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**Grey areas:  
a cross-country comparative study of user-generated  
hate speech, incivility and journalistic responsibility  
for online comments**

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A thesis submitted in partial fulfilment  
of the requirements of the University of Westminster  
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**Abstract:**

This study is concerned with the issue of responsibility for comments. More specifically it is focused on situations where despite of site usage policies and the existing legislation, prohibited content such as hate speech and incivility does appear in the comments. The project consists of a comparative cross-country analysis of a sample of newspapers and comments from Hungary, Romania and the UK. Building on a content analysis of a sample of 16,972 comments collected from the sites of some of the main newspapers in the three countries, and interviews with journalists, this project examines the nature, extent, variations and contributing factors of user-generated hate speech and incivility across countries, newspapers, topics, and hate speech target groups. The research finds a similarity in hate discourse types across the sample and also in values of journalists regarding responsibility for comments. A significantly higher proportion of hate is found in Romania than the other two countries, which might be due to specific features of the media system. While the level of user-generated hate speech is lower in the UK and Hungary, the findings point to a gap in media policy that results in the presence of such content on the sites of newspapers from all three countries.

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## **Declaration**

I declare that all the material contained in this thesis is my own work.

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## Introduction

“So be it. Better that the public sees that their 'muslim fellow countrymen' are nothing of the sort, but an evergrowing threat that should be dealt with while the numbers still favour us.” (Posted on *The Telegraph* by Dave Bould at 2015-07-04 15:19:32)

“(...) the disabled people are the genetic waste of our species, in nature they would die, this way society supports them completely uselessly, under the title that they are humans too,,. So what? (...) Because of this no disabled person should be allowed to be born, the resources totally uselessly spent on them should be spent on the truly valuable parts of society, (...)” (posted on *Magyar Nemzet Online* by hawk777 on 2015-02-05 12:48:00)

“rotten stinky crows that have to be exterminated simple...what’s with all that mouthwash?” (Alex Grecov [USER] 2015-09-19 posted on *evz.ro* Facebook comment box)

"Nobody knows legally who's responsible for those comments. So they've been this gray area that everybody's talking about"<sup>1</sup>, said a journalist interviewed by Singer et al. in 2011. The comments above have been posted to sites of the most important national newspapers in Hungary, Romania and the UK, even though the sites' terms of services prohibit this sort of content and all countries have legislation against hate speech. This thesis is an examination of interactivity in the form of user comments on online newspapers, focusing on the issues of hate speech and incivility. The topic of this thesis is situated at the intersection of several important, complex and highly controversial issues such as limits on freedom of expression and responsibility for third-party content online. Hate speech, and the limitations on freedom of expression necessary for its prevention, has long been a complicated and heavily debated issue. The move to the internet has made it even more

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<sup>1</sup> Journalist quoted in Singer et al., p.134

complicated. The internet has not just provided previously unavailable ways to spread hate speech. The perceived anonymity guaranteed by online communications and the internet's cross-jurisdictional nature have also reduced the threat of possible legal or moral consequences. Further complications emerged when online newspapers opened up their pages to user participation. As noted by Kaufer, contrary to earlier models where speakers had to assemble their own audience<sup>2</sup>, the comment areas supply a readily formed audience attracted by the professional content, similarly to the advertising model, available to anyone capable of creating an email address. Hughey and Daniels describe this as a "classic tragedy of the commons dilemma"<sup>3</sup> in which "flamers, bullies, bigots, charlatans, know-nothings and nuts in online discourse take advantage of open access to other people's attention."<sup>4</sup> Posting hate messages on mainstream websites offers the additional benefit of reaching the targeted group directly if they are posted under articles that are of interest to the target group. Moreover, the presence of hate messages on a mainstream website could also serve as encouragement for people sharing similar thoughts who have not yet taken the initiative to seek out dedicated hate sites or forums. The comment areas of news sites thus provide the perfect tool for the two aims of hate speech posited by Waldron: intimidating the target group and encouraging others who might share similar views.<sup>5</sup>

According to Kovach and Rosenstiel, a primary role of newspapers in democracy is to foster and provide a place for democratic debate<sup>6</sup>. However, for such debate to be at its full potential, civility and mutual respect of interlocutors is essential; therefore, newspapers forbid uncivil behaviour. While the prohibition of hate messages stems from a legal obligation, preventing incivility originates mainly from the aforementioned ethical duty of facilitating democratic debate. In line with this duty, most newspapers forbid uncivil

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<sup>2</sup> Kaufer, David S. 2004. The Influence of Expanded Access to Mass Communication on Public Expression: The Rise of Representatives of the Personal. In *Private, the Public, and the Published : Reconciling Private Lives and Public Rhetoric.*, 153-165. Logan: Utah State University Press, p.155

<sup>3</sup> Hughey, M. W., and J. Daniels. "Racist Comments at Online News Sites: A Methodological Dilemma for Discourse Analysis." *Media, Culture & Society* 35, no. 3 (April 1, 2013): 332-347.

<sup>4</sup> Rheingold, 2004: 121 – cited in Hughey and Daniels, 2013

<sup>5</sup> Waldron, Jeremy. *The Harm in Hate Speech*. Cambridge, Mass.: Harvard University Press, 2014. p 2

<sup>6</sup> Bill Kovach, and Tom Rosenstiel, *The Elements of Journalism: What Newspeople Should Know and the Public Should Expect*, Revised and updated third edition (Amazon Kindle). (New York: Three Rivers Press, 2014).

behavior. However, as Coe et al. showed, almost a quarter (22%) of user contributions could be considered incivil<sup>7</sup>.

A key problematic issue for comments is responsibility. As it will be shown in the literature review chapter, the interplay of different regulatory approaches and models originally applied to the press and e-commerce, places comments, and user-generated content more generally, in the grey area mentioned in the quote at the beginning of this chapter. This has resulted in a situation where no one bears effective responsibility for content that can potentially reach millions of readers. Online newspapers benefit from the same regulation-free approach applied to newspapers, subject only to general civil and criminal law. They also benefit from a policy designed initially for internet service and web-hosting providers that limits the liability of a host for third party content appearing on their pages, allowing online newspapers to decline responsibility to the users who are usually anonymous. Moreover, the policy gap allows newspapers to set their own rules and policies, and decide on mode and level of moderation, thus acting as de-facto communication regulators. The lack of a transparent, clear and uniform policy regarding user contributions also presents the danger of private censorship, as it is left to newspapers to define terms such as discrimination.

Adopting a cross-country comparative framework, the purpose of this thesis is to reveal if there are significant differences in the nature and amount of hate speech and incivility that bypassed moderation in some of the major news sites in Hungary, Romania and the UK; to explore potential explanations both at the newspaper-level and at the broader country-level; and finally to provide some clarification regarding the issue of responsibility.

As mentioned earlier, ‘hate speech’, and the limitations of free expression in order to control it, is a controversial and complex topic. However, contrary to the situation in the United States, where the First Amendment prevents the regulation of hate speech, in all the countries examined in this thesis the law quite clearly prohibits discriminatory behaviours

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<sup>7</sup> Coe, Kevin, Kate Kenski, and Stephen A. Rains. “Online and Uncivil? Patterns and Determinants of Incivility in Newspaper Website Comments.” *Journal of Communication* 64, no. 4 (August 2014): 658–679.

under the generic term of hate speech. Therefore, the question is not whether this type of content (here, hateful comments on websites) should be filtered; rather the question is why such comments are still there despite the legislation and the site's own rules, and consequently what could be done to prevent the phenomenon.

I define user-generated hate speech (UGHS) as content created by non-professional, usually anonymous users; aimed at intimidating or verbally harming particular minority groups; taking advantage of the interactive features of websites and of gaps in media regulation; and intended to be published and reach its target audience. It displays some parasitic and viral characteristics. It needs a host such as an interactive website to exist, but also the host is the one that 'transmits' it to the victims as in a virus. It also exploits the weaknesses of regulations on user-generated content and hate speech, especially provisions protecting free expression such as the lack of regulation regarding the press. The most important feature of UGSH differentiating it from dedicated hate blogs/forums/sites is that it is aimed at the general audience and it is using mainstream sites to reach it, while the readers of hate-sites are usually people who purposefully look for that content. This way it can reach a much wider audience. That is what I call a parasitic behaviour. Also, by being attached to articles whose topic is relevant for the target group (e.g., an article about minority education or a video about an LGBT parade), it relies on the topic of the host to attract members of the target community to both the legitimate content and the hate-speech.

There are no statutory or self-regulatory provisions regarding user-generated content (UGC) on sites where it is present alongside the professional content, neither are there rules regarding the management of user participation. It could be argued that by deciding to access a certain website, the reader has made a conscious decision and assumed the risk of facing whatever is displayed there. However, websites usually do not warn their readers that they might also be hosting harmful content originating from their users, as, for instance, pornographic sites do. UGHS is usually displayed in the same journalistic space (same web page) as the professional text and legitimate user contributions, thus exposing all visitors to harmful content; in effect, inadequate policies on user participation open up

the possibility for the website to be exploited by users as a delivery platform of readers to hate speech.

The thesis is structured in six chapters: the first chapter provides a theoretical overview of the issue of hate speech, presents some of the main regulatory approaches to it, and then also explores some of the ethical implications of comments. The second chapter introduces the comparative framework, focusing on elements in a media system that could influence levels of user-generated hate speech and incivility, especially in the two post-communist countries under analysis. Chapter 3 describes the research methods. The study is based on interviews with journalists and a content analysis of a sample of 16,972 comments gathered from the websites of seven major newspapers from the three countries (Hungary, Romania and the UK); it also introduces the codebook and the five hate target groups on which the comment sampling is based. The first of the two findings chapter, Chapter 4, presents and discusses the results of the content analysis, focusing on the specific types of hate speech addressed to the five target groups. Chapter 5 presents the issue of comments from the journalists' perspective, focusing particularly on the issue of responsibility, limits of freedom of expression, moderation strategies and journalists' and perceptions of challenges, benefits and the roles of comments. The final chapter addresses the research questions and provides a combined analysis of the two findings chapters, relating the results of the study to the literature, and proposes some practical applications of the findings and potential solutions to the problem.



## Chapter 1. Literature review

### Introduction

This chapter is structured in four sections: the first section provides a theoretical overview of the issue of hate speech and presents some of the complications and regulatory approaches. The second part will illustrate the specific challenges presented by online media in general and by user-generated content. Section three will provide a theoretical overview of the transformation of newspapers from a unidirectional closed medium into participatory, interactive spaces, while section four will present the detailed overview of the state of research done on the effects of comments and incivility in the comment areas. Together these four sections aim to provide an illustration of the problem of hate speech, the complexity of regulation and to present some of the prominent issues regarding comments.

### Freedom of expression, hate speech and freedom of the press

According to the International Encyclopedia of Communication hate speech is a “form of verbal aggression, expressing contempt, ridicule, and threat towards a specific group or class of people”.<sup>8</sup> Terry A. Kinney, the author of the entry, considers that its danger lies in the fact that even if they are untrue and expressed by marginal groups, these hateful ideas and acts have the "ability to infiltrate our thoughts." Moreover, the internet has created "new communication spaces where this kind of speech can flourish" making legislation

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<sup>8</sup> Kinney, Terry A. 2008. Hate Speech and Ethnophaulisms. In *The international encyclopedia of communication*, pp. 2051, 2054. Malden MA: Blackwell Pub.

against hate speech especially complicated, due to the internet's cross-jurisdictional nature, anonymity and more relevant for the topic of this work, due to the appearance of interactive websites mixing professional and user-generated content (UGC). The Encyclopedia of Political Communication even considers hate speech as the use of "words as weapons" with potential to terrorize, humiliate, degrade, and discriminate victims<sup>9</sup>.

The three identifying features of hate speech according to Parekh are: it singles out a group based on certain characteristics; it stigmatises the members of the target group by ascribing them highly undesirable qualities and uses these to justify discrimination.<sup>10</sup> Although the third component implies and sometimes can lead to some action against the targeted group that does not necessarily mean that hate speech will directly result in violence but it can still intimidate and harm members of the targeted group. Similarly, while hate is indeed expressed sometimes in an offensive and insulting language, it can also be "subtle, moderate, non-emotive, and even bland and conveyed through ambiguous jokes, innuendoes and images."<sup>11</sup>

The appropriateness of using the term "speech" is also disputed by Waldron, who considers that it wrongly focuses the attention to the spoken act. In his view it is the published materials that are "particularly worrying" compared to spoken insults or racist graffiti due to their endurance and the ease they can spread. Moreover, regulation's aims are "not restriction on thinking" but "on tangible forms" (p.39) Therefore he argues for a definition of hate speech as group libel as exemplified by the French Law on the Freedom of the press that prohibits group and individual defamation.

The primary function of hate speech is not expressive – Waldron points out - it is to send a message both to victims and to others who might be sympathetic to the hateful ideas.

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<sup>9</sup> Rhea, David M. 2008. Hate Speech. In *Encyclopedia of political communication*, 301. Los Angeles. Sage Publications.

<sup>10</sup> Parekh, Bhikhu. 2006. "Hate Speech." *Public Policy Research* 12 (4) (February): 213-223. doi:10.1111/j.1070-3535.2005.00405.x.

<sup>11</sup> Parekh, 2006, 214

“Don’t be fooled into thinking you are welcome here. The society around you may seem hospitable and nondiscriminatory, but the truth is that you are not wanted, and you and your families will be shunned, excluded, beaten, and driven out, whenever we can get away with it. We may have to keep a low profile right now. But don’t get too comfortable. Remember what has happened to you and your kind in the past. Be afraid.”<sup>12</sup> (p.2)

Hate speech undermines the public good of inclusiveness of a society free from discrimination, hostility and violence and also undermines the targeted group’s members rights to dignity – Waldron argues. He argues/contends therefore that hate speech laws are "not the violation of rights but something which may be permitted and even required in human rights context" by pointing out that article 20 of the International Covenant on Civil and Political Rights (ICCPR) does not prohibit hate speech in itself, but it obliges states to pass legislation prohibiting it. Starting from Rawls’ idea of a well-ordered society Waldron argues that hate speech restrictions could fit this liberal concept as the fundamentals of a "well-ordered society should be dignity and respect." The danger is that hate speech does not only undermine the public good of implicit assurance but seeks to provide a rival public good of signalling to others that they are not alone "as the wolves call to one another across the peace of a decent society."

"We know some of you agree that these people are not wanted here. We know that some of you feel that they are dirty (or dangerous or criminal or terrorist). Know now that you are not alone. Whatever the government says, there are enough of us around to make sure these people are not welcome. There are enough of us around to draw attention to what these people are really like. Talk to your neighbours, talk to your customers. And above all, don’t let any more of them in.” (p.2)

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<sup>12</sup> Waldron, Jeremy. *The Harm in Hate Speech*. Cambridge, Mass.: Harvard University Press, 2014. p 2, p 94

Therefore hate speech legislation should "aim not only to protect the public good of dignity based assurance but to block the construction of this rival public good." (p.95)

As Barendt shows, there are two basic types of legal approaches to hate speech. In the United States, "even extreme racist speech is an exercise of freedom of speech"<sup>13</sup> and therefore it is protected by the first amendment of the Constitution. However, according to Braman and most other authors in this respect the US is "an outlier amongst democracies (pp. 105-109).<sup>14</sup> In Europe freedom of expression is weighted against other rights and protections, especially regarding dignity, therefore making it relative. A good illustration provided by Barendt is the constitution of Germany that considers "the inviolable dignity of man" the most important right in light of which all other rights have to be interpreted (p.62) making legislation against Holocaust denial - a limitation of freedom of expression - possible.

The most important argument brought by critics of legislation against hate speech is that it could also be used to suppress legitimate speech. According to this 'slippery slope' argument, if limits on freedom of expression are accepted to prevent hate speech, governments could then also extend their scope for example by defining legitimate calls to political action as hate speech. Moreover, according to 'the chilling-effect' argument the existence of such laws in itself without further action or restrictions can lead to situations where citizens would remain silent fearing prosecution.

As Barendt sums it up, the main dilemma in legislating against hate speech is that restrictions infringe on the rights of ideas to be treated equally, but tolerating it disregards the victims right to dignity (p.34) The advocates of restrictions on hate speech consider them necessary to protect the equality and rights of the targeted groups. On the other hand, it can also be argued that the publishers of hate speech also have their rights

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<sup>13</sup> Barendt, E. 2007. *Freedom of speech*. 2nd ed. Oxford; New York: Oxford University Press. P.172

<sup>14</sup> Braman, Sandra. 2006. *Change of State: Information, Policy, and Power*. Cambridge, Mass.: MIT Press.

disregarded.<sup>15</sup>(p.31) Additionally, this could also mean that the government is taking a side in a dispute.

On the other hand, reacting to the argument that legislation would simply “drive hate speech underground” Waldron considers this a legitimate objective, arguing that society should aim to convey the idea that “bigots are isolated, embittered individuals.” He also points out that the weakness of the marketplace of ideas argument is the assumption that all ideas are equal and up to debate. In his view instead of “presenting them as propositions up for grabs in a debate” society should clearly state that the basic commitments and ideals such as equality and human dignity are “settled features of the social environment to which we are visibly and pervasively committed.” (p.95)

Responding to Waldron, Ronald Dworkin also makes a dignity based argument defending citizens’ right to “ethical independence” of not being “forced to accept any official ethical conviction or being prevented from expressing one’s own dissenting conviction” as part of living in a just society. Dworkin also points out that governments do not fully have the legitimacy to identify and impose a version of the truth.<sup>16</sup> According to the autonomy argument against hate speech regulations, restrictions on hate speech would “violate a person's formal autonomy, while her hate speech does not interfere with or contradict anyone else's formal autonomy.”<sup>17</sup> However, Parekh disputes and reverses this claim and points out that tolerating messages which intimidate, ridicule express contempt, reduce members of the target group’s autonomy by “making it difficult to participate in public life” and more relevantly for participatory spaces such as comments targets of hate speech might be “afraid to speak their minds.”<sup>18</sup>

As it was shown in the section above, hate speech is a complex and controversial issue, however as mentioned earlier and will be detailed in later chapters most countries have

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<sup>15</sup> Barendt, *Freedom of speech* p. 31

<sup>16</sup> Dworkin, Ronald. “Reply to Jeremy Waldron.” In *The Content and Context of Hate Speech: Rethinking Regulation and Responses*, edited by Michael E Herz and Péter Molnár, 341–145. Cambridge; New York: Cambridge University Press, 2012. p.342

<sup>17</sup> Baker, C. Edwin. “Autonomy and Hate Speech.” In *Extreme Speech and Democracy*, edited by Ivan Hare and James Weinstein, 139–157. Oxford University Press, 2009. Accessed September 14, 2015. <http://www.oxfordscholarship.com/view/10.1093/acprof:oso/9780199548781.001.0001/acprof-9780199548781-chapter-9>.

<sup>18</sup> Parekh, *Hate Speech*, p 217

some regulation prohibiting it. Therefore, the aim of this thesis is not to discuss the appropriateness of such legislation, but rather to use the issue of hate speech to highlight a potential weakness of the current policies, in the case of participatory spaces of online newspapers. As Barendt notes, an important argument for prohibiting hate speech is that "tolerating speech abusing racial or ethnic groups would lend respectability to racist attitudes"(p.171). Equally important is "the right of society to indicate abhorrence of hate speech and attitudes it reveals" (p.173) This could also be an important argument for moderation of audience participation: by tolerating abusing speech on their websites, some of the reputation of the newspapers might "rub off" on the abusive comments. As it will be presented in the next section, some authors consider that if such speech is accepted on the website of a respectable newspaper, then it might create the misconception that it could also be accepted in other situations, therefore reversing the slippery slope argument presented earlier.

### **Prejudice, stereotypes and othering**

The most influential definition of prejudice originates from Allport who defined it as "an antipathy based upon a faulty and inflexible generalization."<sup>19</sup> However, this definition came under criticism and was re-evaluated by later authors, who considered that the antipathy component neglected forms of prejudice which are not based on negative attitudes such as benevolent sexism affecting women. Moreover, as Eagly and Diekman argue, changes in racial attitudes in the later part of the 20<sup>th</sup> century resulted in less explicit forms of racial prejudice. These do not necessarily contain out-right negative attitudes or "generalized antipathy" but still have "unfavourable implications for the disadvantaged groups" such as attributing Blacks "social and economic problems" to "internal factors such as lack of motivation" instead of systemic or external factors such as discrimination.<sup>20</sup>

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<sup>19</sup> John F. Dovidio, Peter Samuel Glick, and Laurie A. Rudman, eds., *On the Nature of Prejudice: Fifty Years after Allport* (Malden, MA: Blackwell Pub, 2005).

<sup>20</sup> Alice Eagly H and Emily Diekman, "What Is the Problem? Prejudice as an Attitude-in-Context," in *On the Nature of Prejudice: Fifty Years after Allport*, ed. John F. Dovidio, Peter Samuel Glick, and Laurie A. Rudman (Malden, MA: Blackwell Pub, 2005), 19–36.. 20-22

On the other hand, Stangor maintains the definition of prejudice as “negative attitude toward a group or toward members of a group”. The term stereotype is attributed to Lippmann who adopted a term from printing to refer to “mental pictures of the group in question.” As Stanger notes, there are “tens if not hundreds” definitions of what stereotypes are, which can generally be summed up as “traits that we view as characteristic of social groups or their members and particularly what differentiates groups from each other.”<sup>21</sup>

According to the *The Blackwell Dictionary of Sociology* “A stereotype is a rigid, oversimplified, often exaggerated belief that is applied both to an entire social category of people and to each individual within it” The latter feature, differentiates stereotypes from generalisations, which “do not apply to individuals, only to collections of individuals such as social categories.”<sup>22</sup>

Closer to the topic of this thesis, the *Encyclopedia of Nationalism* maintains the inaccurate and exaggerated belief element but it also adds that national stereotypes “are resistant to change even in the face of contradictory evidence” are usually negative and are used to justify and rationalize “institutionalized inequality on the basis of national origin, race, and/or ethnicity.” Moreover, they can be used to “unify the dominant group through the creation of in-group solidarity in relation to an outgroup.”<sup>23</sup>

While current debates sometimes remove early features such as “negativity, inaccuracy and overgeneralization” Stanger disagrees with this tendency and considers that “stereotypes are problematic because they are negative, inaccurate and unfair.” While the “data is clear” on negative stereotypes, the author points out that even positive stereotypes can have negative implications, as accepting the positive could also assume accepting the negatives. Additionally, while there could be a “kernel of truth” in some stereotypes, Stangor argues that “no matter how accurate a belief is, it does not describe every member of a group,

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<sup>21</sup> Charles Stangor, “The Study of Stereotyping, Prejudice, and Discrimination Within Social Psychology A Quick History of Theory and Research,” in *Handbook of Prejudice, Stereotyping, and Discrimination*, ed. Todd D. Nelson (New York: Psychology Press, 2009), 1–12, p 2.

<sup>22</sup> “stereotype.” In *The Blackwell Dictionary of Sociology*, by Allan G. Johnson. 2nd ed. Blackwell Publishers, 2000. <https://search-credoreference-com.ezproxy.westminster.ac.uk/content/entry/bksoc/stereotype/0?institutionId=1703>

<sup>23</sup> “Stereotypes, National.” In *Encyclopedia of Nationalism: Leaders, Movements, and Concepts*, edited by Alexander J. Motyl. Elsevier Science & Technology, 2000. [https://search-credoreference-com.ezproxy.westminster.ac.uk/content/entry/estnational/stereotypes\\_national/0?institutionId=1703](https://search-credoreference-com.ezproxy.westminster.ac.uk/content/entry/estnational/stereotypes_national/0?institutionId=1703)

therefore basing judgements of individuals on category level knowledge is just plain wrong.” (p.8)

According to Kunda, stereotypes are “a mix of abstract knowledge about a group along with exemplars of group members” (p.315).<sup>24</sup> Stereotypes modify behaviour and the evaluation of actions; the same action can be viewed differently if attributed to a stereotyped category. The lack of out-right discrimination does not eliminate the negative effects of stereotypes, as Kunda notes: “the mere fact that the negative stereotypes are ‘in the air’ may result in a social climate that can hinder the performance of negatively stereotyped individuals” (p.313) Moreover, as Kunda argues, they can also lead to a vicious circle; people holding a stereotyped view might act differently with a stereotyped person who in turn might also act differently thus conforming to the stereotype. (pp.322-325).

### **Othering**

According to Stuart Hall stereotyping “symbolically fixes boundaries” by delimiting normal from deviant to show “what belongs and does not and is other”<sup>25</sup> The “social other” according to Riggins, “refers to all people the Self perceives mildly or radically different” (p.3).<sup>26</sup> Most commonly, it is used in terms of ethnic or racial groups, but “any group perceived as different from the self can be considered as Others” (p.4). “The relationships between Self and Other involve value judgements, (the other may be good, bad, equal or inferior), social distance and knowledge.” (p.5). These groups are not fixed; they are subject to negotiations can be redefined depending on the context and “the particular rhetorical point the speaker or writer is trying to make” (p.8). Rhetorically, othering serves to facilitate victimisation of excluded groups by framing them as a usually homogenous, dehumanised group “making it easier for victimizers to seize land, exploit labour and exert control while minimizing the complicating emotions of guilt and shame” (p.9).

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<sup>24</sup> Ziva Kunda, *Social Cognition: Making Sense of People* (Cambridge, Mass: MIT Press, 1999).

<sup>25</sup> Hall, Stuart. “The Spectacle of the Other.” In *Representation: Cultural Representations and Signifying Practices*, edited by Stuart Hall, 223–290. Culture, media, and identities. London ; Thousand Oaks, Calif: Sage in association with the Open University, 1997. p. 258

<sup>26</sup> Riggins, Stephen Harold. “The Rhetoric of Othering.” In *The Language and Politics of Exclusion: Others in Discourse*, edited by Stephen Harold Riggins, 1–30. Communication and human values. Thousand Oaks, Calif: Sage Publications, 1997.



In the case of prejudice according to van Dijk discourse plays a dual role both at the micro and macro level, it may be “directly discriminatory” for example in the form of derogatory remarks, and it also contributes to their perpetuation “discourse expresses and influences social cognition such as ethnic prejudices and contributes to their acquisition, use and reproduction.”<sup>27</sup>

Reviewing research about media effects on stereotypes Mastro considers that their effect depends on in-group identification, racial attitudes and contact with out-group members. People with stronger in-group identification had more negative views of out-group members if they were exposed to stereotypical reporting.<sup>28</sup> Stereotype effects manifest mainly through the effects of priming and cultivation. According to priming theory, short term exposure to stereotypical content could lead to immediate negative responses: typically studies analysed subjects responses by exposing them on racialized crime news. Extensive research supported that “even a single exposure” to racial or ethnic stereotypes can influence people’s judgement of the group members and provoke stereotypical responses. Cultivating, on the other hand, operates long term. According to this theory, long term consistent exposure to stereotypical content would influence real-world perceptions, responses and voting decisions. For instance, people exposed to racialized news were less likely to vote democrat, based on the belief that they are more likely to be soft on crime.

An evidence of the priming effect in reader comments on online newspapers was found by Harlow 2015, who argues that readers internalize stereotypes which can then be triggered even if the content does not make explicit reference to them.<sup>29</sup> Analysing articles about terrorism, Harlow revealed that they resulted in comments about Muslims, and articles about crime led to comments about Latinos even if the articles did not specifically mention

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<sup>27</sup> van Dijk, Teun A. “Political Discourse and Racism: Describing Others in Western Parliaments.” In *The Language and Politics of Exclusion: Others in Discourse*, edited by Stephen Harold Riggins, 31–64. Communication and human values. Thousand Oaks, Calif: Sage Publications, 1997. p.33

<sup>28</sup> Dana Mastro, “Effects of Racial and Ethnic Stereotyping,” in *Media Effects: Advances in Theory and Research*, ed. Jennings Bryant and Mary Beth Oliver, 3rd ed., Communication series. Communication theory and methodology (New York: Routledge, 2009).

<sup>29</sup> Summer Harlow, “Story-Chatterers Stirring up Hate: Racist Discourse in Reader Comments on U.S. Newspaper Websites,” *Howard Journal of Communications* 26, no. 1 (January 2, 2015): 21–42.

or focused on these groups. Moreover, on articles about crime 27% of comments contained racialized terms, although the suspects' race was not mentioned.

## Hate speech online

Delgado and Stefanciuk place hate speech together with cyber-bullying, revenge porn, plagiarism, swarming as a type of behaviour that "decreases trust, weakens social bonds and erodes the quality of life"<sup>30</sup> Their common characteristic is that they are easy to commit and the risk of identification is low, they are not specific to the internet but "became easier, more cost-free, and more ubiquitous" online (p.323) In the case of hate speech its harming potential is increased on the internet by its permanence. Furthermore "if the hate message goes viral, it may attract millions of viewers and remain in cyberspace perhaps forever." (p.323) As a result "it may erode public discourse while exposing minorities, gays, women and other disempowered groups to ridicule and contempt."

The internet and the courts of the United States are in Delgado and Stefancic's view two notable exceptions to the "firmly established" norms against hate speech that brings "immediate condemnation" to "any instance of it in classroom, speech, television show or newspaper column."<sup>31</sup> Beyond the limitations of the first amendment the authors argue, that the propagation of hate on the internet is caused by some of the structural features of the internet such as "secrecy, self-selection, group reinforcement and a sense of righteous potency". Moreover, the absence of social contact and confrontation, factors that help limit similar attitudes offline also contribute to the problem. Online, people are more likely to encounter like-minded individuals who can encourage their extremist views, and there are also few reminders of the existing norms that confront them.

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<sup>30</sup> Delgado, Richard, and Jean Stefancic. "Hate Speech in Cyberspace." *Wake Forest Law Review* 49, no. 2 (2014): 319–343., p 320

<sup>31</sup> Delgado, Richard, and Jean Stefancic. "Hate Speech in Cyberspace." *Wake Forest Law Review* 49, no. 2 (2014): 319–343.

While this is true for specific areas such as one's Twitter or Facebook feed, from the perspective of this thesis the comment areas of mainstream news sites are more complex. While they indeed facilitate the gathering of like-minded individuals and the presence of uncivil or hateful comments can serve as encouragement to post similar views users do come into contact with plenty of other opinions. Moreover, they are constantly reminded of the site's civility requirements.

Regarding possible counter-measures, conventional strategies such as engaging with hate speech, considering it as a pressure valve, or requiring target groups to "put up with it" would be an undue burden on the target groups in Delgado and Stefancic's view. Instead, they recommend aggressive measures such as unmasking the authors of hate messages, not just by taking away the possibility of anonymous posting but where legally possible also name and shame them. Group condemnation, the organisation of pressure groups facilitated by social media to convince websites or broadcasters to disallow hate speech, is also a recommended strategy and as a final measure, they also suggest economic sanctions such as product boycott, or libel accusations.

According to Biegel "online harassment, hate-related activity and other immoral or offensive acts" (p.85) might be "less hazardous for the average person" but particularly for the victims "these are not activities to be taken lightly." The internet presented a new way for extremist, racist and discriminatory content to reach a much wider audience with its unprecedented speed and relative anonymity. As Biegel points out the "conventional wisdom" amongst legal and constitutional scholars in the United States is that although they can indeed be highly offensive, they are protected under the first amendment.

As mentioned earlier the situation is different in Europe where most countries have some legislation against incitement to hatred that could also reach extremist websites. However, due to the protection awarded by the first amendment, the United States has become a haven for extremist websites. The cross-jurisdictional nature of the internet and the current development of the technology also makes difficult to eliminate online hate sites. From the perspective of this thesis, although their content might be profoundly disturbing, an aspect

which makes such sites less problematic than having similar content published in the comment sections of a major newspaper is that they are generally visited by a niche public. Their users access them knowing what type of content they display, making it easier for members of target groups to avoid for example insults directed at them. Moreover, even if they are hosted in the United States and as such protected by the First Amendment, in most of the target countries their legal status is quite clear, and although it might be difficult to remove them, it is relatively easy for authorities to take measures to make them inaccessible within the country. While this will not remove them from the internet, and bypassing blocking is also relatively easy, it does require a conscious effort making it less likely for members of the target groups to access them inadvertently.

As Biegel notes "inappropriate conduct in the cyberspace is viewed by many as behaviour that people must be prepared to tolerate" similar to being exposed to them in the streets or other public spaces.<sup>32</sup> An argument against limiting online hate speech could be that by allowing it to be expressed online, we can learn more about it and take better measures to prevent it by education whereas if it would be forced to hide with more stringent legislation, it would still exist but out of the public view. On the other hand in Biegel's view beyond the faster speed in which online hate can be disseminated, its biggest danger is that due to their perceived anonymity, people tend to express views that they would hesitate to voice in other public forums such as streets and parks. Eventually, this could reverse the trend according to which "society no longer tolerates open expressions of prejudice."<sup>33</sup> If hate seems acceptable or is tolerated in online spaces such as the comments section of a major newspaper, it might also indicate that it could be acceptable again in the offline environment.

Parekh makes a similar argument describing a reverse slippery slope of hate speech: if hate speech is accepted as part of legitimate freedom of expression, those uttering it might feel encouraged, and gradually could even resort to physical violence against the targeted

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<sup>32</sup> Biegel, Stuart. 2003. *Beyond Our Control?: Confronting the Limits of Our Legal System in the Age of Cyberspace*. Cambridge Mass.: The MIT Press. p.332, p.324

<sup>33</sup> Biegel, *Beyond our control* p.324

groups. As Parekh puts it “if anything can be said about a group of persons with impunity, anything can also be done to it.”<sup>34</sup>

### **Challenges of online hate speech**

The above sections presented the challenges hate speech poses to regulation and some of the arguments for its limitation. The section below presents some of the difficulties in its identification and the effects its removal might have on studying the public discourse.

As mentioned earlier, Delgado and Stefancic consider that the unacceptability of hate speech in most of the media and public life is now a firmly established norm. On the other hand, van Dijk argues that racism, has not disappeared even from the mainstream news but transformed to a new, less visible form that "wants to be respectable and denies it is racism" but the negative attitude towards minorities can be traced both in the linguistic choices and the selection of news topics.<sup>35</sup> Regarding language, the new racism "avoids explicitly racists labels and uses negative words" to describe properties or actions of immigrants or minorities such as "illegals" and uses certain code words referring to minorities or the problems created by them. Regarding news topics, he argues that a desire to reinforce racist or xenophobic attitudes and to emphasise polarisation can be traced in media's tendency to focus on problems and threats on topics about minorities. For example, in news about immigrants prioritising topics such as new (illegal) immigrants arriving (invading) and their numbers, policies regarding minorities/immigrants, reception problems (overloading the school or health system), social problems, differences deviances, threats, responses. However, in line with the desire to hide racism, the problems are not attributed to minorities because they would be not inferior but because they "different" or "problematic." In order to avoid negative sentiments, i.e. to appear as racist with the recipients the new-racism language also frequently uses disclaimers attempting "Positive Self-Presentation and

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<sup>34</sup> Parekh, Bhikhu. 2006. "Hate Speech." *Public Policy Research* 12 (4) (February): 213-223. doi:10.1111/j.1070-3535.2005.00405.x. p 217-218

<sup>35</sup> van Dijk, Teun A. "NEW(S) RACISM: A DISCOURSE ANALYTICAL APPROACH," n.d. p. 34

Negative Other-Presentation in one sentence" such as "I know nice foreigners, but as a whole..."<sup>36</sup>

Although Van Dijk talks about the language of the news, a similar tendency can be observed in the language of the comment sections too. Most online newspapers have guidelines that prohibit racist or discriminatory speech therefore in an attempt to bypass moderators or to appear more acceptable in the eyes of fellow commenters, some users posting racist comments try to disguise them under a seemingly rational civil discourse.

The presence of racist comments is according to Hughey and Daniels' "classic tragedy of the commons dilemma"<sup>37</sup> in which "flamers, bullies, bigots, charlatans, know-nothings and nuts in online discourse take advantage of open access to other people's attention."<sup>38</sup> The authors point out that despite the early assumptions about a neutral cyberspace in which racial identity will not be relevant in reality far from becoming "a thing of the past... the comment pages of newspapers exploded with racism of the most virulent type."<sup>39</sup> Amongst the different strategies newspapers had to resort to in response, a prominent approach is "aggressive moderation." Examining the policies of major US newspapers, the authors concluded that they present a "varied, but relatively unified approach" that bans discrimination, hate speech, attacking stereotypes, harmful, vulgar, distasteful, defamatory and libellous comments.

While successful to a degree, Hughey and Daniels consider that such moderation approaches produce "whitewashed data" and present serious challenges for discourse analysis, as they create the appearance of a public discourse free from racism and hate speech. They point out that as a reaction to racism becoming unacceptable in public it has shifted to private spaces. Users might view the comment areas as a "third space "betwixt and between the public and private spheres" and think that they are conversing in a private area, when in fact their comments are public.

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<sup>36</sup> van Dijk, *New(s) racism* p.39

<sup>37</sup> Hughey, M. W., and J. Daniels. "Racist Comments at Online News Sites: A Methodological Dilemma for Discourse Analysis." *Media, Culture & Society* 35, no. 3 (April 1, 2013): 332–347.

<sup>38</sup> Rheingold, 2004: 121 – cited in Hughey and Daniels, 2013

<sup>39</sup> Washington, 2010 cited in Hughey and Daniels, 2013

In line with van Dijk's theory above, examining the comment sections of major US newspapers they Hughey and Daniels found that in order to avoid detection by moderators, users use coded language to construct in/out groups with "subtle insinuations" of normality, legality, and belonging. A more evident example of this strategy is the linking of Muslim and terrorist, but they cite more complex forms such insinuations regarding Barack Obama's birth certificate that as the authors acknowledge requires quite a significant awareness of the context. Another common sense, seemingly neutral example is the linking of school overcrowding with illegal immigration. The authors also note that newspapers seemed to allow "racism and racial invective when combined with political discourse" (p.342) in cases where political arguments are mixed with "racial othering". They acknowledge the merits of moderation but consider that it leads to a false sense of post-racial society. Moreover, in their view, it is a reactive strategy that only hides racism. They see/regard it as a case of newspapers "burying their hand in the sand" and conclude that "moderation does not address racism, but rather hides it and passes the problem along to other virtual venues where racism will find expression." (p.344)

Although Hughey and Daniels certainly make a good point about moderation not eliminating, but only hiding racism, they do not propose a solution. They seem to advocate for a way for newspapers to address racism or engage with racist users. However, this is arguably not the role of a news site. It is also not considered an appropriate strategy by authors such as Waldron or Delgado and Stefancic. Allowing racist comments, or even to engage with them, could also expose newspapers to legal action in certain countries. While it could be argued that it is up to the decent readers of a given website to engage with hate messages and disprove them, this strategy depends on the composition of the readership of that given newspaper and article, which might not always be dominated by ethical readers. It is true that moderation might only force out racism of the public view, but that could still be considered beneficial as it robs it from accessing a broader public and thus gaining new followers. Additionally, as mentioned earlier the visitors of dedicated hate sites take a conscious decision to access and expose themselves to that content, while members of a targeted group are reading the website of a reputable and seemingly ethical newspaper, presumably did not access it in order to be verbally abused.

There are other complicating aspects in regulation for online hate speech - McGonagle points out - such as jurisdictional issues and the questions of liability in connection with degrees of editorial control.<sup>40</sup> The author also highlights the dangers of the regulatory approach in "prosecution vagaries." If prosecution is not consistent (episodic) or frequently unsuccessful, it can reduce the deterrent value of legislation, but "overzealous prosecution can have a serious chilling effect." Moreover, it can also play into the game of the perpetrators allowing them to portray themselves as "free-speech martyrs" (p.29) Considering the victims McGonagle admits that the technological features of the internet can indeed increase the harm of hate speech due to the "actual amplification" of the messages the "apparent social validity or authority" and the "potential permanency".

### **Freedom of speech and online media**

Before the internet due to limited access to publishing technology, delimiting individual freedom of expression and the freedom of the press was less difficult. The advent of the internet and the turn to interactivity brought not just unlimited possibilities of publishing, but also led to the blurring of the line between media and audience, and it is now unclear who should benefit of the special provisions for the press. There are three perspectives on the issue according to Barendt.<sup>41</sup> The first approach equates press freedom and freedom of speech and allows no special rights to the press that would not be available to individuals. This prevents definitional problems but as the author shows it disregards that in order to fulfil its vital role in democracies the media might need some privileges, especially access rights and protection of sources. Recognizing this vital role, the second approach considers press freedom different from the freedom of expression and "protects mass media institutions" allowing some privileges and some restrictions to the media such as access rights. On the other hand, this creates definitional problems, even more so in the current

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<sup>40</sup> McGonagle, Tarlach. *The Council of Europe against Online Hate Speech: Conundrums and Challenge*. Expert paper. Council of Europe, 2013.  
<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016800c170f>.

<sup>41</sup> Barendt, E. 2007. *Freedom of speech*. 2nd ed. Oxford; New York: Oxford University Press. pp. 417-424.)



technological environment where it is difficult to say why a journalist working for a media institution would have more rights than a blogger or citizen journalist. According to the third perspective "media freedom is an instrument, not a fundamental right," and as such "press claims to special privileges should be recognised insofar as they promote the values of freedom of speech."

In a different approach from the United States the European Union tries to differentiate between freedom of the press and freedom of expression as evidenced in Koltay's view by the existence of separate laws for the media in all EU countries.<sup>42</sup> Similarly, separate media freedom is implied by the ECHR (European Convention on Human Rights) in the references to television, radio and to "the imparting of ideas." The author considers that the recognition of independent freedom of the press also leads to special rights and obligations such as protection of sources, access rights, some immunity from searches. In the case of the audiovisual media content regulations restrict hate speech, impose age-restrictions and classification, restrictions on advertising, there are also market controls. However, these regulations do not apply to the press, which usually is subject to general civil and criminal law. Moreover, while the AVMS (Audiovisual media services directive, that provides the regulatory framework for the European audiovisual media market and also some restrictions on content)<sup>43</sup> extended its scope to on-demand services on the internet, there is still a lot of uncertainty about Internet-based services.

On the internet, the complications start right from the definition of the concept of media, as Koltay points out. The AVMS directive offers a good starting point, with its criteria of commercial services, editorial responsibility, purpose (to entertain, inform, educate) and the purpose of reaching the general public. Furthermore, Koltay also argues that although the AVMS refers to audiovisual services in principle, it can also be extended to the press as it happened under the Hungarian media regulation that created a category of media content provider that covers the printed and online press as it will be presented later. According to Jakubowicz the evolution of the media blurred previously clearly defined

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<sup>42</sup> Koltay, Andras. "The Concept of Media Freedom Today: New Media, New Editors and the Traditional Approach of the Law." *Journal of Media Law* (July 1, 2015).

<sup>43</sup>, E.g. article 6, prohibiting the incitement to hatred

categories of “mass and public, interpersonal and private communication; media outlets and individual communicators; professional and amateur journalist and communicators” indicating a necessity to go beyond the definition of the AVMS.<sup>44</sup>

The ECHR and the Council of Europe (COE) Committee of Ministers both recognise an "enhanced level of freedom of expression." However, as McGonagle shows with greater freedoms, there is also an "expectation of adherence to professional ethics and codes of conduct" regarding accuracy, fairness, avoiding stereotypes.<sup>45</sup> While he considers that if the creators of UGC fulfil the same functions as journalists, they could also benefit from the same freedoms, McGonagle admits that it is indeed a "thorny question" if UGC creators should then also be expected to adhere to the same standards. Pointing out that “responsibility is clearly a legitimate trade-off for the enhanced freedom enjoyed by journalists” McGonagle still holds that an exaggerated emphasis on responsibility can have a chilling effect. Therefore, he maintains that expecting the same levels of responsibility from UGC creators “could serve as a disincentive to exercise their freedom of expression.”

### **Regulating reader comments on online news sites**

Due to its ever-changing nature, even defining user-generated content is difficult, Valcke and Lenaerts point out, making “time proof definition and efficient regulation even more difficult.”<sup>46</sup> The authors highlight many positive aspects of the “read-write” web such as the fact that it creates a “new collective intelligence to which all can add.” Additionally, it has a democratising potential by creating and providing access to many more information sources and adding to the possibilities of control over mainstream media. However, its

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<sup>44</sup> Jakubowicz, Karol. *A New Notion of Media? Media and Media-like Content and Activities on New Communication Services*. Media and Information Society Division Directorate General of Human Rights and Legal Affairs Council of Europe, 2009. p.19

<sup>45</sup> McGonagle, Tarlach. “User-Generated Content and Audiovisual News: The Ups and Downs of an Uncertain Relations.” *IRIS plus* 2013, no. 2 (2013).

<sup>46</sup> Valcke, Peggy, and Marieke Lenaerts. “Who’s Author, Editor and Publisher in User-Generated Content? Applying Traditional Media Concepts to UGC Providers.” *International Review of Law, Computers & Technology* 24, no. 1 (March 2010): 119–131. p.120

“participative and uncontrolled nature” also hold dangers by providing new opportunities for the spreading of hate speech, defamation, obscenity, intellectual property rights infringements. This is further complicated by the fact that the categories of author, editor, publisher, hosting provider on which media and earlier internet and media regulations are based<sup>47</sup> are not clear.

Earlier media and communication channels fell under one of the two models of regulation. The publisher model originating in media law, print and broadcasting, according to which the publisher takes full responsibility for the content of the given media product including third-party content (p.121) and the hosting model originated in telecommunication law that exempts web-hosts of liability for the content they host on their servers. UGC platforms fall between the two and are currently in a "grey zone." The case of comments on online newspapers being further complicated by the fact that they are displayed on the web-pages of a medium (the press) that is traditionally exempt of content and licensing limitations. In their example under the “cascade system” established by the Belgian Constitution (Art 26 t.2) if the author is known he is responsible, whereas in broadcasting due to scarcity and immediateness the broadcaster is generally responsible for the whole content of the programming. This model becomes increasingly difficult to apply in the case of comments where the author is generally anonymous. UGC platforms could choose to avoid liability by recording and divulging their users' identity to authorities. However in the era of anonymous virtual private networks (VPN-s) and ever-present open wi-fi hot-spots, it is difficult to establish the identity of users, and the involvement of private actors in tracking users could also raise privacy and data protection concerns. Moreover, as Leitner shows it is complicated to take individual legal action even when there is a directly affected victim, emphasising the need for revising the current regulatory model. In the cases examined in his chapter where offensive content and direct verbal attacks against named female law students were posted on the JuicyCampus discussion site, it took the involvement of a leading US law firm and cyber-law experts (whose pro-bono work was estimated at hundreds of thousands of dollars) to remove most of the content in one offensive forum,

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<sup>47</sup> Valcke, Peggy, and Marieke Lenaerts. 2010. Who's author, editor and publisher in user-generated content? Applying traditional media concepts to UGC providers. *International Review of Law, Computers & Technology* 24, no. 1 (3): 119-131. doi:[10.1080/13600861003644533](https://doi.org/10.1080/13600861003644533).

and identification and settlement with some of the posters – results he considers quite modest.<sup>48</sup> However, this level of legal support is certainly not available to every member of a targeted group; therefore a better solution would be needed.

In the European Union comments on websites would fall under the European E-commerce Directive<sup>49</sup>; however, there is some disagreement about the relevant article. According to McGonagle, websites could claim hosting exemption for responsibility for comments under article 14, with the level of the editorial control being the decisive criteria. He also considers that if there is no economic aspect to the service for example comments or pictures on personal blogs or Facebook walls then the e-commerce directive will not apply and the UGC would fall under the general criminal/civil legislation. However he is still not clear on the status of online newspapers as he considers that "UGC posted on the websites of newspapers will, in many cases, be governed by self-regulatory mechanisms for the press sector, and certainly insofar as those mechanisms have provisions that explicitly or implicitly deal with newspapers' online presence and UGC."<sup>50</sup>

On the other hand, according to Jakubowicz the basis of websites' claim for immunity for the content of comments is Article 12 of the E-commerce directive that exempts "mere conduits" from responsibility.<sup>51</sup> However, with comments there are issues with two out of three qualifying criteria; in order to qualify for exemption a mere conduit "a) does not initiate the transmission and c) does not select or modify the information contained in the transmission."<sup>52</sup> In the case of comments it can be argued that the online newspapers do have a part in initiating the transmission by asking for reader's opinions and setting the topic of the discussion; moreover, they do select and modify their content and reserve and express this right explicitly in their terms of service. Jakubowicz also agrees that

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<sup>48</sup> Leiter, Brian. 2010. "Cleaning Cyber Cesspools: Google and Free Speech." In *The Offensive Internet*, 155–73. Cambridge Mass., London England: Harvard University Press.p 160

<sup>49</sup> Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on Certain Legal Aspects of Information Society Services, in Particular, Electronic Commerce, in the Internal Market ('Directive on Electronic Commerce'), n.d.

<sup>50</sup> McGonagle, *User-Generated Content and Audiovisual News*, p 18

<sup>51</sup> Jakubowicz, *A New Notion of Media?*

<sup>52</sup> Art 12, E-Commerce directive

"intermediaries do go beyond the role of mere conduit" and quoting an excerpt of the Reuters commenting house rules shows that "moderation requires editorial judgement."<sup>53</sup> The question then arises if indeed newspapers can claim an exemption based on the mere conduit argument. As evidenced in the *Delfi v Estonia* judgement, the European Court of Human Rights (ECtHR) considers that the website gained direct economic benefit from attracting a large number of comments and "exercised a substantial degree of control over the comments"<sup>54</sup> therefore it could not claim exemption of responsibility as its role "went beyond that of a passive, purely technical service provider."<sup>55</sup>

As Koltay shows, the arguments for the lack of regulation for comments are based on denying the connection between the comment and the media publishing it. However, in order for this argument to hold "the two parties should not be acquainted with each other and there should be no overlap between their interests."<sup>56</sup> It is hard to claim that there is no connection between the newspaper and the comments as it is the website that elicited the comments by publishing the article and inviting reader contributions to it. Furthermore, there is also an overlap of interests: the comment's author wants his remarks disseminated to a wide audience while the newspaper also benefits economically from the increased audience and longer on-site time brought by the comments.

### **Media policy on the internet**

Whereas earlier "most areas affected professionals", currently anyone who communicates is affected, says Braman. She points out how the ubiquity of the internet and user-generated content resulted in the deprofessionalization of policy issues and the necessity of reconsidering "traditional approaches to information policy oriented towards professional communities and media organisations."<sup>57</sup> (p.62)

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<sup>53</sup> Jakubowicz, *A new notion* p. 24

<sup>54</sup> ECtHR, The Registrar of the Court. *Delfi AS v. Estonia - Making an Online News Site Liable for Its Readers' Comments Was Justified* (European Court of Human Rights (EHRC) 2013).

<sup>55</sup> ECtHR. *Information Note on the Court's Case-Law 186, Delfi AS v. Estonia [GC] - 64569/09*. Information note. Strassbourg: ECtHR, June 16, 2015. Accessed July 27, 2015. <http://hudoc.echr.coe.int/eng?i=002-10636>.

<sup>56</sup> Koltay, *The concept of media freedom*, p.27

<sup>57</sup> ECtHR, The Registrar of the Court. *Delfi AS v. Estonia - Making an Online News Site Liable for Its R*

Depending on the level of protection for political speech and expectation of privacy Braman distinguishes public, quasi-public, quasi-private and private forums. Public forums such as streets, and parks, are owned and controlled by the state, quasi-public such as schools and universities or prisons, or private where is a total expectation of privacy and freedom of expression. In this typology, the comment sections of online newspapers fall into the category of quasi-private forum, for they are "privately owned and controlled but serve a general public functions." On the other hand, users need to accept TOS to access the service which then acts as an important "de-facto communication regulation" (p.93) defined and applied by private actors. Similarly, Barendt also points out that despite calls for treating the internet as a public forum, the net is established by private actors; therefore, the providers' terms of service apply, and the first amendment or similar free speech provisions in other countries are not taken into consideration<sup>58</sup> This means that the assumption that by creating UGC users have some kind of protected right to free speech in online forums is wrong. In fact, on the moment they accessed the site they have accepted the "de-facto communication regulation" established through the terms of service of the provider, not just accepting the site's limits on what it considers acceptable speech but usually also giving up the intellectual property rights for their content.

Robinson, whose study revealed a sharp contrast between attitudes of the journalists and the commenting audience, also evidenced this frequent misconception. Users considered commenting an exercise of their right to freedom of expression originating from the first amendment, or even a form of journalism, arguing with moderators against the perceived censorship of their comments based on this right. On the other hand, journalist constantly reminded users that "they do not own the place and have no right to it"<sup>59</sup>.

According to Braman, the arguments for regulation and even licensing are different for each system of the traditional media environment. For the printed press licensing can be

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readers' Comments Was Justified (European Court of Human Rights (ECHR) 2013).

<sup>59</sup> ECtHR. *Information Note on the Court's Case-Law 186, Delfi AS v. Estonia [GC] - 64569/09*. Information note. Strassbo

seen as a form of prior restraint giving the government decision power on who can publish or not, therefore in most countries such as the UK it is prohibited by law. Spectrum scarcity, immediacy and assumed more powerful effect are generally accepted as arguments for licensing and stricter controls over broadcasting; whereas in telecommunication the government needed to act as a “traffic cop” to prevent congestion (p.47, p.97). Convergence creates problems in these models as it results in blurring of mediums and genres (p.59, 61) moreover “today there are many situations in which all three bodies of law and regulation (first amendment, broadcast and telecom policy) can apply to a single communicative act”. (p.96)

### **Further problems on the internet – The US perspective**

As Solove points out, “for the first time in history nearly anybody can disseminate information around the world” and reach a “potential global audience”<sup>60</sup>. Moreover, information is also permanent and searchable. However, Section 230 of the Communications Decency Act (CDA) in the United States and similar legislation in other countries, such as the aforementioned E-commerce directive offers immunity of operators of websites for the content posted by others. A notice and take-down system could be a possible solution Solove suggests, however a shortcoming of this approach is that by the time operators take down offensive content not only it was seen by large numbers of users, but it can also be reposted.

Citron points out that "Internet magnifies dangerousness of group behaviour" (p.31) – allowing not just increased access to a potentially large audience, but also to like-minded people. Group members then reinforce each other's views also aided by anonymity, as they would probably not say anything close to that in real life.<sup>61</sup> Allowing offensive content,

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urg: ECtHR, June 16, 2015. Accessed July 27, 2015. <http://hudoc.echr.coe.int/eng?i=002-10636>.  
*Internet: Speech, Privacy and Reputation*, edited by Saul Levmore and Martha C. Nussbaum, 15–30. Cambridge Mass., London England: Harvard University Press. pp .15-25

<sup>61</sup> Citron, Danielle Keats. 2010. “Civil Rights in Our Information Age.” In *The Offensive Internet: Speech, Privacy and Reputation*, edited by Saul Levmore and Martha C. Nussbaum, 31–49. Cambridge Mass., London England. pp 31-37

site owners suggest to their users that such views might be acceptable, and can further reinforce their negative behaviour.

Levmore compares offensive messages on the internet to graffiti on bathroom stalls.<sup>62</sup> The audience is limited in both cases, but while graffiti authors have to work fast and risk detection on the internet, it is easy to communicate with low risk of detection. A considerable difference is, that on the internet, even on the online discussion board example site cited by the authors, it can reach a much wider audience, but it is still probably an audience that is interested in that kind of content. This thesis argues that the potential of harm is increased in the comment sections of online newspapers, as they not only offer a space for UGC, they also attract an audience with their professional content, and in this case, it is an audience that did not access the site with the intent of reading such messages. However, as Solove also shows, "on the internet the cost of screening might be more than the cost of losing audience". (p.56)

For the topic of this thesis, the most relevant criticism of the regulatory approach exemplified by section 230 of the CDA protecting intermediaries comes from Leitner who points out that beyond allowing the existence of "cyber cess-pools" it also gives them a much more preferential treatment compared to newspapers who would publish similar material.<sup>63</sup> While newspapers are liable, cyber-cesspools are immune from responsibility for "even the most noxious material on their site." Admitting that a change in policy might cause a spillover effect with site-owners censoring even valuable speech, he points out the increased harm in hate speech in cyberspace compared to a print newspaper; it is searchable and permanent, whereas a newspaper would only be available for a few days and to a limited audience.

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<sup>62</sup> Nussbaum, Martha C. 2010. "Objectification and Internet Misogyny." In *The Offensive Internet*, 68–87. Harvard University Press. p.53

<sup>63</sup> Leiter, Brian. 2010. "Cleaning Cyber Cesspools: Google and Free Speech." In *The Offensive Internet*, 155–73. Cambridge Mass., London England: Harvard University Press.



## Ethics and Journalism online.

The previous sections presented an overview of the main issues raised by online newspapers and user participation from a legal point of view. Mainly building on the arguments of Kovach and Rosenstiel the following section will now present how the same issues, such as problems of definitions and the role of user participation in online newspapers are addressed from an ethical standpoint.

According to Friend and Singer in the online world where anyone has access to publishing technology, it is ethics that defines journalism. The authors also see a commitment to civic ideals and democracy as a key defining element, therefore consider that a journalist is “someone whose primary purpose is to provide information that citizens of a democracy need to be free and self-governing.”<sup>64</sup> Ethical codes or guidelines are an important element of most professions but are especially significant for self-regulating fields such as the press. However, codifying rights and duties is not enough, and the authors also point out that "a code of ethics does not create ethical behaviour; the strength of a code rests largely in its legitimacy and power in the eyes of those for whom it is written." (p.xx) This is all the more true in the case of journalism; a mostly self-regulating profession where ethics codes such as the code of the Society of Professional Journalists (SPJ) in the United States do not include penalties.

According to Kovach and Rosenstiel, the nature of communication is defined by the content, not the platform. Who is a journalist and what "sets journalism apart from other forms of communications" depends on "adherence to principles of truthfulness, allegiance to citizens and to informing" leading the authors to conclude that in the online world "anyone can be a journalist, not everyone is."<sup>65</sup> A similar view is voiced by Singer, who argues that the ability of publishing and disseminating content available to everyone using

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<sup>64</sup> Friend, Cecilia, and Jane B Singer. *Online Journalism Ethics: Traditions and Transitions*. Armonk, N.Y.: M.E. Sharpe, 2007. p XVI

<sup>65</sup> Kovach, Bill, and Tom Rosenstiel. *The Elements of Journalism: What Newspeople Should Know, and the Public Should Expect*. Revised and updated third edition (Amazon Kindle). New York: Three Rivers Press, 2014.

the internet makes everyone a publisher, but not a journalist "the distinction lies not in the process or product but in the ethical guidelines to which journalists adhere"(p.25). Jakubowicz also agrees with the centrality of ethics as a defining element of journalists and considers that "awareness of, and at least attempted conformity with normative, ethical, professional and legal standards" is a key element of the definition of journalism. Additionally, he posits that the public responsibilities of professional media include "support for basic social order (...) provide forum for public expression (...) promote social cohesion (...), and behave ethically" (p.10) As Singer points out, law and ethics are not necessarily the same. Most journalists choose not to publish the names of rape victims, even if they are allowed to do it under the First Amendment. Similarly, there are ethical challenges in newsgathering in participatory spaces and social media; online conversations such as Facebook and forums are legally available – it is mostly a matter of ethics if journalists choose to publish them. (p.87)

The principles that governed journalism in the 19-20th century are not only relevant on the internet but also more important than ever, declare Kovach and Rosenstiel in the introduction to the latest edition of their influential book *The Elements of Journalism*. Admitting that "how those who produce news fulfil those principles has indeed changed profoundly" the authors provide a list of principles that they consider should form the key building blocks of journalism today. While all the elements are important for ethical journalism to fulfil its role, three are particularly relevant for the purposes of this thesis. According to the second principle "journalism's first loyalty is to the citizens" the sixth holds that "it must provide a forum for public criticism and compromise; and according to the tenth "citizens have rights and responsibilities when it comes to the news as well - even more so as they become producers and editors themselves."<sup>66</sup>

The authors consider journalists' commitment to the public as one of the most important principles and provide a fairly detailed account on how should journalists act to fulfil this role. However, they dedicate little attention to the fact that in the online newspapers the public is present not only in their traditional role of receivers of information but also as co-creators through comments. Therefore journalists now also have to consider their

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<sup>66</sup> Elements of Journalism, Introduction, Kindle loc. 282

commitment to the public in the light of this new role for instance by enforcing guidelines to maintaining the civility of the debate, or by having clear and fair terms of service.

