondents said that their Internet community approaches problems from the mainstream media with suspicion or criticism. Users of media and media want transparency in determining topics, the openness of the process of research and building a journalistic story, and the active participation of users in all stages of the creation of a journalistic story, expecting the journalist to accept the remarks.]

4. LIVING IN A NETWORK – JOURNALIST’S CORNER

The Internet, which Jarvis defines as “the public sphere on steroids” [Jarvis, J, 2015:9], represents a new digital environment that profoundly changes the place, significance, dynamics, sustainability, perspectives, and destiny of traditional journalism, but also of journalists who use their private accounts on social media not only for communication, entertainment, and personal purposes, but also as a place to collect and disseminate information, and often to promote the content they produce. Thus, are our private social media accounts truly and entirely a private matter? Should the behavior of journalists on social media be regulated in some way, and if so, what would be the best way to do it? Would this limit the freedom of expression of journalists and impose excessive and unjustified restrictions on them, or would it, on the other hand, protect them from undermining the credibility of both journalists and the media in which they work? These are some critical and complex questions to which our interlocutors share their experiences, opinions, and answers.

Like any other living space, this one is full of dangers and risks. In the research, we were primarily interested in issues of security, censorship, and the main challenges when it comes to the content of third parties, i.e., hate speech in comments on social media.

4.1 HOW MANY AND WHICH SOCIAL MEDIA ARE USED BY JOURNALISTS IN MONTENEGRO

All journalists who participated in the research recognize the importance of social media for modern media and use these media for professional purposes. They consider social media a key “traffic generator to media portals,” that is, “a tool to direct readers to their digital platform,” as one journalist points out. The most significant number of respondents use several social media, dominantly Facebook (83%), followed by Twitter (50%) and Instagram (37%). They do it both to disseminate information (19%) and as a source of information (19%), i.e., equally for both purposes (58%).

The vast majority of respondents also use their private accounts on social media to promote the content they produce (75%), while 16% of respondents do not use their personal profiles for these purposes.

- **19% of respondents use social media to disseminate information and 19% as a source of information**
- **58% use social media equally for both purposes**

4.2 (UN)REGULATED LIFE IN THE NETWORK

According to the survey results, life in the network for most respondents (66%) is not regulated by any rules. However, a quarter of respondents (25%) are subject to some form of regulation, although the strength of this obligation varies significantly from case to case. The strictest form of regulation of the online behavior of Montenegrin journalists is contained in employment contracts, which was pointed out by several interviewees [only one in the questionnaire]. One newsroom [editorial staff of the daily *Vijesti*] has internal guidelines that bind its members. However, according to the editor-in-chief, they are not fully respected, nor are any sanctions applied to journalists who violate the guidelines. Some respondents point out the provisions of the Code as the limits they set for themselves in respecting and sharing content on social media, while some state that attempts to regulate the behavior of journalists on social media by the editorial board or administration were carried out in the past, but that they did not produce any significant results. Also, the absence of formal regulation was recorded, with suggestions received in internal communication with editors about how one should or should not act on their social media private profiles.

The majority of journalists (62%) who participated in the survey believe that the way in which media professionals behave on social media should be regulated, while 31% are expressly against any form of regulation or self-regulation. The need for regulation or self-regulation of actions on personal profiles of journalists was imposed in some cases where the behavior of journalists was directly opposed to the principles and values of the media company. One editor points out that a journalist who once worked in the newsroom insulted an activist from her personal profile, to whom the editor apologized after his report and pointed out that the journalist in question will no longer work in that media, after which the duty of journalists to behave on private profiles in accordance with the editorial policy of the media became an integral part of the employment contract. This provision, which some of the respondents considered controversial because, in their opinion, it limits and threatens personal freedom of expression, the editor who participated in the research considered necessary to unambiguously protect the principles and values of their media company – anti-fascism, democracy, and respect for human rights. She pointed out that if media employees insult a specific population and discriminate based on gender, religion, nation, etc., on their profiles on social media, this tarnishes the portal's reputation, which is therefore protected by a binding provision of the employment contract. Participants in the research, employed in the public service, also stated the existence of a similar provision in their employment contracts. One of them points out that expressing views on private profiles that are contrary to the orientation of the media in which one works is unacceptable, regardless of whether it is prohibited (by a provision of the employment contract) or not, that journalists who are public figures have a significant influence on viewers, and thus an additional obligation to remain faithful to, as he states, the "habitus of journalists."