Kovach and Rosenstiel note that journalism has become “a collaborative exercise, an ongoing conversation among those who produce news and who consume it”. They consider that in the “new open ecosystem” if the press is the fourth estate than the citizens as “producers and witnesses” form the fifth estate. Despite the many fundamental changes there are also commonalities and shared principles between journalists and newcomers such as bloggers; for instance, the commitment to telling the truth. New journalism’s main role is according to Kovach and Rosenstiel is not that of a gate-keeper deciding what the audience should know, but working with them “to make order of it, make it useful, take action on it.” There are also other new roles such as that of authenticator, i.e. to fact check and set out which of the news that might have broken on Twitter or other social media first is true. Another important new role is that of the intelligent aggregator "playing editor to the rest of the information available". More importantly for the topic of this thesis, the authors also point out the importance of journalism's role as forum leader in "organising public discussion.”

Kovach and Rosenstiel emphasise the importance of journalism offering a public forum, listing this as one of its constitutive elements. To illustrate the historical tradition and centrality of this role they describe the 19th-century American tradition of the newspaper lobby when newspapers literally invited readers in and provided a space for discussion. However, they do not seem to recognise that with the comment sections online newspapers have again literally become a public forum in the sense of access. Resulting in the possibility and responsibility for journalists to organise and manage a much larger part of the public debate not just in theory (and limited to a few select voices), but also in practice. This is also evidenced by the similarity of the comment sections and their description of the newspaper lobby, both being "in a very concrete way a place for the community to gather and talk" ( Ch.7, sect 3, loc 3455). Although they are not clear on the exact forms through which online newspapers should fulfil their public forum role mentioned above, Kovach and Rosenstiel consider that the same journalistic norms should apply to these

discussions too. "In a new age, it is more important, not less, that this public discussion is built on the same principles as the rest of journalism—starting with truthfulness, facts, and verification." (Ch.7, sect.2 loc.3414) Furthermore, they hold that the "forum must be available to all parts of the community" and also argue for a stewardship role of journalists to promote compromise. While not stated explicitly this seems to be an endorsement of the newspapers responsibility to moderate user-generated content applying the same ethical principles as those applied to the professional content.

As mentioned earlier according to Kovach and Rosenstiel besides rights, citizens also have some obligations regarding the media, so they also formulated a Citizen Bill's of Rights. Relevant for the topic of this thesis, in their view, citizens have the right to expect channels of interaction with journalists not just through online forums but directly through email, telephone or Q&A-s and the right to be represented by an audience ombudsman or a similar role. Moreover, they also believe that citizens should expect to be invited to participate in the news production. On the other hand, citizens also have the responsibility to "to show up at these public forums and behave in a way that encourages respect and civility".

According to Friend the reputation and credibility of news organisations depend on respecting and acting according to the "ethical principles of accuracy, verification, independence and minimising harm, but they often suspend those values when using-citizen created content." The author points out that besides a good way to incorporate unfettered citizen voices it can also be interpreted as a "first step in the abdication of journalistic responsibility" (p.161) Similarly Hlavach and Freivogel show that there is a "fundamental discrepancy between the ethical standards newspapers apply to their reporters and letter writers and the posters"<sup>67</sup> The authors consider that allowing hateful reader comments in the online edition while refusing to publish it in a similar space in the printed version could be considered a breach of ethics and conclude that "it may be time to end this dissonance" by applying the same ethical rules to journalists and users.

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<sup>67</sup> Hlavach, Laura, and William Freivogel. "Ethical Implications of Anonymous Comments Posted to Online News Stories." *Journal of Mass Media Ethics* 26, no. 1 (January 2011): 21–37. p 24

While it is unreasonable to expect public service attitude from users – Singer holds - a "consideration of audience ethics should steer contributors away from content that is a *disservice* to the public” such as hate speech.<sup>68</sup>

## Networked public sphere

According to Benkler, in the ‘networked information economy’ citizens can participate in the public conversation “not as passive recipients but active participants” who create their own cultural environment resulting in a “networked public sphere”<sup>69</sup> where the “excessive power given to media owners” in the traditional model is moderated by the “cultural productivity of non-market actors.” In this new model citizens are not limited to reading others’ opinions and discuss privately but can participate in the conversation, “not only in principle but in actual capacity” (p.272), and “statements in the public sphere can now be seen as invitations to conversation rather as finished goods”<sup>70</sup>. Benkler describes the new internet with the term ‘writable web’ best exemplified by blog posts which instead of “finished utterances” result in weighted conversations. They are conversations because allow comments, and are weighted by the right of the owner to moderate.<sup>71</sup> This ‘networked information economy’ also brought a new kind of relationship to information production in the form of the ‘user’ – who can be sometimes producer, sometimes consumer or even both in the same time.<sup>72</sup>

On the other hand, the availability of mass-publishing tools, and the integration of UGC along professional news-products has eliminated not just the access restrictions but also expectations about participating in the public discussion. In the previous models, according

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<sup>68</sup> Singer, Jane B. 2011. “Journalism Ethics in a Digital Network.” In *The Handbook of Global Communication and Media Ethics*, II:845-863. Wiley-Blackwell, p 858, p.855

<sup>69</sup> Benkler, Yochai. 2006. *The wealth of networks how social production transforms markets and freedom*. New Haven [Conn.] :: Yale University Press,

<sup>70</sup> Benkler p.180

<sup>71</sup> Benkler p. 217

<sup>72</sup> Benkler p. 139

to Kaufer “speakers capacity to public expression was measured by their prior power to assemble a mass audience.”<sup>73</sup> However participatory spaces such as the comment sections of major newspapers now provide “any self-selected speaker” with access to a mass-audience attracted by the professional content.

## Exploitation of users

Schafer argues that the shift from creator towards platform provider for UGC<sup>74</sup> on the web 2.0 did not happen in order to empower the audience, but rather to allow the mass-media to extend their production beyond established channels incorporating user activities into commercial media production in an “extended cultural industry” model.

Similarly, Fuchs agrees that the “central aspect of the networked digital media” is the convergence of the consumer and producer of knowledge. However, he considers that in this way “users and producers engaged in the production of UGC are victims of exploitation.” Therefore also building on Terranova’s description he considers users a new class whose free labour is exploited by capital.<sup>75</sup> The fact that “users themselves are the product sold to the advertisers” is not new, Fuchs points out, and it has always been a component of the commercial media model. However, this time the key difference is that the “users are also the producers” and even more so the advertisements are also personalised and targeted based on the data provided by the users. Fuchs concludes “the category of produsage/prosumer does not signify a democratisation of the media towards a participatory democratic system but the total commodification of human creativity”. (p.192)

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<sup>73</sup> Kaufer, David S. 2004. The Influence of Expanded Access to Mass Communication on Public Expression: The Rise of Representatives of the Personal. In *Private, the Public, and the Published: Reconciling Private Lives and Public Rhetoric.*, 153-165. Logan: Utah State University Press, p.155

<sup>74</sup> Schäfer, Mirko Tobias. *Bastard Culture!: How User Participation Transforms Cultural Production.* MediaMatters. Amsterdam: Amsterdam University Press, 2011.p168)

<sup>75</sup> Fuchs, Christian. 2010. “Labor in Informational Capitalism and on the Internet.” *The Information Society* 26 (3): 179–96. doi:10.1080/01972241003712215., p. 190, p. 184

One of the many definitions of convergence is according to Deuze is the convergence of production and consumption – resulting in the citizen-consumer as co-creator.<sup>76</sup> Another interpretation of convergence regarding journalistic work refers to all-in-one multimedia units instead of separate newsrooms, creating content and delivering news across channels, genres and formats. Quoting Jenkins, Deuze notes that "Convergence is both a top-down corporate-driven process and a bottom-up consumer-driven process." In the case of online news the bottom up element is adding UGC to websites. Deuze differentiates between open and closed systems, i.e. controlled traditionally by journalists or the "gatewatching" approach advocated by Bruns (p.268) that open up spaces for citizen-journalist. However, citizen journalism initially aimed to rectify shortcomings of mainstream media, such as adding ideas and presenting ignored voices or information quickly evolved into work being outsourced to users. (p.271)

## From letters to the editor to comments

The first online newspaper allowing same page comments along with the professional content was the Rocky Mountain News in 1998<sup>77</sup>. However, reader participation had a much earlier tradition; comments can be considered a merger of two earlier forms: online discussion forums and letters to the editor. User discussions were an early feature of the internet, starting from bulletin boards (BBS), mailing lists and later developing to dedicated forums.<sup>78</sup> The origins of reader contributions to newspapers reach back much further. They were already part of newspapers in the 18<sup>th</sup> century, several of the founding fathers of the USA wrote letters under pseudonyms.<sup>79</sup> The following section will discuss letters to the

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<sup>76</sup> Mark Deuze, "Journalism and Convergence Culture," in *The Routledge Companion to News and Journalism*, ed. Stuart Allan, Routledge companions (New York, NY: Routledge, 2010), 267–277. p.268, p.271

<sup>77</sup> Santana, Arthur D. "Online Readers' Comments Represent New Opinion Pipeline." *Newspaper Research Journal* 32, no. 3 (June 2011): 66–81. p.69

<sup>78</sup> Papacharissi, *Democracy Online*

<sup>79</sup> Santana, *Online readers*

editor as precursors of comments, also examining their position and evaluation in the public sphere.

Although idealized as a public forum open to everyone in fact as Wahl-Jorgensen argues, letters to the editor were a form of constructed public debate, created through the editors' selection criteria. Editors selected which letters to publish, "parcelling out entitlement for expression" choosing mostly readers who were close to the average reader.<sup>80</sup> Additionally, editors tended to prefer individuals to activist groups and personal experiences, grievances to more general arguments. Even in this earlier form the debates around the nature of the participatory space that would later also be prominent regarding comments were already present. As Wahl-Jorgensen notes "the letter section is not so much a public forum as it is the newspaper's property" (p.312) in addition it is also employed as a PR tool to demonstrate openness, but also as a revenue booster. The author examined which of the three types of publicity from dialogist, activist and exhibitionist can be considered to characterize letters sections and concluded that, although normatively framed as dialogist publicity "the outcome of the actual practices of letters editors" can be considered as exhibitionist publicity, mostly centred on personal grievances and emotions.

In another article, Wahl-Jorgensen examined the criteria used by newspapers for selecting letters to be published.<sup>81</sup> As mentioned before, the letter section is seen by journalists as an expression of deliberative democracy. The ideals of the public sphere also include notions such as access theoretically open to everyone.<sup>82</sup> Habermas saw newspapers as the "media of the public sphere" in the mass societies through which "the public as the vehicle of public opinion is formed". Based on interviews with editors Wahl-Jorgensen, identified four major criteria for publication: Rule of relevance: responses to items placed on the agenda by the newspaper were more likely to be published; Rule of entertainment, the letters had to have entertainment value; rule of brevity, due to restrictions of space short

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<sup>80</sup> Karin Wahl-Jorgensen, "Letters to the Editor as a Forum for Public Deliberation: Modes of Publicity and Democratic Debate," *Critical Studies in Media Communication* 18, no. 3 (September 1, 2001): 303–320.

<sup>81</sup> Karin Wahl Jorgensen, "Understanding the Conditions for Public Discourse: Four Rules for Selecting Letters to the Editor," *Journalism Studies* 3, no. 1 (January 1, 2002): 69–81.

<sup>82</sup> Jurgen Habermas, "The Public Sphere," in *Contemporary Political Philosophy: An Anthology*, ed. Robert E. Goodin and Philip Pettit, 2nd ed., Blackwell philosophy anthologies 4 (Malden, MA: Blackwell Publishing, 2006), 105–109.p.109



contributions that needed less editing were favoured, but this also led to the loss of detail and affecting the quality of deliberations, the available short space did not make it possible to have a detailed deliberation. A fourth un-acknowledged rule of authority was also identified. Journalists sometimes not even consciously, tended to select letters based on criteria of eloquence and competence. Therefore, excluding large parts of the population "privileging those with ample cultural capital" (p.77) and resulting in a subtle bias towards "white middle-aged and well-educated readers". Comments, on the other hand, with their unlimited space and largely uncontrolled access eliminated all these restrictions, in theory getting closer to the ideal of equal access to the public sphere.

Similar selection principles were identified by Raeymakers, who analysed the practices of Flemish newspapers.<sup>83</sup> In line with similar research, the author found that full name and address was required to be published, the editors favoured topicality, lively style, the novelty of the argument in addition to the aforementioned criteria of "relevance and brevity". Editors aimed for balanced opinions, selecting letters on both sides of a given issue, they also enforced civility, letters containing discriminatory language or likely to offend were "firmly rejected." A novel approach in the analysis was that the researcher also tested the selection principles by writing a number of letters to multiple newspapers. This revealed extensive and in their opinion improper editing practices. The already short letters were further reduced, while necessary for reasons of space the cut in length sometimes also resulted in making the text of the test-letters more radical than in the original formulation. In addition, the researchers also revealed some cases of extensive editing, in some letters words were added, sometimes "even changing the original standpoint" or inverting arguments. They also found that dissenting letters were less likely to be published.

Taking into consideration that letters sections always involved some editing, it is perhaps not surprising that contrary to comments, where moderators can in some cases be low-

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<sup>83</sup> Raeymaeckers, Karin. "Letters to the Editor: A Feedback Opportunity Turned into a Marketing Tool: An Account of Selection and Editing Practices in the Flemish Daily Press." *European Journal of Communication* 20, no. 2 (June 1, 2005): 199–221.

trained, low paid external employees or interns,<sup>84</sup> the editors of the letters sections were usually experienced senior journalists as found by Torres da Silva.<sup>85</sup> Examining the practices of letter editors of main newspapers in Portugal, ten years later Torres da Silva reached similar findings to Wahl-Jorgensen. She found that the persons making the selection were usually senior, experienced journalists who aimed for careful and balanced management of the letters section. The newspapers retained the right to edit or summarize, enforcing a word limit of around 150 words. The criteria for selection were subject, relevance, writing quality, brevity being another important factor. All together these elements had an exclusionary effect, reducing the chances of writers who were less able to write well. In addition, social status, although not a criterion also contributed, writing on a professional position was more likely to get published. Resulting in a public debate that in the author's view was a "construction of selected voices and opinions" "shaped by journalistic routines and practices" (p.260)

Landert and Jucker examined the language of both letters to the editor and user comments, considering them a blend of public and private defined as "media texts that combine private and public on various levels".<sup>86</sup> They compared letters to the editor published in *The Times* in 1985 with comments on *Times Online* from 2008. The communicative situation in both cases was public, but in the case of comments was much wider as they were more available internationally. Comments are also more permanent, being available years after publication in online archives and search results, whereas the letters are only available for most readers for a few days after publication. Time from publication also differed, the letters were always published a few days after the original article, resulting in the need to contextualize or introduce the text, comments on the other are immediate. They react directly to the article, but in this case the authors need to clarify if they react to the article or to another commenter. Analysing the topic of the contributions in contrast to the of Wahl-Jorgensen mentioned above, the researchers found that in the letters from 1985, authors "tended to

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<sup>84</sup> Chen, Adrian. "The Laborers Who Keep Dick Pics and Beheadings Out of Your Facebook Feed | WIRED." *Wired.Com*. Last modified October 23, 2014. Accessed July 27, 2015. <http://www.wired.com/2014/10/content-moderation/>.

<sup>85</sup> Marisa Torres da Silva, "Newsroom Practices and Letters-to-the-Editor," *Journalism Practice* 6, no. 2 (April 1, 2012): 250–263.

<sup>86</sup> Daniela Landert and Andreas H. Jucker, "Private and Public in Mass Media Communication: From Letters to the Editor to Online Commentaries," *Journal of Pragmatics* 43, no. 5 (April 2011): 1422–1434.

write in a professional role” in order to appear more objective and credible, usually signing with their position or institutional affiliation. This might mean that the change to the exhibitionist approach found by Wahl-Jorgensen in early 2000-s happened later or it might also be due to cultural differences, the later analysis being based on interviews with US editors. Comments, on the other hand, were subjective, authors supporting arguments with personal experience or by describing how they will be affected, pointing to the tendency of subjectivity found by Wahl-Jorgensen. Even when talking about social or political developments, the arguments in the comments were not based on statistics or facts but on the “observations and judgements of the author.” Professional roles were also rarely mentioned. There were also major differences in formal addressing and style. Letters usually start with Sir! Referring to the author of the article and also frequently contained specialized vocabulary. In one of the comments, on the other hand, the author was mentioned as "Young Fiona" also aiming to undermine the author. Additionally, they contained colloquialisms, non-standard spelling, grammar and punctuation and even elements such as word written in all capitals equivalent of shouting. As the authors note the difference in formality is due to the different editing process, letters were always edited and cut down to size, while comments appeared exactly as the authors typed them, the only editorial decision available to the journalists was to allow them or not (p.1431).

McCluskey and Hmielowski compared the range and tone of opinions in letters editor and online comments, analysing comments and letters to articles about the Jena Six racially charged incident in Louisiana in which six black teenagers were charged with serious crimes after assaulting a white schoolmate.<sup>87</sup> Important distinctive features of the two forms of participation they noted were the requirement of identification for letters compared the anonymity of comments and also the absence of gatekeepers in the latter, whereas as mentioned before letters are usually subject to editorial decisions. The researchers found that opinions in the comments were more balanced between pro and against the accused teenagers, arguing more for the consideration of the context, whereas letters were mostly against the alleged perpetrators. The authors conclude that comments

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<sup>87</sup> Michael McCluskey and Jay Hmielowski, “Opinion Expression during Social Conflict: Comparing Online Reader Comments and Letters to the Editor,” *Journalism* 13, no. 3 (April 1, 2012): 303–319.

brought "additional views into the public discourse" whereas letters acted to "maintain the system and reinforce established authority" (p.314). They noted, that anonymity might have increased the range of opinions, but argued that the nature of technology could also have had an important contribution. Comments were immediate, posting them is easy, only a basic level of technical knowledge was required. Letters, on the other hand, necessitate additional effort to write, edit and mail, which could also mean in the view of the authors that people sending letters are "more passionate about the topic." Interestingly although the scarcity of space was no longer a factor, the authors found that comments and letters tended to have a similar number of words, and although posted to a specific topic 70% of comments contained general discussion.

Comments could be an "unprecedented opportunity to gauge the public consciousness" (p.92)<sup>88</sup> pointed out Santana, who discussed comments as a new kind of public sphere. Here unprecedented relatively equal access allows everyone to express their opinion which is "no longer relegated to the pages of the letters to the editor" (p.103) but can be expressed directly and immediately on any topic addressed by the newspaper. Santana compared the civility of comments on directly and indirectly racialized topics, articles about immigration for the first category and stories about the Tea Party movement for the latter. The definition of incivility included forms of expression generally defined as hate speech such as disparaging remarks based on ethnicity or race, xenophobia, expression of stereotypes, racist remarks along with incivil behaviours such as threats, insults and vulgar language. In addition to the category of civility he also created a neither/nor group that included comments which did not contain elements of incivility but were still formulated in mean spirited, coarse language or contained crude arguments that could also not include them amongst the civil comments. The analysis found that on articles about immigration, 53% of the comments were uncivil while only 15% could definitely be classified as civil, the rest being grouped in the neither/nor category. There was much less amount of uncivil comments in the Tea Party articles, but even there the amount of uncivility reached to a third of comments. Using dehumanizing epithets was a frequent feature of the uncivil

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<sup>88</sup> Santana, Arthur D. "Incivility Dominates Online Comments on Immigration." *Newspaper Research Journal* 36, no. 1 (January 1, 2015): 92–107.

comments, but several comments explicitly calling for genocide were also found. Santana also found alarming that these were not posted on some remote corner of the internet on fundamentalist websites but on the pages of respected newspapers. This has led the author to conclude that in the process of giving voice to everyone, it was the already excluded who would be victimized. “In this way, in their new role in creating a new public square of open discussion, newspapers are sometimes creating forums, perhaps inadvertently, for hate speech.” Moreover, by opening their pages for unlimited public expression newspapers “have also opened the door to fulfilling a key aspect of critical race theory: the normalizing of racism.” (p.104)

## Journalism and user comments

This thesis does not consider user comments as citizen journalism. User comments are a new way of directly expressing audience reaction and as this can add feedback, detail or correction to the editorial content but they are not journalism. As detailed in the previous section, whether something qualifies as journalism depends not on possessing the right level of skills, technology or infrastructure but on the purpose of the work in serving the advancement of democracy and especially on conforming to the same norms and ethical principles as journalists do.

Jönsson and Örnebring examined whether online newspapers addressed their users as citizens or as consumers and also considered if the presence of comments is truly empowerment or just a form of pseudo power.<sup>89</sup> The examination of the degree of participation on Swedish and UK newspapers resulted in a classification from low (audience as consumer) when the site offers tools to customize access such as RSS feeds, polls, article rankings; medium (audience as prosumer) members of the audience can create

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<sup>89</sup> Jönsson, Anna Maria, and Henrik Örnebring. 2011. “USER-GENERATED CONTENT AND THE NEWS: Empowerment of Citizens or Interactive Illusion?” *Journalism Practice* 5 (2): 127–44. doi:10.1080/17512786.2010.501155.

content but only when asked and in relation to professional contents such as comments to articles. Services allowing unsolicited content such forums, wikis, reader blogs were classified as offering high degree of participation (audience as producers). On the other hand, the popularity of services might not be related to the degree of participation. Although they ranked reader forums to the highest level, my previous research on the websites of Romanian national newspapers<sup>90</sup> suggests that these features might be less successful in attracting contributors as they do not benefit from the readers attracted to the professional content and therefore are less popular.

Jönsson and Örnebring found that the users are primarily addressed as consumers in the political content section of news websites, with higher levels of audience participation found in the popular culture, health and travel sections. The authors seem to advocate for greater inclusion of users in the news production process. Despite being called public journalism, citizen journalism or participatory journalism the authors admit that UGC in practice has very little to do with journalism as "it is traditionally understood and defined." (p.140) There is a high degree of interactivity, but that does not mean a true shift in power leading them to conclude that „UGC represents both an empowerment and interactive illusion."

Focusing on the three norms of authenticity, autonomy and accountability Singer interviewed journalists regarding their attitudes and relationship to user comments.<sup>91</sup> She found that they were quite sceptical regarding the value of user contributions judged against those three norms, compared with the editorial output. While being credible is important to journalists, the respondents pointed out that the credibility of user contributions could not be verified. Regarding authority, journalists welcomed challenges to their factual statements, motivating them to be more careful in checking what they published but disagreed with users challenging "basic assumptions". Accountability seemed to be the area with the most disagreement: journalists considered that they were responsible to the community but for the users, there are "all rights and no responsibilities." Journalists also

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<sup>90</sup> Janto-Petnehazy, *User-generated hate speech*

<sup>91</sup> Jane B Singer, "Journalism in the Network," in *The Routledge Companion to News and Journalism*, ed. Stuart Allan, Routledge companions (New York, NY: Routledge, 2010), 277–286.

noted anonymity as further key difference: while users can be anonymous journalists cannot, allowing users to be abusive. (p.280)

## Online news sites and role of comments

Providing a platform for participatory communication, according to Deuze in the online world became a more prominent feature of journalism, than its traditional role of delivering news.<sup>92</sup> On the other hand eight years later Deuze and Fortunati realised that online news constitutes an anomaly.<sup>93</sup> Users do not just exercise their influence over media due to their purchasing power as they always did, "but also want the right to directly create their own news". Building on the ideas formulated by Terranova and Manovich, Deuze and Fortunati consider that "the audiences supply unwaged labour." (p.171) While this is beneficial to news organisations (for cost saving) and journalists (for providing them with new sources of information) at the same time, it also threatens their livelihood. Journalists are being forced to "enter in competition with the unwaged labour of the TPFKATA (*the people formerly known as the audience*) for a chance to tell stories (and earn a living)" (p.171). Since employers can have plenty of user-generated content for free they try to pay less and less for professionally created content leading the authors to conclude that "this is a competition that makes both journalists and audiences worse off instead of empowering them."

Analyzing comments from a critical discourse analysis perspective Goss<sup>94</sup> found that users reproduced predominant ideologies along party lines, class and gender divisions leading him to conclude that the "democratising potential of the internet might be exaggerated" as comments "augment the day to day reproduction of sociological propaganda". (p.378)

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<sup>92</sup> Deuze, Mark. 2003. "The Web and its Journalisms: Considering the Consequences of Different Types of Newsmedia Online." *New Media & Society* 5 (2) (June): 203-230. doi:10.1177/1461444803005002004.

<sup>93</sup> Deuze, Mark, and Leopoldina Fortunati. 2011. "Journalism without Journalists: On the Power Shift from Journalists to Employers and Audiences." In *News Online Transformations and Continuities*, edited by Graham Meikle and Guy Redden, 164–74. Palgrave Macmillan.

<sup>94</sup> Goss, Brian Michael. 2007. "ONLINE 'LOONEY TUNES'." *Journalism Studies* 8 (3) (June): 365-381. doi:10.1080/14616700701276117.

In the only other and most relevant study known to me on hate speech in comments, Erjavec and Kovacic, analysed the three most visited Slovenian news sites and found that despite the existing legislation penalising it there was at least one hate speech comment under almost all news items on domestic politics.<sup>95</sup> Regarding discursive features of comments, they found that they were characterised by extreme bipolar presentation of the sides of an argument, nationalism, racism towards the Roma minority, hate and insults against homosexuality and religious hatred. As for discursive strategies they found that posters frequently rearticulated the news to produce hate speech even if the Slovenian “others” were not mentioned in the article; another strategy was rearticulating political news to present them as “cultural struggle.” They also revealed that one of the more creative strategies to bypass moderation was renaming, i.e. creating new words to label certain groups such as using the name of a singer to label homosexuals pejoratively. In another component of the study, they performed 20 in-depth interviews with commenters regarding their motivations. As the researchers noted, the act of agreeing to be interviewed already has shown that the commenters were mission-oriented as their motivation was to “enlighten the researchers” and let them know that they did not produce ordinary hate speech. The interviews identified two main types of commenters: “soldiers” who were active members or employed by a political organisation and even used a militaristic discourse, e.g. mission, enemies and believers who wrote on their own initiative. Regarding motivations, they also found that some users the “players” who considered commenting a game, were not committed to an ideology and wanted to defeat the enemy, while the “watchdogs” wanted to draw attention to social problems. These findings indicate that political organisations know and use this unregulated access to mass audiences to bypass legislation or ethical limitation. Publishing a hateful message would not be allowed in an official statement. However, nothing is stopping the organisation to post that message as a comment under an article on the same topic and this way reaching at least parts of the same potential audience.

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<sup>95</sup> Erjavec, Karmen, and Melita Poler Kovačič. “‘You Don’t Understand, This Is a New War!’ Analysis of Hate Speech in News Web Sites’ Comments.” *Mass Communication and Society* 15, no. 6 (November 2012): 899–920.



In the most extensive study to date on the role of comments based on interviews with 70 journalists of leading newspapers in 10 democratic countries, Singer et al. found that of the five stages of the news production users were considered important in the interpretation stage with comments being the most frequent form of participation.<sup>96</sup> On the other hand, journalists were reluctant to open up the access/observation, selection/filtering, processing/editing stages and considered audience members as “active recipients” not “active participants.”<sup>97</sup>

A key difference between online comments and participatory spaces in the traditional media such as letters to the editor, or radio call-in shows – according to Reich<sup>98</sup> - is that comments are open to everyone willing to comply with basic guidelines and rules, whereas earlier forms use criteria similar to selecting news or publishing professional content, and are also much more exclusive. A more important aspect is that despite the efforts of designers to separate user-generated and professional content using graphical elements or typography "in reality the two types of content are inseparable" creating the hybrid nature of online news.<sup>99</sup> On the other hand, by sharing the same space and contributing to this hybrid product, users become "authors without responsibilities that go with authorship" leading in the authors' view to an "intolerable situation" where responsibility should be assigned to users or the moderator.<sup>100</sup> The study also found a broad agreement between journalists that comments are problematic and a "necessary evil" that needs to be kept under tight control to minimise the threat to the organisation's reputation. Media organisations still maintain comments because they increase traffic and time spent on to the site (stickiness) and loyalty to the brand. Users can also serve as potential sources, improve accuracy by pointing out errors, and most importantly they represent immediate feedback and information from the audience. This feedback though is heavily distorted and hardly representative. As most authors studying comments point out, only a minority of site visitors actually comment.

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<sup>96</sup> Singer, Jane B., ed. 2011. *Participatory Journalism: Guarding Open Gates at Online Newspapers*. Chichester, West Sussex, U.K. ; Malden, MA: Wiley-Blackwell.\

<sup>97</sup> Singer et al. *Participatory journalism* p 27

<sup>98</sup> Reich, Zvi. User Comments: The transformation of participatory space. Singer et al., 2011

<sup>99</sup> Deuze, 2008

<sup>100</sup> Reich, 2011

The study identified two main moderation approaches: newspapers using pre-moderation filtered comments before allowing them on the site, while those relying on post-moderation allowed most comments and only removed some after receiving a complaint from the audience. The consensus amongst journalists was that newspapers that post-moderate are not responsible for the content, but become responsible to post-publication concerns and the quick removal of offensive content. Although some journalists assumed responsibility for comments considering them "a debate we're hosting and were responsible for" the consensus seemed to be "nobody knows yet who is responsible for that content." (p. 134)

Analyzing the use of audience-created content at the BBC News Online, Allan and Thorsten found that UGC content becomes especially important in crisis "emergency reporting" where users already on the scene can send in photos and videos before a journalist can get there. To do this, the BBC maintained a UGC Hub operating continuously, staffed by more than 20 journalists processing 12,000 emails and hundreds of photographs and videos. While long celebrated as giving voice to the audience, the authors suggest that in truth users actually perform an important (and unpaid) work for the corporation: "This commitment is intended, in part, to enhance the experience for users engaging in moderated debates in the 'Have your say' section, although primarily it is intended to ensure that the corporation is able to react immediately to news events as they unfold."<sup>101</sup>

News online "is open to a higher degree of contestation" - but Fenton and Witchge consider that in order to accomplish a truly radical positive change, journalists would have to involve users more in news production and engage in a dialogue. However, their research shows that journalists "do not trust or respect readers as authoritative voices". Moreover, the authors also seem to consider a negative aspect the fact that "editors still apply the same normative rules and values to online news as they do for the paper edition" although they

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<sup>101</sup> Allan, Stuart, and Einar Thorsten. 2011. "Journalism, Public Service and the BBC News Online." In *News Online Transformations and Continuities*, edited by Graham Meikle and Redden, 20–36. Palgrave Macmillan. p. 32

fail to point out why a different norm set would be needed for the online version or the user contributions.<sup>102</sup>

Despite the talk about the revolution brought on by online news, Domingo and Patterson admit the “cruel irony” that although newspapers have many more readers online, print is still their main source of revenue<sup>103</sup> According to the 2014 World Press Trends report, this was still the case as globally 92% of the newspaper's revenue comes from the printed edition.<sup>104</sup>

Documenting the restructuring of two Belgian newspapers with both print and online editions to a converged newsroom model, Paulussen et al. remarked the strong influence of existing organisational cultures. According to the journalists involved, the transition means not only "scale advantages and cost reductions" but also "requires a change of culture"<sup>105</sup> with far-ranging implications from the physical organisation, job profiles, infrastructure and routines to perception on user's roles.

Old norms seem to persist even at news organisations that appear to embrace user-generated content fully. Observing the practices of a Danish media organization engaged in cross-media news production, Bechman highlighted that even at a media company which has created an online community and published some of the best user contributions "journalists paid little attention to the contributions from the users" because they expected standards and skills "required for professional news production."<sup>106</sup> Moreover "the representation of the users in the newsroom was weak" - the community moderator being

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<sup>102</sup> Fenton, Natalie, and Tamara Witschge. 2011. “‘Comment Is Free, Facts Are Sacred’: Journalistic Ethics in a Changing Mediaspace.” In *News Online Transformations and Continuities*, edited by Graham Meikle and Redden, Guy, 148–63.

<sup>103</sup> Domingo, David, and Chris A. Paterson, eds. *Newsroom Ethnographies in the Second Decade of Internet Journalism*. Making online news Vol. 2. New York, NY: Lang, 2011. p XV

<sup>104</sup> Mira Milosevic et al., *World Press Trends 2014*, World Press Trends (Paris: WAN-IFRA, 2014).

<sup>105</sup> Paulussen, Steve, Davy Greens, and Kristel Vanderbrande. “Fostering a Culture of Collaboration: Organizational Challenges and Newsroom Innovation.” In *Making Online News. Volume 2: Newsroom Ethnographies in the Second Decade of Internet Journalism (Digital Formations)*, edited by David Domingo and Chris A Paterson, 3–14. Peter Lang, 2011. p 8.

<sup>106</sup> Bechman, Anja. “Closer Apart? The Networks of Cross Media News Production.” In *Making Online News. Volume 2: Newsroom Ethnographies in the Second Decade of Internet Journalism (Digital Formations)*, edited by David Domingo and Chris A Paterson, 15–30. Peter Lang, 2011. p 25, p 26

largely marginalised and even web editors "agreed and shared understandings of journalistic quality that marginalised the users."

Describing the transition of a US newspaper to an online-only product, Robinson underlines the persistence of the organisational norms specific to the print media. Journalists believed that "fully accepting digital-world practices and standards necessarily undermined the fundamentals of the traditional journalism"<sup>107</sup> leading the author to conclude that "the convergence culture has only peripherally penetrated this newsroom." While journalists realised that some definitions of news values, their roles and relationship to the users would have to evolve, they were still guided by the traditional organisational norms and values that "had been in place for the last century." She also observed that some journalists struggled both with a redefinition of their own professional identity and also of the news product. Although they were open to dialogue with users, they also wanted a very clear separation "between what was journalism and what not", insisting on graphically separating user-generated content.

Contrary to widespread assumptions, "UGC has not on the whole disrupted traditional relationship between journalists and audience members" – conclude Williams et al. in their extensive study about the use of UGC by the BBC at the national, regional and local levels.<sup>108</sup> Instead, it has been integrated into traditional practices and is considered just another source to be processed. Citing Quandt and Heinonen, they grouped attitude to UGC in two general categories: the segregationist approach "leaving journalism to the journalists" which was the more prevalent and the integrationist where "the audience is an ally in a co-creative journalistic process." On the other hand, they also revealed that the priorities and interests of different departments and organisational levels also shaped the attitudes towards UGC, observing for example that journalists at BBC Wales valued

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<sup>107</sup> Robinson, Sue. "‘Beaming up’ Traditional Journalists: The Transition of an American Newspaper into Cyberspace." In *Making Online News. Volume 2: Newsroom Ethnographies in the Second Decade of Internet Journalism (Digital Formations)*, edited by David Domingo and Chris A Paterson, 31–44. Peter Lang, 2011. p 33

<sup>108</sup> Williams, Andy, Karin Whal-Jorgensen, and Claire Wardle. "Studying User-Generated Content at the BBC: A Multi Site Ethnography." In *Making Online News. Volume 2: Newsroom Ethnographies in the Second Decade of Internet Journalism (Digital Formations)*, edited by David Domingo and Chris A Paterson, 115–128. Peter Lang, 2011. p 120

audience material for the "pragmatic reason" of allowing them to reach distant communities.

### **Effects and role of comments**

Starting from the assumption that it should promote civility Papacharissi examined the internet's role in reviving the public sphere. Although it is a requirement for democratic discourse and presupposes "general politeness and courtesy" the author points out that the meaning of civility is elusive and is not the same as politeness. Politeness itself while less contested is also a complex construct. It involves adherence to etiquette, "cooperation in conversation" and the conforming to formal and informal rules to promote a "conversation that flows smoothly." In Papacharissi's view, civility, however, can also further democratic goals.<sup>109</sup>

The central element of the notion of the public sphere envisioned by Habermas as a "well behaved and rational discussion" is also criticised as being restricted to privileged men, excluding amongst others, less articulate people. Therefore, Papacharissi considers that "civility should be redefined as a construct that encompasses, but goes beyond politeness" (p.266) and citing Garnham considers that "civility standards should promote respect but also allow human uniqueness and unpredictability." She defines civility as "collective politeness with consideration for the democratic consequences of impolite behaviour." (p.267) Incivility is defined as "set of behaviours that threaten democracy, deny people their personal freedoms and stereotype social groups" (p.267) Based on this definition she developed a civility index that includes threats to democracy, assigning stereotypes, and threats to individual's rights. She also added a politeness index classifying messages as impolite if they contained name-calling, aspersions, hyperbole, words indicating non-cooperation, pejoratives and vulgarity. She also includes in this category more covert impolite behaviour such as sarcasm and the use of all caps (shouting). Applying these two

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<sup>109</sup> Papacharissi, Z. "Democracy Online: Civility, Politeness, and the Democratic Potential of Online Political Discussion Groups." *New Media & Society* 6, no. 2 (April 1, 2004): 259–283.

indexes to a sample of online-newsroom messages she found that 14.2% were uncivil, 22% impolite, together these two categories amounting to 30% of the sample.

Although the conceptualisation of incivility and politeness is indeed very useful and Papacharissi's study remains influential and widely cited even a decade since its publication, the very small sample of only 268 messages can be considered as a significant weakness. The most common type of incivility was the use of stereotypes "to undermine the opponent's arguments". However, she also found covert forms of impoliteness and incivility. More importantly Papacharissi, also confirmed that politeness does not equate to civility, arguing that even very polite, well-formulated arguments can be considered uncivil if they question the equality of the members of society. The author argues that this "impeccable incivility" is more concerning.

This conclusion is particularly relevant for the context of this thesis, as this type of incivility is also harder to detect, and passes more easily the filters of moderation. Vulgarities, pejorative insults are quite easy to filter even automatically. On the other hand, 'polite incivility' requires not only human moderation but in some cases quite serious value judgments and knowledge of context. This knowledge and skills might be lacking in moderators, especially if the task is not performed by journalists or is outsourced to other companies who might be using low paid moderators in foreign countries.<sup>110</sup> Papacharissi points out that "Such messages have graver consequences because they are rarely taken back and because they openly contest individual rights" –. A further danger of "well-mannered incivility" is that although it presents a deeply undemocratic argument, it does it in a complex and well-articulated way that can also be more convincing. Whereas a similar argument formulated in a rude language could be rejected immediately on account of its rudeness, this kind of message might also hijack the discussion.<sup>111</sup> Moreover, passing moderation can also be interpreted as encouragement.

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<sup>110</sup> Chen, Adrian. "The Laborers Who Keep Dick Pics and Beheadings Out of Your Facebook Feed | WIRED." *Wired.com*. Last modified October 23, 2014. Accessed July 27, 2015. <http://www.wired.com/2014/10/content-moderation/>.

<sup>111</sup> The practice is called trolling, hence the frequent warning given to online discussion participants to "avoid feeding the trolls."

Examining user engagement in Youtube comments Ksiazek et al.<sup>112</sup> identified two types of interactivity: user-content when users react to the professional content and user-user that forms as a dialogue between users. Based on the argument that commenting means “at least reflecting to the news” they considered that the act and decision of making one’s views public also suggests that users who comment could be more engaged and attentive to the news. Compared to entire newspapers, online news have the considerable research benefit of allowing for a more refined audience analysis at the individual story level. Analyzing Youtube videos, the researchers found a strong correlation between their popularity and the number of comments; but popularity did not correlate with more user-to-user interaction. Quite contrary there was more user-to-user conversation in the comments to less popular videos. Suggesting that users post more user-content comments when they are primarily interested in the story and more user-user comments to niche content where they might perceive "more likelihood of connecting on a social level" probably expecting to find like-minded visitors. Their research also revealed that contrary to optimistic early expectations that interactivity would help users to rectify perceived bias, there was no significant difference in the number of comments to hard or soft news nor biased or objective. The findings might also disconfirm the widely held view that offering more soft news is a good way to engage the audience, also casting doubts on the supposed corrective role of audience participation expressed in the early years of the internet.

One of the more worrying effects of comments is that they could influence the reader’s perceptions and opinions of the news even beyond the professional content itself. Anderson et al. examined how online incivility in the comments affect "lurkers," i.e. people who just read the article and the attached comments.<sup>113</sup> In an experimental setting, the authors analysed reader’s risk perceptions regarding nano-technology depending on being exposed to incivil comments. Their most striking result was that even on a neutral and balanced

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<sup>112</sup> Ksiazek, T. B., L. Peer, and K. Lessard. 2014. “User Engagement with Online News: Conceptualizing Interactivity and Exploring the Relationship between Online News Videos and User Comments.” *New Media & Society*, August. doi:10.1177/1461444814545073.

<sup>113</sup> Anderson, Ashley A., Dominique Brossard, Dietram A. Scheufele, Michael A. Xenos, and Peter Ladwig. 2014. “The ‘Nasty Effect.’ Online Incivility and Risk Perceptions of Emerging Technologies: Crude Comments and Concern.” *Journal of Computer-Mediated Communication* 19 (3): 373–87. doi:10.1111/jcc4.12009.

article uncivil comments induced an increased polarisation of risk perception, i.e. after reading a neutral article when exposed to uncivil comments people tended to take a stronger position regarding risks or benefits of the technology. Leading the researchers to conclude that „perceptions are shaped not just top-down but also by others’ opinions.”

The concern for democracy and the topic of this thesis is that if comments can induce this effect in such a relatively obscure topic as nano-technology, what could their implication be on more controversial or widely known topics such as immigration or minority rights. A similar effect was also documented by Lee and Yang who found that readers exposed to comments expressed opinions "discrepant from the news slant, compared to when only the news article was shown," i.e. the comments might have had a more important effect than the article itself. Others reactions can serve as an indicator of the general climate, i.e. readers could use journalistic content to infer about the public opinion. Comment sections provide an "unprecedented interaction of the mass and interpersonal communication" and could be perceived as a sample of public opinion present directly and in the same place with the article, influencing the perception of readers. The authors consider that although only a small fraction of users post comments, readers could perceive them as a sample of public opinion. Therefore comments can "distort the accuracy of social reality perception as people no longer infer about the general climate from the news but from comments."<sup>114</sup> Applied to the case of hate speech this could mean that readers facing a large number of hateful comments could perceive that a given attitude in society towards a group is more widespread than it actually is, therefore user-generated hate speech could be used both to intimidate target groups and encourage extremist attitudes.

Being exposed to incivility might not just influence people's perceptions but also their (verbal) behaviour. Gervais defined incivility as comments that are “disrespectful towards their target, must do so in a purposeful, confrontational manner, and tend to be presented in a hyperbolic nature.” The researcher created a measure for incivility around four criteria

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<sup>114</sup> Lee, E.-J., and Yoon Jae Jang. 2010. What Do Others' Reactions to News on Internet Portal Sites Tell Us? Effects of Presentation Format and Readers' Need for Cognition on Reality Perception. *Communication Research* 37, no. 6 (7): 825-846. doi:[10.1177/0093650210376189](https://doi.org/10.1177/0093650210376189). p. 843



“name-calling, mockery, and character assassination; spin and misrepresentative exaggeration; histrionics; and conspiracy theories.”<sup>115</sup> Hypothesizing that the anonymity in the online survey would be similar to other online settings he then compared verbatim responses about candidates in the National Electoral Survey (NAES) of 2008 with the programmes respondents said they watched. Based on these criteria he identified 20.7% of the comments in the responses as incivil. When compared with the data on television programmes the author found that those who were consistently exposed to incivil media expressed higher rates of incivility in their responses than the general population and much higher than those who were not exposed at all.

Suler defined as the “online disinhibition effect” the phenomenon when “people say and do things in cyberspace that they wouldn’t ordinarily say and do in the face to face world.”<sup>116</sup> This disinhibition could have two directions. It is considered benign when it results in people sharing intimate thoughts, wishes, doing acts of kindness, or making an argument or contribution to a discussion they would be shy to make in a face-to-face conversation. Toxic disinhibition, on the other hand, manifests in rude language, hate, threats, anger.

According to the author, there are six main factors involved in creating the disinhibition effect. Dissociative anonymity: due to the relative/perceived anonymity of the internet people do not have to own their behaviour and the "online self-becomes a compartmentalized self" (p.322) Differently from anonymity, invisibility; the lack of visual cues to the other's reactions encourages people to do or say things they would not do if they had to face the other person. Similarly, asynchronicity – "not having to cope with someone's immediate reaction" disinhibits people. When reading an online conversation people use their own internal voice therefore unconsciously perceiving it as talking to themselves resulting in less inhibition because "it's safer than talking to others" (solipsistic introjection). Dissociative imagination occurs when people "split or dissociate online

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<sup>115</sup> Gervais, Bryan T. “Following the News? Reception of Uncivil Partisan Media and the Use of Incivility in Political Expression.” *Political Communication* 31, no. 4 (October 2, 2014): 564–583.

<sup>116</sup> Suler, John. “The Online Disinhibition Effect.” *CYBERPSYCHOLOGY & BEHAVIOR* 7, no. 3 (2004): 321–326.

fiction from online fact." Minimization of status and authority specific to the internet contributes to disinhibition as on the internet there are no cues of authority or status such as dress, body language; moreover it was also conceptualized as a place of equality, therefore "people are much more willing to speak out or misbehave." According to the author how these factors manifest also depend on the individual predispositions and circumstances.

## Incivility

As already mentioned, anonymity and the lack of responsibility it allows is considered not just a key element in differentiating users from journalists but also the main factor in encouraging uncivil or even illegal behaviour. It has been a central problem of the Internet from its beginning and eliminating it has been considered as a solution for a wide range of issues, ranging from incivility, revenge porn, hate speech, to even terrorism.<sup>117</sup> Online newspapers also considered eliminating anonymity as a possible solution to increase the quality of the discussion or just to prevent prohibited content on their comment sections and started requiring identification. A widely used commenting tool coupled with identity verification is Facebook's comments box plugin that requires users to sign in with their Facebook account and presumably use their real identity to post comments. It can be argued that the Facebook comments box puts readers on equal footing with journalists as it requires them to stand behind their comments with their real-life reputation just as journalists do. On the other hand, danah boyd considers this an "authoritarian assertion of power over vulnerable people" and argues that it puts members of vulnerable communities at risk<sup>118</sup>. boyd also argues that pseudonyms are a way of creating different personas on different platforms and are used by people to protect themselves from being judged out of context and considers that with pseudonyms "people are responsibly and reasonably

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<sup>117</sup> Levmore, Saul. "The Internet's Anonymity Problem." In *The Offensive Internet*, pp. 50–67. Harvard University Press, 2010.

<sup>118</sup> boyd, danah. "'Real Names' Policies Are an Abuse of Power." Accessed July 27, 2015. <http://www.zephorio.org/thoughts/archives/2011/08/04/real-names.html>.

responding to the structural conditions of these new media” by adapting different personas depending on the context.

Citing Plato’s story of Gyges, Santana points out that the abuse of anonymity is indeed a very old problem and not specific to the internet.<sup>119</sup> To assess the effects of anonymity, he compared civility levels in comments on newspapers that allowed anonymous comments with sites that required identification. Incivility has an adverse effect on the democratic qualities of the public discussion – according to Santana – as it provokes defensive reactions instead of deliberative and as a result when exposed to incivility people are less willing to accept other opinions essential for democratic deliberation. Similarly to Papacharissi, the Santana also cautions against confusing civility with politeness and warns that even seemingly civil arguments can be extremely uncivil, even hateful. The author combined the civility scales of other researchers including Papacharissi and the newspapers’ own terms of service to develop three categories. Comments were considered uncivil if they contained “personal or inflammatory attacks, threats, vulgarities, abusive or foul language, xenophobic or other hateful language or expressions, epithets or ethnic slurs, sentiments that are racist or bigoted, disparaging on the basis of race/ethnicity or that assign stereotypes.” (p.25) Rational and well-reasoned comments that were free of the before elements were considered civil and a third category of “neither/nor” was developed for comments that did not contain the uncivility elements but contained ridicule or made “coarse or crude” arguments. It is worth noting that the above definition of incivility has much in common with the academic definition of hate speech by including xenophobic, hateful language, stereotypes and ethnic slurs. On the other hand, it is a more expansive one for it includes personal attacks not connected to group belonging.

While several of the papers mentioned in this section used definitions that can be assimilated to hate speech none of the authors mentions the term. The fact that they all analysed newspapers from the USA might attest to the influence of the First Amendment.

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<sup>119</sup> Santana, Arthur D. “Virtuous or Vitriolic: The Effect of Anonymity on Civility in Online Newspaper Reader Comment Boards.” *Journalism Practice* 8, no. 1 (January 2, 2014): 18–33.

As it was shown in the first chapter by Waldron's argument, hate speech as a term is difficult to define under the American freedom of speech doctrine.<sup>120</sup>

Santana collected a random sample of 450 comments posted to articles about immigration on the websites of four of the largest newspapers in the three US border states allowing anonymous comments.<sup>121</sup> A similar sample was collected from newspapers that required identification, but in this case, 10 per cent of the sample originated from national newspapers. The results of the content analysis revealed that on the anonymous comment sections the number of uncivil comments was double (53%) compared to the non-anonymous (28.7%) and only 67 of the 450 comments in the anonymous sample were definitely civil compared to 198 in the other sample. Overall in total, there were 369 uncivil comments in the sample, and 65 per cent of those were written by anonymous users leading the author to conclude that the level of civility was indeed higher in non-anonymous comments. On the other hand, although considering the elimination of anonymity a successful strategy to improve the quality of comments Santana also pointed out that it did not eliminate incivility as almost 30 per cent of the non-anonymous comments were still uncivil.

To analyse the influence of topics on incivility in the comments, Coe et al. performed an extensive analysis on a 3-week census of 6,400 comments posted on the website of the Arizona Daily Star, a local newspaper that required logging in for commenting and used post-moderation.<sup>122</sup> They defined incivility broadly as “features of discussion that convey an unnecessarily disrespectful tone toward the discussion forum, its participants, or its topics.” A key element of Coe et al.'s definition is that civility required some measure of mutual respect, and considered as incivil unnecessary, gratuitous contributions that did not add to the discussion. This definition was then operationalised in five forms of incivility: name calling, aspersion, lying, vulgarity, pejorative for speech. This definition is indeed very broad and overall closer to Papacharissi's definition of impoliteness, but they excluded

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<sup>120</sup> Waldron, *The harm in*

<sup>121</sup> Santana, *Virtuous or vitriolic*

<sup>122</sup> Coe, Kevin, Kate Kenski, and Stephen A. Rains. “Online and Uncivil? Patterns and Determinants of Incivility in Newspaper Website Comments.” *Journal of Communication* 64, no. 4 (August 2014): 658–679.

the democratic components referring to equality and rights. Their analysis revealed that 22 per cent of the sample contained incivility, with name calling being the most common category. Moreover, 55 per cent of the articles had at least one uncivil comment, leading the authors to consider "incivility a common feature of public discussions". Furthermore, they found that the comments made by frequent commenters were less uncivil than those of occasional contributors. A possible explanation of this finding is/was that a community of frequent commenters might have formed and set its own norms. They could not confirm if contextual factors such as the type of article (news or column/opinion piece) affected the levels of incivility, but although not statistically significant their results hinted to more incivility on opinion pieces. Regarding topics, the analysis did confirm that comments made to hard news articles had higher levels of incivility; however the highest levels were registered on sports articles, a topic typically classified as 'soft news.' On the other hand, they also found that incivility is not related to the length of the discussion therefore unlike offline discussions it does not occur more frequently because things get heated up.

Considering journalists an interpretive community Meltzer analysed intra-media discussion on the websites of journalist organisations, journalist's blogs or articles about journalism to reveal journalistic perspectives about incivility, its effects and perceptions on how it affects journalist's roles.<sup>123</sup> She found that most journalists expressed concerns about incivility and considered its main causes to be the "culture of irresponsible anonymity" (Petsch 2011 cited in Meltzer), increased partisanship, and campaign rhetoric. On the other hand, some voices questioned the rise of incivility and even considered that "incivility has been fetishised" (Liv 2012 cited in Meltzer). She also found that journalists followed academic research on the media a notable example being *Popular Science*, that closed its comments completely citing the findings of Anderson et al. presented earlier. Regarding strategies to deal with incivility, journalists mentioned the need for "different threshold for crude language", ending anonymity, creating categories of commenters (allowing those with a history of meaningful contributions while those with misbehaviour have to be approved by a moderator); some provided detailed guidelines.

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<sup>123</sup> Meltzer, K. "Journalistic Concern about Uncivil Political Talk in Digital News Media: Responsibility, Credibility, and Academic Influence." *The International Journal of Press/Politics* 20, no. 1 (January 1, 2015): 85–107.

One of Meltzer's key findings and most relevant for this thesis is that journalists were aware of their responsibility in maintaining the civility of discussion in the comments. The author noted that "most journalists' writing indicated that they or their organisations are responsible for keeping things civil on their own sites". (p.98)

## Conclusions

This chapter presented an overview of the debates relating to hate speech and the limitations on freedom, and the role and some of the controversies related to the regulation of user-generated content on and online newspapers. As it was presented in this section participatory areas such as comments on online newspapers present opportunities for audience engagement, but due to the nature of the medium and the regulatory framework they also open up the possibility of abuse.

## Chapter 2. Comparative framework

This chapter is structured in two parts: the first section provides an introduction for comparative research, situating the present study. The next section presents media system and culture-based approaches to the comparative study and their application to post-communist countries in order to provide a framework for the interpretation of the results to be gathered using the methodology described in the following chapter.

The aim of this study is to reveal if there are differences in the levels of hate speech and incivility in the comment sections of major newspapers of different countries, and to reveal some of the possible explanations; the nature of the variations and to identify best practice solutions that might lead to lower levels of prohibited content. The starting point of the present study was a similar research performed in Romania in 2011-12, which found high levels of hate speech in the comment sections of the country's national newspapers despite being prohibited both by the newspapers terms of service and a range of legislation. However, as a single country study and in the absence of similar research it had no measurement against which to compare the results. Therefore, a comparative approach involving multiple countries was necessary using a similar design that would also examine other characteristics of the media system to assess their contribution to the quality of the debate in the comments sections. Identifying and controlling for variables that might affect the outcome is a major challenge for testing any hypothesis especially so for cases as large as countries. Therefore this study adapted a Most Similar System Design recommended by Landman as a solution to this "too many variables", and also builds on typologies and media system variable relationships identified by Hallin and Mancini, the most influential study of this kind. The analysis includes newspapers from the liberal and polarised pluralist model plus the two post-communist countries of Hungary and Romania.

## Comparative communication research

Esser and Hanitzsch define comparative communication research as comparison of minimum two macro-level units with respect to at least one object of investigation relevant to communication research, that “attempts to reach conclusions beyond single systems and cultures and explains differences between objects of analysis against the backdrop of their contextual conditions”<sup>124</sup> Macro-level units are assumed to contain specific factors that have interrelations with the object of analysis and help explain differences and similarities. “Mass communication processes are shaped by several layers of systemic contexts”<sup>125</sup>, therefore “mature comparative research will always be context sensitive.” In addition they list several essential characteristics for a study to be considered ‘mature’: the purpose of comparison has to be explicated clearly, the macro level units have to be clearly delimited, the objects of analysis should be compared with respect to at least one common functionally equivalent dimension, on the basis of a common theoretical framework and by drawing on equivalent conceptualizations and methods. Schematically a comparative study consists of five steps: describing differences and similarities, establishing typologies, explaining differences and similarities, making predictions. According to the authors, comparative studies could take three main theoretical approaches. Actor or behaviour centred studies focus on individual goal and interests driven actors making strategic choices in communication behaviour. Structuralist or institutionalist approaches analyse the “broader framework that constrain or facilitate communicative behaviour; primarily interested in the longterm evolution of the structures that form the broader institutional and normative settings for communication processes”.<sup>126</sup> According to the culturalist or interpretative approach “communication preferences and practices of individuals cannot be understood in isolation but must be placed in the context of shared meanings within communities” (p.11). Of these the present thesis will take an institutionalist approach in the sense that it will examine the different regulatory approaches to user participation and

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<sup>124</sup> Frank Esser and Thomas Hanitzsch, “On the Why and How of Comparative Inquiry in Communication Studies,” in *The Handbook of Comparative Communication Research* (New York: Routledge, 2012), 25–47. , p 5, p 13

<sup>125</sup> Esser and Hanitzsch, *On the Why and How* p. 10

<sup>126</sup> Idem, p11



specifically comments. However, since this is still mostly an unregulated area of the media where the influence of contextual factors might be more influential than the effect of formal institutions. Therefore this study will also aim to identify the elements in journalistic and national cultures that contribute to the shaping of the online discussion and the handling of comments by also taking a culturalist approach.

Regarding methodological considerations, according to Esser and Hanitzsch for small N studies, comparative research can be broadly grouped into two main approaches: most similar and most different systems. In the most similar systems – different outcomes strategy, the analysis aims to identify “the key features that are different among otherwise fairly similar systems and which account for the observed different outcome” (p.13). In the most different systems - similar outcomes approach the analysis tries to identify “features that lead to a particular outcome in systems that are dramatically different.” These allow for testing of hypotheses as features of the media system can be treated as independent variables and media performance outcomes as dependent variables. However, as Esser and Hanitzsch point it out, the challenge is to deal with the many “known and unknown” variables that also influence the outcome.

The present study falls in what Landman describes as Most Similar Systems Design (MSSD) – as it “seeks to compare political systems that share a host of features in an effort to neutralise some differences while highlighting others.”<sup>127</sup> A benefit of this approach is that it keeps some variables constant across systems such as in the case of the present study the banning of discrimination, similar legal frameworks due to EU membership, similar terms of services and similar journalistic ethics codes. Some of the more relevant variables that differ and are examined in this study are elements of journalistic professionalisation such as media self-regulation, the media market, and journalistic culture. Additional characteristics such as attitudes towards the target groups of hate speech, and the target groups themselves might be different but the principle of not allowing discrimination and

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<sup>127</sup> Todd Landman, *Issues and Methods in Comparative Politics: An Introduction*, 3rd ed. (Milton Park, Abingdon, Oxon ; New York: Routledge, 2008). p 70

incivility seems to be universal, and it should reduce the influence of variables such as reader's attitudes on the topic.

As Kleinsteuber shows, comparative research can adopt two main strategies looking either for common characteristics (concordance) or trying to identify differences. The two approaches are not mutually exclusive, and he considers that “when a study focuses on one of these two approaches, it should be ensured that the other perspective is not left out as this would endanger the study's scientific character.”(p.71) According to Kleinsteuber comparative research in the European Union is complicated by the interwoven multilevel structure: “a comparison of EU developments with those of single countries risks the danger of comparing something with itself”<sup>128</sup> – however, this structure also helps simplifying the analysis by providing common frameworks such as the E-Commerce Directive, that shapes media organisation's responsibility for the user-generated content, the AVMS directive shaping broadcasting regulation or the anti-discriminatory directives that provide common definitions for terms such as discrimination. On the other hand the content and market of print and online newspapers are generally not just outside of EU rules but also of national legislation, therefore they are still shaped mostly by country or even organisational level factors such as the values or organisational culture of an individual outlet as it will be detailed in later chapters.

Talking about the importance of comparative research Donsbach and Patterson also point out that despite the similarities in the “legal, political, economic, and cultural conditions” the “formidable legal protections” enjoyed by journalists in Western democracies and also the “shared professional orientation” the press history and traditions and the media and political structures are different in individual countries resulting in differences “in the way journalists see and do their job”<sup>129</sup>. No matter if studies try to find some universally shared

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<sup>128</sup> Hans Kleinsteuber, “Comparing Mass Communication Systems: Media Formats, Media Contents, and Media Processes,” in *Comparing Political Communication: Theories, Cases, and Challenges*, ed. Frank Esser and Barbara Pfetsch, Communication, society, and politics (Cambridge, UK ; New York: Cambridge University Press, 2004), 64–86.

<sup>129</sup> Wolfgang Donsbach and Chris A Paterson, “Political News Journalists: Partisanship, Professionalism, and Political Roles in Five Countries,” in *Comparing Political Communication: Theories, Cases, and Challenges*, ed. Frank Esser and Barbara Pfetsch, Communication, society, and politics (Cambridge, UK ; New York: Cambridge University Press, 2004), 251–270. (pp.251-252), p.267,

values or identify specific factors that shape journalist behaviour, according to the authors both approaches benefit from international comparison. In the case of the former, it is not possible to claim generalizability unless the same characteristics have been identified in other countries. To use the author's words, without international comparison "you never know whether the glass is half full or half empty" i.e. it is not possible to judge the data in absolute unless it is compared with results on a similar sample and similar methods. Another weakness of a single country study is that there is limited context to assess the results: "They are much richer in a comparative study because it provides bases for comparison and thus for judging the significance of a particular tendency or relationship." The direct precursor of this study was a single country case study on user-generated hate speech in Romania, which found that 42 per cent of the comments in the sample constituted hate speech. However, also due to the lack of similar research, the analysis ran into problems described above by Donsbach and Patterson of not being able to compare the results against similar measurements. More importantly, as a single country study it was unable to assess the factors that might contribute to the levels of hate speech discovered. Therefore, the present study has been designed in order to reveal if there are differences amongst the levels of prohibited content between media systems and to try to reveal variables that might affect them.

### **Comparing media governance**

To include all the different forms, levels and actors that come into play in regulating the media the concept of media governance has been proposed and gained popularity in debates regarding media policy. Building on a wide range of literature as well as some partial or narrower definitions according to Puppis and d'Haenens media governance "refers to the regulatory structure as a whole and the sum total of mechanisms both formal and informal, national and supranational, centralised and dispersed that aim to organise media systems." As detailed by Puppis in an earlier work as an analytical concept this definition of media governance includes both statutory, self- and co-regulation reflecting the "diversity of rules" and the vertical extension also reflects the reality that national regulation is

“supplemented by global media governance” and in the case of the European Union by “regional integration.” It also includes sub-national and even individual company level organisational governance in the form of “internal rules and control mechanisms” such as the professional codes and guidelines of individual media companies or complaint handling mechanism such as ombudsmen.

This conceptualisation is particularly important for the topic of this thesis as online newspapers and particularly user participation is situated at the crossroads of different regulatory factors that it would not be covered by any narrower definition.

A comparative approach is considered by Just and Puppis “particularly beneficial” for policy research and “plays a crucial role in identifying best practice models.” Additionally “comparing media policy and regulation can identify gaps in knowledge.” however the authors warn that “cultural differences between legal systems and regulatory regimes have to be considered”(p.228) and studies in this field also have to consider the “need for contextuality and situatedness.”

### **Comparing journalistic cultures and orientations to professional roles**

Hanitzsch and Donsbach define journalistic culture as “a particular set of ideas and practices by which journalists legitimate their role in society and render their work meaningful”<sup>130</sup> According to the authors, journalistic culture has three general states of manifestation: ideas (values, attitudes, beliefs), practices (of reporting, editing) and artifacts (news contents), while its levels of aggregation are journalistic milieus (individual journalists), organizational journalistic cultures (newsrooms) and national journalistic cultures. Based on the review of decades of scholarship they consider that three main research themes are contoured: news decisions, professional orientations, and news cultures.

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<sup>130</sup> Thomas Hanitzsch and Wolfgang Donsbach, “Comparing Journalism Cultures,” in *Handbook of Comparative Communication Research*, ed. Frank Esser and Thomas Hanitzsch (New York: Routledge, 2012). p.262

Regarding professional roles closer to the topic of this thesis one of the most preeminent cross-country studies on journalist's professional roles, the Global Journalist study of Weaver et al. in 1998, revealed that there was "some agreement on the importance of providing access for the people to express their views". (p.265)

The revised 2012 edition of that study also contained questions relating to the "motivational and participatory function of journalism", defined as "willingness of journalists to motivate people to participate in civic activity and political discussion". It found that the United States and Australia had one of the lowest levels of agreement just behind China and Russia.<sup>131</sup> (p.482)

In another survey conducted as part of the same study but on a different sample regarding six journalistic values and roles, Weaver and Willnat found that "reporting objectively and accurately" was considered the most important role, while "providing access to the public" was ranked penultimate before "providing entertainment." More than two-thirds of journalists in any location considered giving "ordinary people a chance to express their views on public affairs" as not an important role. Although their sample did not include online newsrooms, this is still a surprising finding considering the by that time participatory features such as comments were already widespread in the online newspapers especially in Western Countries. Regarding the topic of this thesis, this finding suggests that either the journalistic values and role perceptions of online journalists are radically different from their colleagues in the traditional newsroom or that the motivation to provide participatory spaces is not rooted in journalists' core values.

The Worlds of Journalism study did find an "ideological consensus" regarding journalism as public service, orientation to facts, providing timely and relevant information and "requiring at least some intellectual autonomy and independence."<sup>132</sup> However there was "considerable variation" across the sample with "more disagreement than agreement over

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<sup>131</sup> David H. Weaver and Lars Willnat, eds., *The Global Journalist in the 21st Century*, Routledge communication series (New York, NY: Routledge, 2012).

<sup>132</sup> Hanitzsch et al., "Worlds of Journalism Journalistic Cultures, Professional Autonomy, and Perceived Influences across 18 Nations," in *The Global Journalist in the 21st Century*, ed. David H. Weaver and Lars Willnat, Routledge communication series (New York, NY: Routledge, 2012). p.474

the relative importance of the journalistic roles” thus disproving the existence of “universal occupational standards”(p.538), confirming Weaver’s fourteen years earlier statement about the existence of “strong national differences that override any professional norms or values of journalism around the world.”

Similarly, on the issue of an European journalistic culture, Hanitzsch and Donsbach quote Örnebrig who argued, based on an extensive literature review, that “there is simply no European journalistic culture” and that “the nation-state constitutes the main framework within which the social functions and roles of journalism are defined.” On the other hand, they also point out that several studies found similar cross-national views and professional values that might indicate the emergence of a shared professional culture. Concluding that despite the apparent commonalities a closer analysis of individual countries might reveal stronger differences. Therefore the answer to the question of the existence of a shared European journalistic culture is “highly contingent on the context and the scope of the question” and also on the selection of the journalists and countries (p.266) as exemplified by Western vs Eastern Europe comparisons that consistently reveal significant differences.

### **Hallin and Mancini’s three models of media-politics relationship**

Hallin and Mancini’s well-known models are built around four dimensions: political parallelism, journalistic professionalisation, media market and the role of the state further divided into a number of indicators for each dimension. For journalistic professionalization they considered the main indicators to be professional autonomy from political and economic pressures either external (politicians, business) or internal (newspaper owners, editors); distinct professional norms and ethical principles and public service orientation as opposed to instrumentalisation, i.e. the use of newspapers for advancing specific political or economic interests. For the role of the state, they considered public service broadcasting and press subsidies the main indicators and more relevant to the topic of this thesis this dimension also includes other forms of state intervention such as libel, defamation and hate-speech laws; regulation regarding access to the information, political

communication, ownership and licensing.

The liberal model is characterised by high press reach, a low degree of political parallelism, highly professional journalism and weak state. The Democratic-corporatist model is characterised by high newspaper reach, higher degrees of political parallelism, strong professionalism and state intervention on the form of public service broadcasting and press subsidies. Key features of the polarised pluralist model are the high levels of political parallelism, coupled with weak professionalisation and instrumentalisation of the press.

The authors argue that due to small circulation rate the newspapers in Southern Europe tended to be unprofitable therefore had to rely on subsidies by political actors, the political dependence also leading to the instrumentalisation of the press, and low journalistic professionalisation. On the other hand countries in Northern Europe have had historically and even in the present high newspaper circulation rates with newspapers being profitable business enterprises but also very strong journalistic professionalisation (p.22).

Political parallelism is manifested in the content as a tendency to reflect the viewpoint of a given political orientation in the news, but also in political roles of journalists. Additionally, connections of media and political organisations; and partisanship of the audiences also be indicators of political parallelism. It also affects journalistic role perceptions: in countries with high level of political parallelism, journalists are closer to a “publicist” role trying to influence the readers to a political view, while in countries with lower parallelism a more objective-neutral reporting is more frequent (pp.26-29).

There is no strong connection between formal training and professionalisation according to Hallin and Mancini. In fact, the authors note that Italy has one of the lowest levels of professionalisation despite being the only country in their study that regulates access to the profession by a mandatory examination. They also note that there are strong cultural differences to the degree which professionalisation is equated with objectivity.

An important indicator at the intersection of political parallelism and journalistic

professionalisation is rational-legal authority that also has "important cultural components (...) manifest, for example, in the degree to which citizens, businesses, and other actors are willing to follow rules, or seek to evade them." Rational-legal authority "requires formal codification of procedures and information, and their public accessibility, and thus provide relatively fertile ground for the development of journalism." Regarding the press stronger rational-legal authority is associated with better-codified procedures and rules, stronger professionalism, higher professional autonomy, lesser instrumentalisation and political parallelism.

A contrasting organisation is political clientelism, frequent in post-communist countries, where media is dependent on the benevolence of other powerful actors. Therefore, professionalisation also tends to be weaker and instrumentalisation of the media more frequent, in those countries "formal rules are less important" there is also a tendency for higher external pluralism.

### **Hallin and Mancini in comments**

Studying the conversational characteristics of the discussion in the comments sections of British, French and Spanish newspapers Ruiz et al. confirmed the existence of patterns consistent with Hallin and Mancini's models.<sup>133</sup> In line with the original description by Hallin and Mancini in the comments sections of newspapers from countries of the liberal model there was a higher degree of internal pluralism and higher argumentation manifested in what they describe as communities of debate. In the countries from the polarized-pluralist model participants tended to voice their views without engaging into much of a debate. While concluding that the "cultural context is relevant to the democratic quality of the debate," they also found that the rules for moderation and participation were "quite straightforward and homogenous" and differences in moderation strategies, i.e. pre- or

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<sup>133</sup> C. Ruiz et al., "Public Sphere 2.0? The Democratic Qualities of Citizen Debates in Online Newspapers," *The International Journal of Press/Politics* (September 22, 2011), accessed May 21, 2015, <http://ijp.sagepub.com/cgi/doi/10.1177/1940161211415849>.



post-moderation did not affect the debate.

### **Historical Institutionalism in comparative media systems research**

Despite the abundance of comparative studies on European media systems, few have analysed the relationship between political and media systems, points out Humphreys, arguing for the use of concepts and theories from political science in the comparative study of media systems. Citing Kleinstaub, he notes that “whereas economic and technological developments point generally to convergent outcomes, nationally specific political (and cultural) factors explain many of the enduring differences.”<sup>134</sup>

In his criticism of the rather “broad brush” approach adopted by Hallin and Mancini, Humphreys points out the exclusion of post-communist countries and the questionable grouping of countries that situates the UK in the liberal model along with the US.<sup>135</sup> Also considers questionable the inclusion of Germany in the same model as the Scandinavian countries. The latter, in his view, could even be considered as an example of “cultural stereotyping” about the Northern-European tradition of rational-legal authority. In regards to the UK and US cultural stereotyping, it could explain why other studies on welfare state aligned the two countries together considering the obvious differences such as the NHS.

Important determinant factors ignored by Hallin and Mancini are according to Humphreys: the differences between centralized and decentralized nature of the media systems. Similarly, the differences between majoritarian or consensus style political systems would have affected the clusters. Taking these into account would have included for example the UK and France in the same group, due to their highly centralized metropolitan based media, whereas the US, Spain and Germany also due to the federal nature of the state are decentralized. (p.165). Additionally, Hallin and Mancini also ignored the existence of “sub-

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<sup>134</sup> Kleinstaub 1993, cited in Humphreys, p 160

<sup>135</sup> Humphreys, Peter. “A Political Scientist’s Contribution to the Comparative Study of Media Systems in Europe: A Response to Hallin and Mancini.” In *Trends in Communication Policy Research: New Theories, Methods and Subjects*, edited by Natascha Just and Manuel Puppis, 157–176. European Communication Research and Education Association Series (ECREA). Bristol, UK: Intellect, 2012.

state national identities”, the ethnic and linguistic homogeneity or heterogeneity of countries, and market size. More importantly, historical disjunctures and the examination of the legacy of dictatorships was also neglected. Similarly, the legal system of common and civil law could also have a significant influence on the regulatory approaches and styles, the latter leading to more codified approaches, such as special laws on the press.

Humphreys argues that a historical institutionalist approach could offer a more inclusive analysis. The central elements of historical institutionalism are institutions and path dependency. Institutions are defined as “norms, informal rules and procedures, along with formal rules and structures” (p.170) as the main explanatory factors of political outcomes. Path dependency maintains that “past policy has an enduring and largely determinant impact on future policy” (p.170). Institutional differences in Humphreys view could explain national specifics, for instance, when faced with common external factors such as the rise of the internet "the reforms follow characteristic national path." Therefore, Humphreys argues that a historical institutionalist perspective could explain the “diversity of media systems that are undergoing common processes of technological and market change” (p.170) as evidenced by the persistence of past regulatory styles for television at the introduction of digitalisation. France and Canada maintained strong protectionist approach while the UK and Germany kept their strong public service broadcasting showing that “policymakers in all four cases were adopting these distinct national models to the digital era in ways that very closely reflected past policy approaches” (p.171)

Perusko adopts a historical institutionalist approach to analyse the six countries that made up Yugoslavia. He criticised the "tabula rasa" hypothesis regarding the post-communist Central-East European countries which he considers a source of misunderstandings regarding the evolution of media in the region.<sup>136</sup> This is evidenced by a detailed analysis of the six Ex-Yugoslav countries to illustrate how different institutions lead to different outcomes, even in a situation as similar as being part of the same federal socialist republic. Echoing Humphreys criticism, Perusko considers that the main shortcomings of the first-

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<sup>136</sup> Zrinjka Peruško, “Historical Institutional Approach in Comparative Media Systems Research: The Case of Post-Yugoslavia,” *Javnost - The Public* 23, no. 3 (July 2, 2016): 255–272.

decade research of post-communist countries were that the studies neglected differences between the countries and were normatively-framed toward reaching the ideal of West-European media systems. However, such normative approaches “do not clarify processes and conditions that shape or produce specific characteristics of media systems.” (p.256)

Despite the existing criticism, Perusko notes that a significant value of Hallin and Mancini’s analysis value is that it can “function as a useful empirical benchmark for comparison” (p.257) replacing previous normative frameworks. Reviewing the current state of the art of post-communist research Perusko points out that for the most part they reveal patterns and similarities but do not explain distinction amongst CEE countries. Therefore he adopts a historical institutionalist (HI) approach which looks for causality not by adding new cases from the present “but including processes from the past” (p.259). Building on HI concepts of critical juncture and path dependence Perusko identified three critical junctures regarding the media in CEE countries: the French revolution of 1789 as the starting point of modernisation trajectories and the development of mass media; the installation of socialism when although pluralism and freedom of expression largely disappeared in the socialist countries there were also differences within the bloc; and the Fall of the Wall which is usually the only period covered by current analysis.

Former Yugoslavia can be described as most similar systems, with different origins and different outcomes. The six countries that formed Yugoslavia were originally part of two different empires, with different paths of development of mass media.

According to Kitschelt there were three types of communist countries: bureaucratic authoritarian, specific to East Germany and Czechoslovakia; national accommodative, in countries such as Hungary, Poland, Slovenia, Croatia and Patrimonial in Romania, Bulgaria, Macedonia and Serbia, which then led to different trajectories of democratization. As the author shows even within socialist Yugoslavia, there were differences in the type of communism within the republics.<sup>137</sup>

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<sup>137</sup> Kitschelt 1995 cited in Perusko, *Historical Institutionalist...* p. 263

Perusko proposed an analytical model based around the three time frames, including variables such as capital ownership, illiteracy rates, year of first newspaper, type of communism and censorship for the socialist time frame and Quality of democracy, Human Development Index, EU integration and Freedom of Press index, for the latest time frame. A cluster analysis showed that the six countries clustered in two groups, the more developed Slovenia and Croatia which started in the Habsburg Empire, had stronger modernisation during socialism, mostly avoided war in the dissolution of Yugoslavia and benefitted of a much faster European integration. The other republics clustered together for all three time frames with the exception of the socialist period when Serbia moved closer to Slovenia and Croatia. According to the author, this shows that “the institutional conditions of political and economic development, including the type of communism, were – in spite of the shared state different and consequently produced different conditions for media systems development” (p.266).

## Post-communist media systems

Hallin and Mancini did not include the post-communist countries of Central and Eastern Europe in their analysis, although in the introduction to the concept of professionalisation, to illustrate different views on the concept they do mention that in Poland there was a strong professional identity of journalists even during the communism.<sup>138</sup> Additionally, they mention that Poland and Hungary shared much of the history of the democratic-corporatist countries, but their evolution was interrupted by communism, and suggest that this shared history might make the Democratic-Corporatist model applicable for the two countries.<sup>139</sup>

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<sup>138</sup> Daniel C Hallin and Paolo Mancini, *Comparing Media Systems : Three Models of Media and Politics*. (Cambridge, U.K.: Cambridge University Press, 2004). (p.39)

<sup>139</sup> Hallin and Mancini, *Comparing Media Systems*, p. 305

There is a disagreement on whether the models can be applied to the post-communist countries. Based on the analysis of public service broadcasting Jakubowicz points to a “mediteranisation” of these media systems.<sup>140</sup> Gross, on the other hand, argues that Hallin and Mancini’s models are “incomplete and insufficiently universalisable to allow them to describe and explain Eastern-European media systems and their journalism.”<sup>141</sup> While disputing the relevance of the model, Gross admits that Hallin and Mancini’s conceptualisation and description of professionalism for the Mediterranean-Polarized pluralist model is indeed also true for Romania pointing to the tendency of mediteranisation highlighted by Jakubowicz.

Wessler et al. assessed the applicability of the Hallin and Mancini models in 10 Eastern and Western European countries including Romania by measuring professionalism in reporting styles, hypothesising that a higher degree of factualness would mean higher levels of professionalism. Their analysis revealed that the newspapers not only did not cluster according to the three models, but even newspapers from the same country seemed to belong to different groups – suggesting a very high level of variation or that the degree of factualness might not be a good measure of professionalism. Findings of the European Media Systems Survey (EMSS) indicate that at least regarding indicators for journalistic professionalism and journalistic culture the post-communist countries of Hungary and Romania are closer to each other than to the Western countries, suggesting the emergence of a potential fourth post-communist model.<sup>142</sup>

On the other hand examining attitudes to media self-regulation, one of the key elements for professionalism and also for the topic of this thesis Fengler et al.’s cross country survey<sup>143</sup> found that, although journalistic support for self-regulation “was tepid at best in

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<sup>140</sup> Karol Jakubowicz, Miklós Sükösd, and Karol Jakubowicz, “Finding the Right Place on the Map: Prospects for Public Service Broadcasting in Post-Communist Countries,” in *Finding the Right Place on the Map Central and Eastern European Media Change in a Global Perspective* (Bristol, UK; Chicago: Intellect, 2008), 101–124,

<sup>141</sup> Peter Gross, “Dances with Wolves: A Meditation on the Media and Political System in the European Union’s Romania,” in *Finding the Right Place on the Map Central and Eastern European Media Change in a Global Perspective*, ed. Karol Jakubowicz and Miklós Sükösd (Bristol, UK; Chicago: Intellect, 2008), 125–144. (p.132)

<sup>142</sup> Maria Popescu, Tania Gosselin, and Jose Santana Pereira, *European Media Systems Survey 2010* (Colchester, UK: Department of Government, University of Essex, n.d.), [www.mediasystemsineurope.org](http://www.mediasystemsineurope.org).

<sup>143</sup> Fengler, S., T. Eberwein, S. Alsius, O. Baisnee, K. Bichler, B. Dobek-Ostrowska, H. Evers, et al. “How Effective Is Media Self-Regulation? Results from a Comparative Survey of European Journalists.” *European Journal of Communication* 30, no. 3 (June 1, 2015): 249–266.

most countries” (p.255) and the results did not totally conform to the Hallin and Mancini models. In the Western and Northern (liberal and democratic-corporatist) countries there was a higher impact of professional codes than in Southern (Mediterranean-Polarized Pluralist - MPPL) and Eastern-Europe, confirming Jakobowicz’s proposition of these countries being closer to the MPPL model. Similarly, according to Fengler et al., journalists from Central and Eastern European post-communist countries and the Southern media systems as well were sceptical towards the concept of media transparency, while Western and Northern journalists were convinced that transparency leads to more trust. However, the authors also note that even within countries placed by Hallin and Mancini in the same model there were notable differences, as there also were “marked differences between age groups” regarding the impact of social media criticism.

According to Lauk, after the fall of the communism journalists found themselves in a “normative vacuum” as “old patterns did not work and new ones were yet to be introduced or adapted”<sup>144</sup> The situation was further complicated by the fact that “societal transformations coincided with the global revolution of information technology and communication.”<sup>145</sup> After the end of communism there was a notable effort to introduce the liberal model in an attempt called by Lauk as “profession building,” when a “veritable army of western professionals” has been deployed to provide training and expertise. These efforts, however, were much less successful than expected, according to Lauk in part because Western experts disregarded the traditions and history of local journalism wrongly considering that only propaganda existed before the end of the communism. Another reason for the failure of this attempt could be that objectivity might not have the same value in these countries. Therefore Lauk concludes that “values and norms cannot be introduced wholesale,”<sup>146</sup> there are similar characteristics of media and similar values shared by journalists in elective democracies, but they are applied in different ways. On the other hand, he also posits that while the failure of implementation of the Anglo-American model

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<sup>144</sup> Epp Lauk, “How Will It All Unfold? Media System and Journalist Cultures in Post-Communist Countries,” in *Finding the Right Place on the Map: Central and Eastern European Media Change in a Global Perspective*, ed. Miklós Sükösd and Karol Jakobowicz (Bristol: Intellect Books, 2008), 193–212. p 192

<sup>145</sup> Lauk p 205

<sup>146</sup> Lauk, *How will it all unfold* p.198

indicates a stronger influence of “national, historical and cultural traditions,” a “further digitisation and internetization may ultimately have a unifying influence on journalistic work processes and consequently how we view good journalism.”<sup>147</sup>

According to Jakubowicz and Sükösd in the young democracies such as the post-communist countries, in addition to traditional roles, media has some particular responsibilities to solidify democracy, such as the legitimatization of the very concept of democracy and political pluralism.<sup>148</sup> The post-communist countries of Central and Eastern Europe were subjected to “compressed waves of media change.” Transformations that happened in Europe gradually over decades and as part of the natural evolution of the media systems, such as move to professionalization, democratization and Europeanization, further aggravated by convergence and digitalization happened in a very short time and at once. As the authors put it “the dramatic feature of post-communist media systems is that they faced, partly performed and were subjected to, all these historical processes in an extremely compressed short period of time.”

Jakubowicz and Sükösd note that there were three typical strategies to dealing with the transformation: idealistic; mimetic, i.e. transposing Western-European models and institutions directly, and atavistic, holding on to elements of the old communist system. A combination of mimetic and atavistic behaviour emerged: elites perform a mimetic discourse while engaging in atavistic behaviour. This trend also observed by Gross and Coman<sup>149</sup> could be a possible explanation of the phenomenon of user-generated hate speech observed by Janto-Petnehazy in Romania and Erjavec and Kovacic in Slovenia<sup>150</sup>. Even extremely violent hate speech was tolerated on the websites of newspapers despite a range of legislation and anti-discrimination institutions that were implemented in the

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<sup>147</sup> Lauk, p. 209

<sup>148</sup> Karol Jakubowicz and Miklós Sükösd, “Twelve Concepts Regarding Media System Evolution and Democratization in Post-Communist Societies,” in *Finding the Right Place on the Map Central and Eastern European Media Change in a Global Perspective* (Bristol, UK; Chicago: Intellect, 2008), 9–40.

<sup>149</sup> I. Coman and P. Gross, “Uncommonly Common or Truly Exceptional? An Alternative to the Political System-Based Explanation of the Romanian Mass Media,” *The International Journal of Press/Politics* 17, no. 4 (October 1, 2012): 457–479.

<sup>150</sup> Erjavec and Kovacic, *You don't understand*

process of European integration as part of the *acquis communautaire*, i.e. countries conformed to the formal requirements by adopting the legislation but did not apply it.

According to Örnebrig journalism in post-communist countries could be described as being characterised by “interrupted professionalisation,” the developments that in Western Europe lead to the current form of the media systems were suddenly interrupted by the communism.<sup>151</sup> In these countries, journalism is also a fragmented occupation along ethnic, organisational, national/local and foreign/domestic dimensions. The author highlights the example of Latvia for ethnic polarisation, where there is a separate Latvian and Russian language media with little communication between the two also leading to separate Latvian and Russian public spheres within the country. Amongst the countries analyzed in this study, Romania with a population of 1.24 million ethnic Hungarians is also an example of such ethnic fragmentation, with the existence of a distinct Hungarian media system within the country complete with a range of national and local newspapers, television and radio stations, journalist’s union educational institutions and also ethnic parties and politicians.<sup>152</sup>

The more relevant dimension of fragmentation for the topic of this thesis is the organisational dimension, that could explain differences in the existence and efficiency of self-regulation. While in other countries journalist’s unions and organisations formulate ethical codes, participate in self-regulation and improve professionalisation, in post-communist countries “they have very little legitimacy” and are seen as “remnants of the communist” system resulting in low membership and competing organisations. In the post-communist countries analysed in this study there is a national union of journalists in Hungary, but Romania has several competing organisations such as the Romanian Press

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<sup>151</sup> Henrik Örnebrig, *Journalistic Autonomy and Professionalisation*, Final report - ERC founded project, ‘Media and Democracy in Central and Eastern Europe (Department of Politics and International Relations, University of Oxford; Department of Media and Communications, The London School of Economics and Political Science, September 2013), [http://mde.politics.ox.ac.uk/images/Final\\_reports/ornebring\\_2013\\_final%20report\\_posted.pdf](http://mde.politics.ox.ac.uk/images/Final_reports/ornebring_2013_final%20report_posted.pdf).

<sup>152</sup> For an overview of the Hungarian media in Romania see Tivadar Magyari, “Hungarian Minority Media in Romania: Toward a Policy of Professional Improvement,” in *Reinventing Media : Media Policy Reform in East-Central Europe*, ed. Miklós Sükösd (Budapest ; New York: Central European University Press, 2003) and Attila Papp. Z., “A Romániai Magyar újságíró-Társadalom (The Hungarian Journalist Society of Romania),” *Mediakutato*, no. 2004 Winter (2004), accessed December 27, 2010, [http://www.mediakutato.hu/cikk/2004\\_04\\_tel/07\\_romaniai\\_magyar/00.html?q=erd%E9lyi#erd%E9lyi](http://www.mediakutato.hu/cikk/2004_04_tel/07_romaniai_magyar/00.html?q=erd%E9lyi#erd%E9lyi).



Club, The Romanian Federation of Journalists – MediaSind, and the Hungarian Journalist Union of Romania, with varying levels of representativity.

## **Role of the State**

Dragomir describes the strategies used by various states regarding the use of state funding to control the media.<sup>153</sup> There are other less sophisticated approaches specific to authoritarian regimes such as threats, violence and direct regulation but these are not available to governments in the European Union, also as Dragomir points out the use of funding is “the most effective of them all”(p.1133). The author describes four main approaches of state control: state-controlled media such as public broadcasters, state advertising, state subsidies, which all involve direct state funding, and market disruption measures. Of these, the most relevant for the present thesis are the last three.

State advertising includes the government buying advertising directly, e.g. for governmental information campaigns or state companies, buying advertising from favourable media, while ignoring critical outlets. The decision to exclude independent media from the advertising budgets as Dragomir notes, in some countries effectively “condemns them to extinction”.

Public service broadcasting is according to the author mostly successful in Western Europe in Eastern Europe it takes the form of "state controlled media" which disseminates the government's agenda creating essentially a "form of state propaganda" (p.1135). While the governments in many countries can control the state media by naming members of the board, funding is considered more effective. This is further aggravated by the fact that in CEE countries public media are high-cost operations, much higher than the private counterparts, which also increases their dependence on the state. As Dragomir shows, in Romania in 2017 the budget of the SRTV was 300 million €, equivalent to 820000€ a day,

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<sup>153</sup> Dragomir, Marius. “Control the Money, Control the Media: How Government Uses Funding to Keep Media in Line.” *Journalism* 19, no. 8 (August 2018): 1131–1148.

more than the entire yearly budget of Hotnews.ro. Similarly, in Hungary, a country with half the population of Romania, the public broadcaster's budget in 2014 was 290 Million Euro, coupled with very poor ratings and audience reach.

State advertising is particularly problematic in dysfunctional markets dominated by clientelism, where it could result in situations where "large parts of the media if not the entire industry becomes part of a content-for-advertising dealmaking machinery" (p.1137). The author mentions the two Hungarian newspapers included in the content analysis sample, in 2012 the opposition daily *Nepszabadsag* received 3% of the state print advertising budget, while the (at the time) government friendly *Magyar Nemzet* 22%. It should be mentioned that this changed in 2015 when *Magyar Nemzet* was also excluded from state advertising after its owner had a falling out with the government, resulting in losses that ultimately led to the closing down of the newspaper (for more details on Hungarian newspapers see...).

Market disruption is the most sophisticated strategy; it could take the form of specially designed legislation to reduce profits or the selective enforcement of tax regulation, the latter widely used in countries such as Turkey and Macedonia. Dragomir mentions the advertising tax introduced in 2014 in Hungary, which was designed to cripple the opposition-friendly *RTL Klub* television station, reducing its profits to around half. Another effect of the tax was that it also affected the sale value of another station TV2 which was then acquired at a lower price by a friend of the Prime minister. In regards to content this manifests in two main ways: self-censorship, the media avoids criticising the government and biased coverage towards the government, attacking the opposition or demonising enemies designated by the government such as in the case of Hungary the businessman George Soros or migrants.

A particular form of this took place in 2018 in Hungary when businessmen close to the government who in the previous years, bought up large parts of the Hungarian media, donated their outlets to a Foundation controlled by a friend of the prime minister.<sup>154</sup>

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<sup>154</sup> "Hungary's Orban Exempts pro-Government Media Group from Scrutiny." *Reuters*, December 6, 2018. Accessed June 19, 2019. <https://www.reuters.com/article/us-hungary-media-idUSKBN1O51DW>.

## Other regulatory factors

According to Lessig, the behaviour of any actor can be shaped by multiple factors that can be considered to be acting as regulation: legal constraints consisting of laws and regulations, norms, the market and technology. “These constraints are distinct yet plainly interdependent. Each can support or oppose the other” “ Changes in one will affect the regulation of the whole.”<sup>155</sup>

Applying this theory to the topic of this thesis, in regards to comments and hate speech legal constraints come into play in two ways: first there is no direct regulation for the press, and also the regulation of comments is unclear, but on the other hand, there are strong laws against discrimination in every country. While this could be straightforward, it also depends heavily on the norms of a given country or community what does it consider as discrimination. For example, in the case of Romania surveys revealed that a large proportion of the population does not consider it to be discrimination if children are forced to attend classes of a religion different of their own. Or even though legally speaking legislation defines a country as the equal homeland of all of its citizens regardless of ethnicity or race statements such as Hungary for the Hungarians and Romania for the Romanians might not be considered as discrimination by the users or even worse by the human moderators. On the other hand, even though there is no direct legislation regarding comments, norms might affect the way a newspaper chooses to handle them, i.e. by removing the comments they consider offensive. Markets also can come into play here for example as motivation to implement moderation in order to avoid uncivil or discriminatory comments affecting the brand of the newspapers but also the existence of the commenting feature itself might be just because of market demands. Technology and architecture is also a very strong influencer, the perceived anonymity might supersede the legal constraints, while the architecture of posting content on a platform owned by the newspaper creates not

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<sup>155</sup> Lawrence Lessig, *Code: Version 2.0*, 2nd ed. (New York: Basic Books, 2006). p.124

just legal complications but by the implied consent to the site's terms of service (TOS) by accessing it allows the publisher to impose restrictions according to its own norms but also to avoid responsibility.

### **Weaknesses of system-based approaches: The example of Romania**

In order to introduce the hypothesis, this section will present a short example using the case of Romania one of the four countries in the sample to illustrate the potential weaknesses but also the applicability of a comparative analysis using Hallin and Mancini's framework as a starting point.

Considering that the architecture of a system in itself does not possess enough explanatory power Coman and Gross argue for the necessity of studying the “interdependence between the political system and the extant culture.”<sup>156</sup> To support their argument in the case of Romania they show that despite the existence of a range of legislation on defamation and hate speech similar to Western countries “few if any are interpreted and applied with fidelity to democratic values as to the letter of the law” leading to unreliable state regulation while self and co-regulation are missing. There is also an “abundance” of journalistic codes of ethics, but in their view they are non-functional. The authors also point out that responses given by Romanian journalists in the Worlds of Journalism Survey and other studies are similar to those given by Western journalists and thus they suggest that Romanian “journalists know the correct answer”. But, they add, “foreign and domestic analysis contradicts the responses they gave.” Concluding that the best description of Romania's media systems is “imitative” that and its “political system does not allow for a clear classification of the mass media and its journalism along the lines suggested by Hallin and Mancini” (p.465), the authors argue that a political or media systems cannot be understood just by studying its architecture. An exploration of “the collective and individual ethos of the individuals making them work” is necessary as it also “defines the nature of the

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<sup>156</sup> I. Coman and P. Gross, “Uncommonly Common or Truly Exceptional? An Alternative to the Political System-Based Explanation of the Romanian Mass Media,” *The International Journal of Press/Politics* 17, no. 4 (October 1, 2012): 457–479.

systems' functioning, the interpretations and applications of laws, rules, regulations, policies, and ideologies that drive them.”

Gross also voiced similar criticism of approaches ignoring “cultural explanations” for the configuration of media systems arguing that the organisation, functioning, and thus also the effects of a system are the outcomes of a combination of the institutional, professional, political and the general societal culture. ”A country’s political system and its politics are directly shaped by this mixture of cultures and, in turn, the media as an institution and platform for mass communication is the child of these cultures almost no matter how the system is organised and how many institutional changes are made.”<sup>157</sup>

Pippidi and Ghinea also point to the sharp difference between formal arrangements and the practical reality. They use the example of Romania’s broadcast regulator, the National Council of the Audiovisual, which is meant to be independent according to the legislation but it is still widely perceived as being subject to politicization.<sup>158</sup> Additionally, the authors point out the contradiction of Romania being the “first country to implement the AVMS Directive and the “rather disappointing” outcomes. In the case of print media there are no legal rules or ownership restrictions, but “self-regulation is not a popular idea” amongst journalists and the various codes are not actively implemented. Moreover “media companies have no internal codes and tend to solve problems on a case by case basis.” (p.171) On the economic side “the majority of media outlets in Romania are not viable”, and the existence of actual blackmail media was also discovered.<sup>159</sup> (p.179)

While some of these examples could indeed confirm Gross and Coman’s argument regarding Hallin and Mancini’s frameworks’ lack of explanatory power in the case of

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<sup>157</sup> Peter Gross, *Mass Media in Revolution and National Development : The Romanian Laboratory* (Ames (Iowa): Iowa state university press, 1996). p.148

<sup>158</sup> Mungiu-Pippidi, Alina, and Cristian Ghinea. “Struggling with Media Capture: Romania.” In *Understanding Media Policies: A European Perspective*, edited by Evangelia Psychogiopoulou, 166–181. London: Palgrave Macmillan UK, 2012. [https://doi.org/10.1057/9781137035288\\_11](https://doi.org/10.1057/9781137035288_11).

<sup>159</sup> Dan Diaconescu, the leader of a party named after himself Popular Party Dan Diaconescu (PPDD) based the business model of his television on blackmailing public figures. For additional details see: “Romanian Former Media Tycoon and Politician Dan Diaconescu Sentenced for Blackmail - CEE Insight,” *CEE Insight*, accessed September 29, 2015, <http://www.ceeinsight.net/2015/03/05/romanian-former-media-tycoon-politician-dan-diaconescu-sentenced-blackmail/>.

Romania they could also confirm the models. As Hallin and Mancini show economically weak media tend to be subject of instrumentalisation as it depends on other powerful actors for survival, this in turn leading to low journalistic professionalisation. Another indicator of low journalistic professionalisation is weak rational-legal authority manifested in the examples above by the tendency of not following rules and procedures, also pointing to the applicability of Hallin and Mancini's framework for the analysis of post-communist countries such as Romania. Following the advice of the authors mentioned earlier, the present thesis does not seek to automatically fit the post-communist countries of Hungary and Romania into one of the three models but instead is using relationships amongst variables such as economic conditions and journalistic professionalisation as an interpretive framework for the result uncovered during the analysis.

## Chapter 3. Methodology

### Research questions and hypothesis

The present thesis seeks to answer the following two sets of research questions:

What is the nature and extent of user-generated hate speech in the comment sections of online newspapers? (RQ1) Are there variations in the nature and extent of user-generated hate speech across the countries and newspapers in the sample? (RQ1a)

What are the possible contributing factors to the presence and level of uncivil behavior/prohibited content including user generated hate speech? (RQ2)

The hypothesis of this thesis is that there might be a relation between the different characteristics of the media system and the quality of debate in the comment section, understood in this case as low levels of incivility and hate speech. According to this hypothesis, the results of the Content Analysis will be considered as the outcome (dependent variable) and the features of a country's media system as possible explanations of that outcome (independent variable). A limitation of this approach, and of most studies comparing countries, is that it is not possible to control for all variables that might affect the results. As shown in the previous section, the review of the literature suggests that the variables analyzed here are likely to have a strong effect on newspapers' content, but on units of analysis as large as countries the number of variables could be infinite. According to Landman the Most Similar Systems Design (MSSD) approach could be a solution to this "too many variables" problem as it aims to "neutralize some differences while highlighting others"<sup>160</sup>.

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<sup>160</sup> Todd Landman, *Issues and Methods in Comparative Politics: An Introduction*, 3rd ed. (Milton Park, Abingdon, Oxon ; New York: Routledge, 2008). p. 32, pp.70-75

Despite their differences, the three European media systems under comparison are similar enough to fit under the most similar systems design, as already shown by Hallin and Mancini and authors who followed their approach in applying their framework to Eastern-Europe<sup>161</sup>. Especially relevant, the regulatory framework in terms of legislation, ethical codes and guidelines and site terms of use is very similar, almost identical in case of terms of service. There might be nuances and differences in the interpretation of terms such as discrimination, but these have also been given a common European definition due to the European directives and rulings by the ECtHR in the area that should also reduce national differences.

## Methodology

This study consists of a triangulation of qualitative and quantitative methods building on content analysis, interviews and document analysis. According to Berg and Lune, in a triangulation “every method is a different line of sight directed toward the same point, observing particular aspects of the social and symbolic reality.”<sup>162</sup> The benefit of this approach is that it does not only include multiple data gathering techniques, but each method also reveals a different facet of the same phenomenon contributing to a systemic analysis.

The present study is a multi-level examination of the selected media systems both at the macro, (country) and the micro (newspaper, topic and article) level. At the country-level document analysis, relying mainly on secondary sources, aims to identify and examine the elements of media governance that could influence the quality of discussion in comments by analyzing existing legislation regarding the media, discrimination and the relevant regulatory bodies; the media self-regulatory framework, journalistic organizations their ethical codes, guidelines and activity.

Despite the recent moves to more regulation, due to the provisions of the E-commerce directive, in essence the regulation of user participation on newspaper websites is left largely

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<sup>161</sup> Jakubowicz, 2007, Wessler et al, 2015,

<sup>162</sup> Bruce Lawrence Berg and Howard Lune, *Qualitative Research Methods for the Social Sciences*, 8. ed., Pearson new internat. ed., Pearson custom library (Harlow: Pearson, 2014). p. 5



to the decision of the newspapers, and as such it depends primarily on the journalistic culture of the given country and especially the choices and policies of individual media organizations acting as “de facto media regulation”<sup>163</sup>. To gain insight to this element at the newspaper-level, journalists in charge of user participation were interviewed using semi-structured interviews (see below).

Given that the main purpose of this study is to compare levels of hate speech and incivility in different media systems, a content analysis of a sample of comments is necessary in order to find out if there are indeed differences. Content analysis is particularly suitable for this purpose as according to Krippendorff “revealing differences” is a key purpose of content analysis”<sup>164</sup>. As discussed, the regulatory environment is largely similar, but the media markets and economic conditions are very different; the technological solutions are very similar, sometimes identical, and there are also common topics. However, we do not know if indeed there are differences in the levels of prohibited content.

Neuendorf recommends an integrative model of content analysis and argues that content analysis on itself can only provide description of message characteristics or identify relationships between their elements, and it is not appropriate to make inferences on the source based on content analysis of the text alone. Therefore, if the analysis seeks to also provide explanation, it is necessary to combine the content analysis with studies of extra-message variables. This approach could provide “important missing links in multistep models of human communication behavior”<sup>165</sup>. In line with this recommendation, content analysis is only one element of the study. The examination of other variables at both the newspaper- and media system-level aims to provide explanation to the levels of user generated hate speech and incivility identified through the content analysis. However Neuendorf also cautions that discovery of causality is an “unattainable goal” and the best one can aim for is the identification of some reasonable “presumed causes” and “presumed effects.”<sup>166</sup>

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<sup>163</sup> Braman, *Change of State*

<sup>164</sup> Klaus Krippendorff, *Content Analysis : An Introduction to Its Methodology*, 2nd ed. (Thousand Oaks Calif.: Sage, 2004). p 51

<sup>165</sup> Kimberly Neuendorf, *The Content Analysis Guidebook* (Thousand Oaks Calif.: Sage Publications, 2002). p 53

<sup>166</sup> Neuendorf, *The Content Analysis Guidebook*, p. 48.

## Sampling

### Country selection

The countries included in the current analysis are the post-communist Central-East European Hungary and Romania and the United Kingdom (UK) the latter classified by Hallin and Mancini as part of the liberal model. As mentioned in the previous chapter, after the fall of the communism, Hungary and Romania were subject to rapid media development, and underwent in relatively short time changes that happened over decades in Western Europe. The primary interest of this study was to examine the two post-communist countries but due to the similarities in their recent history and development, comparing them only to each other would have yielded incomplete results. Therefore, the more established and stable UK media system was also introduced to the comparative analysis in order to provide a different perspective. Additionally, considering that the topic of this thesis is hate speech, the different approach to diversity in the UK, both in political and media discourse compared to the other two countries also adds more depth to the analysis. A further motivation in the country selection was the presence in the UK of the *The Guardian* which could be considered a pathbreaker in terms of innovation and user participation.

### Newspaper sample

In every country two newspapers were selected based on the highest combined print and online circulation numbers in the quality national newspaper category. The countries, newspapers and their political orientation are shown in Table 1. Print circulation numbers were used as at the design of this study newspapers still obtained most of their revenue from the printed edition<sup>167</sup> especially in the two post-communist countries. To ensure that the online rankings are similar to the print circulation, the website rankings on Alexa.com were also verified as a secondary selection criterion, but did not change the order. The most read news-site in Hungary is a digital only news-portal Index.hu, which does not have comments on its main site. In the UK and Hungary the newspapers with highest circulation numbers for the category of left-right political orientation were selected. The political orientation of the newspapers was identified using the

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<sup>167</sup> Mira Milosevic et al., *World Press Trends 2014*, World Press Trends (Paris: WAN-IFRA, 2014).p8

results of the European Media System Survey which measured the newspapers agreement with the major political parties in most European countries, including all the newspapers and countries examined in this study.<sup>168</sup>

Country	Newspaper/Website	Political orientation Party most often agrees with (EMSS 2010)
<b>Hungary</b>	Magyar Nemzet/ mno.hu	Centre-right/Fidesz <sup>169</sup>
	Nepszabadsag/ Nol.hu	Left/MSZP
<b>United Kingdom</b>	The Daily Mail Dailymail.co.uk	Right/Conservatives
	The Daily Telegraph/ Telegraph.co.uk	Centre-right/Conservatives
	The Guardian/ Theguardian.com	Centre-left/Labour
<b>Romania</b>	Adevarul/ Adevarul.ro	Centre-right/PNL
	Evenimentul Zilei/ Evz.ro	Centre-right/PDL

**Table 1: Countries and newspapers in the sample**

The political ideology criterion had a significant impact in the United Kingdom where *The Guardian* has lower circulation numbers than *The Times* but was selected as it is the only national newspaper that can be categorized as centre-left. On the other hand, the political orientation criteria had to be disregarded in Romania as the only national left wing newspaper

<sup>168</sup> Maria Popescu, Tania Gosselin, and Jose Santana Pereira, *European Media Systems Survey 2010* (Colchester, UK: Department of Government, University of Essex, n.d.), www.mediasystemsineurope.org.

<sup>169</sup> The owner of *Magyar Nemzet*, Simicska Lajos had a falling out with the government in February 2015 and overnight changed the political orientation of his media properties to opposing the government while still maintaining an overall right-wing conservative approach. After the closure of Nepszabadsag, Magyar Nemzet became the leading opposition newspaper until it was also closed down in April 2018.

Jurnalul National had almost no comments on the articles on their website. During the monitoring period (May 2014-September 2015) not enough articles that would satisfy the minimum criterion of 50 comments were found (more on which below).

The other exception in the sample is the inclusion of the website of the *Daily Mail*, the second most read newspaper in Britain for print circulation and also the most visited website. The *Daily Mail* does not fit into the description of elite quality newspaper but its website has considerable amount of political news content. It also has a significantly different role and political influence within Britain not comparable with the tabloids in the other countries. Although *The Sun* has higher print circulation numbers it was not included in the sample as its website was behind a paywall for much of the data collection period, resulting in low website traffic. Tabloids are also the most read newspapers in Hungary and Romania, but the segment was not included in the sample, due to the limited amount of political content at the time of data collection.<sup>170</sup>

According to the Mediafactbook 2015, the Romanian newspaper market suffered a decline that is surprising even considering the general trend of falling circulation numbers. According to the Mediafactbook, three out of the five publishers of national newspapers declared insolvency in 2014. Furthermore at 6%, print newspapers have the lowest market share of advertising in the region, second only to Albania at European level. On the other hand, in Hungary at 28%, printed press has the highest advertising market share in the region.<sup>171</sup> According to the World Press Trends study, a similar decline is visible from the newspaper advertising expenditure that in 2013 plummeted to 10 million USD, from \$28.3 million in 2009. The other countries in the sample experienced a shrinking of advertising spending, especially the United Kingdom, which lost more than a billion, with \$3.26 billion compared to \$4.30 Bn in 2009. In comparison while also reduced, the advertising expenditure in Hungary remained relatively stable at \$116 Million, down from \$129 million.<sup>172</sup> Romania is also the country in the sample where the circulation of the print edition of both leading quality newspapers is surpassed by relatively

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<sup>170</sup> The Hungarian media system underwent a significant transformation and concentration starting in 2016, when the majority of the media market was bought up by businesses close to the government, resulting in a centralized government based control of the content of the most of the Hungarian media, the closure of the two newspapers in the sample and an increased changing role of tabloids and the regional press

<sup>171</sup> Mediafactbook 2015, p 50, p.13

<sup>172</sup> WAN-IFRA, World Press Trends, 2014, p 54

niche publications such as *Lumina (The Light)* the national daily of the orthodox church<sup>173</sup>. However, the websites might make up for this with *Adevarul.ro* being the 7<sup>th</sup> most visited online site in the country.<sup>174</sup> For the United Kingdom the most read daily was *The Sun* followed by the *Daily Mail*; in the quality segment on the conservative (right) side *The Telegraph* was the most read newspaper (483,306) and was thus selected in the sample while on the liberal–centre-left (Labor) side the only national newspaper with a printed edition is *The Guardian* although with a significantly lower circulation (165,290). All three newspapers reported decreasing circulation numbers compared to the same period in 2014.<sup>175</sup> As for the websites, *MailOnline* was the most visited with more than 13 million monthly visitors, while for the other two newspapers the order was inverted, *Theguardian.com* having almost twice as many visitors (7,771,486) than *The Telegraph* (4,097,915). According to the traffic rankings on *Alexa.com* all the newspaper websites for the sample ranked higher than the websites of other similar publications, i.e. there was no other publication in that category and political orientation that ranked higher. In Hungary audited data was available for three of the four national newspapers (excluding tabloids): *Nepszabadsag* (left, socialist orientation, opposition) sold on average 43,732 copies in the second quarter of 2015, while *Magyar Nemzet* (right, conservative, pro-government) had an average circulation of 36,070, followed by the other left-wing daily *Nepszava* (14,394) and the pro-government *Magyar Hirlap* (estimated circulation around 10,000). No official data is available for the websites in Hungary. However it is worth mentioning that in Hungary according to *Alexa.com* in 2015 the highest-ranking news websites were two web-only news portals *Origo.hu* and *Index.hu*, both left-leaning. They were excluded from the sample not only due to the printed newspaper and political orientation criterion, but also due to the fact that there were no comparable standalone news-websites with similarly high traffic ranking in the UK. In Romania *Hotnews.ro* is a similar news-portal and was included in my previous research on user generated hate speech, but was excluded from the content analysis sample in order to keep a uniform population. As it will be explained later, however, it was included in the interview sample.

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<sup>173</sup> Romanian Bureaus of Circulation Audit (Brat) 2015: *Lumina (The Light)* – 22796, *Evenimentul Zilei* – 20117, *Adevarul*, 15330)

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<sup>175</sup> Britain's Audit Bureau of Circulation does not make any of its data available for free, therefore for the purpose of this sampling I used the ABC numbers reported by the Press Gazette

In the absence of reliable academic categorizations of newspapers' political alignment, the candidates/party supported at the most recent elections was used as a proxy, combined with data from the EMSS regarding agreement with political parties<sup>176</sup>. Political orientation was included as a variable and selection criterion in order to examine if it has an effect on the content of the comments. Political orientation is relevant due to the selective exposure of readers to media that tends to agree with their own political opinions. As Iyengar and Hanhn revealed, there is a strong political selectivity in choosing information sources, the same story generating very different audiences with different labels.<sup>177</sup> Furthermore their experiment has shown that readers on the right of the political spectrum had a strong preference for choosing the same story from Fox News compared to an unlabeled source, and also tended to avoid the media of the other side. This effect was also increased by the level of individual engagement, i.e. the more strongly readers support a view, the more strongly they avoid sources perceived of being of different ideological orientation. According to Iyengar and Hahn, "selective exposure is especially likely in the new media environment" as the possibilities of new technology allow previously unavailable levels and ways of filtering information. While the internet has long been accused of favouring this trend according to Messing and Westwood under the right conditions it could also reduce it<sup>178</sup>. As the authors found that social endorsement (likes, or recommendations) reduced source selectivity, i.e. readers might choose to read an article from a newspaper of different orientation if it is recommended by a friend or has a large number of recommendations. However, this effect also depends on the composition of one's social network and can significantly be reduced by the use of algorithms on services such as Facebook that recommend news that the user is more likely to "like".

Taking political orientation into account when sampling for and studying hate speech is also important, as numerous studies have shown that it has a significant effect on prejudice and attitudes towards a wide range of issues and attitudes such as immigrants, homosexuality and also climate change.<sup>179</sup> More importantly to the topic of this thesis, Pettigrew et al. have shown that political conservatism has a stronger influence on attitudes to immigration than economic variables. They also found that the analysis of the factors influencing prejudice resulted in

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<sup>176</sup> Popescu et al. *European Media Systems Survey*

<sup>177</sup> Shanto Iyengar and Kyu S Hahn, "Red Media, Blue Media: Evidence of Ideological Selectivity in Media Use," *Journal of Communication* 59, no. 1 (March 2009): 19–39.

<sup>178</sup> S. Messing and S. J. Westwood, "Selective Exposure in the Age of Social Media: Endorsements Trump Partisan Source Affiliation When Selecting News Online," *Communication Research* 41, no. 8 (December 1, 2014): 1042–1063.

<sup>179</sup> Cright, 2010, Okdie et al, 2013

similar results across different countries concluding that it might be due to the fact that it is related to other types of prejudice and also because “immigration can threaten native populations in similar ways across industrial nations.”<sup>180</sup> Analyzing Eurobarometer data between 1988-2000 Kessler and Freeman also found that people on the left were more favorable towards permissive immigration policies, while levels of prejudice tended to increase in categories of older and more conservative respondents.<sup>181</sup> Prezza et al also found that political affiliation had a stronger effect on prejudice towards immigrants than the level of local immigrant population.<sup>182</sup> This effect of political orientation is not limited to immigration, as Brumbach revealed that liberalism (in the US) was related to more favorable attitudes to homosexuality. This was also confirmed by Lee and Hicks who showed that liberals were more in favour of same-sex marriage than conservatives<sup>183</sup>.

### Article and comment sample for content analysis

The content analysis was performed on a keyword-based relevance sample of articles on topics regarding the five target groups that are likely to generate hate speech. According to Ritchie et al., in a relevance sample “the sample units are chosen because they have particular features or characteristics which will enable detailed exploration or understanding of central themes and questions which the researcher wishes to study.”<sup>184</sup> This sampling method was necessary as the primary purpose of this study is to analyze levels of hate speech, but such content is more likely to appear on articles on certain controversial topics. It is more likely to find hate speech on articles about immigration than cooking or fashion. This thesis argues that user-generated hate speech presents a parasitic feature relying on the host to reach members of the target group. Comments posted on articles that are relevant to the target group could be more harmful, as the article and the attached comments are more likely to be read members of those groups, e.g. a comment posted on an article about Hungarian minority education in Romania is likely to be

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<sup>180</sup> Thomas F. Pettigrew, Ulrich Wagner, and Oliver Christ, “WHO OPPOSES IMMIGRATION?,” *Du Bois Review: Social Science Research on Race* 4, no. 01 (March 2007), accessed September 11, 2015, [http://www.journals.cambridge.org/abstract\\_S1742058X07070038](http://www.journals.cambridge.org/abstract_S1742058X07070038), p 36

<sup>181</sup> Alan E. Kessler and Gary P. Freeman, “Public Opinion in the EU on Immigration from Outside the Community\*,” *JCMS: Journal of Common Market Studies* 43, no. 4 (November 2005): 825–850.

<sup>182</sup> Miretta Prezza et al., “Territorial Sense of Community, Ethnic Prejudice and Political Orientation,” *Journal of Community & Applied Social Psychology* 18, no. 4 (July 2008): 315–332.

<sup>183</sup> Tien-Tsung Lee and Gary R. Hicks, “An Analysis of Factors Affecting Attitudes Toward Same-Sex Marriage: Do the Media Matter?,” *Journal of Homosexuality* 58, no. 10 (November 2011): 1391–1408.

<sup>184</sup> Jane Ritchie et al., “Designing and Selecting Samples,” in *Qualitative Research Practice: A Guide for Social Science Students and Researchers*, ed. Jane Ritchie and Jane Lewis, 2nd. ed. (London: SAGE, 2014), 111–142., p.113

read by more Hungarians. Therefore, a sample of the general population of articles would have not been relevant for assessing levels of hate speech.

According to Krippendorff, contrary to probabilistic sampling where “one does not have a clue” about the population, in relevance sampling the texts are read at least superficially.<sup>185</sup> The relevance sampling for this study was a multistage process: first the hate speech target groups were identified (see below), followed by the topics, then the articles, leading to a sample of comments. The sample is not representative of the population of texts on a site; it is a population of relevant texts.

Using Neuendorf’s categorization of units of sampling, data collection and analysis<sup>186</sup> for this study the units of data collection are the individual comments. The primary sampling units are the target groups on which the articles were collected, and then the articles that resulted in the comments. The results will be examined at the levels of countries, newspapers, target groups and topics which in this case will form the units of analysis.

## Codebook

The aim of the codebook is to incorporate three elements of regulation that could affect the content of newspapers website: the formal legislation, journalist’s organizations ethical rules, and most importantly the site terms of service (TOS). This codebook and the definition of hate has been adapted from the codebook used for my initial research on user generated hate speech in Romania, a direct precursor of this study after being tested for its applicability for cross-country research.<sup>187</sup> This section provides details on how the different elements of regulation fit into the codebook.

All the websites sampled in this study include a Terms of Service (TOS) providing guidelines for user behavior, allowed and prohibited content and intellectual property rights. As it will be shown in the following chapters, even at a superficial examination the TOSs of different

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<sup>185</sup> Krippendorff, *Content Analysis*, p118

<sup>186</sup> Neuendorf, *The Content Analysis Guidebook*, p 71

<sup>187</sup> Janto-Petnehazy, *User-generated hate speech*



newspapers from different countries are remarkably similar. In general they prohibit the following categories: abusive and insulting language, personal attacks against other users, journalists and moderators, discriminatory language, vulgarity and pornographic content. There is little variation in detailing the terms of use most websites providing only a short enumeration of the categories of prohibited content. Most newspapers use a firm vocabulary signaling that they expect the rules to be followed, e.g. “it is prohibited”, “you must not”, “you warrant”, with the exception of Adevarul.ro which only “recommends” its users to not use discriminatory language.

The press ethical codes in most countries are quite vague on the topic of discrimination, the vaguest being the Romanian Press club saying only that race and ethnicity should only be mentioned if it is strictly relevant. The British National Union of Journalists forbids the production of materials likely to lead to hatred or discrimination and by extension this could be interpreted as not allowing such materials on their online-spaces, while the Independent Press Standards Organization’s Editors Code of Practice cautions against prejudiced or pejorative references to “race, color, religion, gender, sexual orientation.”