Internal regulations or guidelines used by some Montenegrin media represent a “softer” type of regulation of journalists’ behavior on personal profiles on social media. Still, since they do not represent a contractual obligation, they do not foresee any sanctions for journalists who violate them. The editor of a media company that uses internal regulation believes that it would be best if the key elements of the guidelines should become part of the Code of Journalists of Montenegro and that they bind all journalists in the country in the same way. A local media journalist also believes that some internal rulebook should exist. She is convinced that the journalistic profession is never just a profession but much more than that. The weekly editor is of a similar opinion and believes that any form “harder” than the Code of regulating the behavior of journalists on social media could be misused and seriously threaten freedom of expression.

Some of the respondents report bad experiences in this sense. One journalist stated that she was “attacked by the editorial board and the editor-in-chief because her views (which she shared on her personal profile on social media) conflicted with the editorial policy of the newsroom.” She believes that journalists have an “inalienable right to an opinion and should not be fired for using that right.” At the same time, she maintains that this is an area that can and should be regulated by the Code.

Some of the respondents believe that the issue of the principles and values of a particular media company should be a kind of elimination criterion when hiring journalists; that is, those who do not share the same fundamental values simply should not work in a company that supports and advocates them. This would preventively minimize the risk of employees’ potentially harmful behavior on social media private accounts. A long-time journalist who spent a significant part of her career as a correspondent for international media houses and agencies claims in this sense that “on your personal profile, you cannot behave contrary to the professional standards and rules of the company you work for.”

The vast majority of interlocutors in the interviews recognize the need for at least minimal regulation, that is, for the most part – self-regulation of journalists’ behavior on personal profiles on social media, and believe that insults, discrimination, and misconduct are not and should not be a part, even of a personal image of a journalist, since, to a certain extent, they affect the image and reputation of the media in which they work.

4.3 ONLINE COMMENTS AND HATE SPEECH

One of the problems faced by social media users is the comments left under the texts, which are frequently filled with inappropriate content, mostly hate speech. Although the Guide for the application of guideline 2.8 of the Code of Journalists of Montenegro already defined the purpose of commenting in the Preamble with the words: "to ensure a coherent, argumentative and entertaining discussion in which the dignity of all participants is respected, and which contributes to the discussion on the topic opened by the text," in everyday work, this increasingly turns into its opposite. This is what one of our interviewees thought, answering the questions related to the need to moderate comments on social media: "Comments rarely contribute to raising the quality of the published content, so in that sense, I don't see their purpose."

We also asked our respondents: "Do you think that the moderation of comments on the page of your media on social media should be regulated by some act (Code or law)?" to which 21 respondents answered "yes," and 7 replied "no." We were also interested in what our respondents "recognize as the biggest challenge for moderating comments on social media." The answers were mostly similar, and the biggest challenge, they said, is the fight against hate speech. It was also pointed out that newsrooms do not have the means to employ specific persons who will deal exclusively with comments, while for journalists, it has become an "elusive job and impossible to achieve." The "abuse of the possibility of commenting by bots, trolls, and aggressive followers, who always are a few steps ahead of the moderator" was also mentioned. Regarding moderating comments on social media, one of our respondents thinks that "journalists should only remove comments with hate speech, which is a legal obligation, while the rest should be left to the authorities." To the question: "Have you had experience with the removal of content?", 7 respondents answered "yes," and 13 answered "no." To the question: "Are social media platforms transparent in cases of censorship?", 9 respondents answered "yes" and 12 "no." The participants in our research also responded to the question: "If your content was removed, did you receive an explanation from the social media as to why it was done?" Nine respondents answered "yes," and 3 denied.

In their answers, the respondents also stated that to moderate comments, one should have a lot of sensibility and knowledge, not only journalistic but also social and political. The opinion was also expressed that one should be careful and create a precise balance between censorship and freedom of speech, while one respondent assessed that the moderation rules might be unclear. We also asked the question: "Do your moderators have problems distinguishing hate speech from insults when moderating comments under the texts you publish on social media?" to which 14 respondents answered with "yes" and 11 replied "not."

All research participants agreed that the situation on social media is chaotic and unsustainable and requires some form of regulation. "Social media have gone too far from what they wanted to be, so, among other things, they have become political and propaganda tools. They have much more information about us than we think." This was the conclusion of one of the interviewees whose specialty is dealing with social media. However, when it comes to the regulation method, no one had a concrete proposal, except for the general position "that it is a tricky topic, where Montenegro cannot do anything, except to join the global regulation, if it comes to it."

An exception in this regard is one of our interviewees with many years of experience in journalism. She believes that the Code should make journalists responsible for moderating comments on social media and that the rules, in addition to the Code, should also be prescribed by a self-regulatory act, which would determine the rules of journalists' behavior on social media. She is aware that the media community would oppose this, but she thinks that it is the most acceptable initial move. She opposes regulation in this regard because she thinks that legal regulation would restrict freedom of expression. In her opinion, the qualification of hate speech is exaggerated so that everything can be denoted by it. She says that hate speech is not easy to prove and that, in most cases, it is offensive, hateful, and tense. Apart from this, when it comes to social media, she believes that we all exist in an experiment. In addition, one respondent argued for introducing "digital literacy and the implementation of digital training for journalists, especially those who belong to the older generations of this profession, while its younger members are better at handling information technologies."

The majority of respondents consider moderating comments on media pages on social media to be necessary but, at the same time, an exhausting job. Some interviewees point out that this work should not burden journalists more. At the same time, the lack of human and financial resources represents a chronic and common challenge for almost all media in Montenegro.

Regarding the person who does the moderation, the respondents mentioned different practices. Thus, the moderation is done by editors (39%), journalists (16%), specially engaged moderators (23%), portal editorial staff (13%), relying on ad hoc moderation [comments are moderated by the entire team, depending on the moderation schedule or who has free time. Some media divide the work in the sense that some members of the portal report controversial content, while others decide on the potential removal of comments] (13%) or the social media used by the media (3%) [13% of respondents did not answer this question]. Respondents often report a combination of the above options. In this case, the comments are moderated mainly by editors and journalists.

Participating in our research, the representative of the Public Service RTCG said that editors currently do moderation in their media. As a step forward in all this, the representative announced the formation of a newsroom for social media, which, he believes, would significantly improve the overall operation of this media on this communication platform. Criticizing the provision of the Media Act that stipulates a 60-minute deadline for comment removal, one editor believes that in this way, moderating comments turns into, as she called it, a “zombie job.”

Moderators of comments on the media portal most often also moderate comments on the media’s page on social media. Most have a problem distinguishing hate speech from insults when moderating comments under texts the media publishes on its page on the social media it uses.

The majority of respondents, 69% of them, believe that the moderation of comments on media pages on social media should be regulated, 22% believe that this area should not be regulated by any act - legal, code, or similar, while 13% of respondents did not respond to this question.

Hate speech in comments on media pages on social media undoubtedly represents one of the biggest problems that journalists and editors face when moderating [the most significant challenges that respondents in the survey recognize in this context are listed below], that is, as one of the interlocutors pointed out, the question “how to exclude those who ‘talk nonsense’ and who are the loudest” constantly arises. The biggest problems are the already mentioned lack of human and financial resources for comment moderation, insufficient knowledge about how to recognize controversial comments, the lack or absence of commenting rules, and balancing between the right to freedom of expression and other rights that problematic comments can threaten, such as privacy, personal integrity, reputation, dignity, and the like. Targeted and coordinated commenting, i.e., commenting by social bots that systematically heat up and polarize the discussion in the comments, often spreading hate speech or speech against human rights, was recognized as a significant problem. As one of the interviewees wittily remarked: “Bots and haters do not respect working hours.” All this makes it difficult and complicated to moderate comments and make a correct and well-founded decision to remove unacceptable third-party content on media accounts on social media.