The relevant legislation will be presented and analyzed in detail in the following chapters, but at this point, to introduce the codebook it can be said that also due to European Union’s requirements all the countries in the sample have some legislation against discrimination, and some form of authority or equality body to address complaints. Additionally, all countries are signatories of the International Covenant of Civil and Political Rights, whose article 20 prohibits “advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence.” Holocaust denial and seeking to find justification for crimes against humanity is criminalized in Hungary and Romania.

In the absence of a commonly shared definition and to allow for comparison this study will use two encyclopedic definitions of hate speech (International Encyclopedia of Communication and the Encyclopedia of Political Communication):

Comments containing speech aimed to terrorize, humiliate, degrade, abuse, threaten, ridicule, demean, and discriminate based on race, ethnicity,

religion, sexual orientation, national origin, or gender.<sup>188</sup> Expressing prejudice, and contempt, promoting or supporting discrimination, prejudice and violence. Seeking to distort the history of targeted groups, to eliminate their agency, to create and maintain derogatory cultural, racial, and ethnic illusions about targeted groups. Also including pejoratives and group based insults, that sometimes comprise brief group epithets consisting of short, usually negative labels or lengthy narratives about an outgroup's alleged negative behavior.<sup>189</sup>

The primary reason for using these definitions is that despite the similarities there are still differences in regulatory approaches. The two definitions were combined to include both a more general level definition referring to aims of hate speech and more detailed descriptions referring to communicative elements by which it seeks to perform them. However, the similarity of the TOS seems to indicate a shared set of values and also suggest that at the newspaper level the different national regulatory elements are implemented in the same way.

The general encyclopedic definitions were then expanded to allow for more detailed measurements and analysis of different sub-types of hate. The sub-type definitions can be traced back to the original definition, e.g. the holocaust denial codes to “distort the history of the target group” or the “this is our country/exclusion” and “denying rights” codes to “seeking to eliminate their agency” and “promoting or supporting discrimination”.

Since all the sites prohibit incivility the definitions and codes for non-hate threats and insults from the original codebook were extended to allow for the measurement of incivility using definitions adopted from Papacharissi<sup>190</sup>, Sobieraj and Berry<sup>191</sup> and Coe et al.<sup>192</sup> The resulting codebook allows for the measurement of both hate and incivility. In order to make it suitable for cross-country comparative use, national references were removed from the codebook, and the categories were also refined. As mentioned in the literature review, definitions of incivility by other authors such as Papacharissi and Gervais also extended to content that this thesis and

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<sup>188</sup> Lynda Kaid, *Encyclopedia of Political Communication* (Los Angeles: Sage Publications, 2008).p.301

<sup>189</sup> Wolfgang Donsbach, *The International Encyclopedia of Communication* (Malden MA: Blackwell Pub., 2008).p.2051

<sup>190</sup> Z. Papacharissi, “Democracy Online: Civility, Politeness, and the Democratic Potential of Online Political Discussion Groups,” *New Media & Society* 6, no. 2 (April 1, 2004): 259–283.

<sup>191</sup> Jeffrey M. Berry and Sarah Sobieraj, *The Outrage Industry: Political Opinion Media and the New Incivility*, Studies in postwar American political development (Oxford ; New York: Oxford University Press, 2014). (Amazon Kindle edition)

<sup>192</sup> Coe et al. *Online and uncivil*,

the codebook define as hate. While, as Papacharissi shows, denying rights of minorities is certainly uncivil, this thesis considers it as being part of a more harmful category of hate. For the purposes of this thesis and content analysis, the key differentiating factor is the content being based on the target group’s membership such as race, ethnicity, gender, national origin as in the definition of hate above. Comments that were targeted at individuals without making reference at their group membership/belonging were classed as incivility. Both categories are prohibited by the site TOS and in some cases, such as serious insults, might even lead to legal action. However, as ruled by the ECtHR’s 2016 ruling in the case of *Magyar Tartalomszolgáltatók Egyesülete and Index.zrt v. Hungary*, they fall under different consideration from hate. In the aforementioned case, the insulting comments not amounting to hate was one of the key differentiating factors that led the Court to rule against Hungary, while in the *Delfi v. Estonia* case where the conviction of the site was upheld, the comments were clearly hateful, as Judge Kuris points out in his concurring opinion.<sup>193</sup>

### Content analysis sample structure and size

The structure of the content analysis sample is shown in Figure 1. Based on the literature review, hate speech definitions and the sites’ terms of service, five categories of hate speech targets were established: minorities (national, racial and religious), sexual orientation, citizenship (immigrants, refugees), gender and Jewish. The latter was added as a separate target group due to the existence of holocaust denial as criminal offence in Hungary and Romania.

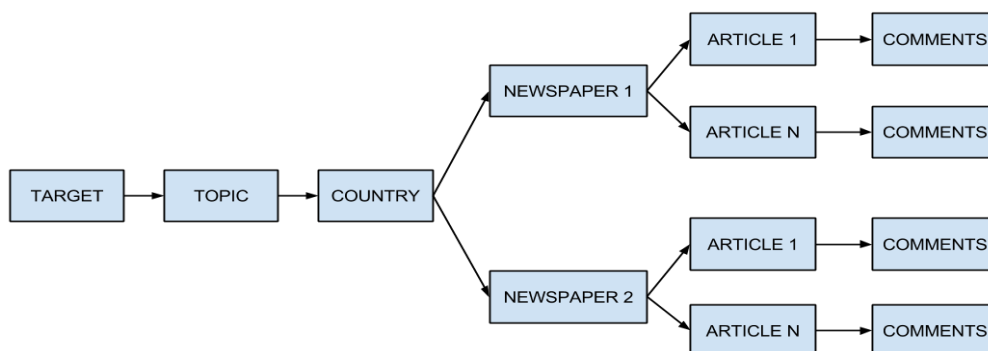


Figure 1. Content Analysis sample structure

<sup>193</sup> *Magyar Tartalomszolgáltatók Egyesülete and Index.hu Zrt v. Hungary* (European Court of Human Rights (ECtHR) 2016),.

## *Target groups*

As mentioned before the five target groups were defined based on the definition of hate speech. Citizenship in this thesis refers to immigrants or refugees, discriminated or being targeted by hate speech on the basis of their citizenship (nationality). LGBT refers to groups targeted based on their sexual orientation.

Gender in this case refers to mainly sexist speech aimed primarily against women. It is disputed if sexism constitutes hate speech. According to Mills this is due to the nature of relationships between female-male couples as a basis of society. Unlike racism and homophobia, sexist speech is not aimed at all members of a particular group but rather sub-groups who transgress in some ways, e.g. “not behave in sufficiently feminine way.”<sup>194</sup> However, as seen before, the definition of hate speech does not contain requirements for it to be aimed at the entire group and it includes gender as a target group. Moreover, as Lillian points out, sexism aims to “inflame the emotions of followers, denigrates women, it aims to inflict permanent and irreparable harm and its goal is ultimately to conquer and subjugate women”<sup>195</sup>. Therefore this thesis will consider sexist speech as hate.

There are variations in definition and the type of minorities in the four countries each having different approach and some different types of minorities, therefore the minorities target group was divided into three sub-groups, referring to race, religion and national minorities. This was due to the fact that contrary to the other target groups which are similar in all three countries each type of minorities is defined differently in the three countries. In the UK, the definition of race is quite wide and according to the Equality Act 2010 includes not just color but also ethnicity and citizenship.<sup>196</sup> There are no such wide definitions in the other countries and in the relevant legislation in Hungary and Romania.<sup>197</sup> Race is a separate category generally understood as color, and therefore it will be used in this sense in this thesis. Moreover, the UK is more diverse racially with sizeable Black, Asian, South-Asian and other communities of people of color, while in Hungary and Romania there is a negligible population of Black or Asian origin and the Roma are considered as a racial minority, as detailed below.

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<sup>194</sup>Sara Mills, *Language and Sexism*. (Leiden: Cambridge University Press, 2008), accessed August 28, 2018, <http://public.eblib.com/choice/publicfullrecord.aspx?p=358852>, p 39

<sup>195</sup>Donna L. Lillian, “A Thorn by Any Other Name: Sexist Discourse as Hate Speech,” *Discourse & Society* 18, no. 6 (November 2007): 719–740., p. 737

<sup>196</sup> Equality Act, 2010 (UK) section 9

<sup>197</sup> Law CXXXV/2003 art. 8 (Hungary), Emergency Government Order (OUG) 137/21 Aug. 2001(Romania)

There are also differences in the national minority category. There are a number of national minority communities in Hungary, currently forming 12 nationality self-governments (*Kisebbségi Önkormányzat*) in charge of minority education and conservation of culture. However, their numbers are low, they are more or less assimilated and do not figure in day to day media. The exception is the Roma community who also have a nationality self-government but can also be considered a racial minority and are generally referred to as such.

The Roma people are Hungary's largest minority community, currently making up 3.2 percent of the population.<sup>198</sup> Their categorization in the typology of minorities is complicated as it is not clear to exactly what type of minority they belong<sup>199</sup>. The delimitations of Roma identity are also ambiguous. Some might have a different appearance and darker skin and might be considered a racial minority but that is not always the case; some communities speak Romany, some an old dialect of Romanian and another major part Hungarian, therefore the Roma "identity is based on a strict differentiation of gypsy and non-gypsy" as largely cultural construct. What is clear however is that they are considered one of the most discriminated minority communities in Europe.<sup>200</sup>

There is a significant Roma population in Romania too, but the largest minority community there are the Hungarians who according to Brubaker form what is defined as a national minority.<sup>201</sup> The Hungarians in Romania became a minority after the end of World War I and, according to this view, have "a structurally ambivalent status": by residence and citizenship they belong to Romania but by "ethno-national affinity" to Hungary – resulting in a very different kind of minority. According to Brubaker a national minority is not simply a demographically smaller group but it is a "political stance" characterized by membership in a different nation, demands for state recognition, and demands for collective cultural and political rights. In this context policies and demands such as "national integration" get a very different interpretation and are seen as oppression and result in mobilization and rejection. In

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<sup>198</sup> 2011. *Evi Nepszamlalas 3. Országos Adatok (Census of 2011. 3rd National Data)* (Központi Statisztikai Hivatal (Central Statistics Office - Hungary), 2013), [http://www.ksh.hu/docs/hun/xftp/idoszaki/nepsz2011/nepsz\\_03\\_00\\_2011.pdf](http://www.ksh.hu/docs/hun/xftp/idoszaki/nepsz2011/nepsz_03_00_2011.pdf).

<sup>199</sup> See. Michael Sinclair Stewart, *Daltestvérek: az oláh cigány identitás és közösség továbbélése a szocialista Magyarországon* ((*Brothers in Song: the persistence of Gypsy identity and community in socialist Hungary*), A Szociálpolitikai értesítő könyvtára (Budapest: T-Twins, 1994).

<sup>200</sup> György Csepeli and Dávid Simon, "Construction of Roma Identity in Eastern and Central Europe: Perception and Self-identification," *Journal of Ethnic and Migration Studies* 30, no. 1 (January 2004): 129–150.

<sup>201</sup> Rogers Brubaker, *Nationalism Reframed: Nationhood and the National Question in the New Europe* (Cambridge [England] ; New York: Cambridge University Press, 1996). pp 56-60

the context of this study, advocating “integration”, which would generally be perceived as positive regarding other minorities and countries, would be understood as “assimilation”. For instance, educational segregation is considered to be one of the major problems affecting the Roma communities; on the other hand for the Hungarians in Romania one of the main community goal is the creation of a separate Hungarian educational system at all levels complete with a separate Hungarian university. In terms of hate speech an argument such as “children of group A should go to separate school because...” is the same in the case of the Roma and would be considered discriminatory as in the case of other similar minorities in other countries. However, for Hungarians in Romania the equivalent would be “Why do the Hungarians have extra rights, they should go to Romanian school as everyone else” and would be seen as disputing their right to maintain their identity.

The differences in the types of minorities were also addressed at the article sampling level. For all other target groups, articles were collected on topics such as problems of integration, criminality, while for religious minorities (islamophobia) selected articles were about terrorism and the activities of the Islamic state. However, for the Hungarians in Romania specific topics such as education or the activities of the Hungarian Party also had to be included.

On the other hand, in Romania there is a Hungarian minority of 1.2 million which as explained in the methodology constitutes a national minority with a distinct national identity, media and educational system.<sup>202</sup> For comparative purposes articles about Scotland were included in the sample in the sub-target group of national minorities, understood in this case as “minority nation”, which according to Keating refers to “smaller components (...) in relation to the state majority”.<sup>203</sup> McGarry et al. describe the Scots as “minority that is wholly contained within the host state” while the Hungarians of Romania as “a minority in one state“ that “have ethnic kin

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<sup>202</sup> The Hungarian leader Tókécs László who had a significant contribution in starting the revolution of 1989 that ended communism in Romania, between 2008-2009 in the European Parliament was a member of the Parliamentary group of the European Free Alliance (EFA) – Greens same the Scottish National Party and Plaid Cymru. Currently the smaller Hungarian People’s Party of Transylvania is a member of the EFA, while the larger Democratic Alliance of Hungarians from Romania (DAHR)– (*Romaniai Magyar Demokrata Szovetseg* (RMDSZ-UDMR) that has a number of deputies and senators in the Romanian parliament (around 7% of MP-s) and two MEP-s is a member in the European Peoples Party.

<sup>203</sup> Michael Keating, *Plurinational Democracy: Stateless Nations in a Post-Sovereignty Era* (Oxford, England ; New York: Oxford University Press, 2001). p.X

who dominate other state.”<sup>204</sup> According to Bauböck, Scottish nationalism is “internal and stateless” while Hungarian nationalism (in Romania) is “transborder and state supported.”<sup>205</sup>

While Scottish is not classified as a minority in the UK, being one of the four constituting nations, in practical reality at the level of the United Kingdom, Scotland is a minority nation as evidenced by the fact of Scotland’s dissenting vote on the question of the European Union being disregarded; moreover as Citra and Harvey point out following the referendums on independence and on leaving the European union a discourse closer to “majority nationalism” emerged, which still recognizes the “plurinational identity” but puts more emphasis on a “more formal ‘British’ identity” reminiscent of more homogenizing states.<sup>206</sup> Moreover, in the debate around English Votes for English Laws (EVEL) launched immediately after the Scottish independence referendum and especially in the 2015 election campaign Scotland as nation was explicitly framed as an out-group by the Conservative party and the right wing press placing them in a position similarly to other minorities.

### Sample retrieval, processing and analysis

The help of a professional web developer was enlisted in order to build a dedicated data collection, management, database and content analysis system.<sup>207</sup> This was necessary due to the variety of technical solutions used by the different websites, which made existing commercial software unsuitable for the purposes of this thesis, especially in the data retrieval (scrapping) and categorizing process. Only the article’s text and the comments were saved with the additional content such as images and advertisements being removed. On the other hand, for both the comments and articles, all the available metadata, such as user names, number of likes/recommendations, location, time etc. has been preserved and can be included in further

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<sup>204</sup> John McGarry, Michael Keating, and Margaret Moore, “European Integration and the Nationalities Question,” in *European Integration and the Nationalities Question: Routledge Innovations in Political Theory 21* (Routledge Ltd, 2006), 1–20, <https://www.dawsonera.com:443/abstract/9780203088401.p1>

<sup>205</sup> Rainer Bauböck, “Autonomy, Power-Sharing and Common Citizenship Principles for Accommodating National Minorities in Europe,” in *European Integration and the Nationalities Question: Routledge Innovations in Political Theory 21*, ed. John McGarry and Michael Keating (Routledge Ltd, 2006), 85–104, <https://www.dawsonera.com:443/abstract/9780203088401.p1>.

<sup>206</sup> Daniel Cetrà and Malcolm Harvey, “Explaining Accommodation and Resistance to Demands for Independence Referendums in the UK and Spain: Explaining Accommodation and Resistance,” *Nations and Nationalism* (April 3, 2018), accessed September 13, 2018, <http://doi.wiley.com/10.1111/nana.12417>. pp.14-15

<sup>207</sup> The data retrieval and content analysis software was built free of charge by a senior web-developer, Anna Balazs (my wife) over several months. Based on the current hourly rate of programmers at this level, the value of programming built in this project is approximately 15,000-20,000 GBP.

analysis. For instance, with a filtering function it will be possible to detect returning commenters or to detect patterns of participation. The system also allows flexible tagging and categorizing.

The comment sample for the content analysis contains 16,972 comments posted to 189 articles of 7 among the most important newspapers in Hungary, Romania and the United Kingdom. The articles were collected based on target groups to form a keyword-based relevance sample. The keywords were defined during an initial observation of the sites in the sample. With the exception of terms referring to local events, political actors, or specific national labels for a target group, the same keywords were used in all three languages.

The keywords referred to: general group names, such as “immigrant”, “muslim”, “gay”, “refugee”, “black”, “Jewish”, “*evreu*”, “*zsidó*” (Romanian and Hungarian for Jewish), “*țigăni*” (RO), “*cigány*” (HU) (Roma)”, “*ungur*”, “*maghiar*” (Romanian for Hungarian); current events that happened during the sampling period, such as “Gay marriage”, “Gaza”, “Rotherham”, “Ferguson”, “Conchita Wüerst”; political/activist organisations such as “UDMR” (Hungarian minority party in Romania), SNP (Scottish National Party), Femen (radical feminist activist group); and actions such as “abortion” discrimination types “anti-semitism”, “misogyny”, “racism” and “Holocaust” (for a full list of keywords, search terms, links and example screenshots see Appendix 3).

An advanced custom Google search of the sites of each newspaper was performed for the period of 01.05.2014 to 30.11.2015, searching for specific set of keywords for each target group using the following search formula, to include articles within the site that contained any of the keywords:

<b>keyword1 OR keyword2 OR keyword3... OR keywordN site:example.com</b>
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Articles were included in the initial database if they had a minimum of 50 comments and their topic was relevant to the search keywords, e.g. articles about the “all blacks” New Zealand rugby team were disregarded when searching for the race target group which included the keyword “black”. After an article was identified, it was read and based on its content and topic it was assigned to a topic group described with a keyword such as “immigration”, “refugee crisis”, “abortion”, “gay marriage.” The topic codes were assigned based on the content of the



article to describe its overall topic and were exclusive. Additionally, the number of comments for each article as displayed on the site was recorded. The Google option “sort by relevance” was selected but the number of comments had no apparent connection to the order in which the search results were displayed. In order to minimize the effect of Google’s sort algorithm, for each target group and newspaper this was repeated until 18 articles with a minimum of 50 comments were gathered or the first 100 of the search results were reached, whichever happened first. If there were not enough qualifying articles, i.e. less than 6 were identified, the selection process continued until the 200<sup>th</sup> search result. In the second step, in order to further randomize the sample, after the required number of articles were gathered, they were ordered by the number of comments in descending order and the first 6 articles with the highest number of comments were placed in the content analysis article sample. The first 300 comments for each selected article were then placed (scrapped) in the database, and the first 100 in the order they were displayed on the site at the time of their capture formed the sample of content analysis.

The data collection aimed to maximize diversity in topics. Therefore, if more than two subsequent qualifying articles were on/about the same topic, articles coded with another topic were placed in the sample instead of the third even if they had a lower number of comments than the immediately following article in the first topic. As the main sampling criteria were target groups, topics were not linked to a given target group, so that articles on a certain topic could have been placed in different target groups, e.g. articles on “terrorism” were identified when searching for the “Citizenship” or “Minorities: religion” target groups.

The aim of the data collection was to create a content analysis sample with similar number of articles and comments for each target group, newspaper and country. However, this was only partially possible due to the lower number of comments of the qualifying articles in Romania and especially Hungary (sometimes between 50 and 100). Therefore, while for some high-interest topics such as the 2015 refugee crisis, the number of comments and articles in the sample is the same for all newspapers, for others there are differences due to newspapers sometimes not having sufficient qualifying articles.

A limitation of this sampling method is the reliance on Google’s unknown search algorithm. While it reduced the possibility for the researcher’s subjective judgement and allows for a limited replication of the sample. However, its replicability is limited by the search and

personalization algorithms used by Google, which are likely to be influenced by location, time, history etc.<sup>208</sup> Using the search terms listed in the appendix will provide similar results but according to tests run during the data collection, the results will be different if the location and country (IP Address) of the computer is changed, and even on the same computer and same IP address there could be differences in different browsers.

## Coding

Comments were coded on two levels, the top-level codes including hate, incivility, moderated, legit (corresponding to the categories of content which were exclusive) and the sub-codes used to identify and describe types of hate and incivility. The aim of the top-level codes was primarily to quantify the amount of problematic content while the sub-codes were used to provide insight into the nature of hate and incivility. Comments ranged in length from a single word to hundreds of words and could contain several types of hate or incivility sometimes even within the same sentence. Therefore, sub-codes were not exclusive and multiple types within the categories of hate or incivility could be assigned to a comment. In practice comments were coded for sub-codes. Once a sub-code of hate or incivility was selected the system automatically assigned the comment to the corresponding top-level code and prevented selecting sub-codes from the other top-level codes. If a comment contained both incivility and hate it was coded for and assigned only to the hate category as the more severe violation of the TOS. A third category was created for moderated comments. While presumably all sites had some form of moderation, only three sites in the sample (*Adevarul*, *The Guardian* and *The Telegraph*) had visible evidence of this, in the form of a placeholder notification about the comment being removed for violating the community guidelines or the site Terms of Service. As these notifications did not provide further detail about the specific reason why the comments were removed, they could not be placed into the hate or incivility top-level codes and a third moderated code was created which reduced the proportion of legitimate comments. During the analysis of the results, moderated comments were considered as problematic content together with the hate and incivility comments.

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<sup>208</sup> Mario Haim, Andreas Graefe, and Hans-Bernd Brosius, “Burst of the Filter Bubble?: Effects of Personalization on the Diversity of Google News,” *Digital Journalism* 6, no. 3 (March 16, 2018): 330–343.

## Coding example

Figure 2 presents the content analysis interface and an example of coding. This comment passed moderation and was posted in May 2015 on Adevarul.ro below an article about a demonstration against the Bucharest Pride by members of a far-right organization.

Articles / FOTO Marșul antigay, prin ochii unui copil de cinci... / Code comment 73 of 153

MAKOTO MADARA 2015-05-23 18:43:47 (Adevarul, #104)

Din cate stiam majoritatea oamenilor din tara noastră sunt anti-stricati. Desi nu am nici o simpatie fata de noua dreapta le felicit eforturile, păcat ca au fost numai 100 de demonstranti. Nu pot sa inteleg cum un om sănătos poate sa fie pro-gay, numai daca aceasta persoana insasi este in aceeasi tabara devianta. Ca sa nu mai spunem ca nu exista nici măcar un singur argument concret care sa le justifice un asemenea comportament dezgustator. Unii zic ca daca asa simt atunci pot sa facă cum vor. Atunci daca eu simt o nevoie covarsitoare de a da cu o caramida in cineva ar trebui sa dau glas acestui impuls? Sa dea Dumnezeu sa nu reuseasca chestiile astea sa obtina vreun drept.

← Previous 73 / 153 Save & Next →

Hate Incivility Legit Moderated

- Insults (hate)
- Violence
- Extermination/Murder/Rape
- Threats
- Superiority/Inferiority/Normality
- Stereotypes/Generalization/Prejudice
- Exclusion/This is our country
- Animals/Sub-human /Pest
- Silencing (hate)
- Homosexuality-Pedophilia

1. “as far as I knew the majority of people in our country are anti-rotten” → Insult
2. “I cannot understand how a healthy human can be pro-gay unless this person is also in that deviant camp” → Stereotype/Generalization+Superiority/Inferiority/Normality
3. “Some say that if they feel like that (being gay) to do as they wish. Then if I feel an overwhelming need to hit someone in the head with a brick, should give voice to this impulse” → Homosexuality/Pedophilia/Slippery slope → typical hate comment in article about LGBT arguing that by giving rights to homosexuals, people engaging in criminal activities (in this case murderers) will soon follow
4. “May god help that these things should never obtain any rights” → homosexuals=“Things” → Sub-human + Denying rights

**Figure 2. Example of coding**, Comment from Adevarul.ro, bypassed moderation on an article about a demonstration against the Bucharest Pride in 2015

The example was chosen to illustrate that seemingly civil and polite comments can also contain hate. In this case, the most insulting word in the comment “*stricati*”, meaning spoiled in a negative tone close to rotten, would not be filtered by any automatic system, although it could be a serious insult for a member of the gay community. At element nr 2, the comment excludes

homosexuals from the category of “healthy humans” and goes on to label all who support them, i.e. “pro-gay”, as “being in that deviant camp”, excluding them too. The comment is also saying that all who support gay-rights are deviants, therefore it was coded with the relevant codes. The next part reproduces an argument that appears frequently in comments and debates on this topic, the homosexuality=murder-type statement. This type of hate, was also identified in Papacharissi’s 2004<sup>209</sup> study on incivility in the form of homosexuality=pedophile argument. Homosexuality is grouped with some criminal behaviours (here murder) and a slippery slope type claim is also added to state that if homosexuals can ask/are given rights, other kinds of criminals, usually pedophiles or zoophiles, can also do the same. The final sentence dehumanizes gay people, naming them “things.” Dehumanizing is a frequent feature of hate discourse that seeks to eliminate the agency of its targets, and is the most worrisome element of the comment. The danger of such dehumanizing arguments is that, if the targets are considered less than human, in this case “things” not only their rights can be denied but they can also be treated outside of the general norms, as it occurred during the Holocaust and the Rwanda genocide. As Catherine MacKinnon notes, “destroying a people's humanity, the goal and effect of hate propaganda, has been one universal predicate to their attempted physical destruction as such. Without it, no genocidal action can be triggered.”<sup>210</sup>

## Interviews

As discussed in the literature review there are a number of questions in relation to comments ranging from their role and place in the online newspaper, to issues relating to anonymity, differences in ethical standards between journalists and users. to crucially who is responsible for this content. To gain insight into the journalistic culture and practices of the newspapers, semi-structured interviews were performed using the set of questions presented in Appendix 2. According to Berg and Lune, the advantage of semi-structured interviews is that each interviewee is asked the same questions thus making comparison possible, while still allowing for some flexibility in wording and question ordering.<sup>211</sup> These interviews fall in the category of elite interviews as the editors of the most read newspapers and news-portals in a country can

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<sup>209</sup> Papacharissi, *Democracy online*

<sup>210</sup> Catharine A. MacKinnon, “Prosecutor V. Nahimana, Barayagwiza, & Ngeze. Case No. ICTR 99-52-A,” *The American Journal of International Law* 103, no. 1 (2009): 97–103. pp 101-102

<sup>211</sup> Berg and Lune, *Qualitative Research Methods*, p 109

reasonably be considered as being part of the elite of that country's journalists.

The interview guide presented in Appendix 2 addresses issues about comments that were also highlighted in the literature review regarding the role and place of comments and their authors, the newspaper's policies, and responsibilities regarding user participation, as well as some technical details of moderation and the volume of comments. Following Kvale and Brinkman's recommendation, the questions form four thematic categories: role and place of comments (three questions), newspaper's policy (four questions), role of the journalists (two questions), and a technical question about the volume of received and rejected comments. As mentioned earlier and in the literature review, one of the key variables affecting the quality of comments is the newspapers' own policies, moderation strategy and journalists' attitude towards comments.

The original aim was to recruit interviewees from the same newspapers included in the content analysis sample in order to provide a side by side examination of the newspapers' policies, their attitudes and strategy regarding user participation and the outcome (i.e., the level of prohibited and uncivil content that might have passed through moderation). This, however, proved to be impossible due to the difficulty in recruiting participants. The primary aim was to interview at least one editor in charge of the online edition for every newspaper resulting in at least seven interviews corresponding to the seven newspapers. However, it became clear early on that even identifying the relevant journalists would be quite difficult as most newspapers do not list the journalists in charge of community participation and when they do they do not provide contact details. Therefore, the editors or vice-editors in chief of the online edition were approached, an email was sent to the email addresses on the site with a short description of the study and an interview request. However, there was almost no response from any of the newspapers. After repeated rounds of emails it became clear that a different approach was needed, therefore the pool of potential participants was extended to include all national newspapers and major news-portals that had comments. Private email addresses and introductions were obtained through personal contacts with journalists in Romania and Hungary; editors were also approached at conferences. In Romania, this resulted in two interviews. A third interview was scheduled with the editor of the online edition of *Evenimentul Zilei*, but he left the newspaper shortly before the research trip to Bucharest. In Hungary, there was no response to any of the contact attempts, and in 2016 *Nepszabadsag*, the largest national newspaper at the time, was closed down. The vice-editor in chief of the other main newspaper

in the sample, *Magyar Nemzet* (at the time the last remaining non-government major national daily, also closed down in April 2018), agreed to an interview in August 2017; an editor from *444.hu*, a left-leaning news-portal, agreed to be interviewed after the COO of the publication was approached at a conference in Budapest. In the end five interviews were conducted three with journalists of newspapers included in the sample (*Adevarul*, *Magyar Nemzet* and a UK newspaper whose journalist asked not to be named<sup>212</sup>) and two with editors of news-portals from Romania and Hungary not included in the original sample (*Hotnews* in Romania and *444* in Hungary). The journalist from *Hotnews* was also coordinating editor of *Contributors.ro*, an opinion site specialized in in-depth articles, and agreed to also talk about his work on that site, providing the opportunity to compare a general news site and a specialized opinion site with a much smaller and niche public.

The interviews were conducted in person in English, Hungarian and Romanian at the newspapers offices in Bucharest, Budapest and London ranging from 45 to 90 minutes. In all cases interviewees were provided with an information sheet about the project, and signed release agreements. Before the beginning of each interview, in addition to the information sheet interviewees were provided a short background about the project, the researcher and an overview of the questions.

The interviews were transcribed and coded using descriptive coding as following the examples of Santana<sup>213</sup> with the aim of providing as detailed description as possible of the ideas and topics expressed by the interviewees. Codes were assigned for each idea, statement or information as it was expressed by the interviewee. The aim of the analysis was, as Santana pointed it out, to identify the topic of the utterance, not its content, i.e. codes were assigned to describe if the interviewee talked about a certain topic, not what they said about it. Coded passages varied in length from a few words to sentences or in some cases a whole paragraph depending on the information density of the text. The analysis started with an initial set of codes based on the main questions, such as Responsibility, Moderation, Role of Journalist, Role of Comments and then was expanded as further topics were identified, resulting in 67 codes and sub-codes. During the analysis, when a unit was identified, if there was not already a code for it, a new code was created. For example, the code Responsibility, which was the

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<sup>212</sup> For reasons of textual fluency the newspaper will be referred to in the findings chapter under the pseudonym *The London Tribune*

<sup>213</sup> Santana, Coding for Qualitative researchers, pp. 70-73

starting point for the analysis, was originally designed to include all ideas connected to responsibility for comments; however, during the interview it emerged that journalists also considered that they are partially responsible. Therefore a Responsibility-journalist code was created and then later a responsibility-users sub-code was also created to include passages where journalists attributed responsibility for comments to users. This approach was chosen as it facilitates the identification of the major themes occurring in the text and considering the scope of the study it also allows for a more objective comparison of the responses.

## Chapter 4. Content analysis findings

### Introduction

This chapter presents the results of the content analysis. First, an overview of the results of the content analysis will be presented, followed by a detailed examination of the results for countries, newspapers, target groups and hate sub-categories. This chapter aims to provide a comparative overview of the levels of hate, incivility and legitimate content for the three countries and seven newspapers. The chapter is divided into two main parts: the first part will present the results of the content analysis at the levels of the entire sample (at country-, newspaper- and article-level). The second part will provide a detailed discussion of the five target groups, focusing on the types of hate characteristic for each group: “Citizenship”, ‘Minorities’, “Jewish”, “LGBT” and ‘Gender’.

To illustrate some of the more prominent or characteristic types of hate (sub-codes) for each target group, example comments from all newspapers, including some of the most disturbing ones, are presented in this chapter. The grammar, formatting, orthography and punctuation in which they appeared on the sites has been preserved, but some of the longer comments were shortened and only the parts relevant to the discussion have been cited. The Hungarian and Romanian comments were translated by the author as close to the original wording as possible, including vulgarities and slang; for the latter elements, definitions and synonyms from [urbandictionary.com](http://urbandictionary.com) and the [dexonline.ro](http://dexonline.ro) (the online edition of the explicative dictionary of the Romanian language - DEX) were also used. The user identification names, time and data posted, target group and topic are marked for each example comment. The originals of the non-English comments are available on request.

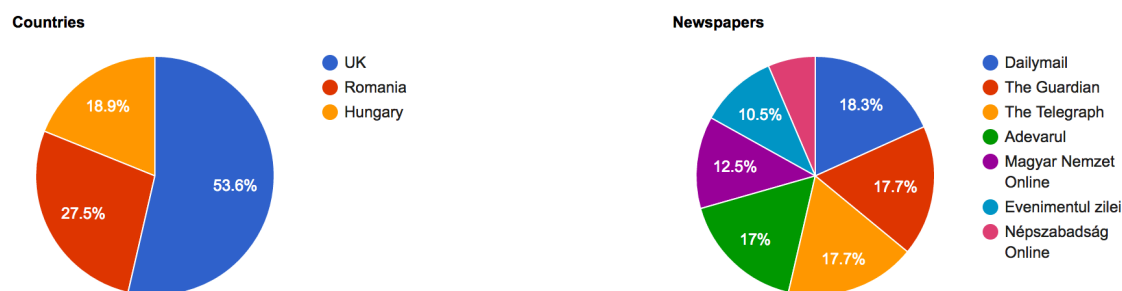


## Sample overview

The comment sample for the content analysis contains 16,972 comments posted to 189 articles of seven among the most important newspapers in Hungary, Romania and the United Kingdom. As detailed in the methodology chapter, the articles were collected based on target groups to form a keyword based purposive sample. The five target groups of hate: Citizenship, LGBT, Gender, Minorities and Jewish were based on the definition of hate speech and the literature on discrimination. A keyword-based sample of articles was assembled, using the advanced search function of Google, by searching for specific keywords for each target group (for a full list of the search terms and results screenshots see Appendix...) the sites of the seven newspapers for the period of 01.05.2014 to 30.11.2015. Articles were included in the initial database if they had a minimum of 50 comments, based on their content they were also assigned a topic code such as such as "immigration", "refugee crisis", "abortion". The search process aimed to identify 18 articles for each target group, the first 6 in the order of the number of comments was selected, then their first 100 comments were placed in the content analysis sample.

As the main sampling criteria were target groups, topics were not linked to a given target group; therefore articles on a particular topic could have been placed in different target groups, e.g. articles on "terrorism" were identified when searching for the "Citizenship" or "Minorities: religion" target groups.

The data collection aimed to assemble a content analysis sample with similar number of articles and comments for each target group, newspaper and country, but this was only partially successful due to the lower number of comments on the qualifying articles (between 50 and 100) in Romania and Hungary resulting in differences in the sample size. Figure 3. shows the structure of the article/comment sample: three newspapers, *Adevărul* from Romania, *The Guardian* and the *Daily Mail* from the UK are the newspapers that had enough qualifying articles for all target groups, with *Népszabadság* from Hungary having the lowest number of qualifying articles and comments.



**Figure 3. Composition of the content analysis comment sample**

### A note on the Hungarian newspapers

It should be noted that during the research of this thesis both Hungarian newspapers in this sample have ceased publication. Therefore, the articles and comments in this sample could be considered press history. *Népszabadság* (Freedom of the people), a centre-left leaning opposition daily, which at the start of data collection was the national newspaper with the highest print circulation numbers, in a position comparable to *The Guardian* or *The Times* in the UK, was closed down overnight in October 2016 without notice by the owner citing financial losses. This was widely considered a political move in order to silence a voice critical of the government, as once rid of the inconvenient title, the rest of the press group containing magazines and local newspapers was sold to a businessman close to the government and turned into what is widely considered a pro-government propaganda machine.<sup>214</sup>

The other Hungarian title, the conservative *Magyar Nemzet* (Hungarian Nation), closed down on 11th April 2018, three days after the current elections that resulted in a 2/3 majority for the Fidesz governing party. At the time of its closure, the newspaper was critical of the government, changing sides in 2015 after the owner, a businessman close to the governing party, had a falling out with the Prime-minister and decided to change the orientation of his publications.<sup>215</sup> When selected initially, *Magyar Nemzet* (MNO) was included as a pro-

<sup>214</sup> "Hungary Paper Shuts, Alleging Pressure," *BBC News*, October 11, 2016, sec. Europe, accessed September 14, 2018, <https://www.bbc.com/news/world-europe-37596805>.

<sup>215</sup> "Hungary's Main Opposition Media Shuts down after Election," accessed September 13, 2018, <https://euobserver.com/beyond-brussels/141561>.

government title. The change in position happened during the data collection period. Thus, the articles/comments in this sample were gathered both from the pro-government and opposition periods.

## Results by countries, newspapers and articles

As detailed in the methodology, the content analysis was performed using a codebook based on academic definitions of hate speech. This was further expanded to include hate sub-types in order to identify and provide a more detailed analysis of the different categories. In addition to user-generated hate speech, the analysis also aimed to identify incivil behaviour, that is, behaviour that is not illegal or prohibited such as hate speech but is still against the site's TOS and rules of a decent conversation. Furthermore, a separate category was created to include moderated comments, usually marked by the sites with a notification placed instead of the infringing comments. While not in the hate or incivility category, these were also considered as problematic content, as presumably they replaced comments in these groups.

Top Level Codes	Count	Percent
Legit	12,549	73.9%
Hate	1,910	11.3%
Incivility	1,856	10.9%
Moderated	657	3.9%

**Table 2. Content analysis results for top-level codes for the entire sample (N=16972)**

As shown in Table 2, overall for the entire sample problematic content was almost evenly divided between hate (11.3%) and incivility (10.9%). This was grouped together with the 3.9% of comments marking moderation originating from the UK and Romania reaching to a total of 25.9%. Despite the different methodology and sampling, the results are similar to the findings of other previous studies findings about comments such as the 22% incivility identified by Coe et al<sup>216</sup>, and of Santana<sup>217</sup> who found 26.7% uncivil content (as mentioned in the literature

<sup>216</sup>. Coe, Kevin, Kate Kenski, and Stephen A. Rains. "Online and Uncivil? Patterns and Determinants of Incivility in Newspaper Website Comments." *Journal of Communication* 64, no. 4 (August 2014): 658–679.

<sup>217</sup> Santana, Arthur D. "Virtuous or Vitriolic: The Effect of Anonymity on Civility in Online Newspaper Reader Comment Boards." *Journalism Practice* 8, no. 1 (January 2, 2014): 18–33.

review chapter, Santana employed a definition of "uncivil content" that incorporates what the present thesis identifies as hate and incivility). There were very similar results for hate and incivility for the overall sample, however at the country level as it will be detailed in the next section, there are significant differences between the two categories.

### Country-level results

The country-level results are shown in Table 3. At a significant distance from the other two countries in the sample, Romania had the lowest proportion of legitimate content at 62.3%, while the other two countries had similar levels at 78.2% for the UK and 78.8% for Hungary. As discussed in the theoretical framework, the rationale for taking a comparative approach for this research was to consider the results from the three countries in relation to each other in order to assess the levels of user-generated hate speech and incivility and whether they could be considered low or high. This thesis originates in a research project that found high levels of hate for the leading newspapers in Romania<sup>218</sup> but at the time had no way to establish how that could be considered when compared to other countries.

Romania			Hungary			UK		
4,664 comments in sample			3,208 comments in sample			9,100 comments in sample		
	Count	Percent		Count	Percent		Count	Percent
Legit	2,906	62.3%	Legit	2,529	78.8%	Legit	7,114	78.2%
Hate	902	19.3%	Incivility	405	12.6%	Incivility	909	10.0%
Incivility	542	11.6%	Hate	274	8.5%	Hate	734	8.1%
Moderated	314	6.7%	Moderated	0	0%	Moderated	343	3.8%

**Table 3. Results of the content analysis for country-level samples**

The results shown in Table 3 indicate a much higher level of hate, incivility and moderated content for Romania than the other two countries. Therefore it is now possible to conclude that the 39% of hate identified in 2012 in Romania, and the levels of user-generated hate speech found in this study are indeed high compared both to the neighbouring post-communist Hungary and to the more developed UK media systems. Furthermore, the close results for the

<sup>218</sup> Janto-Petnehazy, *User-generated hate speech*

other two countries indicate that Romania is an outlier and suggest the presence of some factors in the media system that allow a much higher rate of user-generated hate speech.

Hungary's results are closer to the UK, with a slightly higher rate of hate content. However, overall, when also including the moderated UK comments, Hungary has 2.8% less problematic content than the UK. It should be noted that only the newspapers in the UK and Romania replaced removed content with a note about moderation. Therefore, the level of moderated content in Hungary is not available.

A very surprising result is the similarity in the level of incivility in the three countries, especially considering the high differences in levels of hate between Romania and the others. The results suggest a different, stricter approach to content that could have legal implications such as user-generated hate speech in Hungary and UK and a more similar approach in all three countries to incivility which is not subject to regulation.

As mentioned before, there are no major differences between the countries in the legislation that could apply to discriminative content such as hate speech. In fact, of the three countries, Romania's legislation might be the strictest, for example punishing Holocaust denial by imprisonment. Furthermore, the sites' terms of services are also similar, and the close levels of incivility suggest a similarity in the population of commenting users. Therefore, it could be argued that the significant difference of more than double the amount of user-generated hate speech in Romania, when compared to the other countries, is due to the newspapers' moderation decisions. As it is detailed in the interview chapter, journalists also tend to express similar views on responsibility for comments, all the journalists rejecting the presence of hate in their participatory spaces. However, there are some notable differences in the journalists' perception on the limits of allowed speech (the Romanian interviewees both adopting a more permissive attitude) and also in the newspapers financial resources (which could prove particularly important in the case of user-generated hate speech, the recognition of which requires more trained moderators, whereas categories of incivility are relatively straightforward). The Romanian titles have the lowest circulation numbers despite Romania having a larger population than Hungary. Therefore, in line with the hypothesis of this research, it could be argued that newspapers' financial situation and the journalistic culture influence the levels of user-generated hate.

## Types of hate

While the top-level codes aimed to establish the levels of user-generated hate speech and incivility to assess the extent of the phenomenon, the sub-codes aimed to provide a more detailed insight into the nature and characteristics of hate discourse.

Sub-Codes for comments coded hate (N=1910)	Count	Percent
Stereotypes/Generalization/Prejudice	564	29.5%
Conspiracy/Foreign interests/Enemies/Threat	557	29.2%
Insults (hate)	504	26.4%
Belittling/Demeaning (Hate)	223	11.7%
Superiority/Inferiority/Normality	187	9.8%
Animals/Sub-human /Pest	121	6.3%
Extermination/Murder/Rape	106	5.6%
Exclusion/This is our country	105	5.5%
Holocaust/Genocide/Terrorist- apology/justification/glorification	93	4.9%
Discrimination	84	4.4%
Violence	67	3.5%
Expulsion	62	3.3%
Threats	53	2.8%
Holocaust/Genocide/Terrorism - blame shifting	49	2.6%
Homosexuality-Pedophilia	48	2.5%
Denying rights (political/civil)	48	2.5%
Religious extremism	47	2.5%
Silencing (hate)	44	2.3%
Holocaust/Genocide denial/minimization	39	2.0%
General hate/Discrimination	33	1.7%
History	16	0.8%
Disgrace for the country	13	0.7%

**Table 4. Types of hate: sub-codes for comments coded hate, entire sample**

As shown in Table 4, in line with the literature, the most common type of user-generated hate speech is "Stereotypes/Generalization/Prejudice", i.e. attempting to label the members of the

target groups according to certain undesirable or negative characteristics and behaviours ascribed to their group membership. In close connection to this are the "Conspiracy/Foreign interest/Threat" type of comments that take stereotyping a step further and label the members of a target group as threats to society/nation or as parts of a conspiracy to undermine the nation or society. These two subtypes together appear in more than half of the hate comments, making it their most prominent characteristic and the most common discriminatory behaviour. As it will be detailed later, this became particularly prominent due to and in the discussions about the 2015 refugee crisis in Europe. For "Insults" two categories were created: insults were classified as hate if they were based on group membership or contained pejoratives and vulgarity related to group membership; on the other hand, insults directed directly at a person without mentioning their group characteristics were considered incivility. While insults are one of the most common categories in this study (as well as in other research on comments), their high percentage is somewhat surprising given that, except for few complicated categories, they are also probably the easiest to recognise and moderate, especially if they also contain derogatory epithets.

While not very prominent, the presence of the "Holocaust/Genocide/Terrorist-apology/justification/glorification" comments making up 4.9% of the hate sample is also surprising, especially taking into consideration that some of these comments could have even lead to prison sentences under the anti-holocaust denial legislation of both Romania and Hungary.

An even more worrying type are the comments coded "Extermination/Murder/Rape": while they only make up 5.5% of the hate comments and less than 1% of the overall sample, these are present in all three countries and contain open calls for the murder or genocide of members of the target groups. Uttered in the offline world, these would have almost certainly lead to criminal sentences. A question that arose during the data analysis, but which this thesis cannot answer and is a matter for further debate, is how their presence should be interpreted. Should it be considered a success of the moderation that only 106 comments of a sample of 16,972 are calling for murder, rape or genocide or is it a failure that this type of comment appears at all, no matter how marginally, on some of the most read websites in all three countries?

## Types of Incivility

As seen above, the level of incivil content in comments is almost equal to the amount of hate. As discussed in detail in the methodology chapter, incivility here refers to comments that are against the rules of a decent conversation and are generally prohibited by the site TOS but are not illegal, and as such, it is the decision of the newspapers if they allow them.

Subcodes for comments coded Incivility	Count	Percent
Impolite	867	46.7%
Insult/Name calling	545	29.3%
Profanity/Vulgarity	401	21.6%
Belittling/Demeaning	289	15.5%
Thrash/Spam	70	3.7%
Silencing	54	2.9%
Threat/Violence	12	0.6%

**Table 5. Incivility sub-types for the entire sample**

As with hate, sub-codes were also created for incivility in order to identify and understand the different manifestations of the behaviour. Table 5 shows the different subtypes of incivility. The largest group in this category, "Impolite" was created following Coe et al.<sup>219</sup> and denotes comments containing words or statements written in all capital letters, the equivalent of screaming in real life, which is generally considered rude behavior in textual communication, therefore against the norms of a civilized discussion. However, the high frequency of comments in this sub-category indicates that newspapers, despite asking for civil and respectful behaviour in their TOS, either adopt different norms and do not consider it a content to be moderated, or in case of post-moderated sites such as the *Guardian*, it is not reported.

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<sup>219</sup> Coe et al., *Online and uncivil*



## Newspaper-level results

### *Hate*

Table 6 shows the results of the content analysis for the newspapers in the sample. As mentioned above Romania had a notably higher amount of hate than the other countries. According to the data in this table, this is mostly due to the significantly higher rate of user-generated hate speech on *Evenimentul Zilei (Evz)*. The other Romanian title, while still higher, is closer to the other publications. The lowest rate of hate comments was found in *The Guardian* which could also be considered an outlier. Amongst other factors, such as the newspapers own policies and moderator training (more on which in the interview chapter), this exceptionally low rate of hate comments might also be because the newspaper only allows commenting on a selected number of articles and for a limited time. The other newspapers in the sample, except for *Népszabadság* which also had a lower amount of hate, had comments enabled on most of their articles.

Newspapers	Hate comments	Percent of hate
Evenimentul Zilei	461	25.8%
Adevărul	441	15.3%
The Telegraph	368	12.2%
Daily Mail	291	9.3%
Magyar Nemzet Online	192	9.1%
Népszabadság Online	82	7.5%
The Guardian	75	2.5%

**Table 6. Percentage of comments coded hate by newspaper**

When designing this research, based on previous readings on tabloids, and the incendiary titles and reporting style of the outlet it was assumed that the *Daily Mail* would have a higher rate of hate speech than the quality/broadsheet titles such as *The Telegraph*. Therefore, one of the most surprising findings of this thesis is the higher percentage of hate in *The Telegraph* than in the *Daily Mail*. This is even more unexpected as the majority of the articles in *The Telegraph* are behind a paywall, and thus the users commenting there have even less presumed anonymity. A possible explanation for this could be the use of the Disqus commenting platform on *The Telegraph*, which allows users to post with the same account to different sites. As it is detailed

in the interview chapter, news websites sometimes use Disqus to drive up traffic. However, as the editor of *444.hu* pointed out in the interview section, this could also lead to an unexpectedly high volume of comments and difficulties in moderation.<sup>220</sup>

### *Incivility*

Looking at the incivility levels for newspapers presented in Table 7, it is striking that the number of uncivil comments found in *The Guardian*, contrary to the exceptionally small amount of hate, although still the lowest, is now closer to that found in other newspapers.

Newspapers	Incivility comments	Percent of incivility
Evenimentul Zilei	286	16.0%
Népszabadság Online	169	15.4%
Daily Mail	375	12.1%
Magyar Nemzet Online	236	11.1%
The Telegraph	309	10.3%
Adevărul	256	8.8%
The Guardian	225	7.5%

**Table 7. Incivility levels by newspaper**

Similarly to *The Guardian*, *Népszabadság* registered the second lowest amount of hate comments (7.5%) and displayed almost double the number of comments containing incivility. A possible explanation for this could be that, as pointed out by one of the interviewees, users “test” the limits of the site’s moderation policies.

### *Moderated*

Three of the newspapers in the sample placed notifications, instead of comments removed by moderators, providing some limited insight into the levels of comments the newspapers moderators considered problematic.

Newspapers	Moderated comments	Percent of moderated
Adevărul	312	10.8%

<sup>220</sup> 444.hu, Interview, December 2017, Budapest., see the interview chapter for a detailed discussion of the issue.

The Telegraph	215	7.1%
The Guardian	128	4.2%
Evenimentul Zilei	2	0.1%

**Table 8. Moderated comments by newspaper**

As shown in Table 8, the order for moderated comments is the same as for the levels of hate. Additionally, the difference between *Adevărul* and *The Telegraph* is very similar for hate (3.1%) and moderated (3.2%). The numbers above show that although moderators were present and active on the site at the same time when the hate and incivility comments were posted, these comments were still allowed, either because they were not noticed by the moderators, or because they were not considered to be against their moderation guidelines.

## Typologies of hate

Table 8 presents a comparative overview of the most frequent hate sub-codes in the three countries and their proportions within the hate category. The data shows a remarkable similarity of hate discourse in the three countries, especially looking at the first three categories. Group-based insults are amongst the most frequent in all countries, making up the largest group in Romania. As already mentioned, this is somewhat surprising as these comments are arguably also the most recognisable and the easiest to moderate. Comments regarding Holocaust denial and glorification of war criminals are present in the two Central-Eastern European countries, but not in Britain, which is to be expected, due to the historical particularities and considering that the participation of both countries in the Holocaust is still a hotly debated topic. On the other hand, comments coded "Discrimination" were only found in the UK, pointing to the presence of a large number of immigrant population. The influence of the 2015 refugee crisis is clearly visible in all three countries in the predominance of "Conspiracy" coded comments. This is most evident in the case of Hungary, where the comments seem to reflect the position of the government portraying the refugees as a threat to Europe and part of a plan for undermining the Christian nation states there. In all three countries, Extermination/Murder/Rape comments are in the first ten most frequent codes. While there could be some debate on the limits of freedom of expression and whether some of the other categories go beyond that, and should thus be removed or not, the comments in this category are quite clearly not just against the terms and conditions of the sites but also against the

legislation of all countries and would potentially lead to criminal sentences if uttered in the offline world. The following section will present a more detailed discussion of the most frequent types of user-generated hate speech and their variation across the sample.

**Table 9. Comparative overview of the most frequent sub-codes in the three countries**

Romania			Hungary			UK		
<b>Top 10 SubCodes</b>	<b>Count</b>	<b>Percent</b>	<b>Top 10 SubCodes</b>	<b>Count</b>	<b>Percent</b>	<b>Top 10 SubCodes</b>	<b>Count</b>	<b>Percent</b>
Insults (hate)	279	30.90%	Conspiracy/Foreign interests/Enemies/Threat	93	33.94%	Stereotypes/Generalization/Prejudice	244	33.24%
Stereotypes/Generalization/Prejudice	251	27.80%	Insults (hate)	69	25.18%	Conspiracy/Foreign interests/Enemies/Threat	240	32.70%
Conspiracy/Foreign interests/Enemies/Threat	224	24.81%	Stereotypes/Generalization/Prejudice	69	25.18%	Insults (hate)	156	21.25%
Superiority/Inferiority/Normality	93	10.30%	Superiority/Inferiority/Normality	21	7.66%	Belittling/Demeaning (Hate)	136	18.53%
Animals/Sub-human /Pest	72	7.97%	Holocaust/Genocide/Terrorist-appologetic/justification/glorification	19	6.93%	Superiority/Inferiority/Normality	72	9.81%
Exclusion/This is our country	71	7.86%	Animals/Sub-human /Pest	19	6.93%	Extermination/Murder/Rape	41	5.59%
Belittling/Demeaning (Hate)	70	7.75%	Belittling/Demeaning (Hate)	18	6.57%	Discrimination	35	4.77%
Holocaust/Genocide/Terrorist-appologetic/justification/glorification	55	6.09%	Extermination/Murder/Rape	14	5.11%	Exclusion/This is our country	33	4.50%
Extermination/Murder/Rape	51	5.65%	Holocaust/Genocide/Terrorism - blame shifting	12	4.38%	Animals/Sub-human /Pest	30	4.09%
Expulsion	43	4.76%	Denying rights (political/civil)	11	4.01%	Violence	20	2.72%

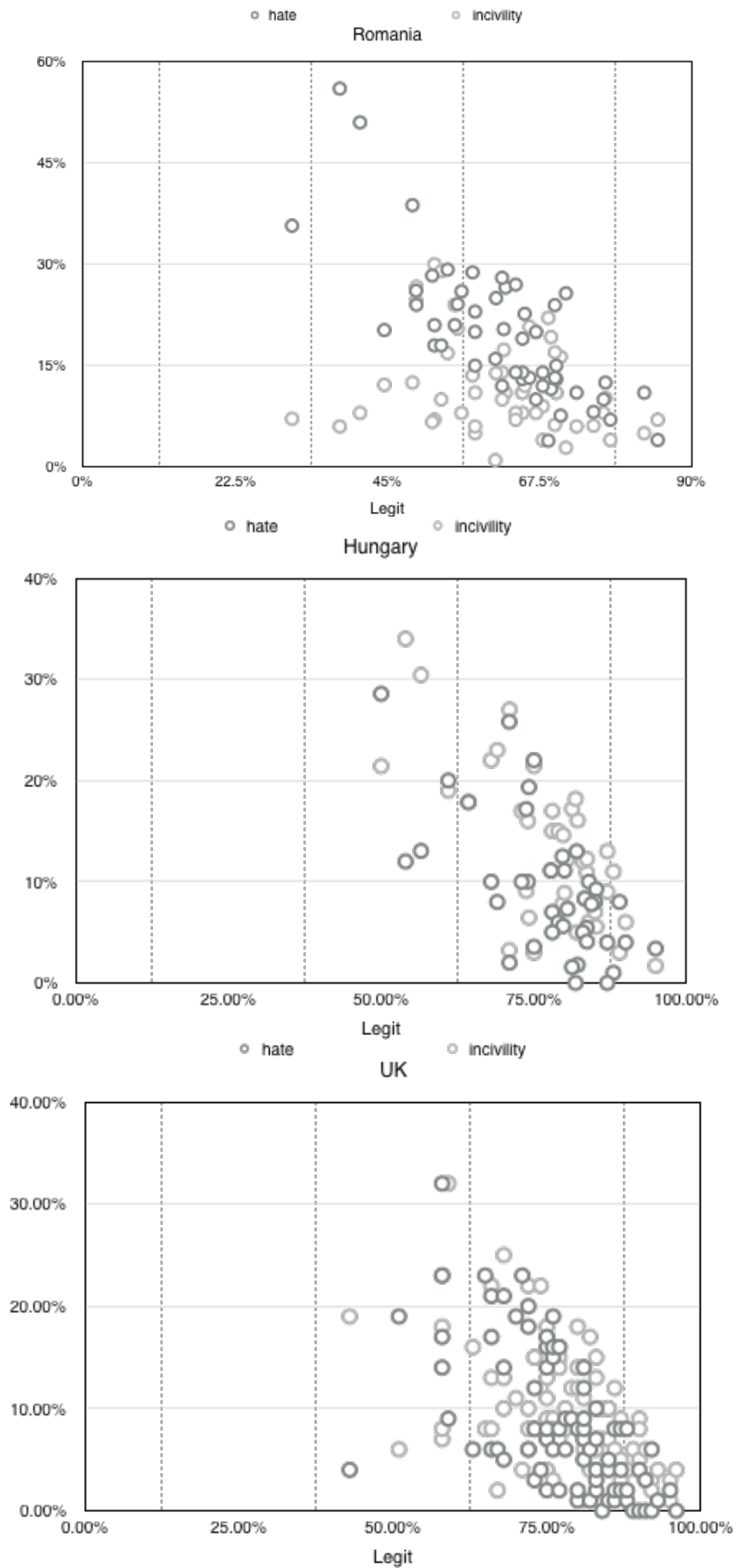
## Hate and incivility at article level

Chart 1 and Table 9 present the results of the content analysis for the three countries, for the main categories of hate, incivility and moderated at the article level, i.e. the levels of hate, incivility and legitimate content found within individual articles. After finishing the coding the proportions of hate, incivility, moderated and legit were calculated for each article, which were then ordered into rankings based on the different top-level codes. As the results show, there are some notable differences between Romania and the other two countries, the average and median hate being more than triple compared to the UK and double compared to Hungary. On the other hand, the results for incivility are closer for the three countries, but in the case of UK and Hungary, in contrast to Romania, the average incivility level is higher than the amount of hate. On average in Hungary and the UK, 77.6% and 78.2% of the comments for an article in the sample are legitimate, hate and incivility-free contributions. In the case of Romania, this is lowered to 62.5%. As the data in chart 1 shows, there are a few outliers in each country, representing articles with an unusually high proportion of hate and incivility. In Hungary and UK, they reach the 30% level, while in Romania they exceed 40% and there are even articles where more than half of the comments identified as hate or incivility. The chart also shows that the vast majority of articles have similar levels of problematic content. However, while the levels of hate are closer in all three countries, most notably in the UK, when it comes to incivility the density is lower and the articles are more scattered, meaning greater variation.

Country	Hate		Incivility		Legit	
	Median	Average	Median	Average	Median	Average
UK	6.0%	8.1%	9.0%	10.0%	80.0%	78.2%
Hungary	8.0%	9.1%	12.2%	13.3%	79.8%	77.6%
Romania	18.0%	19.4%	10.2%	11.8%	64.0%	62.5%

Table 10: Average and median of top-level codes for articles

Table 10 shows descriptive statistics for top-level codes at article level a list of articles ranked in order of proportion of hate can be found in Appendix...). The data shows a remarkable similarity in the UK and Hungary regarding the legitimate content in the articles at 78.2% for the UK and 77.6% for average legitimate content. As in the other cases, in Romania, the average hate level is more than double compared to the other countries.