Respondents in the survey recognize the following as the most significant challenges: anyone can leave a comment anytime. While the moderator is reacting and if s/he is not available 24/7, discussions or comments can go in the wrong direction, leading to hate speech, threats, and the like; being overwhelmed by a vast number of worthless comments; impartiality; suppressing hate speech is the biggest challenge, and not easy to overcome, everything else can be put in order more easily; journalistic ethics, general, and media literacy; insufficient resources, insufficient number of employees; hate speech; timely reaction, and the proper measure between freedom of speech and other rights and liberties; it is difficult to control a large number of comments, especially at a time of high bot activity, and with limited manpower; editorial offices often do not have the capacity to hire specific persons who will deal exclusively with comments; members of the editorial board almost do not participate in discussions in the comments, I personally think they should, especially when the comments are really about the content; comments rarely contribute to raising the quality of published content, so in that sense I often don't see their purpose; balance of censorship and freedom of speech; lack of sensibility and insufficient knowledge of those who do it, but too few people in charge of the work; abuse of commenting opportunities by bots, trolls, and aggressive followers, who are always a few steps ahead of the moderator; too many comments and too few workers dealing with social media; hate speech, insults, threats, disparagement are often unrecognized; I don't know, I don't moderate; editorial offices often lack the capacity to hire specific persons who will deal exclusively with comments; who is the judge; insufficient education of employees for comment moderation; bots and haters do not respect working hours; recognizing inappropriate comments; malicious professional commentators, i.e. bots and attackers who act mostly under false identities; endangering freedom of speech; prevention of hate speech; perhaps unclear rules regarding moderation; the volume of work in reviewing a large number of comments in the shortest possible time; the responsibility of the media for comments should be ensured, therefore, I believe that the media must bear responsibility if they allow the dissemination of controversial content; live inclusion and lack of content verification in comments.

5. SAFETY ON SOCIAL MEDIA

Almost all participants in our research confirmed that they were targeted in some way on social media because of the work they do. To the question, "Have you had any experience with organized online attacks on the media where you work (hacker, bots, etc.)," 20 of them answered with "yes" and 10 with "no." The exact ratio was expressed when answering the question, "Have you experienced harassment and/or threats on social media related to your professional engagement through private messages or in comments under articles?" In most cases, the respondents said they received threats but did not report them, and those who decided to do so reported the threats to the police or the competent prosecutor's office. In one case, the threat was reported to the director and editor of the media and only to one social media.

In the statement about the specific actions of the competent authorities on these occasions, we received the answer that one person was punished for a misdemeanor and that the procedure is ongoing in one case. At the same time, in another, the police and the prosecutor's office assessed "that there was no threat in the reported messages." Two respondents were satisfied with the reaction of the police, and one respondent, after receiving an inappropriate comment, directly addressed the commenter and the comment was immediately deleted. The person who contacted Facebook about the received threat, without receiving any response later, said: "Keeping in mind that Facebook's reporting system relies on artificial intelligence, which is trained for English, but not for some other languages (smaller markets) like ours, it is not realistic to expect that a simple application will have a desirable outcome. It's the same with Twitter and Instagram."

Among the listed threats, the most pronounced is the death threat from an Instagram profile addressed to all daily newspaper journalists. Its sender was identified, and all journalists from the newsroom were questioned by the police and stated that they felt threatened. They repeated the same in the Public Prosecutor's Office in Podgorica, where this process is ongoing.

A respondent from another media also told us that she often finds threatening and insulting messages in her messenger ("Ustaša," etc.), but that she had not reported them until now. She simply did not do that, as she does not consider it all serious, because most of it comes from fake profiles and, as she said, "mentally ill people who have nothing else to do." She says that by possible reporting, she does not want to attach importance to such cases and waste her and her institution's time. "If I and my colleagues, journalists, in Montenegro were to report all threats and personal insults that reach us through social media and outside of official communication, that would be a huge pressure on the state authorities," she said, noting that perhaps she was wrong because reporting threats, and possibly sanctioning them, might have the effect of giving them up.

Her colleague is of a similar opinion, with the addition of being more exposed to insults on social media and in the comments below the texts. He does not report this type of harassment either because he is guided, as he said, by the computer rule "you shouldn't feed trolls." Another journalist spoke about the threats she receives, not on Facebook because she chooses her followers, but through Twitter, where, as she says, this control is weaker and through which the mentioned threats came to her. She did not report them, as some other media did not do, expecting them to be prosecuted by the competent authorities, for whom she has no praise in this regard, especially when it comes to insults at the expense of civil women activists to whom their portal often gives space.