**Chart 1: Hate and incivility by articles**

## Article rankings by countries

This section will present in detail the levels of problematic content in individual articles for each country. The article with the highest proportion of problematic comments, and the lowest number of legitimate content was an opinion piece in the Jewish target group published on *The Telegraph*. This article only had 4% of hate (lower than other articles), but a further 19% of incivility and 34% moderated comments were found, resulting in only 43% of legitimate comments. In the article ranking, this was followed by another article on *The Telegraph*, in the Citizenship target group and on the topic of the refugee crisis: 19% of the comments were identified as hate, 6% as incivility and 24% moderated, resulting in 51% legitimate comments. The amount of moderated comments overall in the newspapers that visibly marked moderation was notably higher in the Jewish target group. On the *The Telegraph* 15.3% were moderated in the Jewish, 6.8% in the Citizenship and 5% in the LGBT target group; similarly on *Adevărul*, the number of moderated comments was 14% for Jewish, 11.3 for Minorities and 10.8 for LGBT target groups. This could be due to the newspapers anticipating more problematic content due to the contentious nature of the issue and Holocaust denial legislation. It can even be observed in the case of the *Guardian* where the article with the highest amount of moderated comments was a piece on antisemitism: 13% of comments were removed, with only 5% hate and 1% incivility comments making past the moderators.

## UK

In the UK the article with the highest amount of incivility was a news item about the funds received by Scotland from the UK Budget, published soon after the 2015 general election in the *Daily Mail*, which resulted in 32% incivility and 9% hate. It ran the incendiary title “*How Scotland dodged austerity: Average Scot has £1,600 more spent on them than an Englishman - and the gap's widened since 2010.*” While the *Daily Mail* did not mark removed comments for some articles there is a notification about the comments being moderated or not. In this instance, the 2,167 comments posted to this article were not moderated, and this was the case for all Scotland-themed articles included in the sample. The fact that there was such a low level of hate for these articles seem to indicate that there was no strong animosity towards Scotland as a target group in the users commenting on these articles, but the issue still proved to be highly contentious as shown by the level of incivil comments.



Next in the incivility ranking was an article in *The Telegraph* in the LGBT target group on the topic of Trans women with 25% incivility, 5% hate and 2% moderated.

In the UK sample, the article with the highest proportion of hate was in the Minorities/race sub-target group on the topic of Islam published on *The Telegraph*, where 32% of the comments were hate, 8% incivility and 2% moderated resulting in only 58% legitimate. The same proportion of legitimate comments was found for the second article in the hate ranking also from *The Telegraph*, where an opinion piece on the topic of feminism in the Gender target group with was met with 23% hate, 18% incivility but only 1% of the comments included in the sample were moderated.

There was no article with 100% legitimate comments in the entire sample in any country. The highest rate of legitimate comments in the UK sample was 96% found on an article in *The Guardian*, with no hate comments and only 4% incivility on the topic of Scottish National Party published before the 2015 elections. The second and third article was also from *The Guardian*, both in the Gender target group. An article about the resignation of Reddit's female CEO had 95% legit comments with only 2% that could be classified as hate and 3% as incivility; this was followed by an article about single mothers in Denmark with only 2% hate, 1% incivility and 2% moderated comments.

Considering the higher proportion of hate and incivility found on *The Telegraph*, surprisingly the fourth best of the 96 UK articles was from this newspaper: 93% of the analyzed comments posted below an opinion piece about the result of the Irish gay marriage referendum and its significance to Catholicism were legitimate, with only 1% hate, 4% incivility and 2% moderated. There were eight articles without any hate comments in the UK sample including the aforementioned best article: all of them were from *The Guardian*, however, and even in this group there were two articles with 84% legitimate comments, 10% incivility and 6% moderated. For the other two newspapers, the *Daily Mail* had one article with only one hate comment, but 17% incivility, a surprising outcome considering the title "*Crackdown on migrant benefits 'would also hit 50,000 young Britons': Four-year wait will have to apply to UK claimants too*" and the fact that the article was not moderated.

## Romania

The highest proportion of hate comments in the entire sample was found on an article published in the Evz, in the Minorities/Race sub-target group on the topic of crime describing a murder allegedly committed by criminals belonging to the Roma minority. The article had an obviously incendiary title “*REVOLTING DETAILS about the boxer KILLED by the interlopers from Slatina (a city in Romania). The victim’s father: ‘I was informed that he was killed by some gipsies. He went cold in my arms.’*” This has resulted in 56% hate, 6% incivility and only 38% legitimate comments. Moreover, possibly due to the inflammatory title and tone of the article, 15 Extermination/Murder/Rape comments were also identified, explicitly calling for violence against and the extermination of members of the Roma minority. Eight of these articles also invoked or glorified Hitler or Ion Antonescu, Romania’s World War 2 leader, both cases being criminal offences according to the current legislation:

1. “I think that the gipsies have to put through forks (orig. Romanian “*ridicat in furci*” (lit. raised with garden forks) but before that I propose to take out their eyes and put stakes in their foot soles. They have crime in their blood and will not be civilised even in 200 years from now" posted by Ion Antonescu (*reference to the WW2 leader*) at 13 July (2015) on *Evz.ro*.

While the user in the comment quoted above (no. 1) disguised the reference to the WW2 leader in the username, perhaps expecting that it would be moderated, this was not the case for several other commenters explicitly mentioning Hitler (no. 2), concentration camps and another even openly teasing the moderators who apparently still did not notice them (no. 3).

2. "Hitler cannot be resurrected anymore, but you Romanians from Slatina, cant' you unite and burn the houses of these scums of society" posted by Lita Ioan on 13 July on *Evz.ro*.

It should be mentioned that "burn the houses" could in this case quite literally be interpreted as incitement to violence. Pogroms, where the entire community has been blamed for a crime

committed by one of its members, have happened several times in Romania and Bulgaria, as recently as in 2017<sup>221</sup>.

3. “What clan of roma ethnicity,,????Some damned GIPSIES who should be exterminated (*orig Romanian “starpit” – lit. exterminating a species*) with all their relatives and,, and descendants,, same as our little Romanian compatriots who help them do their thing!!! Anyone who helps these vomited wretches (*orig. Romanian “Nemermici borati” – lit. nemernic - rogue, criminal, worthless; borat – vomit (slang) used when referred to Roma people in the term “tigan borat” lit vomited gipsy*) should be anathematised to their seventh descendants. And the gipsies... Dachau would be too little... Forum administrator see what you do, as I expressed myself elegantly" posted by dorina at 13 July on *Evz.ro*.

Romania had an additional six articles where the proportion of legitimate comments was lower than the problematic content, compared to one such article in the UK and none in Hungary. Both in Romania and UK, the articles with the lowest amount of legitimate comments were in the Jewish target group. In the case of Romania, the article on the topic of the Holocaust published in *Adevărul* and had 35.7% hate, 7.1%, 26.2% moderated and only 30.9% legitimate comments. In the UK, on the other hand, a similar article in *The Telegraph* while only had 43% legit comments, this was due to the higher number of moderated comments, resulting in a remarkably low amount of 4% hate, although still with 19% incivility. The Romanian sample also contained an article where the proportion of moderated comments was higher than the legitimate contributions. Also published on *Adevărul*, the article in the Gender target group on the topic of female leaders, presenting an interview with a female candidate for the presidency, while 23% of the comments were moderated, still 20.3% was coded as hate and a further 12.2% as incivility.

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<sup>221</sup>. “Roma Burned from their Homes as Lessons Go Unlearned in Romania,” Text, *European Roma Rights Centre*, accessed August 22, 2018, <http://www.errc.org/news/roma-burned-from-their-homes-as-lessons-go-unlearned-in-romania>.

There was no article with more than 90% legitimate or zero hate comments in Romania but unexpectedly given the negative attitudes toward LGBT people, the articles with the highest amount of legitimate comments in Romania were found in this target group. The article with the highest amount of legit comments at 85% (4% hate and 7% incivility) was an opinion piece about the results of the Gay marriage referendum in Ireland, similarly to *The Telegraph*. The next two articles in the legit ranking were an article about church marriages for gay people in Denmark (with 83% legit comments) and an article about the Pride Bucharest (78% legitimate comments, 7% hate, 4% incivility and 11% moderated), both published on *Adevărul*. The article with the lowest amount of hate for Romania was in the Gender target group (on the topic of Abortion) and had 3.9% hate, 22.1% incivility, 5.2% moderated 68.3% legit.

### *Hungary*

The worst article for Hungary was a case where the hate comments made up 50% of user contributions, followed by 22% incivility, leaving only 28% legitimate comments. It was published on *MNO* in the Gender target group but on the topic the danger of sexual assault posed by Muslim immigrants. It was included in the Gender sample due to being returned in the search results for this target group most likely due to the keyword "sexism". This was followed by an article on *NOL* also on the target of Gender and on the topic of gender violence, which although only had 12% hate which in itself was not an outstanding amount, also contained 34% incivility resulting in only 56% legitimate comments. The higher proportion of incivility coupled with lower rates of hate was a characteristic of *Népszabadság*; a similar trend could also be observed at *The Guardian*, both newspapers being of Centre-left orientation.

Similarly, to the other two countries, the best article in the Hungarian sample was in the Jewish target group. On an opinion piece criticising Barack Obama's Middle East policy published around the time of the 2015 Gaza War, 94.9% of the comments were legitimate, 3.4% hate and 6% legit. There were two articles with zero hate in Hungary: one from *MNO*, in the Jewish target group and on the topic of antisemitism, which still had 13% incivility, followed by an article from *Népszabadság* in the Minorities/race target group that also had 18.2% incivility.

## Target group analysis for hate comments

This section will present the results of the content analysis by target groups of Citizenship, LGBT, Gender, Jewish and Minorities; it will start with the results for the top-level codes of hate, incivility, moderated and legit. Then the sub-categories and types of hate for each of the five target groups will be presented and illustrated with example comments.

Table 11 shows the levels of hate for each target groups in the three countries. Romania had the highest hate rates, for all target groups, particularly for minorities, hate comments for this target group made up 22.8%, and an even higher proportion was found for the Minorities/Race subgroup, referring to the Roma minority where it reached 32.7%. While in Romania the level of hate went above 20% for three target groups, this proportion was not observed for any target group in the other two countries, even the lowest level of hate in Romania was higher than for any target group in the other two countries. Hungary and the UK had mostly similar levels although there were differences reflecting different attitudes and possibly moderation strategies towards each group. Most notably the levels of hate for the Minorities/Religion sub-target group, denoting articles containing keywords regarding Islam was almost the same in the two countries.

Romania	Count	Percent	Hungary	Count	Percent	UK	Count	Percent
Minorities	324	22.6%	LGTB	72	12.1%	Citizenship	180	10.0%
Citizenship	241	22.5%	Minorities	68	10.2%	Minorities	179	9.4%
Jewish	189	20.5%	Gender	30	9.9%	Gender	158	8.3%
LGTB	74	12.3%	Citizenship	91	7.8%	Jewish	111	6.5%
Gender	74	11.4%	Jewish	13	2.7%	LGTB	106	5.9%

**Table 11. Levels of hate by target groups by country**

### Target Group 1: Citizenship

The 2015 refugee crisis in Europe affected all three countries and was followed closely by all newspapers, providing the opportunity to analyse the same topic from the perspective of each

country and newspaper. This was also the topic with the highest level of user participation expressed in comments across all newspapers. The citizenship target group, composed of articles containing keywords related to immigration and refugees was the only category where it was possible to identify enough qualifying articles that had at least 100 comments from every site in the sample, resulting in the most uniform sub-sample of 600 comments/newspaper. Although it affected all three countries, they played different roles in the crisis which was also perceived and presented differently by the media and government in each state.<sup>222</sup> Hungary was a transit country, along the so-called Balkan route to Germany and Western-Europe for refugees transiting Turkey, Greece, Macedonia and Serbia. The Hungarian government took a strong anti-immigration, anti-refugee stance, accompanied by nationwide publicity campaigns early on, at the beginning of 2015 even before refugee numbers increased. In August-September 2015 in order to stop refugees crossing the border illegally, the government built a fence along the border with Serbia and later also along the border with Croatia. While few refugees reached the United Kingdom, the country was presented in two of the UK newspapers in the sample and in the political discourse as a target country. Along with immigration including from the EU immigration, the refugee crisis was a prominent topic during the 2015 election campaign, building up to the 2016 referendum on exiting the European Union. The UK articles in this target group frequently used the term "migrant" and "immigrant" referring both to refugees and EU citizens using freedom of movement, despite the two being a different kind of immigration. In contrast to the other two countries, in Romania, there was no heightened government interest and public debate about the refugee crisis. Few refugees entered or transited the country; Romania itself is also a country facing a high amount of emigration including to the UK, Romanian immigrants being targeted by media campaigns in Italy and the United Kingdom.<sup>223</sup> On the other hand due to the geographical closeness to migrant routes and the country's status as a member of the European Union the issue could not be neglected especially in later stages of the crisis when the topic of distributing refugees according to quotas emerged.

Table 12. shows the results of the content analysis for the citizenship target group in the three countries. As in the previous cases, even though it was the least affected, Romania had more

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<sup>222</sup> *Racism and Discrimination in the Context of Migration in Europe. ENAR Shadow Report 2015-16* (Brussels: European Network Against Racism (ENAR), 2016).

<sup>223</sup> Florentina C Andreescu, "The Romanians Are Coming (2015): Immigrant Bodies through the British Gaze," *European Journal of Cultural Studies* (September 12, 2018): 1367549418786418.

than double the amount of hate compared to the other two countries; it was also the only country where the number of hate comments was more than the number of incivility comments, whereas in the case of the UK they were almost equal. While there is a difference in the order, for all three countries the same three sub-codes made up the largest categories of comments. It is noteworthy that contrary to the overall sample for this target group the Conspiracy/Foreign Interest/threat and the Stereotypes/Generalization sub-codes made up a larger part than the normally expected insults. These were especially high in Hungary (36.8%) and the UK (34.3%) where there was more interest in the topic and the government and parts of the media actively presented immigration and refugees as a threat, and even some sort of conspiracy. This was then reflected in the comments too. In Romania, where there were less government and public attention to the issue, the highest sub-code was Stereotypes reflecting the commenters' prejudice against refugees, but they were not perceived or presented as a threat to the same degree as in the other countries.

#### *Extermination/Murder/Rape (EMR) in the citizenship target group*

There were a number of EMR comments in all three countries and with the exception of *Népszabadság* from Hungary in every newspaper. The 16 such comments from Romania in this target group made up 4.1% of the comments coded hate for this target group, while in the UK 14 comments amounted to 5.5% of hate. In Hungary, only three such comments were found constituting 2.6%. As mentioned before in the section about overall results, these constitute a small proportion of hate and even a smaller proportion of the overall sample, but they are also the most extreme examples of comments that were allowed to be posted on the sites of leading National newspapers.

#### *Romania*

4. “Yo, go to your islamists and live there with them in camel manure. You have no business being in Europe you unwashed. And take your swollen (derogatory pregnant) *pirandas* (*piranda* – derogatory reference to Romany women) with you. Too bad that they skipped your grandmother at the showers and disinfection” posted by un european on 21 september 2015 on *Eyz.ro*.

5. “I can’t stand the HUNGURS (derog. Hungarian) but for what they do with the muslims=TERRORIST, I take my hat off! This is how the entire Europe should react in front of this peaceful colonization and against the islamisation of europe! If they try to act smart, the muslims=TERRORISTS! should be served some war bullets to make them understand that they have no business being here! They should go to their muslim=TERRORISTS! brothers.” posted by Radianu Mihai on 16 September 2015 on *Adevărul*. The comment received 13 likes and 4 dislikes.

6. “KILLED IN THEIR MOTHERS WOMB...6000 BULLETS FOR EVERY MUSLIM!!!!” posted by klau\_ss on 22 September 2015 on *Evz.ro*.

The comments above were all coded EMR, but some were also coded into other categories. The first example although directed against the citizenship target group also attacked Muslims and the Roma minority, using a derogatory reference to Romany women, repeating the stereotype of the minority overbreeding the country. Therefore it was also coded as insult (hate) and stereotypes. Moreover, the last paragraph also puts this comment into the Holocaust glorification category, as the user refers to the gas chambers used by Nazis in the Holocaust. Another comment where this can be observed is the third quote above (No.6) with a reference to SS disguised in the username, a common practice of users trying to bypass moderation. In the second comment (No.5) the EMR content is directed against the Muslim refugees whom the commenter equates with terrorists but he also directed a derogatory insult to Hungarians, a sizable minority in Romania, using the term "hungur" instead of the correct form "ungur", to include the term "hun" which is used as a derogatory epithet in Romania. In addition, the comment also refers to the claim that the refugee crisis is part of a conspiracy for the Islamisation of Europe. Another noteworthy element of this comment is that the user seems to have used his real name.

## UK

7. “Round them up and give them a bullet... EACH!” posted by xClaireBearx on the 5th of May on *Daily Mail*. The comment received 47 likes and 26 dislikes.



8. “Where is the backbone? You want to protect your way of life? Don't give them food, shelter, clothing, transport or money. herd them into camps and let them starve.” posted by fowler on the 15th of September on *Daily Mail*. The comment received 54 likes and 48 dislikes.

9. “There IS a simple answer: let them drown and kill - murder - survivors as they land. This is immoral or even evil. But in what sense is it wrong? Being wrong means it wouldn't work. Wouldn't it?” posted by Noel Falconer on the 5th of September on *The Telegraph*.

10. “yes yes we heard the lies before, we will go home when things are fine, yet when they actually have to go home, they don't want to, and since Europeans are nations of pussies nobody dares to touch them. (...) That being said, if this wave ain't going to stop, there is going to be dead people, and not because of winter and drowning, but because countries on the brink of exhaustion will say enough is enough and start protecting it by force - and it's their right to do so. (...)the only way to make them realize we're serious is by force simple as that, since we were unable to show any strength and power until now and they are allowed to do what the heck they want, they will only react if their lives are in threat.” posted by FMinus on the 3th of November on *The Guardian*. The comment received 26 likes and 0 dislikes.

11. (*Previous legit comment*) “Hi, crime researcher, stats person here, actually the rape stats in Sweden have everything to do with how they keep the numbers and how they define rape, and virtually NOTHING to do with emigration.” Posted by JodeBlampette on 19 November 2015 on *The Telegraph*.

12. “(reply to a previous legit comment) Explain to your daughter the meaning of "virtually." posted by Atlas\_Shrugged on 28 November 2015 on *The Telegraph*.

While the search terms used to identify the article for this target group were intended to include refugees but also other types of immigrants, the majority of hate comments were posted to the articles on the refugee crisis and connected topics and were directed against Muslims. The first comment is an example where this is not the case, as it was posted to an article in the *Daily Mail* about Romanian immigrants allegedly abusing the UK benefits system. This comment and some others presented above also illustrate a failure of the marketplace of ideas argument against hate speech. As shown above comments No. 7, 8, 10 from the UK and No. 5 from Romania, the sites contained voting elements of user participation. Some sites such as Hotnews from Romania presented in the interview chapter, use these votes as a form of community moderation, higher negative votes prompting moderators or even resulting in the comment being hidden. In these cases, however, the number of up-votes, likes, green arrows (used by the *Daily Mail*) exceeded the negative votes, further reinforcing their harmful effect. As in the case of the Romanian examples before, the second comment also contains a reference to Nazi concentration camps along with the dehumanising verb "herd them". There was less hate and even fewer EMR comments in the *Guardian*, but the above is an example of a more sophisticated type of hate, as described by van Dijk: while in essence, the user expresses the same ideas as the comment before, it is done in the form of concern for the rule of law and the avoidance of violence, but the last sentence confirms that the user is, in fact, advocating for violence. The comment also repeats the political correctness conspiracy argument according to which foreigners are allowed to commit crimes, as the authorities are afraid of appearing racist. The last comment above from *The Telegraph* (No. 12) is an example of challenging coding and moderation: on its own the comment appears legitimate, but reading it as a dialogue with the previous comment (No.11), reacting to rape statistics in Sweden mentioned in the article and a frequent trope in the anti-muslim anti-refugee discourse, it becomes apparent that the user is calling for the rape of the previous commenter's daughter.

### *Hungary*

13. “Well, these will not get to harm any Christians then” posted by Fadisiz on 27 August 2015 on *Magyar Nemzet Online*.

The Hungarian *Népszabadság* was the only newspaper that had no EMR comments for this target group, but even in the other Hungarian title only 3 such comments were found all posted to the same article. The comment (13) provides a good illustration of the difficulties in moderating user-generated hate speech: while it repeats a stereotype of Muslims being a threat to Christians, in itself the comment is not in the EMR category, but it is placed here when considered together with the topic of the article that described the case of 71 refugees being suffocated in a freezer truck in Austria that originated from Hungary.

**Table 12. Citizenship target group: Top level codes and sub-codes**

Romania			Hungary			UK		
Top Level Codes	Count	Percent	Top Level Codes	Count	Percent	Top Level Codes	Count	Percent
Hate	<a href="#">241</a>	22.5%	Hate	<a href="#">91</a>	7.8%	Hate	<a href="#">180</a>	10.0%
Incivility	<a href="#">134</a>	12.5%	Incivility	<a href="#">145</a>	12.5%	Incivility	<a href="#">187</a>	10.4%
Legit	<a href="#">654</a>	61.0%	Legit	<a href="#">929</a>	79.7%	Legit	<a href="#">1368</a>	76.0%
Moderated	<a href="#">43</a>	4.0%				Moderated	<a href="#">65</a>	3.6%
Subcode	Count	Percent	Subcode	Count	Percent	Subcode	Count	Percent
Stereotypes/Generalization/Prejudice	<a href="#">96</a>	24.4%	Conspiracy/Foreign interests/Enemies/Threat	<a href="#">43</a>	36.6%	Conspiracy/Foreign interests/Enemies/Threat	<a href="#">87</a>	34.3%
Conspiracy/Foreign interests/Enemies/Threat	<a href="#">82</a>	20.8%	Insults (hate)	<a href="#">26</a>	22.2%	Stereotypes/Generalization/Prejudice	<a href="#">72</a>	28.4%
Insults (hate)	<a href="#">71</a>	18.0%	Stereotypes/Generalization/Prejudice	<a href="#">23</a>	19.7%	Insults (hate)	<a href="#">18</a>	7.1%
Animals/Sub-human /Pest	<a href="#">25</a>	6.4%	Animals/Sub-human /Pest	<a href="#">8</a>	6.8%	Extermination/Murder/Rape	<a href="#">14</a>	5.5%
Superiority/Inferiority/Normality	<a href="#">23</a>	5.8%	Extermination/Murder/Rape	<a href="#">3</a>	2.6%	Superiority/Inferiority/Normality	<a href="#">13</a>	5.1%
Belittling/Demeaning (Hate)	<a href="#">16</a>	4.1%	Violence	<a href="#">3</a>	2.6%	Animals/Sub-human /Pest	<a href="#">9</a>	3.5%
Extermination/Murder/Rape	<a href="#">16</a>	4.1%	Superiority/Inferiority/Normality	<a href="#">3</a>	2.6%	Exclusion/This is our country	<a href="#">8</a>	3.2%
Discrimination	<a href="#">13</a>	3.3%	Expulsion	<a href="#">2</a>	1.7%	Expulsion	<a href="#">7</a>	2.8%
Exclusion/This is our country	<a href="#">11</a>	2.8%	Belittling/Demeaning (Hate)	<a href="#">2</a>	1.7%	Discrimination	<a href="#">7</a>	2.8%
Expulsion	<a href="#">11</a>	2.8%	Silencing (hate)	<a href="#">1</a>	0.9%	Violence	<a href="#">7</a>	2.8%
Violence	<a href="#">9</a>	2.3%	Religious extremism	<a href="#">1</a>	0.9%	Threats	<a href="#">5</a>	2.0%
General hate/Discrimination	<a href="#">6</a>	1.5%	Discrimination	<a href="#">1</a>	0.9%	Belittling/Demeaning (Hate)	<a href="#">4</a>	1.6%
Threats	<a href="#">4</a>	1.0%	Threats	<a href="#">1</a>	0.9%	General hate/Discrimination	<a href="#">2</a>	0.8%
						Denying rights (political/civil)	<a href="#">1</a>	0.4%

### *Conspiracy/Foreign Interest/Threat (CFT) in the Citizenship Target Group*

*“Comments that imply that members of a group B are part of a conspiracy against the country/society, or serve some foreign or malicious interests. Comments that imply that by being a member of a group or seeking rights for that group, its members or leaders are enemies of the state/people/society, or that they are a threat. E.g. "these ... want to destroy our country" "the .... are part of a global conspiracy to ...our country/Europe". (Definition of CFT from the Codebook)*

The examples presented at the end of this section were taken from all the newspapers in the sample and were coded as Conspiracy/Foreign Interest/Threat (CFT). The categories were not exclusive; therefore some were also coded insults (hate), stereotypes, demeaning, violence and comment number 6 also as Extermination/Murder/Rape. As the comments here show, there were some noticeably similar themes between the countries, almost to the degree of a shared narrative across countries and newspapers. The central element of this narrative was also adopted by some right-wing politicians, most notably by the Hungarian prime minister, government and state media, implying that the refugees and Islam are a threat to Europe, they are part of an organized plan or conspiracy to islamify Europe, as Muslims will take over the continent with their high birthrate.

Another central theme is that the crisis is a manufactured: "it is a filthy foreigners game" (no.8) organized by the political class or "European leaders", David Cameron (no. 1), Angela Merkel, Barack Obama, but also the president of Romania Klaus Iohannis (no. 6.) (of German ethnicity) could be blamed or the EU elite "junkerk-holland-merkel-verhofstadt" (nr.11) who might also have something to hide or they are incompetent as it is argued in comments nr, 3, 5 and 11. Number 11 also presents Russia as a last resort saviour of Europe, possibly posted by a Russian state employed commenter.

In what can be considered almost a textbook example of anti-Semite conspiracy theory comment nr. 9, although posted to an article about the refugee crisis, not only presents immigrants as threats, but it also makes allusions to the crisis being orchestrated by the Jewish. Wary of moderation, the commenter does not name them, using the clearly recognisable “they are sending one of their enemies against the other one” euphemism instead. This argument already presents in 2015 at the level of everyday discourse a theme that later in 2017 and 2018

will become a central part of the Hungarian governments “Stop Soros” campaigns demonizing George Soros, the Hungarian-American Jewish businessman, using imagery and messages widely considered anti-Semitic, as shown in the picture below<sup>224</sup> which according to anti-discrimination organisations was reminiscent of anti jew posters of Nazi Germany.



**Figure 4. Posters displayed in a Budapest as part of a government communication campaign, the text in the centre reads: “Let’s not allow Soros to have the last laugh” the scribbled text on the face of George Soros reads “stinking jew” (Image source: BBC)**

According to this theory which in 2017-18 became the Hungarian government official position and was even transposed in legislation,<sup>225</sup> George Soros is the mastermind or funder of an attempt to the destroy Europe’s nation-states using non-European, Muslim immigrants or refugees who with their high birthrate will soon overwhelm the continent.

Awareness of moderation and a strategy to avoid it can be observed in comment nr 7. posted to *Adevărul*, in the Romanian original the word “*tigan*” a pejorative reference to Roma people meaning “gipsy” is divided to “TI./GAN” presumably in order to avoid the automatic profanity filter of the site. Moreover, it is also written in capital letters denoting shouting and still was not removed by moderators, who according to the terms of service posted on the site pre-moderate all comments. As in some other cases presented before, this comment is directed

<sup>224</sup> Nick Thorpe, “Hungary Vilifies Financier with Posters,” *BBC News*, July 10, 2017, sec. Europe, accessed September 15, 2018, <https://www.bbc.com/news/world-europe-40554844>.

<sup>225</sup> Stop Soros law

against three target groups: refugees (citizenship), and two of the sub-groups of the minorities category, namely Muslim (minorities-religion) and the Roma (minorities-race). However, because the target groups were exclusive and were based on the articles they were posted to, it was classified under the citizenship target group due to being posted to an article in that category. The user claims that the Roma people were not able to "be civilised" in the centuries they have been in Romania, and so the Muslim refugees will also not integrate. This argument also became part of the political discourse a year later in Hungary where there is also a considerable Roma minority and both the prime minister and another member of the Government have used it to argue against the European Union refugee quotas<sup>226</sup>, again raising the questions of defining the limits of acceptable speech. Comment no. 5 posted on *The Guardian* also shows awareness of moderation, the commenter using sarcasm to avoid the removal of the comment. Although written in a more civil language, this comment, in essence, makes the same claims as the other comments.

### *UK Examples*

14. "This is beginning to look like a crusade in reverse, to overwhelm and eventually subjugate the non-believers. We all remember calls for doing just that very recently from ISIS. Not surprising so many countries don't want them and try to pawn them off to Germany and Sweden." posted by farfromhome on 16 September 2015 on *Dailymail*.

15. "Not all Germans read Hitler's Mein Kampf All Muslims read the Quran. There's more passages of hatred in the Quran towards non believers than there are in Hitler's Mein Kampf <http://www.thereligionofpeace....> Their guide is a book of hatred towards anyone not in their medieval cult Quran (Sahih International 9:73) "O Prophet, fight against the disbelievers and the hypocrites and be harsh upon them. And their refuge is Hell, and wretched is the destination." Definition of a moderate Moslem... 'One who relies on a their high birthrate rather than bombs & guns to islamify Europe' posted by pobinr on 20 November 2015 to *The Telegraph*.

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<sup>226</sup> Lili Bayer, "Orbán Ally Hits Anti-Roma Note Ahead of Election," *POLITICO*, last modified March 29, 2018, accessed September 15, 2018, <https://www.politico.eu/article/viktor-orban-ally-hits-anti-roma-minority-migration-note-ahead-of-hungary-election/>.

16. “European leaders always have a caveat. Was it not Cameron that said, just two days ago, that this Jihadi John "killed hundreds of MUSLIMS". Why would he add this bit to the sentence? And when they say that "we are at war with ISIS, why ISIS? Is Hezbollah, Hamas, Al Nusra, Assad, Fatah, Homeni, Abbas, Al Qaeda etc, any different? Muslims are not coming here as refugees, they are not coming here for better life, they are not coming here for NHS, they are not coming here for housing, they are not coming here benefits - THEY ARE COMING HERE TO CONQUER THE WORLD AND SO FAR THEY ARE DOING A GREAT JOB OUT OF IT. Europeans are succers!!! posted by yidisheboher on 14 November 2015 to *The Telegraph*.

17. “Beware European Christians! In less than 10 year so, you will be the refugees but sadly there will be no more Christian countries to welcome you. ACT NOW or face the CONCEQUENCES.” posted by Savi on 18 September 2015 to *The Telegraph*.

18. “Far be for me to suggest that the immigrants will be anything but a welcome addition to a multicultural Germany. They will never burden the German state financially, they will of course integrate completely, enriching the under-developed German culture and as good moslems they will dutifully respect the secular and religious traditions in the host country. They will never take advantage or abuse German women who shamefully flaunt their hair like harlots and of course the many strands of Islam will co-exist peacefully with one another once they have successfully fled the tainted soil of the middle-east homes, for it is the soil on which they stood which was responsible for any abhorrent behavior.” posted by Maitaimik on 3 November 2015 to *The Guardian*.

### *Romania Examples*

19. “Those you don’t leave to die will not let you live! We will see if we will still live! Merci Johannis (president of Romania, Merci Oprea



(ministry of the Interior at the time), Merci Merkel, Merci Obama! You stuffed “the happiness” in our country, both on the door and the window. Maybe the Coran, will take you too next to Alah” posted by Exilatul Gica on 16 September 2015 to *Adevărul*.

20. “Open to everyone who wanted to come to live and work here, in a Europe of diversity and safety Valid ONLY for EUROPEANS. The ARABS do not come to work, They come to multiply, to cut heads, to make SHARIA. Think of the GIP,/SIES when you see this kind of ARABS who force the borders. After 400 years of living along the romanians they did not get civilized. GIP,/SIES = ARABS!”

21. “Everything that happens now with these imigrants,is nothing else than a well organized(payed) action with the purpose of destroying everything that is national in the European countries. This is a filthy foreigners game. These ARE NOT REFUGEES. They want to destroy our millenary culture. Our government should take example from the Hungarian Victor Orban. Mr Basescu (*former president of Romania*) is right. We have to say a RESOLVED NO to the western tricks! If we have a little dignity left,we should prove” posted by Ian on 10 September, 2016 to *Evenimentul Zilei*.

### *Hungary Examples*

22. “I do not know (maybe I have a hint... and maybe, prejudiced...but I’m afraid that this prejudice is not at the level what is LIKELY!!! in reality) but it seems...that someone is sending Islam against Christianity! (Who that might be, if they are sending one of their enemies against the other one...to cut their throat???) inconceivable” posted by szárnyas on 17 September 2015 to *Magyar Nemzet Online*.

23. “They don’t know what Croatia is? THESE ARE ORGANIZED TO CRUSH HUNGARY!” posted by zotán on 15 September 2015 to *MNO.hu*.

24. “These will indeed occupy Europe. It is true that North Africa and the Middle-Eastern Christianity was destroyed by the muslims in the years 600. The west stopped them, and for a while Byzantium with the much blamed crusades. What can you do with, Junker-holland-merkel-verhofstadt and the like? When the akbars will start blowing things up, then they will move to America, while the EU will be turned into the Middle-East and Africa, where we have to say it, the European aboriginals will be servants. When the west is ended there will be no other solution than to ask the Russians for help against the muslims, otherwise we will be eliminated. The rich western leftist will take refuge in the USA after they destroyed our continent and pushed its population into muslim servitude.” posted by silver on 17 September 2015 to *MNO.hu*.

25. “And one more thing: all those in favor of immigration should keep a watchful eye on the voters (not just here but the entire Europe), every immigrant is ten votes for the far right (Austria, Germany, Sweden, not to mention Jobbik (far-right party in Hungary,) Choose what would you like, to be the victims of the muslims or of the Nazis?” posted by pesti on *NOL.hu*.

26. “Jack, comprehension (*responding to another user*) all who are not muslim are enemies, here the story is not about the fact that they will exterminate the Christians, but everyone, they become muslims or die! And everyone knows how fast they multiply, they will also ask for family reunions.” posted by pizematyi on 17 September 2015 on *MNO.hu*.

## **Target Group 2: Minorities**

The minorities target group was composed of three sub-groups, referring to race, religion and national minorities. This was due to the fact that contrary to the other target groups which are

similar in all three countries each type of minorities is defined differently in the three countries. In the UK, the definition of race is quite broad and according to the Equality Act 2010 includes not just color but also ethnicity and citizenship.<sup>227</sup> There are no such wide definitions in the other countries and in the relevant legislation in Hungary and Romania.<sup>228</sup> Race is a separate category generally understood as color, and therefore it will be used in this sense in this thesis. Moreover, the UK is more diverse racially with sizeable Black, Asian, South-Asian and other communities of people of color, while in Hungary and Romania there is a negligible population of Black or Asian origin, and the Roma are considered as a racial minority, as detailed in the methodology chapter. There are also differences in the national minority category too. There are a number of national minority communities in Hungary, currently forming 12 nationality self-governments (*Kisebbségi Önkormányzat*) in charge of minority education and conservation of culture but their numbers are low, they are more or less assimilated and do not figure in the day to day media. The exception is the Roma community who also have a nationality self-government but can also be considered a racial minority and are generally referred to as such.

On the other hand, in Romania there is a Hungarian minority of 1.2 million which as explained in the methodology constitutes a national minority with a distinct national identity, media and educational system, and in terms of distinct national identity, political activity including demands for territorial autonomy are comparable to the Scots in the United Kingdom.<sup>229</sup> Therefore articles about Scotland and Scottish people were included in the sample for comparative purposes. The only minority group in common in the three countries was Muslims in the sub-target group Minorities/religion. There is some overlap between the Minorities and the Citizenship target group due to the 2015-15 European migration/refugee crisis. In the context of this thesis the minorities/religion target group refers to articles identified searching for keywords related to Islam while the citizenship category referred to articles with keywords about migration such as immigrant, refugee but due to the prominence of the refugee issue the other immigrant categories were overtaken regarding the number of comments. In Romania, the orthodox church has a dominant semi-official status, and there

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<sup>227</sup> Equality Act, 2010 (UK) section 9

<sup>228</sup> Law CXXV/2003 art. 8 (Hungary), Emergency Government Order (OUG) 137/21 Aug. 2001(Romania)

<sup>229</sup> The Hungarian leader Tókécs László who had a significant contribution in starting the revolution of 1989 that ended communism in Romania, between 2008-2009 in the European Parliament it was a member of the Parliamentary group of the European Free Alliance (EFA) – Greens same the Scottish National Party and Plaid Cymru. Currently the smaller Hungarian People's Party of Transylvania is a member of the EFA, while the larger Democratic Alliance of Hungarians from Romania (DAHR)– (*Romaniai Magyar Demokrata Szovetseg* (RMDSZ-UDMR) that has a number of deputies and senators in the Romanian parliament (around 7% of MP-s) and two MEPs is a member in the European Peoples Party.

are a number of minority religions such as Roman-Catholic, Lutheran, Calvinist-Reformed, Unitarian, the latter two also being almost exclusively Hungarian, no articles with enough qualifying comments could be identified for the sampling period.

Romania			Hungary			UK		
Top Level Codes	Count	Percent	Top Level Codes	Count	Percent	Top Level Codes	Count	Percent
Hate	324	22.8%	Hate	<u>68</u>	10.2%	Hate	<u>179</u>	9.4%
Incivility	195	13.7%	Incivility	<u>91</u>	13.6%	Incivility	<u>192</u>	10.1%
Legit	835	58.6%	Legit	<u>509</u>	76.2%	Legit	<u>1,480</u>	77.9%
Moderated	70	4.9%				Moderated	<u>49</u>	2.6%

**Table 13a. Minorities target group – top level codes.**

**Table 13b. Minorities target group – sub-codes.**

Romania			Hungary			UK		
Hate Subcode	Count	Percent	Hate Subcode	Count	Percent	Hate Subcode	Count	Percent
Insults (hate)	<u>123</u>	22.0%	Stereotypes/Generalization/Prejudice	<u>29</u>	25.0%	Conspiracy/Foreign interests/Enemies/Threat	<u>62</u>	21.6%
Stereotypes/Generalization/Prejudice	<u>85</u>	15.2%	Conspiracy/Foreign interests/Enemies/Threat	<u>23</u>	19.8%	Stereotypes/Generalization/Prejudice	<u>58</u>	20.2%
Conspiracy/Foreign interests/Enemies/Threat	<u>55</u>	9.8%	Insults (hate)	<u>15</u>	12.9%	Insults (hate)	<u>34</u>	11.9%
Exclusion/This is our country	<u>48</u>	8.6%	Holocaust/Genocide/Terrorist - appologetic/justification/ glorification	<u>15</u>	12.9%	Belittling/Demeaning (Hate)	<u>33</u>	11.5%
Threats	<u>32</u>	5.7%	Holocaust/Genocide/Terrorism - blame shifting	<u>10</u>	8.6%	Superiority/Inferiority/Normality	<u>24</u>	8.4%
Violence	<u>31</u>	5.6%	Extermination/Murder/Rape	<u>8</u>	6.9%	Exclusion/This is our country	<u>21</u>	7.3%
Superiority/Inferiority/Normality	<u>28</u>	5.0%	Animals/Sub-human /Pest	<u>6</u>	5.8%	Extermination/Murder/Rape	<u>12</u>	4.2%
Extermination/Murder/Rape	<u>24</u>	4.3%	General hate/Discrimination	<u>2</u>	1.8%	Discrimination	<u>7</u>	2.4%
Animals/Sub-human /Pest	<u>24</u>	4.3%	Superiority/Inferiority/Normality	<u>2</u>	1.8%	Animals/Sub-human /Pest	<u>7</u>	2.4%
Expulsion	<u>22</u>	3.9%	Belittling/Demeaning (Hate)	<u>1</u>	0.9%	Expulsion	<u>6</u>	2.1%
Holocaust/Genocide/Terrorist- appologetic/justification/ glorification	<u>21</u>	3.8%	Expulsion	<u>1</u>	0.9%	Violence	<u>6</u>	2.1%
Belittling/Demeaning (Hate)	<u>14</u>	2.5%	Discrimination	<u>1</u>	0.9%	General hate/Discrimination	<u>5</u>	1.7%
Disgrace for the country	<u>8</u>	1.4%	Threats	<u>1</u>	0.9%	Denying rights (political/civil)	<u>4</u>	1.4%
						Threats	<u>3</u>	1.1%
						Silencing (hate)	<u>2</u>	0.7%

The results of the content analysis for this target group are presented in Table 13 above. The minorities target group had the highest rate of hate in Romania, at 22.8% and it was second in the UK and Hungary. In this case too, in Romania, the amount of hate was more than double compared to the other countries, however, in terms of incivility the results were much closer especially to Hungary at 13.6% compared to 12.5% for Romania and 10.1% for the UK. While the overall hate levels are not much higher than for the other target groups a noteworthy result in the case of Romania is the proportion of moderated comments, which was lowest for the two target groups with the highest rates of hate, 4.9% for Minorities and 4% for Citizenship, whereas for the Jewish and LGBT target group moderators removed 8.8% and 10.8% of comments. Considering the higher rate of hate, this indicates a different moderation strategy for the first two target groups, i.e. the moderators were less strict than for the other three target groups.

At the general level combining the three sub-target groups, the make-up of hate comments is similar to citizenship and the overall sample, with Insults, Stereotypes and Conspiracy/Threat being the most prominent. However, the order within these categories is different in each country. The most notable difference is that in the case of Romania, insults are the highest group at 22% while both in the UK and Hungary they are the third at 11.9% and 12.9%. In the case of Romania, the majority of these comments were posted at articles about the Roma and Hungarian minorities (minorities/race and minorities/ethnic sub-target groups) and contained derogatory terms such as: “*bozgor*” (an untranslatable word of unknown origin referring to Hungarians presumed to mean without country) and “*Ciora*” for Roma (literally meaning crow in reference to the darker skin, but also referring to criminality stereotypes, *a ciordi* being a slang word for stealing). These could have been easily identified even by untrained moderators or automatic profanity filters. As with the moderated category, this seems to indicate a deliberate decision on the part of the newspapers to allow them. In Hungary and UK, on the other hand, the highest categories are made up of the harder to recognize stereotype, conspiracy/threat type of comments.

A further notable type of comment prominent in the Minorities target group on Romania is the Exclusion/This is our country type of argument which claims ownership of the country for the majority group and disputes the rights or political participation of minorities and even their presence in the country on this basis. This is highest in Romania at 8.6% of hate, reflecting the contested history of the region of Transylvania and the presence of the Hungarian national

minority. In Romania the categories of threats, violence, EMR explicitly calling for violence or even the extermination of minorities, quite clearly fitting under the description of incitement to violence in the Romanian penal code<sup>230</sup>, are also more numerous than for the other target groups. Romania alone has more EMR comments than the other two countries combined. Similarly, for Threats and Violence Romania alone has more than double amount of comments than the other two countries.

There is a striking resemblance in the conspiracy/threat category between the three countries, especially between the UK and Hungary similarly to the citizenship target group. This in part is due to the fact that the Minorities/Religion refers to Islam, which in both cases was seen as a threat by the commenters posting hate comments, again using similar arguments. In the case of Hungary on the articles about the terrorist attacks in France in 2014-15, it is noteworthy that the comments tried to justify terrorism or blame the victims, a criminal act possibly resulting in prison in a number of countries.<sup>231</sup>

### *Minorities sub-target groups*

The division of the results to the sub-groups of the Minorities category is shown in Table 13. As mentioned before the Minorities/Race sub-group in Romania, referring to the country's Roma population, had the highest proportion of hate across the sample. On the other hand, the Minorities/Religion had the lowest amount of hate within the category a 17.5%, and lower than the 22.5% found for the Citizenship group, despite the fact that the majority of people in both categories were Muslims, suggesting that in the case of Romania the amount of hate was not motivated by Islamophobia but perhaps the framing of the refugee issue. In Hungary and the UK, very similar levels of hate were found for the Religion sub-target group, slightly more for the latter. In both cases the hate levels were higher than for the Citizenship category, 12.5% compared to 7.8% for Hungary and 12.6% to 10% for the UK. Looking at the results for national minorities, in the case of the UK 5.3% is amongst the lowest in the sample, but just as in the other cases of low hate groups the amount of incivility is significantly higher, in this case at 15%, three times more, suggesting a stable number of commenters who post problematic

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<sup>230</sup> Art. 369 of the Penal Code (Romania) "The incitement of the public by any means to hate or discrimination against a category of persons is punishable with imprisonment from 6 months to 3 years or with a fine."

<sup>231</sup> For a discussion of the relevant legislation see pp 92-98

content, the division of hate and incivility varying depending on target group and newspaper and country.

Romania			
Top Level Codes	Hate	Incivility	Moderated
Minorities/Race	32.4%	6.6%	7.1%
Minorities/Ethnic	20.3%	16.0%	3.3%
Minorities/Religion	17.5%	16.7%	5.5%
Hungary			
Top Level Codes	Hate	Incivility	Moderated
Minorities/Religion	12.5%	9.2%	0.0%
Minorities/Race	8.8%	16.2%	0.0%
UK			
Top Level Codes	Hate	Incivility	Moderated
Minorities/Religion	12.7%	6.8%	1.8%
Minorities/Race	11.0%	7.7%	3.8%
Minorities/Ethnic	5.3%	15.0%	2.1%

**Table 14. Top level codes for minorities sub-groups**



### *Facebook comment box – real names*

Of the seven newspapers in the sample, only *Evenimentul Zilei* used the Facebook comments box<sup>232</sup> allowing users to use their social media account, including their real name and profile to post comments on the newspaper's website. Anonymity on the internet was pointed out as a significant problem and encouraging factor for incivility by early authors, identification being considered as a potential solution.<sup>233</sup> The comments below were posted to the same article in the Minorities target group and were all coded in the most extreme EMR category and contain some disturbing, explicit and violent calls for genocide posted by users using their real names, photos and profiles apparently without fear of legal consequences, showing that the inhibiting potential of identification or real name policies might be exaggerated or lacking effectiveness entirely:

27. "These crows need to be exterminated!!! SAhort (*orig. SAcurt, distorted scurt-short to include SA- acronym for the nazi organization Sturmabteilung*) and on topic...without other commentaries. I think that a new Hitler needs to be invented, it cannot go on in this way" posted by Toti Andrei on 18 September 2015 to *Evz.ro* Facebook comment box.

28. "this so you also know what your children should expect if we allow the desert monkeys to get in to romania. a good muslim is...fodder in the pigs trough, preferably alive" posted by Jalabert Laur on 18 September 2015 to *Evz.ro* Facebook comment box.

29. "rotten stinky crows that have to be exterminated simple...what's with all that mouthwash?" posted by Alex Grecov on 19 September 2015 to *Evz.ro* Facebook comment box.

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<sup>232</sup> <https://developers.facebook.com/docs/plugins/comments/>

<sup>233</sup> Saul Levmore, "The Internet's Anonymity Problem," in *The Offensive Internet* (Harvard University Press, 2010), 50–67.

## *Hate types and examples - Minorities*

### *Romania – This is our country*

As mentioned before this exclusionary type of argument is more frequent on the minorities target group, especially for national minorities, where it was the second most frequent (12.6% of hate) after insults (21.7% of hate), but can also be found in the race category. A prominent element of the comments below are the expressions of ownership and the superiority of the majority population such as “our country” “our laws” “we bear with” that are based on the claim that the majority is the rightful owner of the country and on that basis can grant and deny rights or even expulse minorities who are not satisfied with their allotment. This argument is a reflection at the level of everyday language of the contradiction in the Constitution of Romania between defining the country as a nation state and the equality of citizens. Article 1 of the Constitution defines Romania as “Sovereign, independent, unitary and indivisible national state”<sup>234</sup> in which “The national sovereignty shall reside within the Romanian people” (article 2) also “The State foundation is laid on the unity of the Romanian people and the solidarity of its citizens.”(article 4) thus explicitly stating that the “people” and “national” cannot be understood in a civic sense and that the people do not cover the whole of the citizenry. As Irina Culic<sup>235</sup> points out this defines the Romanian state “as the state of a nation and for a nation” symbolically excluding minorities, thus providing the basis of the claim for “our country” in the comments below.

In contrast according to Article 4.2, “Romania is the common and indivisible homeland of all its citizens, without any discrimination on account of race, nationality, ethnic origin, language, religion, sex, opinion, political adherence, property or social origin.” However, together with the previous paragraph the constitution places the “Romanian people” in the position of what Dimitrijevic calls “titular nation”<sup>236</sup> who grants some rights to the minorities, expressed in popular language in the second comment below as “too much was allowed to them in **our** country” and as the users see it can also deny it, expressed in the example as “you have to adapt to **our** laws. If you don't like it get lost to the mother, Hungary.” Based on the aforementioned

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<sup>234</sup> Anon. CONSTITUTION OF ROMANIA. *Romania. Chamber of Deputies*. <http://www.cdep.ro/pls/dic/site.page?id=371>. Dimitrijevic (2000), Culic (2002),

<sup>235</sup> Irina Culic, *Căştigătorii : Elita Politică Şi Democratizare În România 1989-2000 - The Winners - Political Elites and Democratization in Romania: 1989 - 2000* (Cluj-Napoca: Limes, 2002).

<sup>236</sup> Nenad Dimitrijević, “Ethno-Nationalized States of Eastern Europe: Is There a Constitutional Alternative?,” *Studies in East European Thought* 54, no. 4 (2002): 245–269. p 252

provisions of the Constitution, Romania fits in the category of 'nationalizing states' defined by Brubaker as:

A state of and for a particular ethnocultural 'core nation' whose language, culture, demographic position, economic welfare, and political hegemony must be protected and promoted by the state a key element is a sense of 'ownership' of the state by a particular 'ethnocultural' nation that is conceived as "distinct from the general citizenry or permanent population as a whole."<sup>237</sup>

In a similar argument Dimitrijevic considers that in Romania as in most other post-communist states, the constitutions implement a concept of "privatized ethnic state" where the state is 'owned' by the 'titular nation' alone, thus creating two types of citizens, "the members of the titular nation" to whom the country rightly belongs and the 'others' i.e. the minorities. The examples below illustrate how the abstract constitutional concepts filter down to the level of nationalist discourse, and their everyday consequence as the basis for hate speech and discrimination. This could also be an explanation for the presence of these type of comments; it could be the case that the newspapers chose to disregard the "common homeland" element of the Constitution and did not consider some of these comments as hate, despite the existing legislation prohibiting all kind of discrimination.

30. "Hey you peasant, I believe you forget that you live in Romania and you have to adapt to our laws. If you don't like it get lost to the mother Hungary which gave you only milk and honey until now" posted by cristeaa on 29 august to *Evenimentul Zilei*. The comment received 48 likes and 41 dislikes.

31. "Very well! they should sing the anthem, and I want to see the flag and national signs all over, the minorities that do not adapt, need to be expelled (in fact all of them should be expelled, but fine) those with anti-romanian discourses a few months in the prison...you will see how beautiful that would be" posted by

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<sup>237</sup> Rogers Brubaker, *Nationalism Reframed: Nationhood and the National Question in the New Europe* (Cambridge [England] ; New York: Cambridge University Press, 1996). , p.103

doctor.doom on 28 May 2014 to *Adevărul*. The comment received 46 likes and 42 dislikes.

In addition to the aforementioned sense of ownership and superiority the comments below also refer to fear and suspicion of Hungarian separatism, an ever-present fixture of Romanian political discourse since Transylvania became part of Romania after the end of World War 1 and raised time-to-time by parties from both end of the political spectrum<sup>239</sup> The second comment refers to the Democratic Alliance of Hungarians from Romania (DAHR – UDMR) which at the time of the comment was part of the government coalition and its political activity regarding minority rights. In this case, the extension of education in Hungarian is seen as a covert attempt to separatism and excessive demand. The comment also refers to the claim according to which the recognition of minority rights is a discrimination of the majority. According to the 2014 survey on discrimination, 17% of the respondents agreed with the statement that minorities have more rights than the majority for the Hungarian and Roma population, 11% respectively 10% also held this view for the almost non-existent German and Jewish minority.<sup>240</sup>

32. “In other words you propose that we should sleep on one ear (orig. *sa ne culcam pe o ureche* -Romanian expression meaning – *ignore the problem*) The Hungarians are capable of such thing, especially if they ally themselves with the Russians. Too cheeky the Hungarians have become in the last few years, too much was allowed to them in our country and now they are running wild (orig. *isi fac de cap* – *they make their head*). More attention for these otherwise we will have to pull. This problem has to be treated with the outmost seriousness” posted by Lus on 22 February to *Evenimentul Zilei*. The comment received 28 likes and 17 dislikes.

33. “That’s what happens when you let the devil in your house. UDMR got in the government again and they started with the claims. Transylvania was, is and will be Romanian territory. You will not get your hands on it whatever you do. But it is shameful to behave

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<sup>239</sup> Roper (2000) pp. 110, 114

<sup>240</sup> Perceptions and attitudes regarding discrimination, (*Perceptii si atitudini privind discriminarea*), p.33

so rudely in a country where you have more rights than the majority population. We Romanians bear with your impertinence and dirty business, but how long you think this will be like that? Even the *mămăligă* (Romanian polenta) pops sometimes” posted by dragos on 11 March to *Evenimentul Zilei*. The comment received 4 likes.

Due to historical reasons Hungarians from Romania are the primary target of ownership type discourse, but it was also found for the other target groups too. The first three comments below are targeted to the Roma minority evidencing the same “ownership” attitude found regarding Hungarians of the majority “granting” citizenship to autochthonous minority communities who again are placed in an inferior position.

34. “OUT WITH THE GIPSIES FROM THE COUNTRY! who the hell gave them citizenship because they have no clue of tying two words together in Romanian.” posted by tornado at 19 January to *Evenimentul Zilei*. The comment received 55 likes and 3 dislikes.

35. “It is the first time, when I hear of Romanian citizens beating roma citizens. It is always the other way round. (...) I have always presented myself as anti-țigan in my posts. I have always incited to racial hate. Still I could not have beaten those gipsy passengers even if they made noise. but I ask you: why don’t you leave the country? Do you think it is convenient for us to be mistaken for you? You think we are not scarred by your demographic increase? Especially that many quality people are leaving the country. By the time you get civilized (if there will be such thing) we will end up with the country being destroyed by you. Those of now. We think that we cannot risk to have patience. (...)” posted by cristian hans on 5 May to *Adevărul*. The comment received 32 likes and 1 dislike.

36. “Please don’t forget Soros the Hungarian jew, who proposed the founding of a “country” of the gipsies in Romania (P.Roman also jewish) and Mugur Isarescu (illuminate) who gave a Government Decision in this sense (of changing the name from gipsy to Rrom).

This way, on Romanian passports ROM (Romanian) was changed to ROU (Roumanie) to avoid the confusion! Hmmm, who benefits from all this confusion and correlation with the authentic Romanian people? (...)” posted by Jean Maurer on 25 May 2015 to *Adevărul.ro*.

A notable element of the second comment (No.32) is that it presents a potential explanation for the levels of hate by mentioning that the user has “always (...) incited to racial hatred” in his posts, i.e. the views expressed are considered acceptable. Similarly, to other comments of this type, it asks the minority to leave the country as they are not civilized and a threat is added for good measure. The second and the third user also refer to a frequent complaint of the nationalists in Romania about being confused with the "uncivilized" Roma and therefore ask for the return of the ethnonym "țigan" (*read as tzigán*) “gipsy.” The term is considered pejorative, insulting and discriminative by Roma organizations, activists as well as international bodies such as the OSCE. Originating in Greek meaning *untouchable, pagan*, the term “*țigan*” is also associated with the Roma slavery that existed in Romania from the middle ages until 1879 when it was synonymous with “slave.”<sup>241</sup> Following a similar initiative from 2010, during the sampling period of this thesis, there was another legislative proposal of a nationalist member of the parliament for the change of the name, but it was rejected. An article by the initiator of the legislation published in *Adevărul* was included in the sample and had the highest amount of hate at 20% in the Minorities target group for that newspaper. Comment No. 32 above is an example from that article and also refers to a conspiracy theory according to which the former prime ministers Petre Roman, allegedly of Jewish origin and Mugur Isarescu, the current governor of the National Bank, allegedly illuminate renamed the minority to Roma as part of a conspiracy to denigrate Romania. While some local elements are added, this is a variation of the anti-semitic conspiracy theory according to which the extension of minority or liberal rights is part of the subversive activities of Jews in order to weaken or undermine a given nation.<sup>242</sup> The last example (No. 34) is a comment of this type coupled with a religiously targeted insult (pig) in order to maximize offensiveness directed at Muslims, that again should have been easily recognizable, yet it was still not removed.

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<sup>241</sup> “Ire of the Țigan,” *The Economist*, December 8, 2010, <https://www.economist.com/eastern-approaches/2010/12/08/ire-of-the-tigan>.

<sup>242</sup> Kofta and Sedek, *Conspiracy stereotypes*; Bergmann, *Anti-semitic attitudes*

37. “Get lost from Romania you wretched muslim dog together with your pig of mahomed” posted by mezinu usa on 9 January to *Evenimentul Zilei*.

### ***Minorities/National – UK (Scotland)***

As detailed in the methodology the Minorities/national sub-target group referred to articles related to Scotland. The most significant event for this target group in the sampling period was the 2014 Independence referendum. However, this was followed by a general election in 2015 and articles published during and after the election campaign about the role of the Scottish National Party in the UK wide politics and a possible second referendum gathered a higher number of comments and dominated the sample. As with the other target groups, insults were the most frequent type of hate, but a significant number of these and also some coded Belittling/Demeaning were directed against first minister Nicola Sturgeon based on her appearance and gender and sometimes also containing sexualising remarks. As it will be detailed in the sub-section about the Gender target group, this is a frequent strategy used to undermine female politicians. The other notable characteristic was the prominence of belittling/demeaning type of comments some of which were also coded superiority/inferiority and contained arguments about Scotland or the Scots being dependent on or taking advantage of the financial generosity of England.

### ***Belittling/Demeaning***

38. “Scotland is a wonderful country but it is totally wasted on the Jocks.” posted by border\_reiver on 5 May 2015 to *The Telegraph*.

39. “It still pays to be a Scotsman, what like that Sturgeon geezer???” posted by english and proud on 26 May 2015 to *Daily Mail*.

40. “As soon as EVEL was announced the Scots began whining! (...)” posted by imnotacrook on 7 May 2015 to *The Guardian*.

41. “I think she fancies him [David Cameron], look of lust on her face!” posted by Jazzman on 8 May 2015 to *Daily Mail*.

42. “nasty little scots woman.” posted by trevor59 on 9 May 2015 to *Daily Mail*. The comment received 26 likes and 0 dislikes.

Although not as prominent as in the case of Romania the This is our country type of argument was also found on articles about Scotland. The examples below probably reflect the use of this argument in the election campaign of the Conservative party in 2015, which warned voters about the dangers of a potential Labour - Scottish National Party coalition. The conservative campaign pre-emptively questioned the legitimacy of the SNP to decide the governing party of the UK, but instead of historical-constitutional arguments, it relied mostly on economic and financial issues.

43. (...)The 60 million south of the border will never allow a few communist Scots to destroy our country. How about organising one million English protesters travelling to Glasgow for a mass protest march? And if there is any trouble from the jocks bring it on....” posted by solaquapure on 6 May 2015 to *The Telegraph*.

44. “Any European can attend Scottish university for free - EXCEPT if you are from England! Time for a referendum for the English, Scottish and Northern Irish! Kick em out on their own, before they purposely destroy our country out of spite.” Posted by w..h on 15 July 2015 to *Daily Mail*.

45. “I urge every conservative, in every seat where the UKIP candidate has a good chance to win, to vote tactically for the UKIP candidate. We must stop the mad Scots from destroying our country at all costs.” Posted by solaquapure on 6 May 2015 to *The Telegraph*.

### ***Minority Extermination/Murder/Rape (EMR)***

Similarly, to the other target groups, there were a number of comments coded EMR for Minorities in all countries. As with the other groups, the number of these comments were generally low with only 8 such comments in Hungary, 12 in the UK, but 24 in Romania. In the UK, with two exceptions from the *Daily Mail*, the other comments came from *The Telegraph*,



and they could be found on articles for all minority sub-groups. A particularity of the comments in this category in the UK and Hungary was that some of them were not directed against the minority featured in the article but to politicians or political opponents. In Hungary, the comments in this category with one exception were posted on articles about the 2015 terror attacks against the *Charlie Hebdo* magazine and were also placed into the terrorism justification/apology category as they were providing justification for the murders. As illustrated below, there are some notable similarities between the UK and Romania in the wish of expelling troublesome minorities who should be “dealt with.” The first two UK (No. 48-49) and both Romanian comments were also coded as conspiracy/threat presenting genocide as a solution or response to a threat posed by the minorities. In the case of the second comment (No. 47) in Romania the topic of the Jewish conspiracy also appears, repeating typical theories of Jewish control of America and imposing minority rights as part of their global conspiracy. The example comment also contains illegal glorification of Ion Antonescu, coupled with a generalization that could be considered insulting by any decent Romanian. As detailed previously in this section and in the article-level analysis, the Romanian comments in this target group were particularly violent, especially when directed at the Roma minority. The last two Hungarian comments (No. 55-56) are rare examples of only four of this type from *Népszabadság* which overall had a very effective moderation resulting in the second lowest hate proportion after *The Guardian*. The example is even more surprising as it contained an obvious Nazi reference, a hate slogan in English and the obscene insult “*köcsög*” translated as bugger, generally used in the sense of homosexual male.

### *Romania Examples*

46. “I can hardly wait for the Hungarians to start a war with us. I want to send them across the border legally. Well...those that get away, but maybe some of them run faster than me and get lucky. I have still not forgotten the knife stabbed in our sportsman’s heart by the Hungarians (Romanian basketball player Marian Cozma killed in a bar fight in Veszprem, Hungary) and the fact that in front of me they took down the stamps from the store display and told me they don’t have any because I did not speak Hungarian” posted by Yuri Malanin on 20 February to *Evenimentul Zilei*.

47. “Only a WAR can let romania to escape of the GIPSIES!!! the judaized and satanised america has established a GIPSY DICTATORSHIP in romania in the last 25 years!!! The FILTHY JEWS should not FORGET that in the SOUL OF EVERY ROMANIAN LIES AN ANTONESCU – MARSHAL ANTONESCU THE HERO OF ROMANIANS !!!” posted by Dolph Lundgren on 20 July to *Evenimentul Zilei*. The comment received 6 likes and 0 dislikes.

### *UK Examples*

48. “What's your solution? Cower in the corner until the demographics overwhelm us? Better we come out fighting and deal with the threat permanently. There are no nice options left.” posted by lancastrian1 on 3 July 2015 to *The Telegraph*.

49. “So be it. Better that the public sees that their 'muslim fellow countrymen' are nothing of the sort, but an evergrowing threat that should be dealt with while the numbers still favour us.” posted by Dave\_Bould on 4 July 2015 to *The Telegraph*.

50. “That statement alone qualifies as treason in my view. If I had my way he would swing for it alongside B'liar.” posted by Furious Hawk on 4 July 2015 on *The Telegraph*. The comment received 43 likes and 0 dislikes.

51. “5 million votes for 1 seat, that could start a revolution, bring back the guillotine.” posted by Roger Brown on 5 May 2015 to *The Telegraph*.

52. “I sympathise with the police - the violent rioting just shows what kind of people they have to deal doth on a daily basis... No wonder they feel the need to shoot” posted by britishbandogge on 25 November 2014 to *Daily Mail*. The comment received 45 likes and 14 dislikes.

53. “Atomic bomb Isis stronghold areas - innocents will have to lose their lives, but in the bigger picture we have no other choice !!!” posted by Nickster on 14 November 2015 to *Daily Mail*. The comment received 153 likes and 52 dislikes.

### *Hungary Examples*

54. “I don’t feel sorry for these “journalists” one bit! They finally got it in their face what they deserved! Was it a bit too strong? Maybe exaggerated? They were also not weak with their front-pages...(E.g. the one where the Son, the Father from behind... with a triangle in his butt: Saint Esprit for those needing help)” posted by pepe on 7 January 2015 to *Magyar Nemzet Online*.

55. “Hell Istvan (person mentioned in the article) says “We should accept everyone who is fleeing these terrorists” Just so their children and grandchildren to become terrorists. Si vis pacem, para bellum (Latin: If you want peace prepare for war). Europe could very well get to the idea that a precondition of defeating Islamism is the neutralization of those who think like you. I’m just saying. Historia est magistra vitae. It will be very tough” posted by Balang to *Népszabadság Online*.

56. “They should have caused explosions in the dirty uSSa, we are suffering the consequences of the war aggressor and the CIA-s stirring of the shit. Bugger terrorist, better do on more WTC and then I will even open champagne. DEATH THE USA!!!!!!“ posted by Halott jenki, jó jenki (Dead yankee, good yankee) to *Népszabadság Online*.

### **Target Group 3: Jewish**

The comments in the Jewish target group were identified by searching for articles containing keywords related to antisemitism, Israel, holocaust. During the sampling period in April 2015,

armed conflict erupted between Israel and Hamas in Gaza. Therefore the Gaza war became a prominent topic. As with the other target groups the articles were placed in the sample in the order of comments; therefore the composition of the article/topic sample reflects user's interest as expressed by the number of comments. In the case of the UK, especially in the *Daily Mail* and *The Guardian*, this resulted in more comments on the (at the time current) topic of Gaza war. In *The Telegraph* general issues around antisemitism gathered more comments, therefore making up a larger part of the sample. On the other hand, due to historical reasons, in Romania and Hungary, the articles for this target group were mostly on the topic of current and historical antisemitism, the Holocaust and the countries role in it. In these two countries, only the penultimate article in terms of the number of comments in the MNO sample was about the current event of the terrorist attack against a Jewish supermarket in Paris with only 54 comments.

Holocaust denial and minimization of crimes against humanity is a criminal offence in Romania and Hungary, punishable by imprisonment<sup>244</sup>. In addition in Romania, the glorification of war criminals and persons convicted of crimes against humanity is also a criminal offence, the Romanian legislation also containing a specification that denying or minimizing the role of Romania in the Holocaust is also punishable.<sup>245</sup> As it will be discussed in the interview chapter sites sometimes disable comments on highly contentious topics due to potential legal liability. This might have been the case at *Népszabadság* in Hungary where no articles with comments could be identified for this target group. Presumably in the case of *Magyar Nemzet* too, moderators monitored the comments more closely as only 2.7% comments could be identified as hate, making this the target group with the lowest amount of hate across the sample. A stronger moderation for this target group is also suggested by the fact that there is no such visible difference in the levels of incivility: 9.4% in Hungary, 9.9% in the UK and 10.4% in Romania. In the case of the UK newspapers, where moderation was visible, the Jewish target group had the highest rate of moderated comments at 7.9% compared to 3.6% for Citizenship, 2.6% for LGBT, 2.5% for Minorities and 2.2% for Gender. On the other hand, in Romania, there was no such notable difference between the target groups: 8.8% for Jewish, 10.8% for LGTB, 9.9% Minorities.

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<sup>244</sup> Michael Whine, "Expanding Holocaust Denial and Legislation Against It," in *Extreme Speech and Democracy*, ed. Ivan Hare and James Weinstein (Oxford University Press, 2009), 538–556, accessed September 21, 2018, <http://www.oxfordscholarship.com/view/10.1093/acprof:oso/9780199548781.001.0001/acprof-9780199548781-chapter-27>.

<sup>245</sup> Government Emergency Order (OUG) – Romania No. 31/2002

Table 15 shows the results of the content analysis for the top-level codes and hate types and incivility for the Jewish target group in the three countries. As with the other target groups, newspapers in Romania had the highest level of hate at 20.5%, but an exceptionally low level was found in Hungary, while in the UK at 6.3% of hate, this was the second lowest group after the 5.9% found for LGTB. Looking at sub-codes, for Romania and the UK, the order of the first three highest sub-codes within hate is similar to the overall sample and the other target groups. A notable difference can be found in the next three categories, in the case of Romania comprising the three sub-codes related to Holocaust, all of which as mentioned before, refer to content that could result in criminal charges. In the case of Hungary of the very few hate comments that got through the moderators of *Magyar Nemzet*, the majority were also in the Holocaust denial category which just as in Romania could result in criminal charges.

Romania			Hungary			UK		
Top Level Codes	Count	Percent	Top Level Codes	Count	Percent	Top Level Codes	Count	Percent
Hate	<u>189</u>	20.5%	Hate	<u>13</u>	2.7%	Hate	<u>111</u>	6.5%
Incivility	<u>96</u>	10.4%	Incivility	<u>45</u>	9.4%	Incivility	<u>163</u>	9.6%
Legit	<u>554</u>	60.2%	Legit	<u>419</u>	87.8%	Legit	<u>1,289</u>	75.8%
Moderated	<u>81</u>	8.8%				Moderated	<u>137</u>	8.1%

**Table 15a. Top-level codes for the Jewish target group**

**Table 15b. Sub-codes for the Jewish target group**

Romania			Hungary			UK		
Hate Subcode	Count	Percent	Hate Subcode	Count	Percent	Hate Subcode	Count	Percent
Conspiracy/Foreign interests/Enemies/Threat	<u>82</u>	24.5%	Holocaust/Genocide/Terrorism - apologetic/justification/ glorification	<u>4</u>	30.8%	Stereotypes/Generalization/P rejudice	<u>53</u>	29.8%
Stereotypes/Generalization/P rejudice	<u>42</u>	12.5%	Holocaust/Genocide denial/minimization	<u>2</u>	15.4%	Conspiracy/Foreign interests/Enemies/Threat	<u>36</u>	20.2%
Insults (hate)	<u>38</u>	11.3%	Holocaust/Genocide/Terrorism - blame shifting	<u>2</u>	15.4%	Insults (hate)	<u>26</u>	14.6%
Holocaust/Genocide/Terrorism - blame shifting	<u>30</u>	9.0%	Conspiracy/Foreign interests/Enemies/Threat	<u>2</u>	15.4%	Holocaust/Genocide/Terrorism - apologetic/justification/ glorification	<u>16</u>	9.0%
Holocaust/Genocide/Terrorism - apologetic/justification/ glorification	<u>29</u>	8.7%	Insults (hate)	<u>1</u>	7.7%	Extermination/Murder/Rape	<u>7</u>	3.9%
Holocaust/Genocide denial/minimization	<u>28</u>	8.4%	Stereotypes/Generalization/P rejudice	<u>1</u>	7.7%	Belittling/Demeaning (Hate)	<u>6</u>	3.4%
Discrimination	<u>12</u>	3.6%	Belittling/Demeaning (Hate)	<u>1</u>	7.7%	Superiority/Inferiority/Norm ality	<u>5</u>	2.8%
Silencing (hate)	<u>10</u>	3.0%				Animals/Sub-human /Pest	<u>5</u>	2.8%
Religious extremism	<u>9</u>	2.7%				Holocaust/Genocide denial/minimization	<u>4</u>	2.3%
Exclusion/This is our country	<u>9</u>	2.7%				Holocaust/Genocide/Terrorism - blame shifting	<u>4</u>	2.3%
Extermination/Murder/Rape	<u>9</u>	2.7%				Exclusion/This is our country	<u>4</u>	2.3%
History	<u>8</u>	2.4%				Expulsion	<u>3</u>	1.7%
Belittling/Demeaning (Hate)	<u>8</u>	2.4%						

Surprisingly in the case of the UK, the 8.9% of comments in the Holocaust/Genocide/Terrorism apologetic category are comments that seek to justify or glorify terrorist acts against Israel and Israeli citizens such as the following example from the *Daily Mail*:

57. “This is happening because the Palestinians are fed up and have had to resort to these means because the world has been watching since 1948 as the Israeli steal Palestinian land and homes and methodically eradicate the memory of them from the land they take and does nothing. Israel is the problem. Israel has always been the problem. Israel is causing most of the problems in the Mideast and innocents are dying because of it.” posted by tpvero on 24 November 2015 to the *Dailymail.com*.

On the other hand, the majority of comments in the Extermination/Murder/Rape category seek to justify the killings of Palestinians by the Israeli Defense Forces and their elimination as a nation such as the following user contribution also from the *Daily Mail*:

58. “(...)There is a possibility that if Israel sets up an automatic retaliation system, with no Israeli hands on the button needed, that the people of Gaza will blame Hamas for the resulting damage, rather than Israel (it doesn't really make sense, but it's human nature). Failing that, what's needed is a prolonged campaign to rid both sides of the religiously fanatic agitators that keep this conflict going, by whatever means necessary. Forced birth control for the populations that are growing the fastest will also be necessary. When dealing with savagery, the principles of western democracy need to be put on hold.” posted by P\_L on 8 August 2014 to the *Daily Mail*.

As mentioned before, the number of moderated comments in the UK and the low proportion of hate in Hungary suggest a stricter than usual moderation for articles in this target group. In the case of Romania on the other hand, the comments in the insult category also suggest some negligent approach to moderation as 11 of the 38 comments in this group contained the racially disparaging word “jidán”, clearly recognizable as a racially insulting epithet, which could have also been easily prevented by an automatic profanity filter. There was an additional comment where the same word appeared as “j,i,d,a,n” using the most common attempt to bypass the automatic moderation (which, as the results show, turned out not to be necessary). There was

no comment in the insult category in Hungary. In the UK similarly to the EMR category the majority of the insults were directed against the Palestinians referred to as “barbaric so called Palestinians”, “muslim barbarians”, “Muzzies”, “Satan worshipers”, “pedophile Mohamedans” while the insults against Jewish people referred more to the state of Israel, such as “TThe vomiting of the state of israel on the people of Palestine”. A few vulgar insults directed against Britain presented below (comments No. 60-61) and posted to the same article were also identified, comment No. 61 also contained dehumanizing epithets and as such was coded as Animals/Subhuman/Pests too. As with Romania, these comments contained obvious swearwords, vulgarities and group-based insults, but surprisingly were not stopped by an automatic profanity filter or by moderators.

59. “On the hour out pops Hitler; on the half-hour the Holocaust Survivors go round and round. Is that the time? Must dash!” posted by Laurel Grove on 13 November 2014 to *The Guardian*.

60. “It was you fukkkking British assholes that helped make Israel in the first place! The middle east now has never ending melodrama coming out of the holyland, no thanks to you reet@rds.” posted by Campus Maximus on 2 September 2014 to *The Telegraph*.

61. “Britain hasn't lost faith in Israel. Our pathetic spineless government is still licking dirty oily Arab dick. A stupid Fakestinian attempted to wave their flag at one of our football matches, the entire crowd chanted 'wanker' until the dirty Mohammedan vermin was escorted out of the stadium.” posted by Ritch Ritchloui on 4 eptember 2014 to *The Telegraph*.

### ***Holocaust denial in Romania***

As mentioned before, Romania has a strict legislation against Holocaust denial and glorification of war criminals. However, in the three sub-codes regarding holocaust denial, there are 87 comments that potentially could lead to prison sentences for the users posting them. The examples below present different cases of holocaust denial and the narratives used in these types of arguments, the main common element being that they are based on conspiracy



theories. As Lasson put it “Holocaust denial is a form of anti-Semitism, its adherents are essentially conspiracy theorists.”<sup>246</sup> The first two example comments, coded Holocaust denial minimization were posted by the same user to *Adevărul* at a distance of seven months in 2015 showing that the user felt confident enough to return to the site to express the same views. It is also notable that the second comment is a bit more brazen, as the user even used the “*Arbeit macht frei*” slogan placed at the entrance of the Nazi extermination camps without concern for moderation or legal action, and the language became more extreme, more vulgar and contained more insults. The first comment (No. 62) includes the frequent anti-Semitic conspiracy theory that the Holocaust is an invention in order to obtain reparations<sup>247</sup> made even more explicit with the term “Holocash” and the also frequent claim that the deaths that did happen were not the result of a deliberate action. The second comment (No. 63) is expressing the anti-Semite argument that Jewish people are to blame for anti-Semitism,<sup>248</sup> a claim so typical that it is included in the Anti-Defamation League’s (ADL) global questionnaire on anti-Semitism, according to which in 2015 this view was shared by 21% of Romanian respondents.<sup>249</sup> In this case, the comment claims that the Jews exploit others as “leeches” which also puts it in the animals/dehumanizing category, and again disputes the Holocaust reducing it to “tearjerking trombones.” Additionally, the use of the Nazi slogan placed at the entrance of concentration camps coupled with the dehumanizing insult could be interpreted as a call for the Jewish people to be exterminated. The third comment (No.64) is similar to the first two, expressed in more civil language and tries to discredit the Holocaust by making a factual claim about objects found in Auschwitz again a typical trope of anti-Semite holocaust denial discourse.<sup>250</sup> The fourth comment (No. 65) is also written in uncivil capitals, denoting shouting and is an example of Holocaust/blame shifting combined with Holocaust/Justification. It claims the existence of a Jewish conspiracy presumably Zionism and using the Balfour declaration as a justification for Hitler’s actions, probably referring to the “stab in the back myth” according to which Jews caused Germany’s loss in World War I and the War itself<sup>251</sup> in this case in order to obtain the land of Palestine. The “rusophile” is probably a reference to the conspiracy theory of Judeo-Communism which will be detailed below.

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<sup>246</sup> Kenneth Lasson, “Defending Truth: Legal and Psychological Aspects of Holocaust Denial,” *Current Psychology* 26, no. 3–4 (December 3, 2007): 223–266. p. 257

<sup>247</sup> Werner Bergmann, “Anti-Semitic Attitudes in Europe: A Comparative Perspective,” *Journal of Social Issues* 64, no. 2 (June 1, 2008): 343–362.

<sup>248</sup>248 Question 11 in the ADL questionnaire on anti-semitism “People hate Jews because of the way Jews behave.”

<sup>249</sup> ADL, global index, Romania

<sup>250</sup> Kenneth Lasson, “Defending Truth: Legal and Psychological Aspects of Holocaust Denial,” *Current Psychology* 26, no. 3–4 (December 3, 2007): 223–266.

<sup>251</sup> Norman Cohn, *Warrant for Genocide: The Myth of the Jewish World Conspiracy and the Protocols of the Elders of Zion*, New ed. (London: Serif, 2006) , pp.145-149

62. “If the germans, wanted to kill the jidans they would have shot them in the mouth on the spot, not taking them into lagers to support them with food. The story with the Holocash is an EGREGIOUS LIE, meant to squeeze money out of the nations.” posted by commikilla on 28 January 2015 to *Adevărul*.

63. “Oh the poor jidans. They cry for pity again. What the hell does all the world have against them, that they “oppress” them so much? GET STUFFED, YO FILTHY/ROTTEN JIDANS (orig. romanian HAI SICTIR BEY JIDANI IMPUTITI) WITH YOUR TEARJERKING TROMBONES (approx. meaning hogwash) ARBEIT MACHt FREI, YOU LEECHES” posted by commikilla on 7 August 2015 to *Adevărul*.

64. “The Holocaust, a universal bluff. Go to Auschwitz, to see in real life that amongst the confiscated articles, oh my God, from those that were about to enter the gas chambers, there was artificial hair and other objects of the same nature. Everything is a historical bluff, on planetary scale, set up and exploited multiple times for decades by the ‘chosen people’” posted by red wall on 08 September to *Evenimentul Zilei*.

65. “READ THE BALFOUR DECLARATION AND YOU WILL UNDERSTAND WHY WAS ADOLF THE WAY HE WAS. OR BENJAMIN FREEDMAN WHO WILL ELUMINATE THE MINDS OF THOSE WHO STILL BELIEVE IN THE RUSOPHILE TALES OR THE “INNOCENT” JEWISH ETHNICS. (...)” posted by GICA CONTRA on 25 April to *Evenimentul Zilei*.

While the previous comments referred to Holocaust in general, the two examples below seek to justify the actions and glorify Romania’s wartime leader Marshal Ion Antonescu, convicted

and executed for war crimes, whose glorification is explicitly forbidden in the relevant Romanian legislation.<sup>252</sup>

66. “Ludwig (*another commenter*), yes man... there are still some who venerate Antonescu... and many at that...all Romanians... with Romanian blood, will venerate Antonescu.After all he wanted the good of Romanians...what Romanian can condemn him for this?He did not go in israel to occupy their country, to enslave those from there, he did not bring the “roma” with ships as slaves here...neither the hungarians...so he had all the right to set the rules in his own country.When you enter a house you take off your shoes and you only sit at the table if they tell you.” posted by aurel aurel on 28 january 2015 to *Adevărul*.

67. “Marshal Antonescu was a great patriot.” posted by Aron Deleanu on 28 January 2015 to *Adevărul*.

While the two comments listed above are clearly against the current legislation, this is less evident in comment No. 68 below, which is an example of Holocaust/blame shifting. It is built on the aforementioned Judeo-Communism conspiracy theory according to which Jews caused communism. This is particularly frequent in Romania, a theory also shared by some politicians and historians, and is based on the fact that some of the first communist leaders installed at the end of the World War 2 were of Jewish origin. The argument seeks to retroactively minimize Romania's responsibility for the Holocaust based on the claim that Jews have also committed genocide by installing communism; therefore Romania should not be held responsible for the Holocaust. Connected to this type of argument the aforementioned Ion Antonescu is also frequently portrayed as an anti-communist hero.<sup>253</sup>

68. “Romania’s criminal balance” – HOW ABOUT THE HYPER-CRIMINAL BALANCE of THE JAILS WHERE IN WHICH YOU HAVE EXTERMINATED HUNDREDS OF THOUSANDS OF

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252 OUG 31/2002, Art 5. and Art.6.1 Law 217/2015 (Romania)

<sup>253</sup>Werner Bergmann, “Anti-Semitic Attitudes in Europe: A Comparative Perspective,” *Journal of Social Issues* 64, no. 2 (June 1, 2008): 343–362., p.357

ROMANIANS, AFTER YOU SET UP CAMP HERE STRAIGHT UNDER THE PANTIES OF hannah robinsohn (ana pauker)? (Ana Pauker - *jewish-romanian communist leader, who played a major role in the installation of communism in Romania*) Who was yo, the POPULAR assessor who has sent in EXTERMINATION lagers the Romanians who opposed the SOVIET OCCUPATION... alexandra sidorovici – the wife of saul brukner .. (communist leaders of jewish origin) (...) GOD IS PUNISHING YOU but you DON'T notice ... and still keep to thievery” posted by Cristi Nicolae on 28 January 2015 to *Adevărul*.

### *Jewish – Conspiracy*

The comments coded conspiracy for this target group made up the largest category of hate in Romania and the second largest in the UK. In Romania, in line with the country’s history of antisemitism, conspiracy codes were highest for this target group. According to Kofka and Sedek, “conspiracy theories are a core element of anti-Semitism”<sup>254</sup>: they “portray outgroups as “collective enemies” set up to dominate in-groups through subversive (hidden) activities” (p.41) As the authors point out, while they are one type of stereotype, contrary to trait laden stereotypes which attribute certain negative characteristics to members of a group and focus more on issues such as access to resources, jobs and are used to justify hate against individuals, conspiracy stereotypes present the entire out-group “jews as a whole” as a “dangerous potent and deceptive enemy.” They serve to “manage the past, interpret current political and economic events, mobilize collective actions” and most importantly to provide “moral justification and cruelty toward out-groupers.”(p.43) The most harmful of these is the compendium of anti-Semite conspiracy theories gathered in the Protocols of the Elders of Sion, which played a critical role in the Nazi ideology leading to Holocaust. As Aaronovitch puts it, there is "a straight line ran from the Protocols to the precepts of the Nazis and from there to the attempted murder of a race.”<sup>255</sup>

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<sup>254</sup> MIROSLAW KOFTA and GRZEGORZ SEDEK, "Conspiracy Stereotypes of Jews During Systemic Transformation in Poland," *International Journal of Sociology* 35, no. 1 (April 1, 2005): 40–64. P.

<sup>255</sup> David Aaronovitch, *Voodoo Histories: The Role of the Conspiracy Theory in Shaping Modern History* (New York: Riverhead Books, 2014). p.75

Even though the users do not refer to them as such, the comments below reproduce conspiracy stereotypes largely based on the Protocols such as the Jewish control of world politics and finance, Jewish control and manipulation of the media sometimes combined with holocaust denial claiming that a Jewish conspiracy created anti-Semitism in self-victimization.<sup>256</sup> Another claim observed in all countries was that multiculturalism is the result of a Jewish conspiracy to undermine western nation states. A typical element of anti-Semite conspiracy theories is the accusation of extreme in-group solidarity of Jews coupled with complete disregard for out-groups<sup>257</sup> which appeared in relation to the refugee crisis was also claimed to be part of some Jewish conspiracy. These arguments occurred not just on articles in the Jewish target group but, as shown with the examples in the previous section, in the case of Hungary (comment No.22) they appeared in the citizenship target group too.

### *UK Examples*

#### Jewish control of the media:

69. "(...)When the powers that be get a whiff of anti semitism, the "offenders" buckle and apologise with a swiftness. Is this because the Holocaust was a white on white crime? Serious question. Because you can be damn sure that most of the nowadays trashy rap music has somebody Jewish holding the reins. Not anti Jewish, just stating the Hollywood/Israel/Zionist connections that is prevalent in the industry (don't mean me no nevermind, I know that juggernaut is too powerful for my bangle waving "rage" to counteract) whilst carpetbagging off of others culture." posted by fullofsense on 13 November 2014 to *The Guardian*.

70. "I forgot to add that the New York Times is owned by a jewish American - need I say more!" posted by roberto79 on 8 August 2014 to *The Telegraph*.

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<sup>256</sup> Werner Bergmann, "Anti-Semitic Attitudes in Europe: A Comparative Perspective," *Journal of Social Issues* 64, no. 2 (June 1, 2008): 343–362; ADL Antisemitism Index - "About the Survey/Methodology," *ADL Global 100*, accessed September 18, 2018, <http://global100.adl.org/about#aboutAntiIndex>.

<sup>257</sup> Kofta and Sedek, *Conspiracy stereotypes*, p.42

Ingroup solidarity- disregard for others (Kofta and Sedek):

71. “I'd probably be more receptive to the idea of an ethno-nationalist jewish nation if it weren't for the fact that every zionist in the West seems to do nothing but push for 'multiculturalism' and 'diversity' over here whilst stressing how important it is for Israel to remain jewish.” Posted by riteinurgabber on 18 August 2014 to *The Telegraph*.

Jews causing wars - can be traced back to the Protocols, was already used after World War 1 by the Nazis, who also claimed the the Jews were behind both wars.<sup>258</sup>

72. “Israel refuses to live in peace with it's neighbors. There is no profit in peace. They make billions from war without end.” Posted by Tim Crowley on 21 January 2015 to *Daily Mail*.

### *Romania examples*

Jewish control of global finance and media, but also the global finance system is itself is a Jewish scam; Jews are to blame for anti-Semitism.<sup>259</sup>

73. “The jews have one thing that we Romanians don't and don't even have the right to have it!:The money factory! They have the right that we do not, and print billions of dollars and euro without any cover and with these papers buy everything, people, countries, etc. They are not smarter, they are just some well organized fraudsters! And that is why the entire world hates them” posted by ionisus ionisus on 28 May 2014 to *Adevărul*.

74. “(...) Finally a journalist that has the courage to call things on their name... Hats off, Cosmin. The whole world is fed up with this masquerade called anti-semitism propagated to the point of

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<sup>258</sup> Cohn, *Warrant for Genocide*

<sup>259</sup> ADL, *Global 100*

dementia by the jewish media which has its hand all the media in the west and not only that, all the education programmes especially history, which they have rewritten as it was convenient to them. I did not have the slightest suspicion that the great uprising of 1907 was anti-Jews. What got me suspicious was the brutality by which it was crushed...it is their *jidan* style without the least mercy for the *goims* (everything that is not jewish). (...)" posted by Popescu Escu on 8 August 2015 to *Adevărul*.

Conspiracy of global Jewish control, Jews are also to blame for the radicalization of Muslims. The use of the word "parasitized" is also noteworthy, as mentioned in the methodology chapter dehumanizing discourse such as this is used in hate campaigns leading up to the Holocaust and the Ruanda genocide.<sup>260</sup> The comment also refers to legislation banning hate speech and holocaust denial as part of the effort of the Jews to maintain their conspiracies secret.

75. "Is this your argument? They have to be tolerated, because they are of assistance against the other hooligans? Maybe it is right because of them that the muslims have radicalized! And in Europe all of politics is parasited totally by them. Not to mention the usa... In France as soon as Sarkozy came to power, what was his first move? To subjugate France! He put it into NATO which is american "property" and america is led by the jews even though they represent less than 1% of the population... Well, why shouldn't we say things as they are? They made laws of "fist in mouth" type in the entire europe? You can speak about everything but if you speak about them – BLASPHEMY!!! Until when?" posted by Mihai Ghici on 27 September 2014 to *Adevărul*.

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<sup>260</sup> Catharine A. MacKinnon, "Prosecutor V. Nahimana, Barayagwiza, & Ngeze. Case No. ICTR 99-52-A," *The American Journal of International Law* 103, no. 1 (2009): 97–103.

### *Hungary Examples*

The theme of the global “israel lobby” controlling the USA, and in comment No.66 the theme of in-group solidarity and disregard for others mentioned at the UK examples and similarly to comment No.54 from Romania a probable reference to the Balfour declaration.

76. “Obama is not able to exercise independent foreign policy, that is controlled by the israel lobby. Walt and Meirsheimer / doctors of political sciences / The Israel lobby. Richard Wikerson- who was the personal secretary of Collin Powell, and saw everything from inside – confirmed this” posted by illes on 9 August 2014 to *Magyar Nemzet Online*.

77. “Of the palestinians robbed by their homeland since decades, and butchered why is there no worldwide commemoration? A nation took itself the right, based on a scribbling of questionable credibility, in collusion with the leading powers of the world to take and kill the Palestinians. Because they want that land, that was promised to them. This, on the other hand, is humanist act.” Posted by EaP on 28 May 2015 to *Magyar Nemzet Online*.



## Target Group 4: LGBT

The attitudes towards LGBT target groups are markedly different in the two Central-European countries compared to the UK. In Romania homosexuality was decriminalized only in 2001 at the pressure of the European Union, while in Hungary large police units were still necessary in order to protect the participants of the Budapest Pride marches.<sup>261</sup> The most significant events for this target group for the sampling period in Europe that were reflected in all three countries was the referendum legalizing gay marriage in the Republic of Ireland (topic code Irish referendum) and the winning of the Eurovision song contest by Conchita Wurst. Both events were covered very differently in the two UK and the other countries. While in the UK newspapers, including the conservative *The Telegraph*, the Irish referendum was generally reported in a positive tone, the Romanian and Hungarian newspapers framed it as a defeat for the Catholic Church and Christian values in general. While legal in the UK, same-sex marriage is not legal in Hungary and Romania. There is a form of registered partnership available in Hungary, but Romania does not even recognize registered partnerships or same-sex marriages from other EU countries. In Romania at the time of the sampling there was a nation-wide signature-gathering campaign for a referendum and change in the constitution in the opposite sense to Ireland, defining marriage as a union between one man and one woman<sup>262</sup>, a definition already present in the Constitution of Hungary.

Romania			Hungary			UK		
Top Level Codes	Count	Percent	Top Level Codes	Count	Percent	Top Level Codes	Count	Percent
Hate	<u>74</u>	12.3%	Hate	<u>72</u>	12.1%	Hate	<u>106</u>	5.9%
Incivility	<u>35</u>	5.8%	Incivility	<u>70</u>	11.7%	Incivility	<u>163</u>	9.1%
Legit	<u>426</u>	71.0%	Legit	<u>454</u>	76.2%	Legit	<u>1,484</u>	82.4%
Moderated	<u>65</u>	10.8%				Moderated	<u>47</u>	2.6%

**Table 16a. Top level codes for LGTB target group**

<sup>261</sup> Jennifer Walker, "In Budapest, LGBT Pride Behind the Police Barricades," *Vice*, July 12, 2015, [https://www.vice.com/en\\_uk/article/wd7nkq/in-budapest-lgbt-pride-behind-the-police-barricades-235](https://www.vice.com/en_uk/article/wd7nkq/in-budapest-lgbt-pride-behind-the-police-barricades-235).

<sup>262</sup> Claudia Ciobanu, "Romania 'turns Illiberal' with Moves against Gay Marriage," *POLITICO*, last modified October 6, 2017, accessed September 3, 2018, <https://www.politico.eu/article/romania-gay-marriage-turns-illiberal-with-moves-against/>.

**Table 16b. Subcodes for LGTB target group**

Romania			Hungary			UK		
Hate Subcode	Count	Percent	Hate Subcode	Count	Percent	Hate Subcode	Count	Percent
Superiority/Inferiority/Normality	<u>35</u>	24.0%	Insults (hate)	<u>21</u>	20.0%	Conspiracy/Foreign interests/Enemies/Threat	<u>37</u>	22.3%
Insults (hate)	<u>21</u>	14.4%	Conspiracy/Foreign interests/Enemies/Threat	<u>15</u>	14.3%	Insults (hate)	<u>25</u>	15.1%
Homosexuality-Pedophilia	<u>20</u>	13.7%	Superiority/Inferiority/Normality	<u>12</u>	11.4%	Belittling/Demeaning (Hate)	<u>17</u>	10.2%
Stereotypes/Generalization/Prejudice	<u>14</u>	9.6%	Homosexuality-Pedophilia	<u>11</u>	10.5%	Stereotypes/Generalization/Prejudice	<u>17</u>	10.2%
Religious extremism	<u>10</u>	6.9%	Denying rights (political/civil)	<u>9</u>	8.6%	Homosexuality-Pedophilia	<u>15</u>	9.0%
Denying rights (political/civil)	<u>10</u>	6.9%	Stereotypes/Generalization/Prejudice	<u>9</u>	8.6%	Discrimination	<u>12</u>	7.2%
Discrimination	<u>10</u>	6.9%	Belittling/Demeaning (Hate)	<u>7</u>	6.7%	Superiority/Inferiority/Normality	<u>11</u>	6.6%
Animals/Sub-human /Pest	<u>7</u>	5.0%	Discrimination	<u>6</u>	5.7%	Religious extremism	<u>9</u>	5.4%
Expulsion	<u>5</u>	3.4%	Religious extremism	<u>5</u>	4.8%	Denying rights (political/civil)	<u>8</u>	4.8%
Exclusion/This is our country	<u>3</u>	2.1%	Animals/Sub-human /Pest	<u>4</u>	3.8%	Silencing (hate)	<u>6</u>	3.6%
Silencing (hate)	<u>3</u>	2.1%	Silencing (hate)	<u>3</u>	2.9%	Extermination/Murder/Rape	<u>3</u>	1.8%
Belittling/Demeaning (Hate)	<u>3</u>	2.1%	Threats	<u>1</u>	0.9%	Violence	<u>2</u>	1.2%
Conspiracy/Foreign interests/Enemies/Threat	<u>2</u>	1.4%	Extermination/Murder/Rape	<u>1</u>	0.9%	Animals/Sub-human /Pest	<u>2</u>	1.2%
Violence	<u>1</u>	0.7%						
Extermination/Murder/Rape	<u>1</u>	0.7%						

The hate levels for this target group are very similar in Hungary and Romania (12% to 12.3% respectively), but in Hungary, this was the target group with the largest proportion of hate. Surprisingly, in Romania, given the all-party support for the referendum against gay marriage and prevailing attitudes in the country (72% of those questioned opposed gay marriage and 86% said that homosexuality should not be accepted by society<sup>263</sup>), LGBT was the target group with only the second lowest level of hate in Romania. This is possibly due to the fact that moderators seemed to pay close attention to articles on the topic as this target group also had the highest proportion of moderated comments for the country.

In the UK, as expected, this target group had the lowest amount of hate and incivility and the highest proportion of legitimate comments at 82.4%, suggesting that articles in this target group were considered the least controversial by the users.

Looking at sub-codes, there are a number of hate types that stand out. As with the other target groups, insults are prominent in all countries, but specific to this target group are the Superiority/Inferiority/Normality and Belittling/Demeaning type of comments and more importantly the Homosexuality-Pedophilia type, which is specific to LGBT. The order of sub-codes for Romania reveals what could be considered typical homophobic discourse. The most numerous group is made up of comments arguing about the abnormality and inferiority of LGBT people. This is followed by insults which in this case are quite vulgar, and some take a sexual connotation, then the specific code of homosexuality-pedophilia. The latter equates homosexuality with pedophilia and generally argues about a slippery slope of criminal acts being legalized next if homosexuality is accepted, or makes allusions to homosexual men also being pedophiles or danger to children. There is a similar overall picture in the Hungarian comments too, but in this case, there are also a number of Conspiracy/Threat coded comments that refer to "gay lobby" or present the legalization of gay marriage as a threat to the fundamentals of society. The most positive finding both for Hungary and Romania is perhaps the almost complete lack of EMR comments, a development since 2012 in Romania<sup>264</sup> when a number of very violent comments of this type were identified.

While the amount of hate comments is much lower, in terms of their typology, the UK also present a similar picture to the other two countries, again showing a strange similarity in the

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<sup>263</sup> Neha Sahgal and Alan Cooperman, *Orthodox Christianity in the 21st Century* (Pew Research Center, 2017).

<sup>264</sup> User-generated hate speech

narratives used by the commenters even in countries with very different attitudes to the issue. A sign of the different attitudes, showing that outright expressions of hate as presented in the examples below are less acceptable in the UK could be that specific group-based insults for homosexual men such as the Romanian “*poponar*” or Hungarian “*buzi*” were not found in any UK comments. Instead, there were a number of comments with sexual allusions such as the example from *The Telegraph* below in comment No. 68. On the other hand, outright expressions of hate are replaced by the seemingly civil arguments in the Conspiracy/Threat type which is the most frequent kind in the UK at 22.3% of hate, again pointing in the direction identified by van Dijk of racism and hate taking more civil forms.<sup>265</sup>

### *LGBT – Insult (hate) examples*

78. “As if this attitude of loser *poponar* (*pejorative ref. to gay men, ~fagott, bugger*) does any good to someone????! And since you are quoting the New Testament, quote until the end and without SOPHISMS! For ex have you heard about the causes of the distraction of Sodom and Gomorrah by the Good God???? That’s where the word sodomy comes from. Heloooo distinguished mr-s and others too are different like the *poponars*... there are the RAPISTS for example! Why don’t we accept these too??? That is the sense of the completely pathetic logic you are expressing!” posted by Marian Garleanu on 7 May 2015 to *Adevărul*.

79. “Not yet. We still don't have a law which obliges every man at some point in his life to kneel down and... I better shut up.” Posted by geniusloci on 7 September 2014 to *The Telegraph*.

80. “Stop being a tosser about this and call him a he... he is ladyboy... not a girlfriend” posted by herzcoxy on 13 July 2015 to *The Guardian*.

81. “What is wrong, if someone doesn’t like the *buzi* (*Hungarian insult to gay ~faggot*)? Will we have to like the pedophiles too?” posted by Tibor Bócsa to *Népszabadság Online*.

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<sup>265</sup> van Dijk, *New(s) Racism*

### *Homosexuality-pedophilia, conspiracy*

As mentioned above, Homosexuality-Pedophilia is a type of hate comment specific to the LGBT target group. At its core, it is a type of conspiracy theory arguing that the legalization or acceptance of same-sex marriage or the extension of gay rights inevitably lead to a slippery slope and will soon be followed by legalization of incest, pedophilia, zoophilia rape and criminal acts of such kind. This type of argument and the demonization of minorities by attributing them repulsive sexual practices is not new or specific to homosexuals; it has been present in hate discourse for centuries. Czarnecky found that homophobic hate speech shows a remarkable similarity to anti-Semitism: both groups were and are frequently accused of being abnormal and deviant, intent on undermining society, in this case by undermining its morals and part of an organized larger and secret conspiracy to fulfill those intentions. Central amongst the accusations against the Jewish was that they engaged in incest and the blood libel, i.e. they abducted children to use their blood in religious rituals. As the author points out:

“Much like how incest was intentionally used to demonize Jews for partaking in one of the most taboo of sexual acts, (coupled with their proclivity towards preying on Polish children for religious purposes), paedophilia is used to demonize the gay community. Accusations of paedophilia are used most commonly with gay males who are seen as particularly dangerous for children.”<sup>266</sup>

The Homosexuality-pedophilia type comments also contain a common element of moral panics, namely the “the prohibitionist model of the ‘slippery slope’”<sup>267</sup> according to which tolerating a smaller deviance will inevitably lead to a greater danger to society in this case as presented in the comments below. Together these serve not only to legitimize further discrimination but also to undermine arguments for extending LGBT.

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<sup>266</sup> Greg Czarnecki, “Analogies of Pre-War Anti-Semitism and Present-Day Homophobia in Poland,” *Beyond the pink curtain. Everyday life of LGBT people in Eastern Europe* (2007): 327–344., p.336

<sup>267</sup> Stanley Cohen, *Folk Devils and Moral Panics: The Creation of the Mods and Rockers*, Routledge classics (Abingdon, Oxon ; New York: Routledge, 2011).3<sup>rd</sup> Edition, p.XX

## *Homosexuality-Pedophilia example comments*

### *Romania Examples*

82. “(...) If you do, good deeds does that mean that automatically, an abnormality becomes normality? You try to justify your deviance by bringing forward famous people with the same deviations. I understand you, but you anyway you still are abnormal. What do you think of the pedophiles? Are they normal? Noooo! Of course not! They are abnormal – you will say but guess what? For them it is normal. Then why should we not legalize pedophilia, zoophilia and all the other ...”normalities”? They are minorities, and they have rights that have to be protected, and maybe in your sick mind you believe this, but you have no courage to say it because it is not “politically correct.” Snobism? Or maybe lack of intelligence...?” posted by Abel Clopotel on 9 May 2015 to *Adevărul*.

83. “Correct, Mr E. Tanasescu! (*the author of the article*)! We are assisting at the decay of the traditional family, the only capable to perpetuate the human species normally. I have asked already and ask again: What’s next? Marriage between a man and a...turkey or between a mule and a...woman? Because...they too...have rights, don’t they?” posted by M Costi on 26 May 2015 to *Adevărul*.

### *UK Examples*

84. “Agreed. Otherwise, you will eventually have child molesters claim that they are a minority and will seek rights.” Posted by roy10 on 19 October 2014 to *The Telegraph*.

85. “When is the referendum allowing people to marry their pets going to be? I have a cute Koy Carp that I wish to elope with.” Posted by Paul Riley on 24 May 2015 to *The Guardian*.

86. “How long before they normalise pedophilia or incest as well, which some people also have an appetite for? Or have they started that already?” posted by Charles Henry on 4 February 2015 to *The Telegraph*.

87. “We live in a very sick country ,When the sick cant get treatment but we pander to pervsion . What life for the chidren this makes ?” posted by ANTEK on 3 August 2014 to *Daily Mail*.

### *Hungary Examples*

88. “It is obvious: by hiding behind the law, they are making acceptance mandatory. And what will happen with their moral needs when they will no longer satisfy it, fulfill it. Then what will be the next step? Rape? My response a firm: NO!!!! (*The title of the article was Would you support gay marriage?*) (*Népszabadság Online Irish referendum LGBT Páncélos*) (...)Love keeps the world moving. Let’s leave everyone’s right to love, wherever they might obtain its object. Some people are right to be puzzled? How about sodomy? Ladies and gentlemen, let’s not harm those who share with their beloved loyal companions, their dogs, goats and other animal lovers, their beds or their loins. My god, well this is their taste. Let’s just disregard this small lapse in taste and if they happen to come out with a world saving invention, we should not toss it away, just because their creator is an alternative personality! (...)” posted by tündérmese on 19 May 2014-05-19 to *Magyar Nemzet Online*.

89. “The “association” of the gays will never be equivalent with the traditional marriage. Just try to put together a child, just the two of them without help! Not to mention that promiscuity is quite large in their circles. Everybody lives as they want that is assured by democracy, it does not interest me what anyone does in their bedroom, but they should not want to demolish the normal frameworks of the family! By the way, another topic is already on the threshold, the legalization of incest, and in the USA the polygamists are also raising their voice. This ambition will result in the break of floodgates for all kinds of unusual forms of living together. Who wants that? Let's remember that for example the extraordinary prominence of the homosexual culture caused the fall of multiple empires, also the Roman empire’s too, and history repeats itself because people forget the lessons.” posted by ren52 to *Népszabadság Online*.

### *The “Gay agenda”- LGBT conspiracy*

As mentioned before this type of comment was the most prominent in the UK sample, and it was also the second most frequent code in Hungary. Here, besides being considered deviant, homosexuals are also accused of having a “gay agenda” and being part of a “gay lobby” with concerted efforts of “brainwashing” people into accepting their deviant practices. An interesting common element of comments both from the UK and Hungary is the notion the purpose of the gay agenda is not only to gain acceptance but also to spread their deviance by corrupting children, thus hinting back to the previous category. As Czarnecky points out: “a clear and direct connection can be seen between the theories of a ‘Jewish conspiracy’ and a ‘homosexual lobby,’ both of which are thought of as intentionally aimed at destroying the nation, state and family.” This is illustrated by comment 90 below that links several conspiracy theories together considering that the advancement of gay agenda is the result of the machinations of the Jews, who also control America. A characteristic of hate comments of this type but also of others directed at this target group is the frequent mention of children, commenters being worried that they will be brainwashed or that their sexual orientation will be influenced negatively thus providing arguments for discrimination and linking back to the previous category. The comments below present the evolution, “slippery slope” of the argument with examples taken from Hungary and the UK. The first comment from Hungary (No.90) only argues for the need for legislation; the next two (91-92) voice worries and warnings against “encroachment”; No. 93 argues against “equality and diversity”; and the last one, taken from *The Telegraph* (94), adds a dehumanizing insult and considers that “the modern day filth” “needs cleansing out of our society.” This is also a common feature of homophobic discourse and can again serve to undermine anti-discrimination efforts, as Czarnecky notes talking about the issue in Poland: “Very few debates on issues concerning the gay community transpire without a mention by opponent of gay rights how these rights would negatively affect the family or children of Poland.”

90. “I condemn the relativizing of marriage, this is today a more timely danger than relativizing of the Holocaust, still there is law against the latter but not against the former. Why is marriage relativizing more dangerous? Because the Nazis, thank God, have no chances in getting to power (...) no Jew’s life or wealth is in



danger because a few persons unfounded opinion underestimates the weight of the Holocaust, but the recognition and teaching of the deviant “marriage” the misdirection of the development of children’s personalities is gaining space in the world! How do the Jewry and the advance of homosexuals “rights” come together? I recommend the thoughts of Joe Biden the American vice president of Jewish religion on the significant (in one of his speeches he talks about 80%) role the liberal part of the Jewry played in stuffing *buzi* (*Hungarian slang for homosexual ~faggot*) marriage down on society’s throat. I also recommend the researches analyzing the causes of homosexuality (...) that disprove the genetic disposition to homosexuality (so the homosexual behavior (...) is not without dangers to children)” posted by Barna Tibor to *Népszabadság Online*.

91. “They are utterly obsessed with brainwashing children to accept their practices, every parent should be very wary, each time something like this gets raised remember Dolphin Square and the North Wales children's homes, these are the same people.” posted by Monument on 4 February 2015 to *The Telegraph*. The comment received 11 likes and 2 dislikes.

92. “(...)What teacher or organisation is going to broach this issue for fear sexual shaming and offending the gay lobby. It's already way out of hand. However I don't think 'gay people' exist. I believe it is something everybody is capable of depending on various factors. The other thing is of course parenting and the beginning of homosexual indoctrination in schools which has started and will continue. So... I was pretty blase about homosexual stuff until the encroachment started (as was predicted by many people). (...)” posted by MissOgyny on 13 July 2015 to *The Guardian*.

93. “Once again LGBT- related issues dominated the first part of the Andrew Marr show this morning. Frankly, given the important

issues that get pushed aside for this rubbish it's about time gay people stooped pushing their agendas down everyone else's throats. Please, no more equality and diversity - it has already caused too many problems.” posted by stevetheintellectual on 24 May 2015 to *Daily Mail*.

94. “The facts are no parents would ever want their children to be affiliated or afflicted with this modern day filth. It needs cleansing out of our society and if demonising, mocking and marginalisation is the only option, so be it.” posted by roy on 4 February 2015 to *The Telegraph*.

### Target group 5. Gender

The gender target group, referring to articles with keywords related to gender issues such as women, feminism, abortion, contraception, rape, sexism, was the target group with the lowest proportion of hate comments in Romania at 11.4% (with a similar amount of incivility at 12.7%). In the case of Hungary, the gender target group, on the other hand, had the highest amounts of incivility, almost double the proportion of hate comments at 17.9% resulting in the lowest amount of legitimate comments for all target groups at 72.2%. In the UK too, the highest proportion of incivility was found on articles in this target group. Both in the Hungary and UK, this was the third target group by number of hate at 9.9% and 8.3%

Romania			Hungary			UK		
Top Level Codes	Count	Percent	Top Level Codes	Count	Percent	Top Level Codes	Count	Percent
Hate	<u>74</u>	11.42%	Hate	<u>30</u>	9.93%	Hate	<u>158</u>	8.32%
Incivility	<u>82</u>	12.65%	Incivility	<u>54</u>	17.88%	Incivility	<u>204</u>	10.74%
Legit	<u>437</u>	67.44%	Legit	<u>218</u>	72.19%	Legit	<u>1,493</u>	78.58%
Moderated	<u>55</u>	8.49%				Moderated	<u>45</u>	2.37%

Table 17a. Top level codes for Gender target group



**Table 17b. Subcodes for Gender target group**

Romania			Hungary			UK		
Hate Subcode	Count	Percent	Hate Subcode	Count	Percent	Hate Subcode	Count	Percent
Belittling/Demeaning (Hate)	<u>28</u>	28.0%	Conspiracy/Foreign interests/Enemies/Threat	<u>10</u>	21.7%	Belittling/Demeaning (Hate)	<u>76</u>	30.8%
Insults (hate)	<u>26</u>	26.0%	Stereotypes/Generalization/Prejudice	<u>7</u>	15.2%	Insults (hate)	<u>53</u>	21.5%
Stereotypes/Generalization/Prejudice	<u>14</u>	14.0%	Belittling/Demeaning (Hate)	<u>7</u>	15.2%	Stereotypes/Generalization/Prejudice	<u>44</u>	17.8%
Animals/Sub-human /Pest	<u>13</u>	13.0%	Insults (hate)	<u>6</u>	13.0%	Superiority/Inferiority/Normality	<u>19</u>	7.7%
Superiority/Inferiority/Normality	<u>4</u>	4.0%	Superiority/Inferiority/Normality	<u>5</u>	10.9%	Conspiracy/Foreign interests/Enemies/Threat	<u>18</u>	7.3%
Religious extremism	<u>4</u>	4.0%	General hate/Discrimination	<u>3</u>	6.5%	Discrimination	<u>7</u>	2.8%
Conspiracy/Foreign interests/Enemies/Threat	<u>3</u>	3.0%	Extermination/Murder/Rape	<u>2</u>	4.4%	Animals/Sub-human /Pest	<u>7</u>	2.8%
Silencing (hate)	<u>2</u>	2.0%	Denying rights (political/civil)	<u>2</u>	4.4%	Silencing (hate)	<u>7</u>	2.8%
Extermination/Murder/Rape	<u>1</u>	1.0%	Discrimination	<u>2</u>	4.4%	Extermination/Murder/Rape	<u>5</u>	2.0%
Holocaust/Genocide/Terrorism - blame shifting	<u>1</u>	1.0%	Animals/Sub-human /Pest	<u>1</u>	2.2%	Denying rights (political/civil)	<u>3</u>	1.2%
Homosexuality-Pedophilia	<u>1</u>	1.0%	Violence	<u>1</u>	2.2%	Violence	<u>3</u>	1.2%
Disgrace for the country	<u>1</u>	1.0%				Threats	<u>2</u>	0.8%
Violence	<u>1</u>	1.0%				Holocaust/Genocide/Terrorist-apologetic/justification/glorification	<u>1</u>	0.4%
Holocaust/Genocide/Terrorist-apologetic/justification/glorification	<u>1</u>	1.0%				History	<u>1</u>	0.4%

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This target group attracted the lowest number of comments on Hungarian newspapers. In the case of *Népszabadság*, only one qualifying article had been identified, resulting in a total country sample of only 304 comments posted to 7 articles in the two newspapers. There were similarly few comments in the Romanian newspapers on gender related articles, with only one qualifying article being identified on the *Evz*. In the UK the gender related articles attracted a much higher number of comments, for all three British newspapers the full sample could be assembled. The article with the highest number of comments was found for this target group on a topic about sexism at the *Daily Mail* (7,740 comments).

Compared to the other target groups, the order of sub-categories is different in Romania and the UK, Belittling/Demeaning (hate) and Insults being the most prominent categories. Overall these types of comments included victim blaming in cases of rape, sexual allusions, objectification and reducing women to body-parts. A notable feature of both demeaning and insult-coded comments was the frequent use of diminutives, a characteristic of sexist language<sup>268</sup> (e.g. “silly girl”, “little boy” “poor wee thing” and the use of female animal names “cow” “sow” “heifer” and “hen.”) Among the 76 UK comments in the belittling category, 11 contained the word “silly”. Another typical feature of the comments, and typical of sexist discourse, was attacking the looks and appearance of the female individuals mentioned or featured in the article or the author if she was female and then questioning their abilities. As Lakoff points out, this is a frequent strategy used against female politicians as a way of disempowerment and objectifying and serve to "reduce a woman to her traditional role of object, one seen rather than one who sees and acts."<sup>269</sup> Additionally, Lakoff also notes that female politicians are much more likely to be subject to the "erosion of the wall between their public and private personae". Speculations and judgements about their private life then affect the way their political or public performance is measured. This phenomenon was observed both in the case of the UK and Romania. In the case of the UK in the Minorities/National sub-target group a frequent strategy was the discussion of the appearance of First Minister Nicola Sturgeon and using remarks about it to undermine political claims. Similarly, in Romania, is the case of presidential candidate Elena Udrea discussed in the last two Romanian example comments, especially in the last comment where she is compared unfavorably to an Italian adult film star in order to dismiss her political arguments. In a similar line of previous

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<sup>268</sup>Sara Mills, *Language and Sexism*. (Leiden: Cambridge University Press, 2008) p 59.

<sup>269</sup> Robin Lakoff, “Language, Gender, and Politics: Putting ‘Women’ and ‘Power’ in the Same Sentence,” in *The Handbook of Language and Gender*, ed. Janet Holmes and Miriam Meyerhoff, Blackwell handbooks in linguistics 13 (Malden, MA: Blackwell, 2003), 161–178, p.173

argumentation, comment refers to the candidate's presumed promiscuity and trivializes and sexualizes her political efforts in a quite vulgar language. A similar dismissive strategy, again undermining women's argument by sexualization, can be found in the first UK example. As Mills notes, discussing Schultz focusing on women's sexuality, addressing them in sexual terms is a strategy to "constitute women as an out-group."<sup>270</sup> Sexual allusions of the type "probably needs a good..." (posted by bewildered on Dailymail, topic Sexism, TG: Gender on 2015-09-11 at 13:40:30) were also classified as demeaning and serve as an illustration to the phenomena of trivializing women by focusing on their sexuality or biological functions.

In contrast, in Hungary Conspiracy remained the largest sub-category. This was mostly due to an article about abortion which was considered in the comments as part of a conspiracy to destroy the Hungarian nation. This framing of abortion was also found in comments from the UK and Romania, but the conspiracy comments in the UK talked more about a feminist conspiracy or threat to subjugate men.

## *Demeaning*

### *Romania Examples*

95. "Rapists (women and men) are embarrassingly stupid (orig. Romanian *penibil*=embarrassing, awkward)...especially the men, because they are incapable of realizing that the vagina is not a big something (*orig.nu e stie ce* ~not a big deal)...it doesn't worth to rape a woman for sex...for a vagina...the rapists are doing nothing else than to give a higher value to the vagina because they are willing to break the law to have access to a vagina...some retards" posted by Saceanu Emil on 20 July 2015 to *Adevărul*.

96. "The only clear thing is that you are not thinking (...) If you play the prostitute on the roadside, don't be surprised that you can be raped by some who don't think about what rights you have, but about what they see in front of their eyes. A woman who is sending signals that she is willing to have

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<sup>270</sup> Mills, *Language and Sexism*, p.61

sex. If you cross the road suddenly on the pedestrian crossing in front of a car, it is possible that the driver could not break, although you have the right to cross. You have the right to protect yourself, if you care about your life. Is that clear?????” posted by Mens Sana on 21 July 2015 to *Adevărul*.

97. “Miss Radu (*author of the article*) has some learning to do on how to write, in order to better present the very few ideas that she has in her little head, simplistic ideas, that make her feel like a missionary in a wild country...” posted by D B on 15 June 2015 to *Adevărul*.

98. “Marcus (*another commenter*) what project of Elena Udrea (female candidate for the presidency)? She might still defeat Ponta's (*Victor Ponta, prime-minister, also candidate*) manhood, as she has the skills..” posted by miron miron on 20 August 2014 to *Adevărul*.

99. “does anyone take this one seriously? how much vulgarity and lack of common sense...at least the italian’s cicciolina (*stage name of Ilona Staller, Hungarian-Italian adult actress elected to the Chamber of Deputies of Italy in 1987*) has style, looks and brains” posted by master of disaster on 20 August 2014 to *Adevărul*.

### *UK Examples*

100. “My old gran used to say that women who protested their decency were often on all fours to the gas man when hubby was at work.” posted by bewildered on 11 September 2015 to *Daily Mail*.

101. “She is suffered from Unbalanced Hormones Syndrome (UHS), which it looks like is affecting her judgement. I would advise her to get a job in ASDA filling shelves, should be therapeutic to her.” posted by RonyUK on 11 September 2015 to *Daily Mail*.

102. “Utterly incompetent. In an un-PC world, she'd be waiting tables.” posted by Richard Gross on 11 July 2015 to *The Guardian*.



103. “A womans place is in the home, no where else unless her services are needed in clubs and the red light district.” Posted by Frankie on 19 May 2015 to *Daily Mail*.

104. “Don't confuse the poor wee thing with facts - they are so inconvenient when they go against the dogma of feminism.” posted by steve3005 on 21 October 2015 to *The Telegraph*.

105. “Must be that time of the month.” posted on 28 October 2015 to *The Telegraph*.