A longtime journalist from Podgorica did not report threats either. He received threats when reporting on an event known in Montenegro as a "coup d'état." They were referred to him by a person who was brought in connection with it but who, being a citizen of Serbia, was unavailable to the competent state authorities of Montenegro. That is why, he says, he did not report those threats to the police because he considered it pointless. Some other media, specifically portals in Montenegro, received identical threats from the same person, but he told us they did not report them either.

Two of his colleagues, with many years of journalistic experience, were also exposed to threats. They did not report threats either. The first explained it with the folk saying "that a dog that barks does not bite," while the other told us that he did not take the received threats seriously, "just as he did not take those who sent them seriously either, but sees it as a consequence of a dehumanized society." A much younger journalist did not take the insults and threats he received seriously at first, but when he started receiving death threats, he was forced to report them to the authorities. Then he was offered police protection, which he did not accept.

In addition to insults and threats, one interviewee told us that she also received curses, which she did not report. To her colleague from another media, the threat came at the expense of her national feelings. After she got in touch with the person who left the comment with such content, the comment was deleted.

The words of one journalist are also interesting. In addition to not commenting, he sometimes uses his account to delete his past posts. He does not consider it self-censorship, but a kind of prevention, because "some people are inclined to follow a person's entire life through his appearance on social media."

6. DISTRIBUTION AND MODERATION OF MEDIA CONTENT ON SOCIAL MEDIA

The transparency of the work of social media is one of the central topics when talking about these platforms. This topic has arisen in the last ten years, and in recent years it has become the main problem of almost all democratic societies. Very quickly in the last decade, social media also showed their dark side. Illegal content and misinformation have flooded the space given to them by these tech giants and thus worried many world governments. This automatically raised the issue of transparency of their work. As the influence of social media grew, so did their manipulative and harmful impact. Last year, at the World Economic Forum in Davos, Ursula von der Leyen said: "We have to deal with the dark side of the digital world. We cannot accept that it alone makes decisions that have a far-reaching effect on our democracy."

It is known that all social media use algorithmic programs that determine the visibility or invisibility of the content posted on them. Our interlocutors were mainly unclear about the role of algorithms in the operation of social media. Most of the interlocutors interviewed were not clear about the working principle of social media, nor could they find guidelines or instructions on how to use them. On the other hand, we had a couple of interlocutors who were highly educated and knowledgeable about the programs and rules of operation of these technological platforms. This was mainly due to the nature of their work, so their knowledge cannot be taken as characteristic of the media community. They were not journalists and did not work for the media, but their work was primarily related to social media.

To understand this topic and methodology, it should be emphasized that the most popular and used social media in Montenegro is Facebook and that most of our conversations were about this social media, although this was not explicitly stated anywhere during the interview. All other social media are less used compared to Facebook. So, when we talk about platform algorithms, we mostly mean this most extensive social media.

When it comes to journalists, a number of them think that the algorithms of social media are flawed or that they are adjusted that way for manipulative reasons. They noticed that if the content is posted more often, it is less accessible to a broader audience. This is followed by the opinion that algorithms are the biggest censors and have dramatically limited visibility. Insufficiently clear instructions for use, insufficiently clear optimization rules and their feedback make the prevailing opinion about social media.

We highlight the opinion that algorithms are created based on the experience of users and content sharers. "They know us, and we can only guess about them," says one interlocutor. For the most part, it seems that the reach is based primarily on the activity of the user who chooses to pics similar to those the medium conveys. This opinion referred mainly to the profiles of individuals, not specific media pages.

Several interviewees noticed that social media algorithms allow only 10% of any media audience to see that media's publications on different platforms. Therefore, the downside of using social media to promote content is the obligation to boost the content if the media want to reach a wider audience. They are of the opinion that the social media do this to force users, above all the media that care about reaching a wider audience, to pay to get as many readers and users as possible. Half of the respondents did not have a formed opinion on this topic and were not familiar with the existence of algorithms and how social media function and make certain content more or less visible.