106. “I'm sure these three girls all own vibrating sex toy phalluses. It's funny, feminists hate men yet they indulge in long objects.” posted by papadapapapalopa on 31 October 2015 to *The Telegraph*.

### ***EMR on articles on Gender topics***

Compared to the others target groups there were fewer EMR comments in the Gender category with only one such comment found in Romania and three in Hungary, while five were identified in the UK. A particularity of this target group was that some of the EMR comments were not directed against the target of the article (i.e. women), but against other categories. The comment from Hungary below is an example of ableism, i.e. hate directed against people with disabilities, posted to an article on the topic of abortion. Despite being one of the most disturbing cases in the EMR category in the entire sample, it presents an argument for eugenics that could have been taken straight from the Nazis in quite civilized well formulated language, again illustrating the fact that hate does not necessarily mean uncivil. The comment from Romania is a rare example of hate directed against users supporting discrimination. The UK example was posted to an article on the topic of abortion titled “How much would you pay to stop an abortion?: Pregnant woman challenges pro-lifers to pay her \$1 million in 72 hours or else she terminates her baby”. It presents quite a clear call for murder, which could potentially satisfy the criterion of “clear and present danger”, especially considering that the article is about a case in the USA where the *Daily Mail* is also one of the most read websites and murders of doctors and violent attacks related to abortion are not uncommon.

107. "But the children certain to be born with disabilities I would abort. There are tests by which it can be predicted almost with 100% certainty if the child will be disabled or not. If it turns out that yes, then abortion. This I would place into legislation too. Although I know this will sound cruel, but according to the rules of nature, the disabled people are the genetic waste of our species, in nature they would die, this way society supports them completely uselessly, under the title that they are humans too,,. So what? Life is cruel and evolution is cruel and history is cruel, that person, that race, and that country or nation will survive and go on which is the most powerful and can best adapt to its environment. Because of this no disabled person should be allowed to be born, the resources totally uselessly spent on them should be spent on the truly valuable parts of society, (...)" posted by hawk777 on 5 February 2015 to *Magyar Nemzet Online*.

108. "70 years ago the fruit of the education by the bigoted priests in the rural and urban areas was the legionary movement (*Romania's version of fascism*) which literally killed people in the name of the ancestral religion. I wish to you to be picked on by some people whose only education was the religious one...you will be killed smiling by people convinced that a great reward is waiting them in the heavens." Posted by Andrei Vasilescu on 23 March 2015 to *Adevărul*.

109. "I'll pay the money if we can 'terminate' the mother" posted by KimJongUn3 on 3 July 2015 to *Daily Mail*. The comment received 40 likes and 50 dislikes.

## Conclusions

The results of the content analysis show that the sites of Romanian newspapers had a much higher number of hate comments than the sites of newspapers in Hungary and the UK, the latter two countries presenting a similar level of hate (19.3% for Romania, 8.5% Hungary, 8.1% UK). At the level of incivility, however, variations between the three countries were less pronounced. At the newspaper-level, the results show a reverse relationship between the user-generated hate speech and incivility: newspapers and target groups with a higher proportion of hate tend to have less amount of incivility and where the hate number are lower incivility tends to be higher. The most surprising finding at this level is that contrary to expectations the proportion of hate comments was higher in the quality/broadsheet *Telegraph* than the tabloid *Daily Mail*.

Looking at the nature of user-generated hate speech, the results of the content analysis point to shared themes and narratives of hate across countries, newspapers, most notably in conspiracy theories-based or related to anti-Semitism.

## Chapter 5. Interview findings

### Introduction

As discussed in the methodology, and evidenced in the literature review there are a number of questions in relation to comments, ranging from their role and place in the online newspaper, to issues relating to anonymity, differences in ethical standards between journalists and users, and crucially about who is responsible for this content. To gain insight into the journalistic culture and practices of the newspapers, semi-structured interviews were performed using an interview guide discussed in Chapter 3. The ten topic questions presented in Appendix 2 address issues regarding comments that were also highlighted in the literature review regarding the role and place of comments and their authors, the newspaper's policies in their role as "de facto" regulators of their participatory spaces, and responsibilities regarding user participation, as well as some technical details of moderation and the volume of comments.

The original research design for this study aimed to recruit interviewees from the same newspapers as the comment sample in order to provide a side by side examination of the newspapers policies, their attitudes and strategy regarding user participation and the outcome, in this case in the form of level of prohibited and uncivil content that might have passed through moderation. This however proved to be impossible due to the difficulty in recruiting participants. After repeated attempts of contact the pool of potential participants was extended to include online news-portals from Hungary and Romania. The present chapter is based on the findings of five interviews conducted between July 2016 to December 2017 with journalist from *The London Tribune*<sup>271</sup> (UK), *444.hu* and *Magyar Nemzet (MNO.hu)* Hungary, *Adevărul* and *Hotnews* (Romania). The generalizability of the findings presented here is limited due to the small number of interviewees. On the other hand, it is important to note that the aim of the

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<sup>271</sup> The London Tribune is a pseudonym given for textual fluency to one of the UK newspapers also included in the content analysis sample whose journalist chose not to be named.

interviews was not to provide a representative data for the population of journalists, but to gain access to the specific knowledge of the interviewees.

The interviews were transcribed and coded using descriptive coding as described by Santana<sup>272</sup> with the aim of providing as detailed description as possible of the ideas and topics expressed by the interviewees. The interviews were transcribed verbatim, using a denaturalized approach,<sup>273</sup> but response tokens such as “um” and “yeah”, and filler words such as “*erted*” (*you see*) “*stiu eu*” “*tudom is en*” (~*Don't know, you know*), were preserved as they provided indication to the journalists attitude towards the topic i.e. indicated thinking, hesitation. Additionally, in the case of the Romanian journalists regionalisms such as “*aiciea*” (here, standard version *aici*) were also recorded in the form used by the interviewee. The interviews were transcribed and analyzed in the original languages, the quotes included in this chapter were translated by me as close to the original meaning, choice of words and grammar as possible.

Codes were assigned for each idea, statement or information as it was expressed by the interviewee. Coded passages varied in length from a few words to sentences or in some cases a whole paragraph, depending on the information density of the text. The analysis started with an initial set of codes based on the main questions, such as Responsibility, Moderation, Role of Journalist, Role of comments and then was expanded as further topics were identified, resulting in 67 codes and sub-codes. During the analysis when a unit was identified, if there was already a code for it, it was assigned to that or if there was not, a new code was created. For example, as the starting point was the code Responsibility, originally it was designed to include all ideas connected to responsibility for comments, however during the interview it emerged that journalists also considered that they are partially responsible, therefore a Responsibility-journalist code was created and then later a responsibility-users sub-code was also created to include passages where journalists attributed responsibility for comments to users. If an idea/topic was identified which did not fit into any of the existing categories a new category/code was created.

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<sup>272</sup> Santana, Coding for Qualitative researchers, pp. 70-73

<sup>273</sup> D. G. Oliver, J. M. Serovich, and T. L. Mason, “Constraints and Opportunities with Interview Transcription: Towards Reflection in Qualitative Research,” *Social Forces* 84, no. 2 (December 1, 2005): 1273–1289.

This approach was chosen as it facilitates the identification of the major themes occurring in the text and considering the scope of the study it also allows for a more objective comparison of the responses. Fig. 5 shows a schematic representation of the results of the coding for all the interviews, the blocks representing the coverage i.e., the amount of each topic in the text. It is important to note that quantity does not necessarily reflect importance. However, despite being asked the same questions interviewees talked about different issues in variable lengths and expressed different ideas. Suggesting that they were preoccupied with different aspects of an issue and allows for a comparative analysis, in addition to the identification of the major themes. The most prominent theme/code for all journalists is moderation, which is partially due to the amount of questions, but could also reflect the centrality of this issue when talking about comments. However, the order and extent of the next categories, are not explained by the number of questions alone, and there are differences both between newspapers and countries that could reflect the concerns and particularities of each journalist, newspaper and country.

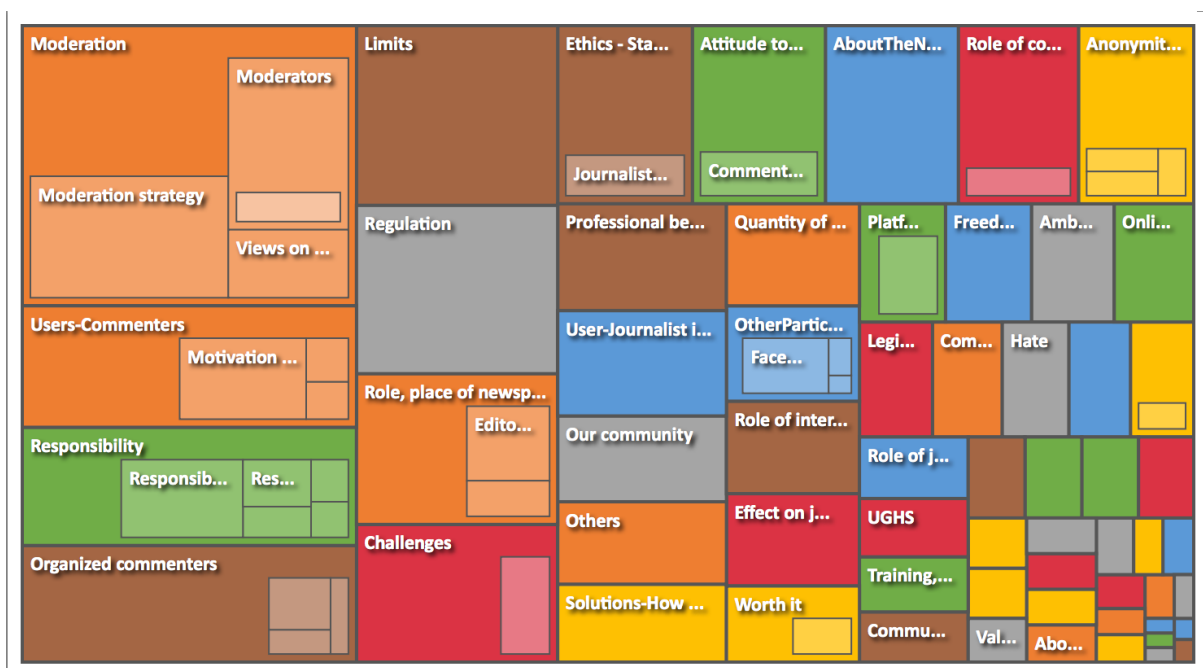


Figure 5. Codes compared by number of coding references, for all respondents

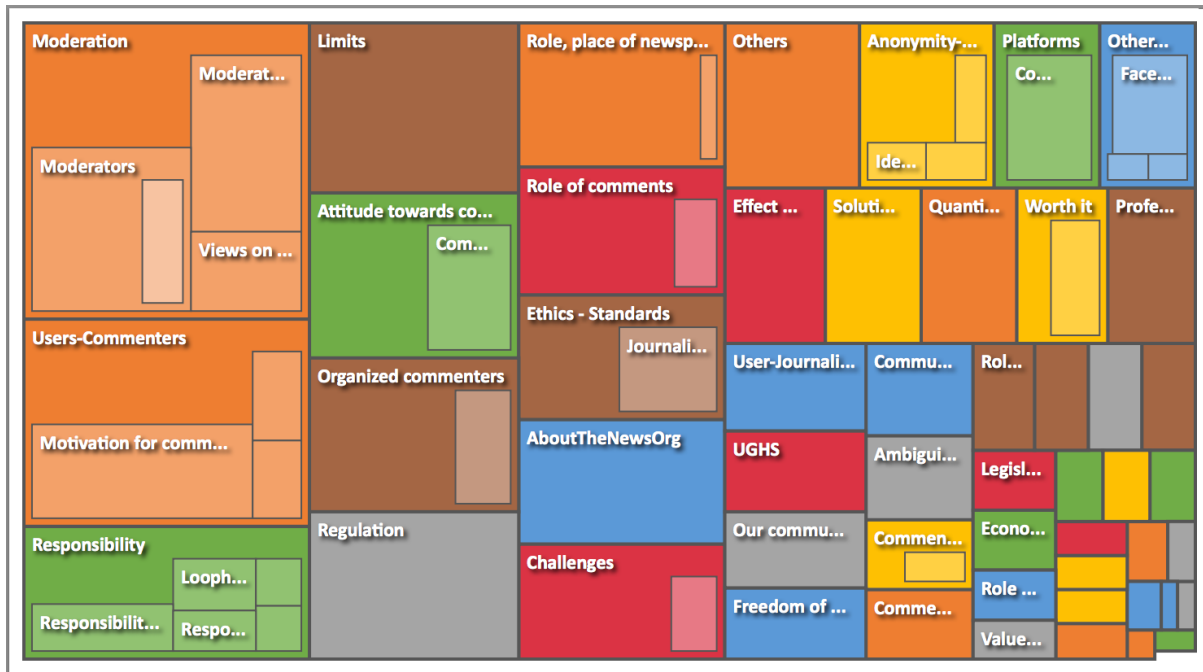


Figure 6. Codes compared by number of coding references – Hungary

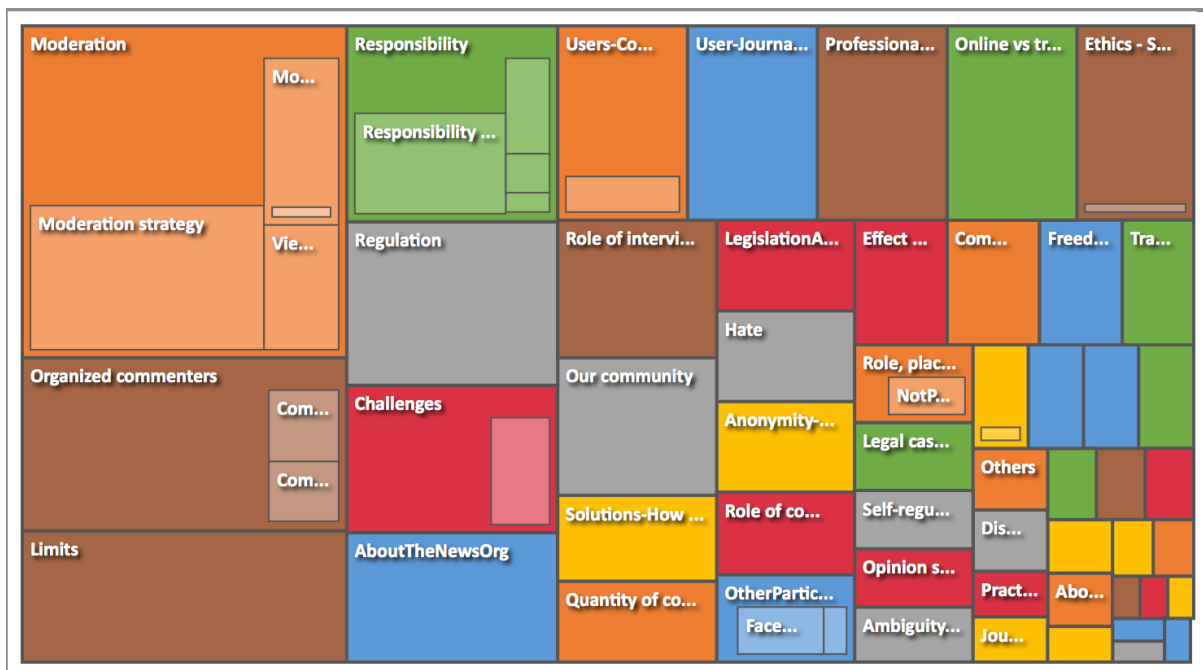


Figure 7. Codes compared by number of coding references – Romania

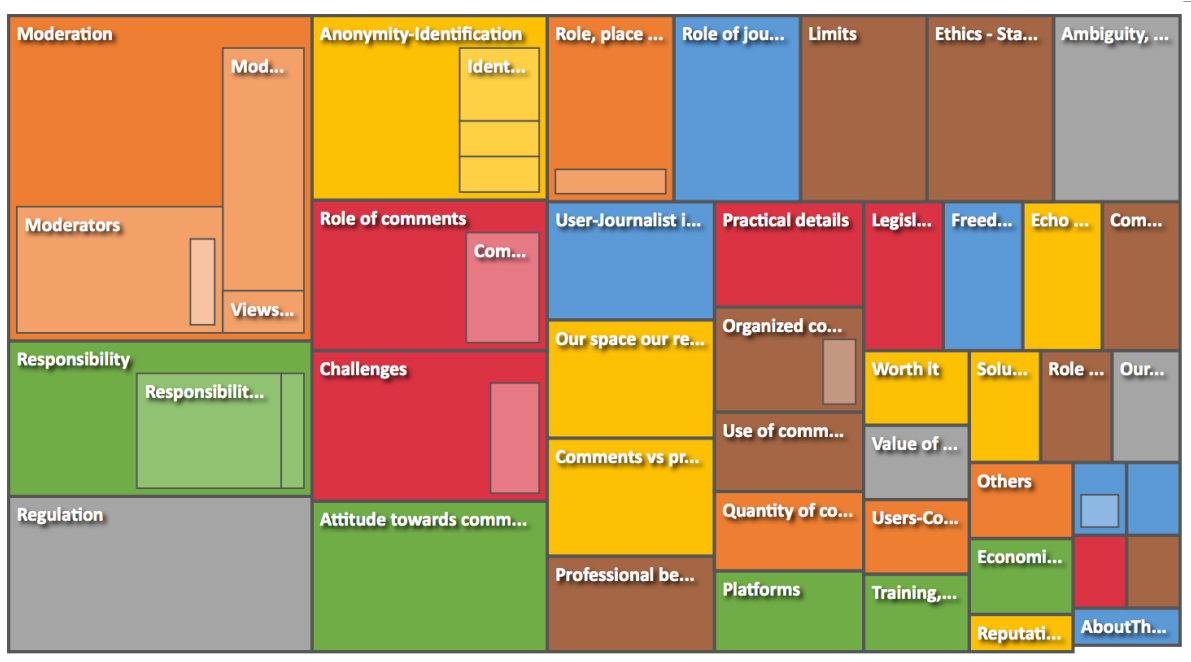


Figure 8. Codes compared by number of coding references – UK (*The London Tribune*)



The following section presents a detailed qualitative analysis of the interviews, ordered by major themes such as the changing roles of newspapers and journalists or the issue of responsibility for user-generated content. It will start by exploring the reasons for having comments and the value attributed to them by the journalists; then will examine the changing and continuously evolving roles of newspapers in the online world, followed by an exploration of the major issue of responsibility for comments. The role and behavior of users will also be discussed, followed by moderation, limits on freedom of expression, ethics and regulation and the chapter will close with a discussion of potential solutions to challenges highlighted by the journalists.

## Role of comments

The following section will discuss the role of comments, their contribution to the journalistic work, changing role depending on the life-cycle of the media organization, community and economic benefits.

### Why have comments?

In line with the findings of previous similar studies<sup>274</sup>, journalists agreed that a principal value of comments is that they offer a way for the audience to provide immediate feedback and engagement. In the words of the editor from *The London Tribune*, “when people talk with us we have an unrivalled opportunity to listen.” Not all feedback is positive but as the vice-editor in chief of *MNO* put it: “despite all the negatives (⋯) there are constructive readers, who point out errors, give further information and even contribute with story suggestions.” This latter is the second main benefit of comments noted by all journalists: users can act as sources, sometimes only providing story suggestions (*MNO*) but at times information leading to “important new articles” and even confidential information; sometimes journalists even contact commenters in order to develop a story (*Adevărul*). For some story leads the anonymity

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<sup>274</sup> Singer et al. *Participatory journalism*, WAN-IFRA *Online comment moderation*

and instant feedback of comments is essential compared to other traditional contact methods, especially if the reader has reasons to remain anonymous. As the editor from 444 says:

“Although we will never know for sure, it is possible that without the opportunity of commenting anonymously, he would have not sent it in an email, or write it in a Facebook message, but he really only sent it to us, because he could comment right away and then he wrote something immediately that we could use later.”

All journalists mentioned financial constraints; therefore it is also an important feature of comments that they can be journalistic tools that reduce the pressure on the newspaper/portal's limited financial resources. In other cases comments can contribute to a more optimal use, as mentioned by the community editor of *The London Tribune*: “we can through - exploiting is the wrong word - through intelligently using the resources and the information people give us in the comments we can do a great deal more to improve our journalism”.

### **Comments in the newspaper's life stages**

Comments can have different roles depending on the life stage of the media organization. This point was made by both Hungarian journalists. At 444, which is a relatively new organization only founded in 2013, comments initially served as a way of attracting users, providing something different from other news-sites, especially considering that Hungary's most important news-portal, *Index*, never had comments on its main pages: “As a tiny, newly launched newspaper we had to grab every opportunity, to be a little different to give something more (...) at the time we were in an environment where usually there was no commenting.” Attracting new users was also an important motivation at *MNO*. However, as the vice-editor in chief described it, comments also served as a way of affirming journalistic integrity in an effort to gain the public's trust: “the other reason is to present a sort of... openness, to show that we are not afraid of the readers, of being measured.” This happened at a crucial turning point in the newspaper's life, when the owner suddenly decided to change the newspaper's orientation towards the government, and overnight the newspaper turned from what was broadly categorized as government's propaganda to one of its most vocal critics, also resulting in a sudden change and loss of a large proportion of the readership and

the editorial team.<sup>275</sup>

## Community benefits

Kovach and Rosenstiel emphasize the importance of journalism offering a public forum accessible to the readers, even considering it one of its constitutive elements;<sup>276</sup> moreover, according to Deuze, interactivity could even be a more important role for journalism than the traditional function of providing information.<sup>277</sup> All the interviewees, including the one journalist who argued for the elimination of comments, expressed opinions in line with these arguments, and considered building and reinforcing the community of readers an important reason for having comments. In the words of the journalist from *444.hu* who was the most skeptical towards comments, having “some kind of community around it, in many ways makes the newspaper more powerful.” Similarly, for the editor of *Adevărul* expanding the community of readers was a motivation for implementing interactivity. The strongest support for the community role came from the journalist from *The London Tribune*, who expressed a view similar to Kovach and Rosenstiel’s argument mentioned above, highlighting the importance of comments, in the current media climate where the numbers of journalists are decreasing: “newspapers are in part spaces where the community comes together to talk to itself. Comments perform that function in the online world, in a way which..., as newspapers lose staff, as reporters are no longer able to go to public meetings anymore with the same regularity or council debates or all of the other spaces were communities talk to themselves, online the spaces that we convene have started to become those things.”

As other terms regarding online media, community might also need a clearer definition. According to the journalist from *Hotnews*, perhaps the term community should be used when referring to people sharing a stronger common characteristic or interest such as “the community of mothers or people suffering from the same disease”, and applying it for people around a news site, might be an exaggeration. So, he added, it “is a community more between quotation

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<sup>275</sup> In February 2015, Simicska Lajos, a businessman close to the Hungarian governing party and the owner of *Magyar Nemzet* and a number of other outlets, had a falling out with the government and decided to turn his media empire, including *Magyar Nemzet* against the government for more details see: “Hungary’s Main Opposition Media Shuts down after Election,” accessed September 13, 2018, <https://euobserver.com/beyond-brussels/141561>.

<sup>276</sup> Elements of Journalism, Introduction, Kindle loc. 282

<sup>277</sup> Deuze, Mark. 2003. “The Web and its Journalisms: Considering the Consequences of Different Types of Newsmedia Online.” *New Media & Society* 5 (2) (June): 203-230. doi:10.1177/146144803005002004.

marks.” What it is certain, regardless of the term used for it, is that, according to the journalist, the site had a large group “of around 2000 users who returned regularly and even knew each other by nicknames,” and as such functioned like a community. On the other hand, the journalist from *The London Tribune* considered that these are indeed communities and do not necessarily need “flipping serious civic issues,” She continued: “it’s also the small things like running or crosswords, these are spaces where people chat and converse, and people come and use comments to do that, because it’s a, it’s a space in which they feel that they going to know the other people who are there, by virtue of the fact that they share a common bond i.e. the paper that they read.”

A “well moderated comment section” could help in creating a more “committed readership”, according to the vice-editor in chief of *MNO*, “who will return because they know other users, they have debates with, so there is definitely a community creating effect.” On the other hand, while creating a community of readers is important, the journalist also noted that “it is debatable if this can be created with online moderation and commenting facility”. In the words of the journalist from *The London Tribune*, it is important not to forget about the people behind the content: “the community functions as an organism rather than simply as a set of statements. We’re talking about commenters, not just comments. We’re talking about people not just the words they say.”

### **Economic benefits**

On the issue of economic benefits of comments, the interviewees were divided. They agreed that comments indeed drive more traffic to the site, but also noted that it is difficult to quantify their effects in economic or financial terms. According to the journalist from *The London Tribune*, comments increase traffic, time spent on site and readers of comments are “vastly more likely to return to the site. In an environment where traffic is important that helps, so there is a financial..., getting away from the kind of lofty journalistic ideals there’s a bottom line argument about this.” At *MNO* after the change in the newspapers political orientation, implementing a commenting system with the Disqus commenting platform was a strategic choice in order to drive more traffic to the site. Due to the cross-referencing and cross-site user login system, Disqus allowed the newspaper which was in search of a new audience to reach users who do not usually read *MNO*. Using Disqus could also backfire, as it could work the

other way by attracting undesirable users of other sites that also use that system. This happened to *444.hu* who found their comment area flooded with users of a notorious extremist site *kuruc.info*, who took advantage of the shared login system.

On the other hand, the editor from *444.hu* pointed out that “the potential benefits are very narrow compared to the resources spent.” Similarly, according to the vice-editor in chief of *Adevărul*, in “strict economic terms comments do not bring money;” however, as the journalist from *The London Tribune* pointed it out, it is difficult to measure/quantify economic benefits:

I think what a lot of people miss when they say that it isn't worth the effort is that they miss the indirect benefits. I can't point to the comments and say: Well having comments made us this much money, but what I can do is say well we know that it improves this (...),and it enables this, and people who sign into comments give us scarce data and ..., there's, it's a raft of things none of which on its own, necessarily financially justifies the investment, but all of which put together do in my opinion.

### **Worth it?**

Comments were seen as positive element of the site that is worth the effort and costs at *The London Tribune* and *Hotnews*. The editor of *Adevărul* was skeptical, considering that comments are not worth it if judged purely on economic terms, but they allow *Adevărul* to keep abreast of the developments in the media. At *MNO* they were seen as an important way to attract readers to a newly reoriented newspaper and to add a degree of professional transparency, even if otherwise they do not return the costs, while the journalist from *444* saw comments as a waste of effort and resources, so not worth having them.

As mentioned already, the benefits of comments are not necessarily quantifiable. When asked if they think maintaining comments overall is worth it, the interviewees were ambiguous. The journalist from *The London Tribune* highlighted the indirect benefits, while the editors of *MNO* and *Adevărul* said that they keep them even if they do not necessarily justify the costs. The editor of *Adevărul* stated:

“I don't think that it brings me something in economic point of view, strictly

economically speaking it does not bring me money. But pure and simple we saw the problem in this way (...) this is the novelty brought by the internet, the possibility for the readers to also have an opinion.”

Similarly, at *MNO* the vice-editor in chief saw comments as a way of attracting new readers and demonstrating openness which “at the moment brings in more than it costs.” The journalist from *Hotnews* also highlighted professional benefits.

“It’s worth the effort, in many ways it does. It’s worth the effort for the journalist because he can measure himself directly in front of his readers, and even if they are absolutely against the way you presented certain news, they bring something new, they bring you an opinion which... umm...is worth reading.”

On the other hand, the journalist from *444*, who expressed the most critical opinion towards comments, considered them a liability and disclosed that he even advocated for their removal on editorial meetings. He admitted that there were some benefits, which was the reason why they were not eliminated, but he was categorically against comments and considered them an unnecessary burden adding costs and creating risks for the newspaper: “their potential advantage is very narrow compared to the amount of resources spent on it.” He went on saying: “My position is that this, in this form simply put is not worth it in terms of value for money.”

Amongst the risks mentioned were the possibility of the comments area being used for disseminating hate speech and the newspaper being sued for defamation in a comment posted on the site as it will be discussed later in this chapter in the section about regulation. While there could be strategies to improve the quality of comments or filtering users, also by allocating more resources, the editor also strongly questioned the value of these efforts:

Really, in my view the most tragic aspect of this... and what makes me angry sometimes, because we fight as if we would find some kind of Holy Grail on the other side. As if, it would be like, well it is a very hard problem, it is on very shaky ground, but if we find the solution then we will increase our traffic and revenues tenfold, then our prestige would... we would get awards one after another... But this is not true, we are fighting a battle in which even the victory would be almost uninteresting.

## Challenges

The main challenge mentioned by all journalists was the costs and resources needed for moderation. In the words of the journalist from *444.hu*, “commenting is only valuable, if you have enough money and resources to moderate this content very strictly”. Additional challenges mentioned were difficulties in moderating controversial content and groups of commenters who aim to disrupt or derail the conversation. These will be discussed in detail in the relevant section of this chapter about moderation and users.

Moderating was highlighted as challenging not just because all the newspapers in the interviewee sample were struggling financially. At *The London Tribune* and *444.hu* this was also exacerbated by the very large amount of comments. Paradoxically, in the case of *444* the difficulties regarding comments were in part due to the site’s success. Founded in 2013 it gradually became the largest opposition news-portal in Hungary that allowed comments, growing in readership and commenters tenfold from around 30,000 to 400,000 daily readers. While in the beginning the authors themselves could join in the moderation or read through the comments, this was no longer practical as the number of comments grew, resulting in what the journalist considered an “unmanageable situation”: “we grew to be very big and we are in the same situation<sup>278</sup> as in the beginning, but there are now not 30 but 300 comments below an article.” Attempts to solve the issue by introducing a whitelist were also unsuccessful as after a while even the number of users included on the whitelist became too large to filter effectively and unruly users who posted disallowed content also made it on the whitelist resulting in a “dramatically bad situation” and a “very contra-comment mood” where many members of the editorial team, the interviewee included, argued for the closing of comments.

In the words of the journalist from *The London Tribune*, “comments are an opportunity..., but a tricky one because of the sheer volume in some cases, and in some cases because some of the things people say are not necessarily things that we necessarily want to hear”. She added: “It’s expensive, and difficult, and complicated and even Facebook is really bad at it so why we think news sites are going to be brilliant.”

It is revealing of the difficulties faced by the newspapers of the much smaller media markets

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<sup>278</sup> The journalist used the untranslatable word “*ize*” generally meaning, thing, situation, state, with a negative connotation

in Romania and Hungary that even *The London Tribune*, by far the most powerful in the sample and amongst the most read websites in the world, had to admit that there are sometimes failures in moderation. In addition, the choice of moderation method is also affected by the newspaper's resources sites frequently choosing post-moderation i.e. removing comments if they are reported by other readers. Pre-moderation i.e. approving comments before they are published on the site is more resource intensive, usually needing more moderators. "I mean we cannot stop people, unless you turn comments off or go purely to pre-moderation (...) we haven't gone full pre-mod, because that would take resources that right now we don't have, even to run tests."

Journalists were aware that there are shortcomings in their moderation and most of them mentioned the lack of available staff and the need to balance it with the core editorial functions of the newspaper as one of the reasons. According to the editor from *Adevărul*, "to be short we would need to have many more people, (...) sometimes the amount of work is more than we could do (...) we try... we do as much as our budget allows us (...) but after all we are trying to cover some topics here, not just...[moderate]" A similar viewpoint was also voiced by the editor from *444.hu* who also maintained that editorial content and journalistic work should take priority: "So if we would have three times as much money, I could spend them better on something else.." In a similar line of thought, according to the journalist from *MNO*, "I simply do not think that any publisher is prepared for these...(...) you can implement strict rules, but to do better...to ensure more resources for this, I do not see..."[this happening]

## **Professional roles**

### *Role of Newspapers*

As mentioned in the literature review, in Braman's categorization the comment sections of online newspapers would fall into the category of quasi-private forum, as they are "privately owned and controlled but serve a general public function." On the other hand, users need to accept TOS to access the service which then acts as an important "de-facto communication regulation" (p.93) defined and applied by private actors. Barendt also notes that despite calls for treating the internet as a public forum, it is established by private actors therefore the providers' terms of service apply, and the first amendment or similar free speech provisions in other countries are not taken into consideration. This means that the assumption that by creating



UGC users have some kind of protected right to free speech in online forums is wrong.<sup>279</sup> As the vice-editor in chief of *Adevărul* put it, “The right of the user of expressing himself on our site exists within the limits which were also imposed by us.”

This was reflected by all the interviewees who without exception strongly disagreed with the notion that the newspaper’s comment sections would constitute some kind of public forum or that any kind of right to freedom of expression would apply there. As the community editor of *The London Tribune* pointed out, “we won’t stop people from saying things. We just stop them from saying it ... there.”

As mentioned in the first chapter, Robinson revealed a sharp contrast between attitudes of the journalists and the commenting audience. Users considered commenting an exercise of their right to freedom of expression or even a form of journalism, and argued with moderators against the perceived censorship of their comments based on this right. Journalists on the other hand constantly reminded users that “they do not own the place and have no right to it.”<sup>280</sup> The present study found similar attitudes, almost to the degree of journalist using the same words. This was one of the issues which has had unanimous agreement between all journalists from the three countries, with one exception even including the use of similar analogies, comparing users to guests, and strong emphasis on ownership with repeated use of words such as “ours”. Users were compared to guests, who although are welcome in the newspaper’s space, will not become owners and will have to accept the host’s rules. “Well... anyone can say their opinion, but not anyone can come to your house and say their opinion. So, the situation is, that this is our space, our newspaper and on top of that we also have all kind of legal and ethical responsibilities regarding what appears in our space.”- as the editor of *444* put it. An almost identical opinion was expressed by the vice-editor in chief of the *MNO*: “So this is like when someone comes to my place as a guest, I can establish certain norms, but the notion that we would be obligated to publish it on our pages, well that is a huge mistake.” In the most sympathetic opinion to users’ claim for a sort of equality, the community editor from *The London Tribune* acknowledged the complicated nature of comments described by Braman and Barendt as a semi-public space, However, responding to another question the journalist compared comments to a bar and users to patrons and firmly reaffirmed the newspaper’s ownership while pointing out that journalists are also not exempt from rules: “It is a

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<sup>279</sup> Barendt, *Freedom of speech*

<sup>280</sup> Robinson, *Traditionalists vs convergers*

complicated thing right, because *The London Tribune* wants to be a space for public debate, but it is privately owned. So we are not talking about something where anybody has an unassailable right to speak. Even the editor in chief goes through an editing process before their words end up on our site.” A similar semi-public analogy was used by the journalists from *Hotnews* who compared comments to a fence facing a public street and reaffirmed the right of the newspapers to decide the rules and what they find acceptable: “well then, freedom of expression, so then you would have the right to write on my fence, I don’t think so. You have that right if I want to.”

As mentioned before, a significant proportion of the debate around the role of online newspapers maintained that their role would be not so much to provide the news but to offer a space for interpretation and discussion (Deuze, Kovach and Rosenstiel) and in this sense the news would become a type of collaborative object. While the journalists agreed in general with a greater level of interaction with the readers, considering comments a good tool for feedback and sometimes information, they strongly disagreed with any notion that this would imply a sense of shared ownership or a right of the users to be published and categorically refused that they should relinquish or share any kind or level of control.

This was most strongly expressed by the editor from 444, who in line with Barendts’ argument mentioned above also emphasized that as a privately owned company, the site is under no obligation to allow any kind of content and that it is up to the journalists to decide what they accept.

We don’t have any obligation to ensure this opportunity. Anyway I don’t believe that any newspaper would have this obligation. Perhaps in case of public service(...)in case of a publication functioning with public money I could imagine it, or it could be debated... but in my opinion even there the situation is not straightforward. But we? We are a for-profit, private company. What kind of obligations would we have? If we decide to allow certain things, well we can do that...

### *Editor/publisher/host*

As mentioned in the literature review, a key debate about comments and similar participatory spaces, with major policy and ethical implications also making them so difficult to regulate, is where do online newspapers fit in the traditional legal categories of editor, publisher or host. As discussed in Chapter 1, the Delfi vs Estonia ECtHR ruling somewhat pushed online newspapers towards the category of publisher, and offering some clarification to this question was one of the objectives of this thesis. Considering the limitations of the small sample, the main conclusion of the interviews could be that we are no closer on getting a clear response to this question than when it was asked for instance by Valcke and Lenaerts in 2010<sup>281</sup>. Some journalists did not understand the question and asked for further clarification, but after that their responses along with those who were aware of this debate expressed the same ambiguity as before. As the journalist from *The London Tribune* put it, “The short answer is yes, all three.” According to the editor from 444, this ambiguity might be due to trying to fit a novel thing such as comments in old schemes, which all fit a little: “from certain point of view we are hosts, from another we are publishers” but comments are best considered “a thing of their own” (*sui generis*).

### *Contradictions with Terms of Service (TOS)*

In a surprising finding, all journalists expressed opinions that are somewhat in contradiction with the TOS on their websites. As the extracts below clearly show, TOS position the newspapers in the role of the host, implying lack of responsibility.

*The London Tribune* TOS “You acknowledge that we have no obligation to pre-screen, monitor, review, or edit any content posted by you and other users on *The London Tribune* Site.” [...] “We accept no liability in respect of any content submitted by users and published by us or by authorised third parties”.

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<sup>281</sup> Peggy Valcke and Marieke Lenaerts, “Who’s Author, Editor and Publisher in User-Generated Content? Applying Traditional Media Concepts to UGC Providers,” *International Review of Law, Computers & Technology* 24, no. 1 (March 2010): 119–131.

*Adevărul* TOS: “*Adevărul* does not assume juridical responsibility for the problems caused by a member of the site to another member, however *Adevărul* will ensure that members complaints will be taken into consideration and if the situation demands it will take every measure to resolve it.”

All journalists expressed different positions compared to the hosting approach supported by publishing industry and their own terms of service. On the other hand, as mentioned before, there was no agreement on what that role might be. The editor of *444* quoted above considered that of the three traditional roles in the case of comments newspapers are closer to the roles of “publisher and editor and not of host” and within those two roles closer to publisher. He felt that editing a comment would be “unfair” and problematic in cases such as changing an obscene word to one less offensive; therefore as editorial tools newspapers only have the binary option of deleting or approving a comment.

The vice-editor in chief of *Adevărul* did not choose one of the traditional roles, but pointed out that “you cannot say that you do not have any responsibility when this is happening on your newspaper’s space”, a clear departure from the supposedly neutral third-party hosting role. The journalist from *Hotnews* somewhat undecidedly said that he “believes” that it is the role of editor, with the additional responsibilities it implies. The only journalist who considered that comments are “closest to the hosting role” was the vice-editor in chief of *MNO* but then he also added that “host only is not a good approach” as newspapers could willingly choose to not moderate using this role as an excuse to stoke up “certain impulses”. In addition, in what could be considered a further departure from the hosting model, he also admitted that the newspaper “provides readership to the comments.”

According to the community editor of *The London Tribune* even accepting the argument that newspapers are only hosts does not mean that they would have no responsibilities: “I’d suggest that those people must be really bad hosts if they don’t understand that hosting implies responsibility - in most of the same way as ISPs have responsibilities in various different ways. If somebody is using a server for an illegal activity or for harassment there are consequences around that.”

As mentioned in Chapter 1, the wording of the TOS reflects the fact that, according to Jakubowitz, in legal cases regarding comments websites claim immunity for the content of comments based on Article 12 of the E-commerce directive that exempts “mere conduits” from responsibility.<sup>282</sup> However, as Jakubowicz notes “intermediaries do go beyond the role of mere conduit”<sup>283</sup> as it can be argued that the online newspapers do have a part in initiating the transmission by asking for reader’s opinions and setting the topic of the discussion. As mentioned above all the journalists interviewed for this research voiced opinions in line with this argument, pointing out the fact that comments are posted to a space that is controlled by the newspaper: “I think that’s massively irresponsible, unfortunately. I mean fundamentally, these conversations are happening in public, in an environment which we can and do control. I think that when we say that our only responsibility is to open this space and then back away slowly ..., we are missing the fact that..., we have responsibility for the spaces that we host and for the environment which we create with comments.” Moreover, as the journalist from 444 points it out, it is the newspapers that transform a private conversation into a public discussion, thereby implying additional responsibility.

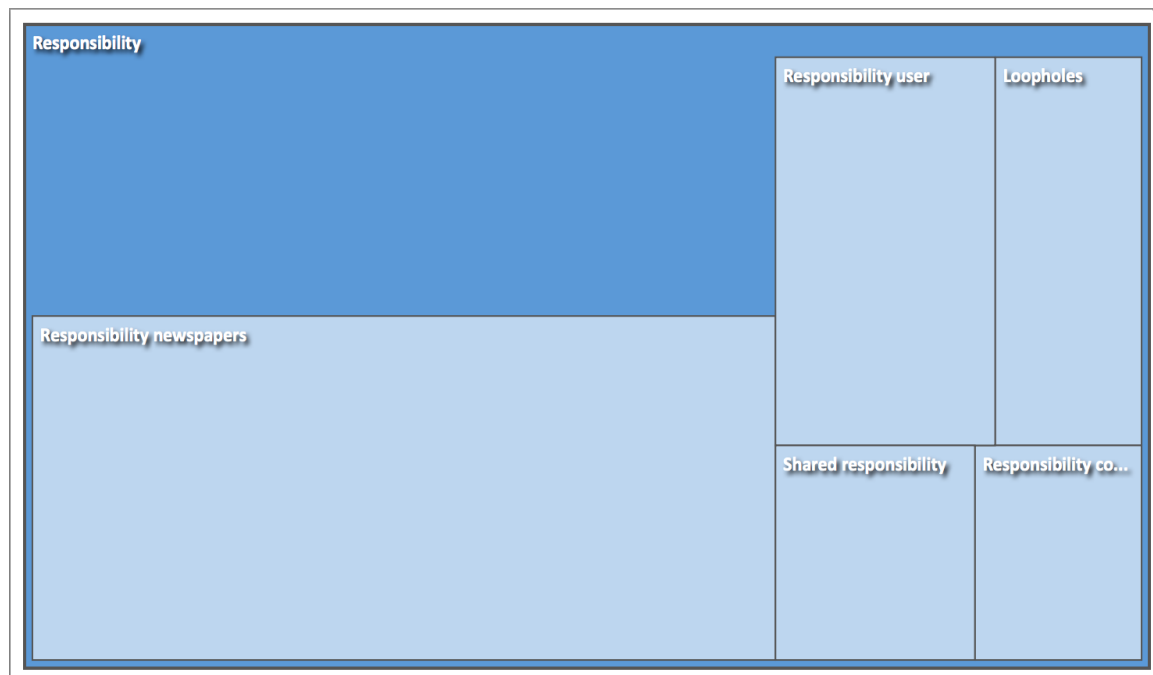
I am not saying that this is straightforward, because there are many considerations. But when we talk about a comment being offending, that offence becomes interesting because it reaches many people (...) In my opinion, we don’t just[host] (...) so you can twist it and turn it in legal and technical details (...) I could also give you arguments on why it is not our job, it’s Disqus’ or why it is the commenter’s responsibility but... what makes this matter, the publicity is added by us.

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<sup>282</sup> Jakubowicz, *A New Notion of Media?*

<sup>283</sup> Jakubowicz, p 24

## Responsibility



**Figure 9. Hierarchy chart for the codes and sub-codes responsibility for all journalist**

A common finding of most studies regarding comments could be summed up that no one knows exactly who is responsible for that content<sup>284</sup>. As mentioned before, the interviews indicate a contradiction between the newspapers' publicly expressed position (in TOS) and the journalists' professional values and beliefs. While the TOS decline all responsibility and maintain that it falls on the user, all journalists accepted that newspapers have responsibilities for the comments. As the vice-editor in chief of *Adevarul*, puts it "A responsibility exists, how could it not exist? That is why we have some rules that we impose, so that the discussion does not go beyond those limits."

Figure 9 presents a summary of the statements coded responsibility and its sub-codes for all journalists. It shows that when discussing this topic, the interviewees talked in the largest proportion about the responsibility of newspapers, acknowledging that they indeed have a responsibility. This is somewhat confused by the fact that they also spent an almost similar amount of time talking about users having primary responsibility, the loopholes that might occur and how responsibility is shared. Therefore, in line with the previous studies, this research also cannot provide a clear answer on who should be responsible for the comments. What is certain, however, is that no journalists declined responsibility completely (which is the

<sup>284</sup> Singer et al. *Participatory Journalism*

position maintained in their newspapers' TOS.) What emerged instead was an argument for a kind of shared responsibility between journalists and users, further complicating the issue of comments. According to the journalist from 444.hu referring to the research consensus mentioned above, "that's because a lot of research expects to be able to point to someone that they are the responsible. But this is not the situation...there is shared responsibility, for the commenter himself, the technical provider or the service, the publisher, the moderator...so here we have common responsibilities."

It is interesting to note that Figure 4 also shows that while journalists spent a relatively long time talking about the newspapers' responsibility providing examples and nuancing, the issue of user's responsibility was generally mentioned in fewer and shorter sentences expressing straightforward and clear opinions such as "the biggest responsibility is for the one posting it", "and yes, at the end of a legal procedure, we think the right thing would be for the one who wrote it to be punished, because he committed the infringement"(444). Or as the vice-editor of *Adevarul* put it in a bit more detail: "I cannot assume responsibility in general or juridical for one of our readers believing that Antonescu<sup>285</sup> was treated unjustly. It is his opinion; I cannot assume responsibility for that." A more nuanced opinion also pointing for a need for journalists taking more responsibility was expressed by the community editor of *The London Tribune*: "because obviously, fundamentally the user is responsible for what they say, for what they type for what they post. But as an organization I feel like there is a duty of care to other commenters and to other writers."

One notable exception was the vice-editor in chief of *MNO* who emphasized the importance of differentiating legally between the "core material that is the responsibility of the publisher, and the comment for which the readers are responsible." He also highlighted that the readers should be aware that they are responsible even if they think that they are anonymous. On the other hand, somewhat in contradiction to his previous statement, he also pointed out that there could be situations where the "pseudo-anonymity" and confusing legal situation could be beneficial to society:

In certain not quite exemplary democracies or dictatorships, this pseudo-anonymity or reinforcing the rules that the reader is responsible for comments, could weaken the civil

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<sup>285</sup> Romania's contemporary to Hitler, whose glorification is punishable by prison

courage (...) perhaps it would be desirable that the responsibility for the readers commenting activity not to fall on the newspapers. On the other hand there could be social situations when freedom of the press could indeed be ensured or reinforced through comments and there these rules could have a different outcome, so this is a hard question from this point of view.

The statements described in the previous section seem to suggest a contradiction between the journalists' professional values and the legal and practical reality of commenting. Guided by professional values, journalists are willing to assume responsibility for the comments, as detailed above, just as they would as editors or publishers. However, this does not translate to the terms of service. In practice, as the previously cited examples and statements show, online newspapers decline responsibility for comments in legal terms but then still assume a responsibility manifested in moderation, based not so much on legal obligation but on ethical values. This is best exemplified by the following statement from the editor of *444*, which could very well summarize the attitude expressed by all interviewees: "Even if the law would say that we have no responsibility, I would still say that we would have to deal with this. If it would turn out that for example in no form could we be made responsible for anti-Semitic or anti-Roma expressions on our page, I would not say that we would not have to take measures against them. Here the legal responsibility is not the only motivation of a responsible newspaper." A similar opinion was voiced by the community editor of *The London Tribune*:

But as an organization I feel like there is a duty of care to other commenters and to other writers. And I also feel quite strongly that there is a (...) a reasonable responsibility (...) to be responsible civil participant, if you are providing a space for debate and discussion than you have a responsibility in my view to ensure that what happens there is constructive, positive, not horrendous cesspit full of abuse.

Additionally, while journalists would be willing to take responsibility this has to be measured against the practical realities such as the high volume of comments and costs. This is a particularly challenging issue at *444*. After the closing of *Nepszabadsag* in 2016, *444* suddenly found itself in the role of the main left-liberal opposition news-portal allowing comments: "I don't think that we should dissect this responsibility thing. It is impossible. On the current volume of comments, it is impossible for a person or one and half persons to



manage them.” A similar opinion is voiced in more sarcastic terms by the vice-editor in chief of *Adevărul* referring to the EctHR’s *Delfi v Estonia* ruling and the tendency of pushing newspapers to taking more responsibility: “I agree that in an ideal world that is how I would want it to happen, but then I would also invite the gentlemen from the European Court to buy advertising on the websites of all European newspapers.”

Another aspect is the newspapers’ role in providing audience for comments by publishing them on their pages. Journalists from the *MNO*, *Hotnews* and *The London Tribune* noted this role and relationship. It was most eloquently described by the journalist from *444.hu*, who pointed out that it would also imply additional responsibility:

If I tell you that Orban Viktor [current prime minister of Hungary] is a rotten person, it is not but let’s suppose that would be an infringement. This infringement is uninteresting while it is a personal situation. This will be an infringement (...) because I do it in front of a large public. The publicity is given by the publisher, by the newspaper. So in this sense, in my opinion they can be expected to moderate and to have a responsibility. So personally... I am not sure that everyone at the newspaper would agree with me. In Hungary this is actually the practice, that the publisher, the newspaper could be made responsible for the comment published on their page, as I said this is not a simple question but I don’t think that this basically would be wrong.

On the other hand in this case too, the journalist emphasized that the assumption of responsibility is not total, and as mentioned above it would mostly fall on the user, but acknowledged that there could be cases such as not removing an infringing comment after being notified about it when the newspaper could “also be justly penalized.” Additionally, similarly to the editor of *Adevărul*, and other interviewees the journalist also considered that the resources of the newspaper should also be taken into consideration, further reinforcing the notion that similarly to previous studies it still not clear who and to what degree is responsible for comments.” “If we had 80 articles a day with 7,000 comments and we did not notice it, then we have less responsibility than if we would if we only had to moderate 300 comments, because we only allow comments for 5 articles. So, I am just saying that I cannot tell you in general that, this is seems always the truth, you have to examine it.”

Other journalists also seemed to agree, pointing out that by opening up a space for comments

the newspaper should assume some responsibility, which seemed to imply mostly ensuring civil behavior. As the community editor of *The London Tribune* described it,

You, you cannot open a space for public debate and then allow that to sit there quietly, with no attention being paid to it. It's the equivalent of opening a bar and then not putting anybody behind the bar, and not putting any door-staff on and then being surprised when the place is full with very rowdy people, smashing bottles and demanding attention. (...) and actually in most the same ways it's up to the publicant to ensure that, the patrons are not too unruly, and to ensure that nobody gets hurt, and to ensure that, you know, that people get served. It is up to organizations that open these spaces to ensure the same things.

The vice editor-in-chief of *Adevărul* also voiced a similar opinion and clarified that enforcing rules of behavior and moderation was an expression of the newspapers' responsibility: "You cannot put the responsibility entirely on the newspaper or entirely on the reader, but I also don't think that this approach of 'Well I have no responsibility, it is an agora and everyone says what they want'. If that would be the case we would not have put rules in place and would let everyone to say whatever aberrations they want." The editor of *MNO* noted that imposing some level of civility is not only important for the public discourse, but incivility can also damage the brand of the newspaper: "the publishers cannot just let things run on their own if they would like to defend their content."

A similar ambiguity was expressed by the journalist from *Hotnews*. Contrary to the other Romanian journalist, he agreed with the Delfi vs Estonia ruling but then he also balanced the statement noting that the users should also taking responsibility: "at least in the case of Romania, newspapers should take more responsibility then they do now, but the commenters too." He was also somewhat dismissive of the financial arguments arguing for less responsibility for newspapers: "regardless of how much money you have, as I said if you let a campaign against homosexual people then you really are responsible of that campaign. If you have two comments with insults because they slipped then you are not necessarily responsible."

The journalists from Hungary and Romania all voiced similar opinion when they talked about shared responsibility. The overall agreement was, as the editor of *444* put it, that "the biggest

responsibility is for the one who wrote it”. He also pointed out that there is shared and common responsibilities for the commenters, editor, the commenting platform provider, moderator and the user and how these are divided is up to the courts. According to the editor of *Adevărul*, the responsibility is “somewhere in the middle”, while according to the journalist from *Hotnews* “it is a blended responsibility of the one writing them, the one hosting them, and also of the one approving them... it is the responsibility of all to a larger or lesser degree.”

## Users

There were significant differences on the way journalists saw the commenting users; overall commenters were seen the most positive by the journalist from *The London Tribune*, also in mostly positive light by the Romanian journalists; on the other hand, they were seen with a measure of skepticism at *MNO* and outright negativity and criticism at *444.hu*. The opinions ranged from “even though only a very small proportion of our users comment, those users are often the people who are the most engaged, are potentially the most loyal to *The London Tribune*” to portraying commenters as “economically inactive so, either a pensioner or currently unemployed, who has time for that” (*MNO*). Moreover, according to another journalist, one of the theoretical benefits of comments is the free content the users could provide: “but the reality is not that, the reality is that crazy people post crazy things” or “the reality is that an article has comments from four, five, six ten, twenty people who are normal or not crazy” even in best case scenario. While admitting that it might be an overgeneralization, he considered that it takes a certain kind of people to “take the trouble of posting a comment on an article they read”, “in many cases you have to be a little bit of crazy to do that.”

On the other hand, in a position similar to *The London Tribune*, the journalist from *Hotnews* saw users in more positive light and noted that they can even contribute to the journalists’ self-evaluation: “there are many intelligent commenters, many with university degrees, who really are knowledgeable in a certain topic (...) who add value, some are full with humor, (...) many times there are very pertinent opinions... yourself as a journalist find out more about your own article.”

According to the vice-editor in chief of *MNO*, the readership of the site could be divided in three categories: there is a group of “more intelligent readers” who do not comment anymore

in part due to the incivility in comments and because they do not have the time and inclination to “get involved in comment wars;” there is a group of users who do post comments, formed largely by inactive, possibly unemployed and pensioners “who have time for that;” and there is third category of people (“and they are not few”) who “are not really looking for an opportunity to comment on articles, but for these type of discussion spaces where they can clash their ideas with others or express themselves in other ways. But because of this, their comments are not in any way related to the article.”

The other Hungarian journalist also considered that the part of the audience with the more valuable, specialized input are “serious people” who might not be interested or will not have time to post comments: “If something happens to bother them very much, or it provokes something extreme, there might be a reaction, but otherwise, everyone has better things to do, then posting under articles (...) now, that... what Kovacs2Geza, from I don’t know where, otherwise thinks about a relatively specific question, what relevance does that have?”

Sometimes the comment sections are used for conversations, debates, or verbal fights between the users in a situation where, according to the editor of *Adevărul*, “the article, where the comments are posted has nothing to do with the discussion between these people”. Some of the incivility might be due to the audience/users not understanding the limits of news and commentary. The editor considered this a problem in Romania: “very few have the education and understanding of what a commentator or a journalist means,” so users also do not always make the distinction between a news item or an opinion piece.”

According to the editor of *Adevărul*, journalists joining the discussion can make an important difference in the quality of the discussion: “they write there believing probably in many cases that no one is reading them and that they are just insulting each other between themselves, but from the moment you enter the discussion they take one, two, three steps back.”

In the view of the journalist from *Hotnews*, comments are useful to the users too, because they can provide clues on who else reads the story: “they can check what other people think, and can complete the story for themselves, or the news they read with the comments of the readers.” In contrast with other interviewees, the journalist from *Hotnews* considered that most commenters address their comments more to the journalists than to other users: “they got used

to talk... even if not addressed to me directly, they are addressing implicitly the journalist who wrote the news.”

### *Motivation for commenting (User generated hate speech)*

The journalists who talked about users motivation for commenting mentioned two reasons: to get access to their audiences and as a kind of “self-expression” or exhibitionism. Both Hungarian journalists considered that a key motivation of commenting was getting access to their audiences: “People do not comment on our site because our comment system is so wonderful that it could even guess their thoughts. No. They comment here, because we, with our own content, attract the attention of many people to our page.” This view was also shared by the vice-editor in chief of *MNO* who considered that the site “provides readership for the comments.”

As discussed in the literature review, a key argument for moderating or limiting hate speech in comments could be that by tolerating hateful content, some of the newspapers’ reputation might rub-off on it, and could be perceived as providing a kind of legitimacy. This was confirmed by the vice-editor in chief of *MNO*: “so commenters perceive that if they appear below an article, then their message is sort of legitimized or confirmed by the fact that it gets space...”

A similar opinion was also voiced by the journalist from *Hotnews*, who considered that newspapers have less responsibility if one or two hateful comments happen to slip by the moderator, which could be considered an accident, but allowing multiple instances of user-generated hate speech will increase the responsibility of the newspapers and would mean that they allowed their site to be used for a hate campaign: “if you allow 15 anti-gay comments, you allowed a campaign (...) You assume this, that’s it, you assume it[the responsibility].”

This is further confirmed by the fact that on *444.hu*, which is a left leaning news-site, there were a large number of right-wing extremist comments, quite far from the site’s political orientation. According to the journalist, this is a strategy to reach the readers of the newspaper, motivated by the intention of communicating a certain ideology:

They come here, in order for their views to appear in front of our readers, which is a comparatively large community, to also present to them what they think about Gypsies,

homosexuals, Jews, or don't know who, or of Orban Viktor. (...) someone who writes under one of our articles that the Gypsies do not work in Hungary, or that they never work... he wants to communicate that, he does not want to comment on the article.

The newspapers' moderation approach might also serve as a motivation for users to post on a given site. At the moment of the interview 444.hu had possibly the largest number of comments in the Hungarian media. As mentioned before, this is not viewed as a success, and has caused significant problems for the newspaper's editorial team. According to the journalist, this was in part due to the weaknesses in the moderation: "amongst other things, a reason for this is that we do not moderate too much, or we moderate very badly" which attracts more comments, but in turn it makes it even harder to handle them, leading to a further reduction in the level of civility.

On the other hand, the editor of *MNO*, which had significantly fewer comments and in the words of the editor a "less lively comment area than other places", changed commenting platform in order to increase the number of users. He was concerned that due to the newspaper exercising "too much control", users might not want to comment because of a "commenting trauma" of having their comments refused multiple times. *MNO* still chose to enforce a stricter moderation in order to protect the newspapers brand. This was visibly a preoccupation of the journalist who talked the most amongst the interviewees about how the brand might be affected by comments, mentioning it three times ("the brand of *Magyar Nemzet* would not allow to have continuous diatribes under the articles") and considered enforcing stricter rules a necessity as "editors cannot just let loose these things, if they want to protect their content." The other journalist who mentioned the newspapers brand was from *Hotnews*, who considered that "comments are part of *Hotnews*' brand."

The journalists from *The London Tribune* and *Hotnews* were the most positive about the community of users in their comments sections: "every newspaper grows its own community" according to the journalist from *Hotnews*. Moreover, "the community functions as an organism rather than simply as a set of statements" according to the journalist from *The London Tribune*, who also pointed out that the importance of knowing this community and to identify its needs and adjusting the moderation: "Our moderators know our community, they know that the poem of the week is going to be really aggressive, they know that the quick cross-word community

needs a certain amount of additional help, if it gets a lot of traffic because people like to come in and troll the commenters.”