Half of the survey stated that their media allocated special funds for promotion, that is, for boosting the visibility of media content, while the other half answered this question negatively. One of the interlocutors told us that they started using social media immediately after establishing their portal. He says that they tried not to become dependent on social media because it is an uncertain project and because they cannot control Facebook's algorithms to distribute content. In the beginning, it was simple because every follower could see the posted text, and they tried to get as many followers as possible. Later, Facebook reduced the visibility of texts to make money from advertising. Initially, the original number of followers could be reached with a few euros. Later, the hosting price increased, so it was not worth investing in this way of content visibility. They have also somewhat neglected the use of social media because they want their readers to go directly to their portal and not to reach them through social media, which is increasingly the case lately.

"Now the daily number of followers on Facebook and Instagram is limited," another interlocutor tells us. Previously, this was not the case, as the media could reach a large number of followers in a short time. While advertisers monitor the number of followers on Facebook and Instagram, which is particularly relevant for all media, it turns out that reaching a larger number of users through advertising is now a significant expense for the press. He told us that he was not satisfied with posting texts on Facebook and was not allowed to promote his political texts. Facebook did not authorize, for example, the posting of text concerning the composition of the new government of Montenegro.

To the question, "Have they had experience with censorship (organized reporting of content, banning, blocking, etc.) on the social media they use?" 8 respondents answered "yes," while 24 replied "no." Regarding censorship on social media, 12 interlocutors answered that social media are non-transparent when they do it, while 9 said that they do it entirely transparently. The others had no opinion or information on this issue. Seven interlocutors had experience with content removal. Only three came up with an explanation as to why this was done.

Very different answers were received regarding communication with moderators of social media or with the media themselves. Nine respondents answered that they managed to make contact with people who moderate content, while 12 of them responded to this question negatively.

From those who confirmed that their profile was blocked, we obtained information that one user's profile was suspended multiple times for 30 days and that he received notifications about it. Another user says that he was banned unjustifiably and had to rearrange the content while the search for mediation was ongoing because the procedure was not clearly stated. We also registered the case of a user whose Facebook group was permanently terminated and who received an explanation for this. We also had the experience of one social media user who was banned for 7 days without receiving an explanation. To the question "Did you have the possibility to appeal to the social media and did you complain?" 18 respondents answered "yes," while 10 said "no." About the outcome of the appeal, the respondents expressed themselves more concretely through interviews.

When it comes to removing content and blocking profiles, whether private or belonging to the media they work for, we received many different answers that could not be systematized into several categories. From the fact that every time content is removed or blocked, an explanation is given as to why it was done and that the procedure is highly transparent, including an explanation about the possibilities of appeal, to the fact that the procedure is not transparent and that something completely arbitrary and untrue is consistently cited as the reason. According to the experience of one colleague, the reasons for content removal are not always objective. Due to the faulty interpretation of information by social media platforms, specific contents are too easily marked as incorrect, i.e., as "fake news," and because of this, they are removed or their visibility is limited.

On the other hand, one interlocutor says that the work of social media is transparent in our language. Feedback is readily available, both regarding reach/range and profile blocking. An explanation is given as to why something was done, and here we refer primarily to Meta (Facebook).

One interlocutor told us about the experience of a colleague who, because of a text on Twitter, found herself under an intense internet attack that lasted for ten days. The attacks came from another country and fake accounts. They tried to notify Twitter about it, but it did not work. Only when they managed to reach the people responsible at Twitter through private connections did they find out they had been talking to machines the whole time. That is how they discovered that the Balkans is a small market for Twitter and that all types of moderation are done by artificial intelligence, not humans. In addition to being a small market, the Balkans is also a non-English speaking area, which makes it even less attractive. Until Twitter had many such users, people were responsible for moderation. Today, due to various savings, unattractive regions are moderated by artificial intelligence. This interlocutor told us that this way of working on Twitter became known relatively quickly, so it happened that certain texts were reported as illegal for political reasons. Artificial intelligence then automatically deleted them or blocked profiles. This is an example of the misuse of artificial intelligence algorithms by users.

According to our interlocutor, even Facebook is not immune from this type of abuse. Sometimes a few users tag a particular medium for misinformation, even though it is not the misinformation. Then Facebook reduces its visibility, while that medium has no one to turn to and complain. The situation has been somewhat improved with fact-checking organizations, but according to our interlocutor, selecting organizations that check misinformation on Facebook is not transparent. He believes that more needs to be done to familiarize journalists and the media with Facebook's procedures because our journalists are not familiar enough with the ways of using social media.

On the other hand, one interlocutor had his Facebook group, which had over 40,000 followers, permanently blocked. He believes that it was justified. "My group was canceled due to the large number of comments that appeared on it, which were unacceptable for the rules of the Facebook community. Five comments were particularly problematic, of which I single out: 'kill,' 'slaughter,' 'civil war'..." he says. He adds that it is impossible to moderate the comments of such a large group. Also, this respondent's profile on another social media was banned because he published a post about the ban on tattoos in the EU, which he had to remove so that this account would not be canceled.

A portal journalist told us they were victims of a reporting campaign for disinformation. Based on this experience, they came to the knowledge that anyone can mark and target a specific media for irregularity and that, afterward, one needs a month to find out what everything was about and why Facebook imposed the restrictions.

As a final example, she cited the text about monkeypox, which stated that the disease was widespread among the gay and bisexual population. A fact-checking organization marked this text as misinformation and the portal was sanctioned. A few days later, the exact text appeared in another media, but no one reacted. Our interlocutor says that these double standards are questionable and that the text, if problematic, would have to be sanctioned in all the same. Something similar happened with the column of the famous Montenegrin writer Andrej Nikolaidis.

The Montenegrin public service media has recently been intensively dealing with social media and is looking for an optimal way to use them for its needs and promotion. Interviewing one of the employees, we learned that the public service media is soon establishing a newsroom for social media that will be in charge of all aspects of communication on these platforms. In the public service, they expect to be able, with the help of this new editorial office, to use all the benefits of social media and prevent all the harmful content posted under their texts on these platforms.

According to one representative of a fact-checking organization, only Facebook has a transparent public fact-checking program because it cooperates with local partners. The France-Press agency works for the entire region for Facebook, and local organizations are partners for this news agency in our area. From our conversation with her, we learned that these organizations do not deal with disinformation from Montenegro but with disinformation that affects public opinion in Montenegro. "We deal with disinformation in our language, we don't follow the media, but disinformation," she says. According to her, other platforms have some systems to combat disinformation, but all of this is relatively non-transparent. Fact-checkers have criticized YouTube and Tik Tok for being non-transparent. If they cooperate with someone, it is a secret. She says that they hope that the Act on Digital Services will change these occurrences and force large platforms to work more transparently and responsibly. She also expects this law to strengthen the cooperation of social media with fact-checking organizations.

She mentioned that there is a lot more misinformation than they have the resources to cover it. The capacity of fact-checkers to reach the audience is also limited, which is one of the problems when exposing disinformation. From our conversation with her, we learned that the media in the region, which deal with disinformation campaigns, are acquainted with the programs that social media use. They are now adapting their activities to those programs to avoid fines or more permanent suspensions. This evokes the local elections in Nikšić in March 2021 and, for Montenegro until then, the unprecedented disinformation campaign marked the election day. Several media from Serbia and several from Montenegro participated in this campaign. One media outlet published a text with false information, which it deleted soon after. Still, in the meantime, it was transmitted by all the other media that participated in this action and reached millions of audiences. A few days after the end of the election, these media would properly publish an apology and correction of false information to avoid more severe punishment from Facebook. Certain media from Serbia regularly used this type of manipulation.

Although these media have learned how to abuse Facebook's rules, the constant work of fact-checking organizations has forced them to stop using this platform to spread disinformation and move to Russia's V Kontakt and Telegram. Telegram is one of the platforms that avoid any cooperation with the European Commission on this issue. Our interlocutor also notes that some domestic portals now publish less controversial content on Facebook and that such content goes to YouTube, which has less restrictive measures.

The fact-checking organizations are now preparing for Twitch, she says, which is a gaming platform soon to become a network for spreading disinformation. It has been noticed that misinformers are increasingly migrating towards it. It is a streaming platform, which is very difficult to follow because it goes live.

There is a special section on Facebook for hate speech, but fact-checking organizations have no contact with it. Our interlocutor reminds us that "small" languages are neglected regarding hate speech on Facebook. She says that the context in which certain hate speech occurs is often overlooked and that with a lack of understanding of the context, open hate speech passes, while something that is not hate speech is banned. This is especially a problem for minor, marginalized languages. There are mechanisms to contact Facebook for severe matters of hate speech. She says that the Government can communicate anything that is a criminal offense and request the removal of disputed content. According to her, the problem is that we do not have a strategy, a law, or a regulation that would authorize someone in the country to deal with this kind of content.

7. CONCLUSIONS AND RECOMMENDATIONS

Based on the conducted research, it can generally be concluded that Montenegrin journalists and media do not know enough about the work of social media and do not fully use all the possibilities of these platforms for their work. Through direct conversations with them, we concluded that half of them do not know the rules and procedures of Facebook regarding the various restrictions that this platform can impose, as well as the ways of submitting complaints about them. Therefore, the education of journalists and editors on the way social media function (filing complaints, communication with moderators, algorithm systems of individual social media) seems more than necessary.

As the growth and presence of these technological platforms will undoubtedly continue in the future, for the needs of traditional media and journalism, it would be necessary to get to know the possible benefits that social media can offer journalists, as well as the negative sides of social media that can harm traditional media. The working group concluded that Montenegrin journalists would need education on the basic postulates of the work of social media. The presence of these platforms must be taken into account. Accordingly, it is necessary to create a cohabitation strategy and extract the maximum benefit from this relationship for traditional media. Many facts do not favor traditional media at the moment. Yet, they still provide objective, accurate, and reliable information for the citizens. On the other hand, social media are marked as a source of spreading organized disinformation, hate speech, and all types of illegal content.

At the moment, the situation is that social media use the contents of traditional media for free and take over the marketing from them to a large extent. This does not mean that in the near future, after adopting adequate regulations, this relationship could not be reversed and that this cohabitation would also bring some privileges for traditional media. Above all, we mean respect for media copyrights and their protection. Also, the algorithms of social media are subject to change. At the same time, possible legal solutions could force these platforms to make the media content they currently use free of charge more visible.

All this indicates that the connection of traditional media with social media should also be legally defined so that social media help promote traditional media to some extent.

When it comes to the use of social media, traditional media could do more to adapt and improve the way the content is placed on social media, without advocating clickbait journalism, but by investing in new capacities, instruments, and text equipment. In this sense, the working group appreciates the announced initiative of the public service to establish an expedient newsroom for social media, which would take responsibility for the placement of content on these platforms, as well as all obligations arising from this.

When it comes to threats and violence on social media, which have been directly communicated several times through our research, it is necessary to seek greater involvement of social media and their help in discovering the persons who are the perpetrators of these parts. Failure to report threats favors the normalization of a culture of violence and makes journalists live under constant pressure, which they are expected to get used to. The working group appeals to all journalists to take threats seriously, properly report each case to the police authorities, and make this topic more visible to the public.

Since fact-checking organizations on Facebook play an increasingly important role, it is necessary to achieve communication and cooperation between the media and these organizations to improve collaboration between the media and social media. This would avoid unnecessary restrictions on specific content and establish a more professional relationship between the media and these organizations. From the conversation with the interviewees, we understood that the transparent work of these organizations would help the media, but also that the social media themselves could do more on transparency when selecting these organizations.

Organized disinformation campaigns are currently one of the biggest problems facing social media. Almost all of our interlocutors pointed out that social media should deal with illegal content professionally and invest more resources in the fight against it. It is also necessary to recognize that social media disinformation campaigns are often coordinated actions, not incidents. Accordingly, more should be invested in the visibility of the findings of fact-checking organizations so that the disinformation discovered is made known to a broader audience.

When it comes to journalists' activities on social media, most interlocutors think that the Code should prescribe their obligations, which would mean that even when journalists act privately from their personal profiles, the Code would oblige them to act professionally. In this sense, the working group proposes a broad and inclusive debate among media actors regarding the potential expansion of the competence of self-regulatory bodies to the work of social media.

The vast majority of research participants agreed that the situation on social media is chaotic, unsustainable, and requires some form of regulation to prevent the further transformation of social media into political and propaganda tools. As the official application of the Law on Digital Services and the accompanying Code at the level of the European Union are expected soon, adequate and timely preparation for the adoption of these documents and their implementation is recommended at the national level.

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