According to the journalist from *Hotnews*, with consistently applied standards after a while the community not only accepts the standards but can also be trusted to enforce them. Users sort of “get domesticated” after a while and learn that it is not worth their time to post insults or hate because they will be removed and the other users themselves will “sanction the trolls.” This learning effect allowed the journalist to have such a degree of trust in the community to even experiment with a kind of community/market place of ideas moderation where he knowingly lets offending or stereotyping comments to bypass moderation trusting that “they will be amended by the other users” and after such a stereotyping comment is allowed, there are a number of comments “amending” it. As the journalist put it, citing a typical marketplace of ideas argument, “this is more productive than rejecting them and then say that they do not exist.”

At 444, the journalist admitted that one of the reasons for the problems with comments might be that both the moderators and the journalists “do not really have a clear picture of this community.” There were attempts to involve users in the development of the commenting guidelines by inviting a number of users for a roundtable discussion, which later revealed an adversarial relation between the users and the journalists: “it was really this kind of adversarial thing where we think that the commenters are stupid while they also think that 444 is stupid, and one cannot imagine a worse marriage than that; [...] why are we together then if they think of us that we are idiots, and we think of them that they are idiots?” Additionally, the community perceived that those invited to the roundtable “somehow betrayed the others” and they were even marginalized and considered “collaborators.”

### *Organized commenters – trolls*

All journalists mentioned the presence of “trolls”: organized groups of commenters who seek to influence the discussion in a certain way, to disrupt it, or coordinate to post comments supporting a political actor or foreign power, in most cases Russia, in order to influence public opinion. The journalists described three kinds of trolls: first, organized groups that were likely paid by a political actor or foreign power such as Russia encountered in higher numbers on the comment sections of *The London Tribune*, *Adevărul* and *Hotnews*; secondly, groups described

by the journalist from *444* as “useful idiots” who reproduce the same messages and communication panels, as organized actors, but out of conviction. According to the journalist from *The London Tribune* these could be “groups whose behaviour mimics organized groups (...) but is not coming from an organization.” Finally, there are also the “classical trolls” (*MNO*) who only seek to disrupt the conversation.

In Romania the phenomenon of employing people to post on websites became so widespread that according to the journalist from *Hotnews* in 2012 there were “armies of trolls”, and newspapers started to use the term “*postac*” (poster) to describe paid users. As the journalist described it, in the previous election campaign most political parties have had “call centers with *postac*-s” and they even had a former minister, and the leading politician of the current governing party describing in an interview for the site how he set up the first ones of these call centers. The journalist himself even visited one of these call centers, mostly employing language students: “it was funny, because I was talking to them, we were eating cookies and when the guy in charge of the call center left one of them asked me, saying (*changed intonation to indicate whispering*) ‘but, you know, I wonder is it moral what we are doing here?’” The existence of *postac*-s was also mentioned by the editor from *Adevărul* who also noted that the main difficulty of dealing with the phenomenon is that the posters/trolls take care not to break the rules of the site and as such, there are no grounds for filtering their comments. Additionally, as the editor pointed it out there are also no clear ways of delimiting them from the regular users and even if there were, their removal would still be debatable: “after all, these people, even one of these posters or a troll of Putin, have some arguments more or less sophisticated, more or less real, but those who are curious about it can read it, and accept them or not.” Similarly, all other journalists talked about being wary of grouping regular users with posters/trolls. Sometimes they are clearly identifiable due to the content of their comments or their IP addresses such as the dark-net/Tor IP which usually indicate Russian trolls, but in other cases these might be genuine users who reproduce certain communication patterns out of conviction. On the other hand, as the editor from *Adevărul* pointed out even if there would be technical solutions to identify and unmask them “how would that help, as long as they are within the rules of the site.”

A similar phenomenon of “very clearly politically directed commenters” attempting to disrupt the site’s readership was observed at *MNO* after the change on political orientation from supporting the government to criticizing it. A type of politically-directed commenters were also



observed at 444.hu but in the view of the journalist, while some of them might be coordinated that was the minority and there was also another category of users that reproduced the government communication messages in a strategy to advance in the state administration because “defending the honour of the uniform”<sup>286</sup> might get them good points. According to both the Hungarian and the Romanian journalists, some of the trolls/posters are using “professional methods”; “they will not just start glorifying Putin” but will attempt to take over or divert the topic of discussion, or misdirect the readers by “spreading false targets or questioning and undermining any authority” (*Hotnews*), “fake-news and progaganda” (*MNO*), shifting blame on the Americans (*Adevărul*) or in the case of *Hotnews* exploiting the community moderation to eliminate legitimate comments. The effectiveness of these strategies can be amplified by co-opting “useful idiots” “if two people are doing it cleverly, there will be 15 others who will do it, just because others are doing it too.” In most cases these are politically motivated groups, but the editor of *MNO* and the journalist from *Hotnews* both mentioned that economic actors also use hired commenters to gain influence, while at *The London Tribune* “men’s right activists” are also present and sometimes direct a large number of abusive comments to the site by posting links to articles on forums. The danger in both cases, as the editor of *MNO* pointed it out is that whether it is political or economic actors, “this is a way of gaining influence that is not transparent for the society, and the newspaper practically provides the space for this.”

### *Anonymity*

Probably one of the most frequently highlighted aspects of comments is the perceived anonymity of their authors. Especially early works such as Biegel in 2003 and Solove in 2010<sup>287</sup> highlighted how this can be abused. Surprisingly, in contrast to the trend of requiring real-name identification, in some case even on their own sites, the journalists did not express strong views on the issue or supported identification policies. Moreover, even with the associated risks journalists talked more about the complexity of identity in the online world and the potential benefits of anonymity than its negatives. The most detached opinion was expressed by the editor of *Adevărul*: “I honestly do not care about identifying them, (...) as long as he respects certain rules, I think it is ok, that if he wants to identify himself honestly or

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<sup>286</sup> “Vedi a munder becsuletet, lit. defends the honour of the uniform “tries to justify/explain a mistaken/incorrect/unlawful action of somebody in his organisation/group.”(Paczolay, 1991)

<sup>287</sup> Biegel, *Beyond our control*; Solove, *Speech, Privacy and Reputation*

calls himself the Archangel Vasile... ." This was again in contrast with the policy of the newspaper itself, which after the latest redesign included elements to encourage users to identify, such as making easier to post a comment using Facebook login.

Both Hungarian journalists expressed almost identically ambiguous opinions regarding users' anonymity, highlighting the negatives. According to the journalist from *444.hu*, in most cases the anonymous opinions are of little value: they are "not only worthless, but explicitly harmful." The editor of *MNO* highlighted that anonymity changes people's behavior who feel encouraged to post "verbally sadistic remarks, that otherwise in daily face-to-face interaction, the same person would not even think to say." However, he also noted that due to historical circumstances of being through both fascist and communist dictatorships, "the majority of people or a significant part do not like to appear with, and do not like to express opinions with their names" as they fear negative consequences. He considered that a strict identification policy would scare away users who do not abuse anonymity. The journalist for *444.hu* expressed a similar opinion, while also highlighting that the easiness of posting a comment immediately could encourage users who otherwise would not bother with registering or emailing: "I now think that overall, we have to bear and struggle with the problems caused by anonymity because the alternative is worse." The editor of *MNO* also emphasized how "in certain non-exemplary democracies or dictatorships, this pseudo-anonymity could encourage citizens to use it as a tool against oppressive state powers." On the other hand the editor also noted that although the users are not readily identifiable, this is just an apparent "pseudo-anonymity" and users can be identified very easily even if they use pseudonyms. Therefore, "the readers should be aware that even anonymously they are responsible for what they have written."

Similarly to the Hungarian journalists, the community editor of *The London Tribune* also considered anonymity to be "actually incredibly helpful in a lot of ways because it enables people who might not otherwise be able to speak." The journalist also highlighted the complexity of identity in the online world and cautioned about confounding anonymity with "persistent pseudonimity". The latter was also highlighted by authors such as boyd, can become an important part of identity, as the journalist from *The London Tribune* put it:

where a culture of pseudonymity is natural, but there is real cultural capital attached to a pseudonym and real consequences of being banned or being sanctioned um, you don't

see the same sorts of misbehaving that you do in supposedly real name but... platforms like Youtube for example which is notorious at this stage for having god awful comments despite the fact that Google enforced a real name policy.

This skepticism towards real-name policies such as Facebook Login was shared by all journalists. The editor from *Adevărul* noted that Facebook profiles can also be faked, while according to the journalist from 444 “just because they have to show their face does not really restrain anyone.” Moreover, as the editor of *MNO* put it, “we can see that commenting on Facebook, where even in case of comments posted with clearly real names and genuine profiles, people are not always interested in the fact that this is a comment linked to their name, and they are trolling by posting the most brutal and ugly comments.” According to the journalist from *The London Tribune*, a cause of this ineffectiveness might be that the limits of personal and private spaces are not very clear:

We're getting much more efficient as a society at compartmentalizing our identities around different things, (...) like what I say on Facebook is only going to be seen by people who are already agreeing with me on Facebook so if I'm posting a Facebook comment on another news site I'm doing so in the context of my Facebook page not in that news site's conversation. ” She concluded: “the danger then of introducing that into your comment system is you have bunch of people who are arguing within their own filter bubbles and they are just talking past each other there is no real genuine conversation or community possible.

## **Moderation**

### *Why moderate?*

Moderation, setting and enforcing rules of behavior in the comment sections, is seen as the expression of the editorial role and responsibility for most journalists. Singer et al. mention that some newspapers were reluctant to implement moderation in order to avoid being considered editors and taking responsibility.<sup>288</sup> According to the journalist from *The London Tribune*, managing comments is part of being a responsible host; not having proper moderation

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<sup>288</sup> Singer et al., *Participatory journalism*

in place, “It's the equivalent of opening a bar and then not putting anybody behind the bar, and not putting any door staff on and then being surprised when the place is full with very rowdy people, smashing bottles and demanding attention.” Additionally, as the editor of *MNO* noted, if the comments area is overrun by vulgarities, insults and people fighting each-other, this would undermine the newspapers brand and its articles, and readers would abandon the site because “that is not what they would expect from a newspaper like *Magyar Nemzet*,” and it would also make the article above look unserious.” According to the editor of *Adevărul*, having moderation is “the normal thing to do” and implementing rules is an expression of the newspapers responsibility: “if it wouldn't have been like that we would not have set rules and would just give comments free reign and let everyone to post whatever aberrations they want.” Moreover, as the journalist from *Hotnews* put it, not having moderation might not be a valid strategy for avoiding responsibility: “they have the same responsibility regardless if you moderate or not; from the moment it appears on your site, I do not really see what the difference is in responsibility.”

### *Moderators*

With the exception of *444* all sites had in-house moderators, who were generally part of the social media team and also had additional responsibilities in those areas such as managing the Facebook page. All journalists mentioned shortage or even lack of available financial resources and manpower. This was most pressing at *444.hu* which at the time of the interview had possibly the highest number of comments in the Hungarian press, moderated by only one external moderator. *Hotnews* also had only one dedicated employee but here journalists were also asked to join in and approve comments. With about a quarter the amount of comments compared to *444.hu*, *MNO* had a team of five who in addition to moderation were also in charge of the social media and other background tasks.

The level of training and specialization of these teams varied; at *The London Tribune* they receive “a fairly intensive training.” At *MNO* they were originally part of the documentation support team and, according to the editor, they are situated somewhere between the journalists and editorial departments. As a team they were trusted to be “quite self-directing” in applying and partly elaborating the community rules, with little guidance, training or discussion from the editorial team, a situation that the moderators “took issue many times and rightfully”. However, while the editor admitted the need for more discussion and exchange of experiences,

he noted that “there is simply no energy for it.” This awareness of the need to employ more moderators and to allocate more resources, the budgetary constraints and the effect of the shortage on the quality of the comments was a common theme of the interviews. As the journalist from *Hotnews* put it, “there are a thousand and some comments a day, a person cannot read them all and be lucid.” Similarly the editor from *Adevărul* admitted that “we should have... to be short we should have many more people, to be able to afford, more employees in order to do a truly very good and professional moderation (...) We try...we do as much as our budget allows.” Budgetary constraints operate even in the case of *The London Tribune*, as the choice of opening or closing comment threads is weighted also according to financial factors, and also influences the choice of moderation strategy.

Journalists can join in the conversation under their articles at all newspapers. This is even encouraged at *The London Tribune* and *Adevărul*, but ordinary journalists are not allowed to moderate or remove comments. A notable exception was *Hotnews* where journalists were also asked to join the moderation. Another exception was the interviewee at *Adevărul* who as vice-editor in chief also had moderating privileges and frequently joined the discussion and took over the moderation of his own articles. As the journalist noted, the presence of the author has a moderating effect in itself on the comments even in cases where “they curse you terribly or have a very violent reaction, but from the moment you start having a dialogue with them and say “look you haven’t read that, did not take in consideration that” in a civilized manner, suddenly they soften their tone, and it becomes decent.” However, this requires time and very likely especially skilled journalists. On *Contributors* a site aimed at a niche, relatively specialized public, the authors and the managing editor (same as the journalist from *Hotnews* who was interviewed for this research) moderated together, but this was a special case too, as the number of comments was significantly smaller than on the general news site such as *Hotnews*.

None of the sites in this research used community moderators recruited from the users. While all sites have a reporting feature for offensive comments, this was most essential for *The London Tribune* as they did not pre-moderate comments before publication. *Hotnews* also uses an element of community moderation with a voting system of plus/minus votes for registered users whereby a comment whose total turn negative could be hidden under a notification message, therefore giving the sites’s visitors the option of revealing and reading it or not by clicking on the relevant link.

### *Moderation strategy*

With the exception of *The London Tribune*, according to the interviewees all the sites in the interview sample pre-moderated comments, i.e. they had to be approved by a moderator before appearing on the site. Comments were enabled by default on all articles for all the newspapers with the exception of *The London Tribune* where they were enabled only on a select number of articles and for a limited time, chosen according to a number of factors such as available resources, likelihood of problematic content and legal issues, or relevance of topic.

The two Hungarian newspapers used the same Disqus commenting platform and operated a white-list for trusted, registered users whose comments could appear directly. In the case of *MNO* this was paired with a penalty of permanent ban for abuses of whitelisted status, which according to the editor never happened. However, in the case of *444* the white-list approach failed as too many users were allowed on the white-list and even that became unmanageable. The success of the moderation is arguably largely dependent on the moderators not the moderation approach, as the results of the content analysis suggest that even with a post-moderation strategy, that would theoretically expose it to more abuses, *The London Tribune* had the lowest rate of problematic content, while despite pre-moderation *Adevărul* had one of the highest rates of hate speech in the sample. The journalists are aware of the failures in their moderation as noted by the interviewees from *444.hu* and *Hotnews*, but as the editor of *Adevărul* admitted, “I am convinced that we could find comments that are not within the rules of the site, there is a lot of them. Sometimes the volume of work is more than we could do.”

### *Moderation-censorship (Freedom of Speech)?*

In terms of freedom of expression almost all journalists pointed out a division between freedom of expression and the right to be published. This position was most clearly summed up by the editor of *MNO* who agreed that the user has the right to write freely, “but that we would be obligated to publish it on our page, well that is a huge mistake”. Or as the journalist from *444* put it, “commenting is not a human right”, a very similar opinion expressed by the journalist from *The London Tribune*: “we won't stop people from saying things. We just stop them from saying it ... there.” On the other hand, as the journalist from *444* noted, even in the offline world “freedom of speech is not absolute right” and in Europe it is rightly limited in some

cases, in line with other rights that are also not absolute: “it does not mean that anyone would have to listen, to anything someone says.” The journalists from *The London Tribune* and *Hotnews* both compared moderation to the newspaper editing process where the editors select articles for publication. According to the journalist from *Hotnews* who was also managing editor of *Contributors*, on that site 60-70% of the articles are rejected and no one would call that censorship as “censorship is done by the states not newspapers.”

On the other hand the editor of *Adevărul* firmly affirmed the right of the newspaper to decide: “there is a right of the users to express themselves on our site, within the limits that we impose and when they are breached we will censor them.” “It is a censorship in the strict, literal sense of the word, but it is a censorship we announced.”

### *Limits on freedom of expression*

Regarding the limits on freedom of expression in the comments, the journalists mentioned two types of offending content: the legal categories such as clear hate speech and incitement to violence whose removal is mandated by law, and other cases where the classification of the content is not straightforward and basically depends on the newspaper to decide what rules to apply. There was unanimous agreement by all interviewees that comments that fit into legal categories of hate speech, antisemitism, incitement to violence should be removed. However, there were notable differences on defining the limits of these categories especially in the cases where it is not immediately obvious if a comment contains hate speech. This was best summarized by the journalist from *The London Tribune*, in the following quote but almost all journalists expressed similar views:

“There is a difference between homophobic speech and actionable hate speech, and actionable hate speech is always going to come down because it's legally actionable and we as publishers are legally responsible for hosting it, so you take it down. And then there are comments which are unpleasant, rude, de-humanizing, vicious and all of those things should come down and all of our moderators get training in recognizing those.”

On the other hand, the vice-editor in chief of *Adevărul* did not see the category of hate speech as clear cut:

I can give you examples of comments which in essence can be included to hate speech, but are formulated in civilized terms, and in that moment, honestly I do not know, what should I do? Uhm in principle I would be tempted to leave those comments, as long as they make an argument. Because I cannot...as I told you at the beginning, I am not the keeper of the absolute truth.

As the quotes before show, for the comments in the second category newspapers have quite a large latitude to decide what to accept and remove, and this could be a contributing factor to the differences in the levels of hate speech noted between newspapers that have similarly worded terms of service.

This problem was noted by van Dijk, who argues that racism has not disappeared even from the mainstream news but transformed to a new, less visible form that “wants to be respectable and denies it is racism”. However, the negative attitude towards minorities can be traced both in the linguistic choices and the selection of news topics.<sup>289</sup> In terms of language, the new racism “avoids explicitly racists labels and uses negative words” to describe properties or actions of immigrants or minorities such as “illegals” and uses certain code words referring to minorities or the problems created by them. Regarding news topics van Dijk argues that a desire to reinforce racist or xenophobic attitudes and to emphasize polarization can be traced in media’s tendency to focus on problems and threats on topics about minorities.

This is further illustrated by the following examples comparing the views of the journalists from *Adevărul* and *444*. As mentioned above, the editor from *Adevărul*, similarly to the other journalists considered that hate speech and insults should be removed, but then noted that things become complicated in the case of comments that are “essentially hate speech, but formulated in civilized terms” thereby providing an almost text-book example of van Dijk’s observation:

Yes, but what about when I have a comment that does not say explicitly "death to the gypsies"? But the commenter invokes the fact that... most people of the roma ethnicity, don't go to school, and perpetuate the... the life style in which they go... steal... or I

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<sup>289</sup> van Dijk, Teun A. “NEW(S) RACISM: A DISCOURSE ANALYTICAL APPROACH,” n.d.



don't know. Well there...uhm... after all what that man says... what that man says cannot be contested..., when I have statistics that tell me this thing. (*Adevărul*)

Similarly, the editor of *MNO* also noted that while the comments in the legal categories of hate speech, antisemitism, instigating to violence “are eliminated by default”, “hate speech is quite a rubber-category” especially since “this form of communication, these kind of comments, allow for many possibilities of misunderstanding” and “if we judge things too strait-lacedly, we could harrow the reader’s feelings, if unjustly..., so we could scare away someone from reading the *Magyar Nemzet* if they see that the moderation is self-serving.”

On the other hand, according to the journalist from *444.hu* “That..., "gipsies don't work" is a racist statement.(...) I cannot give you a good coordinate system, where...where you can see this clearly. (...) if someone tells me..."the gipsies do not work" that, that is racism.”

Interestingly, both *Adevărul* and *MNO* occupied similar positions on the media landscapes of the two countries, they were right-leaning conservative and the most important dailies at the time, on the other hand he journalists from the two news-portals, *444* and *Hotnews* expressed a less permissive view of hate speech. The journalist from *Hotnews*, the only interviewee who was also directly involved in day to day moderation, said that he would delete even well formulated comments that contained stereotyping or labelling certain groups. On the other hand, *Hotnews* also used a marketplace of ideas type of moderation approach, where they would knowingly allow stereotyping comments entrusting the readers to counter them. As the same interviewee put it, “I can allow on *Hotnews* some of these stereotypes with intention, precisely because I now that they will be amended by the other readers.”

While the above could provide some explanation into the varying levels of hate speech amongst the newspapers in the sample, as in the case of responsibility, there are notable differences between the journalists’ stated professional values and practical reality. Even though the journalist from *444* voiced the strongest opinion against racist and hate speech, the site does not have the resources to implement and enforce those views into action. The interviewee admitted that they basically do not moderate and therefore have quite high levels of problematic content, with users attracted to their comments area specifically because of this fact. Thus, inaction and lack of resources effectively overwrite their editorial values and the site could unwillingly contribute to the propagation of hate speech.

## Ethics and Regulation

As discussed in the literature review, Hlavach and Freivogel highlight a “fundamental discrepancy between the ethical standards newspapers apply to their reporters and letter writers and the posters.”<sup>290</sup> They consider the double standard of allowing hateful reader comments in the online edition while refusing to publish it in a similar space in the printed version a breach of ethics.

When asked about this issue, there was a surprising similarity between the interviewees’ opinions, all agreeing that in most cases different rules should apply to users and journalists, even if that means stricter rules for journalists and holding them to higher standards. The main reason for the distinct rules mentioned by all journalists seemed to be a kind of professionalism, both in the sense of professional training and adherence to professional rules.<sup>291</sup> Journalists have different skills and education that makes them more aware of the limits and enables them to express opinions without breaching ethical rules. More importantly, adhering to different rules seemed to be perceived by the respondents as an element of professional identity, a way of delimiting journalists from users. This argument, voiced to some degree by all interviewees, was not only surprisingly similar across countries, but also presented in practical terms Kovach and Rosenstiel’s theoretical notion that in the online world where everyone has access to publishing technology it is the adherence to ethics that defines journalism. As the journalists from *Hotnews* put it, “if we would apply the same rules it would only be journalists commenting between ourselves.” Similarly, the journalist from *444.hu* also highlighted professional differences, arguing that it would not be fair to have the same expectations from someone whose professional duty is to report news or criticize public figures with the corresponding experience and education and an “amateur”:

I make my living of expressing myself, (...) I can destroy someone (...) I can write a very devastating opinion about someone in a way to be very... but in no way, you understand being ethically unacceptable, (...) because I practice this every day in many hours. In my opinion, it is not a problem..., I do not think it is reasonable to expect, to apply the same rules, for someone who is doing this for money and...[an amateur]

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<sup>290</sup> Hlavach, Laura, and William Freivogel. “Ethical Implications of Anonymous Comments Posted to Online News Stories.” *Journal of Mass Media Ethics* 26, no. 1 (January 2011): 21–37. p 24

<sup>291</sup> Hallin and Mancini pp 33-34

“In principle there should not be different rules, but you cannot have the same expectations from a reader” said the vice-editor in chief of *Adevărul*, who also noted that even in the professional content different rules and expectations around language and objectivity apply to news and opinion pieces. Similarly, the journalist from *The London Tribune* also highlighted that a certain level of contention is to be expected due to the nature of comments as opinions. Similarly to the vice editor-in-chief of *MNO* and the journalist from *Hotnews*, the journalist noted that enforcing too strict standards could stop users from commenting:

We do have different rules about things like swearing above and below the line, different rules about things like opinion and bias and that we will allow opinion comment on a flat reported news story, we will likely to keep comments on opinion because that's sort of where they belong but at the same time opinion is often one of the most contentious places because by default there is something to argue with.(...) I think there is an argument that one shouldn't allow bias in comments where one wouldn't allow bias in articles. I just don't think that that argument..., where that argument inevitably leads up is that no one gets to comment on anything anymore and I think that throws the baby out with the bathwater.

The necessity to clearly differentiate between facts and opinion, and the different expectations regarding the content created by journalists and readers was also echoed by the vice-editor in chief of *MNO*. Similarly to the editor of *Adevărul* and the journalist from *The London Tribune*, he highlighted the opinion element in the comments as an argument for more relaxed rules for users, and also and pointed out the need to clearly differentiate between them.

Moreover, the journalist from *Hotnews*, a natively digital publication, considered that the awareness of this polarizing potential of online news, resulting from the possibility of immediate audience reaction is a key differentiating factor between print and online journalism: “the rules are the same, but the attitude differs very much.” Similarly, to the other interviewees, he pointed out that journalists should be aware that “online favors the polarization of opinions” and journalists need to be much more transparent and careful with the “nuances they use.” In addition, as a journalist who worked in print but was present at the founding of the site, he considered that there are major differences in the “way of writing” between print and online journalists. One point of difference is that for the online press journalists should prepare for

the readers' immediate reactions and give additional information they would not necessarily provide in print, to pre-empt the polarization of readers' opinions, which can reach the extremes quite fast. This is a skill that in his view print-only journalists do not readily possess: "when you come from the printed press you are self-sufficient, you don't have precautions, you don't know that you have to respond to readers." On the other hand, the editor from *Adevărul*, Romania's oldest newspaper, while acknowledging the additional technical possibilities the online form offers, such as no limitations on space or the possibility to update the information, considered that "for the journalistic rules, I do not see why would there be any differences."

## Regulation

### *Legislation awareness*

As journalists, the respondents are a special population in terms of legal awareness; they not only receive legal advice from their lawyers, or juridical departments, but they also obtain their own information from sources, such as politicians and lawmakers in their journalistic work. As such they are aware of legal cases and especially changes in legislation. As the editor of *Adevărul* put it, they have a legal department, but in many cases "they don't come to us, because usually we find out first."

Probably *The London Tribune* was the news organization in the study best equipped to deal with legal issues. It has a team of lawyers specialized in media law available permanently (some of whom on site) and also provide some legal training to moderators. As a global publisher with offices in multiple countries, *The London Tribune* also has to be aware of the legislation and work within multiple jurisdictions, and prepare for the challenge of having large numbers of comments from different countries with different free speech regulations, including the significant difference that arise due to the First Amendment in the USA. As a strategy to face this problem, as the journalist noted, "generally whatever is happening we will apply the strictest legal standard of the countries we are operating in."

## Legal issues

Journalists mentioned a number of legal risks associated to comments. This section discusses some of the more prominent issues mentioned by the interviewees.

### Defamation

Being held responsible for defamation committed by users was the legal risk most frequently mentioned in relation to comments. This was discussed in detail by both Hungarian journalists and the journalist from *Hotnews*. In addition, at *The London Tribune* “risk of defamation” is one of the criteria taken into consideration as to whether or not to open comments on an article. It was also the only issue where journalists from Hungary and Romania provided actual examples of legal action faced by the newspapers due to comments. The site being sued because of defamation occurring in the comments was one of the arguments mentioned by the journalist from *444* for elimination of the comments. This was most prominent in the case of Hungary where both interviewees talked in detail about the legislation. It was considered to be “horrible” by the journalist from *444.hu* while according to the editor of *MNO*, “is quite from the 19<sup>th</sup> century or has that approach, and there are many grounds on which to drag the editor or the journalist in front of the courts,” a risk that is expanded due to the unpredictability of comments: “An editor of a newspaper can feel constantly treading on thin ice due to the comments. The newspaper, the editor or the journalist could be sued, due to false claims or statements made in the comments, if the court does not perceive them as an opinion, but factual statements, which then opens a new dimension in the problem.” (*MNO*)

Due to the nature of the legal and criminal system based on trial juries in the United Kingdom, at *The London Tribune* endangering the proceedings especially in criminal cases was a risk specifically mentioned by the interviewee as something that “carries very, very severe penalties” and as such sometimes leads to the removal of “perfectly reasonable comments and perfectly sensible conversations.”

## Hate speech

As mentioned in the relevant section, there was a unanimous agreement that comments containing hate speech should be removed. Some journalists also mentioned the issue when discussing regulation. As discussed earlier in this chapter, one of the major issues in regulating hate speech is providing a definition for it. As the community editor of *The London Tribune* noted, “Legally actionable speech is legally actionable speech and that definition is provided and tended to by our legal department”[ ...] “because it's legally actionable and we as publishers are legally responsible for hosting it, so you take it down.” As mentioned before, the vice-editor in chief of *Adevărul* considered the definition of hate speech problematic. However, the existing anti-discrimination regulation and the need to protect the newspaper was one of the reasons he mentioned for maintaining moderation: “from a legal point of view we would be vulnerable (...) if we would allow that sort of comments.” On the other hand, the journalist from *Hotnews*, while worried about the possibility of calumny and defamation, considered hate speech less problematic and noted that the “anti-discrimination council does its job well.” However, it should be mentioned that a search on the anti-discrimination authority’s decision archive for keywords related to comments returned only two results and in the only case about racist comments the authority did not examine the complaint because the complainant was no longer available.

## Delfi vs Estonia

As discussed in the literature review, the ECtHR’s *Delfi v Estonia* ruling seems to point in the direction of pushing the newspapers to assume more legal responsibility for comments. Journalists were asked if they were aware and what they thought of the ruling. Only the Hungarian journalists were familiar with the case, probably due to the latter, *Index*, *MTE vs Hungary* ruling on the topic of comments that somewhat reduced the site’s responsibility. After being provided some explanation on the case, only the journalist from *444* supported the ruling. The editors of *MNO* and *Adevărul* agreed with the principle of newspapers taking more responsibility for comments as noting that “it is basically a good direction” (*MNO*), but then also pointed out the financial and practical limitations that stand in the way of turning it into practical reality.

The only journalist who was familiar with the details of the case seemed to support the decision. He expressed a view quite similar to those of writers supporting hate speech regulation noting that tolerating hateful content in the comments also has a damaging effect and could erode public discourse in general:

I think that for example, the European decision (...) is good, so, it is necessary for the publishers to face the fact that this is a problem. I do not wish for someone to be punished (...) This is not only bad because it is bad for my article, because it looks bad...It is bad because it erodes the quality of public discourse. People behind masks, many times completely without context, so in reality a 12-year-old kid posts something about someone (...) for political reasons, state ordered or similar cases. Simply put, it is damaging, that this is what people see, this becomes normalized, this is what they accept (...) Such extremes got into the public discourse that we pretend as if normality also moved slightly, and I think this is a very bad thing.”

On the other hand, the vice-editor in chief of *Adevărul* argued for decision makers to also take the newspapers situation into consideration: “It should be judged in what degree they saw that comments, and if they were aware, so if they knowingly let a wrong comment (...) I would penalize malevolence, yes I would, but this, in this style when they tell us how we should do things, but not also where to get the money to do it, seems to me a bit exaggerated.” Moreover, the community editor of *The London Tribune* considered that the trend signaled by the judgement could endanger commenting itself:

It is difficult as well because if the Estonian decision is taken to its logical conclusion then no newspaper can have post-moderated comments anymore; everything needs to be pre-moderated because if post-moderation is no longer sufficient especially as legal remedy then that just throws that whole argument out of the window.

## Solutions

There was no common solution that the journalists agreed on. None of the interviewees, however, advocated for stronger regulatory provisions, education being a preferred solution

instead. This was most clearly articulated by the journalists from *The London Tribune*, who considered that the negative issues around comments might be due to their novelty and society needs time to adapt to them:

“I think it’s society adjusting to a terrifying new technology which enables communication in ways that we have never ever experienced before as a species. And part of me thinks that this is just going to take a generation to work through until (...) the kids who are my niece's age who have grown up on the internet become adults and start bringing up children and educating them about how, how discourse works.”

A similar opinion was expressed by the editor from *Adevărul* who maintained that “censorship is not a solution. It would be better to fight to educate ourselves and each other – even if some erroneous things get through, but not to impose censorship.”

Regarding self-regulatory solutions, Romania is the only country included in the study without a representative journalist organization or any forms of journalistic self-regulation. The journalist from *Adevărul* considered that a form of self-regulation could be good, but together with the other Romanian journalist agreed that currently that is not possible, as there is no credible and representative journalist organization. According to surveys, this is a rather specific characteristic of the Romanian media, as even journalists do not trust forms of self-regulation.<sup>292</sup>

The Hungarian journalists on the other hand argued that new strategies and approaches to handling comments could be a solution. The editor of *MNO* called for more involvement of the audience in moderating themselves, also aided by automatic filtering technology and the guidance of professional moderators. The journalist from *444* was skeptical about the worthiness of the effort of keeping comments and saw it necessary to at least drastically reduce the number of comments, possibly by moving to paid memberships or closed Facebook groups, and mentioned the example of a Slovakian site where this was successful.

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<sup>292</sup> ActiveWatch Media Monitoring Agency, Centrul Pentru Jurnalism Independent (Center for Independent Journalism - Romania), and IMAS Public opinion research agency. 2009. *Autoreglementarea presei in Romania - Self regulation of the press in Romania*. Survey. ActiveWatch-Media Monitoring Agency (Romania), October. <http://www.activewatch.ro/uploads/FreeEx%20Publicatii%20/Autoreglementarea%20presei%20din%20Romania.pdf>.



## Conclusions

This chapter presented a qualitative analysis of interviews with journalists from the main national newspapers and news-portals of Hungary, Romania as well as *The London Tribune* in the United Kingdom. The interviews revealed that there is a contrast between journalists' professional values, the site TOS and the predominant legal arguments. Contrary to expectations, the interviewees do not see online newspapers as merely hosts of comments, but at the same time they are not willing to assume a full role of publisher. They are however willing to assume some responsibility that comes with this role, primarily through moderation of comments, but that does not mean that they would also take responsibility for the failures of moderation. On the other hand, there is also a contrast between the personally held professional values and practical reality as the journalists' beliefs and intentions have to be balanced against the available resources. An additional finding of this chapter was that despite the unanimous agreement that discriminatory content such as hate speech should not be allowed, there are notable differences on the interpretation of where the limits of such content are, which together with the difference in available moderation resources could provide some explanation as to the difference in the levels of user-generated hate speech described in the content analysis chapter.

## Chapter 6. Conclusions

This thesis set out to examine the nature and extent of user-generated hate speech and incivility in the comment sections of the most important newspapers in Hungary, Romania and the UK. In addition to revealing the extent of the phenomenon, this thesis aimed to explore some of the possible elements in the media system that could influence the levels of user-generated hate speech (UGHS) and to explore the issue of responsibility for third party content on the sites of major national newspapers.

The present thesis originates in a research project that found high levels of hate on the comment areas of the leading newspapers in Romania<sup>293</sup> but at the time had no way to establish how that compares to other countries and also did not explore contributing factors. The rationale for taking a comparative approach involving newspapers from these three countries was to assess how the two neighbouring post-communist countries compare with the more established UK and to each other, and to establish if the levels of user-generated hate speech and incivility could be considered low or high. To assess the nature and extent of the phenomenon of user-generated hate speech in a comparative framework, a content analysis was performed on a sample of 16,972 comments posted to 189 articles, published in 2014-15 on the sites of seven important national newspapers in Hungary, Romania and the United Kingdom. The articles were collected based on five target groups: Citizenship, LGBT, Gender, Minorities and Jewish to form a keyword-based purposive sample. In order to provide a common definition across the sample, two encyclopaedic definitions of hate speech were used as a starting point for a codebook. This was further expanded to include hate sub-types derived from elements of the primary definition referring to different types of discriminatory discourse. Building on definitions from the academic literature such as those of Pappacharissi and Coe et al. the analysis also aimed to identify incivil behaviour, i.e. content not illegal or prohibited such as hate speech, but still against the site's terms of service (TOS) and rules of a decent conversation. A separate category was created to include moderated comments on the sites that visibly marked removed comments. The three types were grouped under the generic term of problematic content as opposed to legitimate comments which did not contain any of the

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<sup>293</sup> Janto-Petnehazy, *User-generated hate speech*

discriminatory or incivil behaviours. In order to identify some the potential contributing factors and to gain insight into journalistic attitudes towards comments, interviews were conducted with journalists from the three countries, including some from the newspapers that formed the content analysis sample.

## Nature and extent of user-generated hate speech

At a considerable distance from the other two countries in the sample, Romania had the lowest proportion of legitimate content at 62.3%, while similar levels were found in the other two countries - 78.2% for the UK and 78.8% for Hungary. Therefore, the findings of the content analysis confirm that the 39% of user-generated hate speech identified in 2012 in Romania was indeed high compared both to the neighbouring post-communist Hungary and to the more developed UK media systems. The closer results of the other two countries, coupled with the similarity in the level of incivility for all three, indicate that Romania is an outlier and suggest the presence of some factors in the media system that result in a much higher proportion of user-generated hate speech. Furthermore, the similar levels of incivility, especially considering the differences in the number of hate comments, suggest a different attitude to user-generated hate speech in Hungary and UK compared to Romania, and a more similar approach to incivility in all three countries. There are no major differences between the three countries in the legislation on hate speech, which would explain the difference found in the content analysis. In fact, of the three countries, Romania's the only one that ratified the Additional Protocol to the Convention on Cybercrime concerning the Criminalisation of Acts of Racist and Xenophobic nature.<sup>294</sup> The sites' terms of services are also similar, and the closer levels of incivility suggest a similarity in the population of commenting users. Therefore, it could be argued that the significant difference of more than double the amount hate in the Romanian sample compared to the other countries might be due to the newspapers' moderation choices, either in the form of moderating decisions, moderation strategy, or allocation of available resources.

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<sup>294</sup> “Chart of Signatures and Ratifications of Treaty 189 - Additional Protocol to the Convention on Cybercrime, Concerning the Criminalisation of Acts of a Racist and Xenophobic Nature Committed through Computer Systems,” *Council of Europe - Treaty Office*, accessed September 28, 2018, <https://www.coe.int/en/web/conventions/full-list>.

The journalists interviewed for this thesis also expressed similar views on responsibility for comments. All the journalists rejected the presence of outright hate in their participatory spaces. On the other hand, both Romanian interviewees showed a more permissive attitude regarding the limits of allowed speech and defining what counts as hate. There were also significant differences in the newspapers' financial resources, the Romanian titles having the lowest circulation numbers despite Romania having almost double the population of Hungary. Moreover, at the time of data collection, both Romanian newspapers were subject to insolvency procedures<sup>295</sup>. This could have had a significant influence in the training of moderators and hence their ability to recognise the more complicated manifestations of hate speech, whereas categories of incivility are relatively straightforward. Therefore, it could be argued that newspapers' financial situation and the journalistic culture both influenced the levels of user-generated hate.

At the newspaper level, there were two notable outliers, the *Evenimentul Zilei (Evz)* from Romania (which had a significantly higher rate of user-generated hate speech than the other titles in the sample at 25.8%) and *The Guardian* (which had the lowest level of hate at 2.5%). Regarding hate with the exception of *The Guardian*, the newspapers clustered in country groups, from *Evz* (25.8%) and *Adevarul* (15.3%), followed by *The Telegraph* (12.2.%) and the *Daily Mail* (9.3%) from the UK then *Magyar Nemzet* (9.07%) and *Nepszabadsag* (7.5%) from Hungary. The exceptionally low number of hate comments at *The Guardian* could be amongst other factors, such as the newspaper's own policies and moderator training, also due to the newspaper only allowing comments on a selected number of article and for a limited time. The other newspapers in the sample, except for *Népszabadság* which also had a lower amount of hate, had comments enabled on most of their articles without time limitations.

One of the most surprising findings of the content analysis that challenged assumptions regarding tabloids and broadsheet/quality newspapers in the online world was the significantly higher number of hate comments on *The Telegraph* compared to the *Daily Mail*.

This study found much lower variance and no country-based clustering in the levels of incivility. Contrary to the small amount of hate, *The Guardian* was now closer to other newspapers. Similarly, *Népszabadság* registered the second lowest number of hate comments

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<sup>295</sup> Mediafactbook, Romania, 2016

(7.5%) while displaying an almost double amount of comments containing incivility. The closer proportions for incivility indicate a relatively similar number of users posting infringing comments between the three countries, while the levels of hate seem to be influenced both by country- and newspaper-level factors.

The results of the content analysis at the newspaper level also suggest that the moderation method of pre- or post-moderation alone has no significant effect on the levels of UGHS. The *Guardian* used a post-moderation approach that theoretically would have exposed it to higher levels of hate and incivility. On the other hand, the two newspapers that confirmed pre-moderation, *Adevarul* and *MNO*, both had higher levels of hate.

Although there is limited data in the sample due to only one site (*Evz*) using Facebook login, the findings suggest that identification in this form is not very effective in preventing user-generated hate speech. In fact, the comments with identified users were amongst the most violent. According to the interviewees, this might be due to users confusing the limits of their private Facebook feed with the newspapers' public commenting areas.

The content analysis found a remarkable similarity in the types of hate discourse in the three countries, especially looking at the first three categories of Insults, Conspiracy/Threat and Stereotypes. Group-based insults are the most frequent, being in the first three types for all target groups in the three countries, making up the largest group in Romania. This is somewhat surprising as these comments are arguably also the most recognisable and the easiest to moderate. Although potentially punishable by imprisonment, comments regarding Holocaust denial and glorification of war criminals are present in the two Central-Eastern European countries, but not in the UK. This could be expected, due to the historical experiences of both Hungary and Romania and considering that the participation of both countries in the Holocaust is still a hotly debated topic. On the other hand, Conspiracy-type comments, in many cases based on anti-Semitism, are prominent in all three countries, not just on the Jewish but also on the Citizenship target group. The influence of the 2015 refugee crisis is clearly visible in all three countries in the predominance of "Conspiracy"-coded comments, especially reproducing the Eurabia conspiracy theory, according to which the Muslim refugees are intent on conquering the West.<sup>296</sup> This is most evident in the case of Hungary, where the comments seem

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<sup>296</sup> Matt Carr, "You Are Now Entering Eurabia," *Race & Class* 48, no. 1 (July 2006): 1–22.

to reflect the position of the government portraying the refugees as a threat to Europe and part of a plan for undermining the Christian nation states.

The findings of this thesis support Papacharissi's argument that politeness does not equate to civility.<sup>297</sup> The content analysis revealed that hate comments including some in the most violent categories were at times presented in civil, well-formulated arguments. This is a particular challenge not only to the moderators but as the interviews indicate, sometimes to the journalists themselves, as noted by a Romanian interviewee, they could be inclined to allow essentially hateful, but well-argued comments. The findings of the content analysis support van Dijk's reasoning that racism, transformed to a less visible form which "wants to be respectable and denies it is racism."<sup>298</sup>

In all three countries, Extermination/Murder/Rape comments are in the first ten most frequent codes. While there could be some debate on the limits of freedom of expression in relation to some of the other categories, the comments in this category are quite clearly not just against the terms and conditions of the sites but also against the legislation of all countries. If uttered in the offline world, they would potentially lead to a criminal sentence.

The target group-level results of the content analysis found that each target group had a different typology of hate, with a specific sub-type amongst the most prominent that changed according to target group. Conspiracy and Holocaust denial-type comments were more prominent on the Jewish target group; despite having the lowest level of hate, the LGBT target group presented the same Homosexuality-Paedophilia-specific type of comments in the UK as in Romania and Hungary. In the same way, in the Gender target group Belittling/Demeaning-type of comments were more prominent and again presented similar narratives and discriminatory tactics across the sample.

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<sup>297</sup> Papacharissi, *Democracy online*

<sup>298</sup> van Dijk, *New(s) Racism* p.

## Contributing factors

On the most important issue for the topic of this thesis, responsibility for comments, the interviews found similar values and attitudes between the interviewees from the three countries. Contrary to the position stated in the TOS, journalists do not decline all responsibility for comments; they also do not see themselves and online newspapers as mere hosts, and are willing to take some responsibility for their participatory spaces. However, that does not mean that they would be ready to assume the same level of responsibility as for the professional content. Moderation is seen as an expression of this responsibility in preventing harmful content reaching the readers; however, that does not mean that journalists would also assume responsibility for its failures. The interviews also revealed a tension between the personally held professional values, terms of service and practical reality. All journalists interviewed for this thesis accepted that they have a responsibility for comments; however, due to legal risks, the TOS say otherwise. Moreover financial constraints also militate against newspapers taking on more responsibility.

The case of Hungary (at the time)<sup>299</sup> which had almost the same results overall as the UK indicates that a Hallin and Mancini model<sup>300</sup>-based approach might not explain the levels of hate speech. Based on Hallin and Mancini framework, both economically and politically Hungary should be seen closer to Romania, yet the levels of hate are similar to the UK. In the case of Romania, the findings of the interviews combined with the results of the content analysis confirmed what Jakubowicz and Sükösd described as a combination of mimetic and atavistic behaviour<sup>301</sup> – the regulatory framework is similar, and journalists express similar values, but those rules, and the underlying values informing them, are not enforced and implemented. However, it would be an error to ascribe the higher levels of hate entirely to cultural elements, as Gross and Coman would argue<sup>302</sup>. The interviews also indicate genuine

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<sup>299</sup> As mentioned in the methodology both Hungarian newspapers have ceased publication since the data collection ended and the country is considered to move towards an authoritarian media model

<sup>300</sup> Hallin and Mancini, *Comparing media systems*

<sup>301</sup> Karol Jakubowicz and Miklós Sükösd, "Twelve Concepts Regarding Media System Evolution and Democratization in Post-Communist Societies," in *Finding the Right Place on the Map Central and Eastern European Media Change in a Global Perspective* (Bristol, UK; Chicago: Intellect, 2008), 9–40.

<sup>302</sup> I. Coman and P. Gross, "Uncommonly Common or Truly Exceptional? An Alternative to the Political System-Based Explanation of the Romanian Mass Media," *The International Journal of Press/Politics* 17, no. 4 (October 1, 2012): 457–479.

concern for preventing hate but a significant lack of resources also limits newspapers to act according their journalists stated values.

## Of their own kind - Complicated roles

As Valcke and Lenaerts point out, the categories of author, editor, publisher, hosting provider on which media and earlier internet and media regulations are based, became blurred in the context of user-generated content,<sup>303</sup> This thesis aimed to provide some clarification on this issue, but admittedly the interviews conducted for this study highlighted the complexity of the issue and the still many grey areas. The interviewees have similar views regarding their role in user participation: they do not see themselves as merely hosts but neither do they see themselves as publishers or editors; they situate newspapers instead at the intersection of the three traditional roles of editor/publisher/host.

The interviewees see the users as "guests" invited to the newspapers' participatory areas but only within limits set and enforced by the newspaper. None of the journalists interviewed considered that this would mean any shared ownership or any rights to freedom of expression beyond the limits set by the newspaper. In this sense, the user-newspaper is still a mostly top-down relationship as in the traditional media model. In line with the findings of Singer et al., the comments are seen as immediate feedback and sometimes sources, but the commenters are not seen as co-authors. In the case of the Hungarian interviewees, due to the special nature of the media system moving towards an authoritarian model, comments and users are also seen as validators of journalistic integrity and sources of support.

The interviews and the content analysis supported the role of the TOS as "de-facto communication regulation" described by Braman.<sup>304</sup> The TOS set the limits of acceptable behaviour as defined and enforced by the newspaper. A position best summarised as "our place, our rules and (to a certain degree and within our material possibilities) our

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<sup>303</sup> Peggy Valcke and Marieke Lenaerts, "Who's Author, Editor and Publisher in User-Generated Content? Applying Traditional Media Concepts to UGC Providers," *International Review of Law, Computers & Technology* 24, no. 1 (March 2010): 119–131.

<sup>304</sup> Sandra Braman, *Change of State: Information, Policy, and Power* (Cambridge, Mass.: MIT Press, 2006).



responsibility". Furthermore, the interviewees unanimously considered that the assumption by some users that they would have some protected right to freedom of speech in their comment areas is a misconception. As summed up by an interviewee, "commenting is not a human right".

The findings of the interviews, and the presence of communication elements later appearing in governmental campaigns identified in the content analysis in Hungary, indicate that the comment areas can also be seen as political tools. This could take the form of organised, hired commenters (hired by political or economic actors or other groups), but also of ordinary users, who reproduce messages out of conviction, thus playing the role of "useful idiots". Either way, comments provide covert access to potentially large audiences; and, as the interviewees confirmed, political organisations know and use this unregulated access, potentially in the line of the findings of Anderson et al., to manipulate and distort public opinion.<sup>305</sup> In addition, publishing a hateful message would not be accepted in an official statement or in most cases one's own social media accounts; however, there is nothing stopping an organization from posting that message as a comment under an article on the same topic and in this way reaching at least parts of the same potential audience.

## Implications

Talking about the issue of a European journalistic culture, Hanitzsch and Donsbach quote Örnebrig claiming that "there is simply no European journalistic culture."<sup>306</sup> The findings of the interviews, however, point in the direction of shared values and attitudes across countries. On the other hand, the results of the content analysis also indicate that when talking about comments there are not only shared values amongst the newspapers and journalists, but also shared narratives and strategies of hate among commenters across the three European countries included in this study.

The interviewees agreed that hate speech should be removed; however, the content analysis found extremely violent Extermination/Murder/Rape-type comments on all sites – comments

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<sup>305</sup> Ashley A. Anderson et al., "The 'Nasty Effect': Online Incivility and Risk Perceptions of Emerging Technologies: Crude Comments and Concern," *Journal of Computer-Mediated Communication* 19, no. 3 (April 2014): 373–387.

<sup>306</sup> Thomas Hanitzsch and Wolfgang Donsbach, "Comparing Journalism Cultures," in *Handbook of Comparative Communication Research*, ed. Frank Esser and Thomas Hanitzsch (New York: Routledge, 2012). p.266

that should not be there, according to the journalists, the site's TOS and the legislation. The interviews in Hungary and Romania revealed that journalists see two types of problematic content, outright hate and Holocaust denial, that unequivocally should be removed. However, in the case of Romanian journalists, and to a lesser degree at *MNO* in Hungary, there was more flexibility towards content that is not clearly violent or discriminatory, indicating a definitional problem in user-generated hate speech. While the encyclopaedic definitions classify labelling members of a group and ascribing them certain negative characteristics as hate speech, perhaps the higher proportion of stereotype-based and conspiracy comments could be due to the fact that they were simply not considered as such by the moderators. This further reinforces Braman's point that in these quasi-public spaces newspapers act as de facto communication regulators. Comments such as EMR would not be allowed off-line in any of these countries, Holocaust denial is also punishable by imprisonment in Hungary and Romania. However, users felt comfortable enough to post them, sometimes even with their full real name and Facebook profile, as in the case of *Evz*.

The findings of this thesis indicate a failure of the legislation, the sites TOS and the moderation strategies in all three countries. While the levels of hate are much lower in Hungary and UK than they are in Romania, this turns the internet into what Delgado and Stefancic described as the only area (besides the courts of the United States) where such content is still tolerated<sup>307</sup>.

## Still grey areas

At the time that this thesis was completed, just as in my previous study in 2012, comments remain a form of content for which no one bears effective responsibility. Journalists agree that they are more than hosts and are willing to take some responsibility primarily manifested in moderation, but this is also limited to their financial resources, declining the responsibility for UGHS to users who are hard to identify. The combination of gaps in policy and the nature of the medium has turned the comments into what is effectively a responsibility-free area: while there is legislation against user-generated hate speech, and journalists are willing to remove it, in practice that content is still there.

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<sup>307</sup> Richard Delgado and Jean Stefancic, "Hate Speech in Cyberspace," *Wake Forest Law Review* 49, no. 2 (2014): 319–343.

On the other hand, it should be noted that, at the level of the overall sample, problematic content (including 1,910 hate comments, 1,856 incivil comments and 657 moderated comments) accounted for 22% of the total number of comments. Compared to this, were the 12549 legitimate comments that contributed to the discussion, provided feedback and sometimes even formed online communities. It could be argued, as some interviewees pointed out, that as long as newspapers cannot afford to spend more on moderation, tougher legislation, forcing newspapers to implement stricter moderation policies, could also lead to the elimination of these diverse voices along with the user-generated hate speech.

Interpreting the results of the content analysis poses a question that this thesis cannot answer. Should the level of 11.3% be interpreted as a positive result (that only around 10% of a sample of 16,972 is hate)? Or should it be considered a failure? Should the existence of the hate comments be accepted as the inevitable cost of opening up the pages of the newspapers to the audiences? Alternatively, should it be considered, as Delgado and Stefancic argue, an undue burden on the members of the target groups?

Obtaining access to the site's readers was mentioned as a motivation for commenting by both Hungarian journalists, who noted that the newspaper effectively provides readership to the comments, confirming the parasitic nature of UGHS. Users posting hate speech gain access to the audience attracted by the professional content or the participatory spaces. In addition, as journalists from Hungary and Romania admitted, newspapers could also provide unintended legitimation to the comments. This is because the fact that they have been allowed on the site of a major newspaper could serve as a source of validation. This also confirms Barendt's argument that "tolerating speech abusing racial or ethnic groups would lend respectability"<sup>308</sup> to such content.

Journalists from Romania and Hungary confirmed that sometimes users do not access the site to read the professional article or comment about its topic but to interact with other users. Sometimes this is just socialising, but in many cases users do not want to add something to the topic of the article but wish to communicate their views about one hate target group or another. Therefore, in such cases the comment area and the site are turned into inadvertent channels for

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<sup>308</sup> E Barendt, *Freedom of Speech*, 2nd ed. (Oxford ; New York: Oxford University Press, 2007) p.171

the delivery of readers to hate speech, potentially increasing their harm more than if they would have been uttered on someone's Twitter feed, blog or even some dedicated hate forum. The presence of hate speech in a public arena, such as the site of the most important newspapers, could also serve as an encouragement to others who might hold similar views. Therefore, comments such as those found in this study realise both objectives of hate speech identified by Waldron: First, intimidating the target groups by conveying them the message “don’t get too comfortable. Remember what has happened to you and your kind in the past. Be afraid.”<sup>309</sup>; and, secondly, encouraging those holding similar views, “as the wolves call to one another across the peace of a decent society.”

Moreover, as Anderson et al. show, incivility in comments could influence reader’s perceptions of the news even beyond the professional content itself. As Lee and Jang found, users can use them, instead of the news, to infer about the general climate. They can therefore also provide a distorted view of the topic of the article itself.<sup>310</sup> Some of the articles included in the sample already have a negative tone or incendiary title regarding the target groups; if this is also coupled with some hate comments and incivility, that could lead to further intimidation of the targets. As Parekh also notes, if hate speech is accepted or in this case is perceived to be accepted as part of a legitimate discussion, those uttering it might feel encouraged, and gradually could even resort to physical violence against the targeted groups.<sup>311</sup>

Compared to a print newspaper, hate comments posted to the comment areas of online news sites are searchable and permanent. As of September 2018, at the closing of this thesis, some of the comments were revisited, and they are still present on the original sites.

## Contribution/Solutions

The findings of the content analysis indicate that user-generated hate speech is present on all sites to some degree. With one exception, none of the interviewees agreed with the need for stricter regulation: the preferred solution was more education. Recognizing the extent and the

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<sup>309</sup> Jeremy Waldron, *The Harm in Hate Speech* (Cambridge, Mass.: Harvard University Press, 2014). p.2, p. 95

<sup>310</sup> Lee and Jang, *What others opinion*

<sup>311</sup> Bhikhu Parekh, “Hate Speech: Is There a Case for Banning?,” *Public Policy Research* 12, no. 4 (February 2006): 213–223.

nature of UGHS can contribute to a better understanding of the phenomenon, and possibly lead to better policies. The interviews indicate a definitional problem. Currently, it is up to the newspapers, and ultimately to the moderators, to decide if a comment qualifies as hate or not. Definitions and examples such as those found in this thesis could be used in moderator training or for the creation of better terms of service. As mentioned by some of my interviewees, and in the literature, moderation is a costly and challenging process. Additionally, the low proportion of hate at *The Guardian* also shows that a carefully designed commenting and moderation strategy could improve the levels of legitimate content. A target group-based classification such as the one used in this thesis could help to pre-empt the articles likely to generate hate speech that need more moderator attention and help to use a newspaper's limited resources better. The classification of the comments as presented in the content analysis chapter could also provide moderators with definitions and examples for each target group and hate type reducing the scope of subjective judgement. The results presented in the content analysis could improve automatic moderation as they can be used as starting vocabulary in supervised machine learning such as in a Support Vector Machine (SVM) approach.

Other major studies about comments such as of Singer et al. and Ruiz et al.<sup>312</sup>, took a comparative approach, but neither of them included Romania and Hungary, they also only analysed the journalist (Singer et al) or the comment (Ruiz et al) side. Similarly, the series of large-scale interview-based studies on comments published/undertaken by WAN-IFRA did not include interviews with any journalists from the two countries.<sup>313</sup> To my knowledge, this is the first study that performed a comparative study in the area of comment and hate speech involving comparison and classification of hate types in a sample of Hungarian and Romanian comments. As shown during the 2015 refugee crisis and the following European debate around migration and refugees, the two Central-European countries analysed in this study could have an important role in deepening or solving the crisis. Understanding the nature of hate discourse regarding minorities and other target groups in the region, but also in the UK, could help in designing policy solutions and strategies to address discriminatory attitudes and behaviours.

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<sup>312</sup> Singer et al, *Participatory Journalism*; Ruiz et al, *Public sphere 2.0*

<sup>313</sup> Emma Goodman and Federica Cherubini, *Online Comment Moderation: Emerging Best Practices* (WAN-IFRA, October 4, 2013); Federica Cherubini and Chia Lun Huang, *Do Comments Matter - Global Online Commenting Study 2016*, WAN-IFRA Reports (WAN-IFRA, 2016).

The high levels of clearly and easily recognisable insults within the hate category and the violent EMR comments indicate that the definitional problem is not the main issue. The current study confirmed that the policy gaps found in Romania regarding user-generated content are present both in Hungary and the UK. Despite making such content illegal, the existing regulatory framework does not provide enough incentives for newspapers to implement stricter, more effective moderation, or it has gaps and loopholes that allows such content to be posted and left in the comment areas of the most important newspapers.

Although the present study concerned newspapers' websites, the same regulatory model is in place for all sites allowing third-party user-generated content, including social media, making the findings also relevant to other parts of the media. As shown in the debate about the abuse of social media to manipulate the elections in the USA and the UK, social media sites use the same arguments based on the hosting role to decline responsibility. The role of social media in the Rohingya genocide in Myanmar also confirms that the danger of user-generated hate speech is not only a theoretical possibility<sup>314</sup> further confirming the need to address the policy gaps regarding user-generated content.

## Directions for further research

The findings of this thesis confirm that there are some elements of the Romanian media system conducive to higher levels of UGHS and incivility. Further research based on more interviews, and including other countries and different UGC sites, could provide more insights into the factors contributing to user-generated hate speech. As mentioned above, machine learning-based computerised content analysis could be a solution to analysing larger samples. However, the case of hate speech presents a challenge to automatic content analysis as it is sometimes very context-dependent, making human coding necessary. The codebook and classification presented in the current thesis, or a similar approach could be used in SVM-based studies on larger samples combining human and automatic classification.

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<sup>314</sup> Timothy McLaughlin, "How Facebook's Rise Fueled Chaos and Confusion in Myanmar," *Wired*, July 6, 2018, accessed September 29, 2018, <https://www.wired.com/story/how-facebooks-rise-fueled-chaos-and-confusion-in-myanmar/>.

Finally, the findings of the present thesis also suggest that identification might not be as effective as previously thought in preventing hate speech and incivility. Further studies involving social media-based samples such as Facebook comments could provide more clarity to this issue.

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## Appendix

### Appendix 1. Coding protocol and codebook for user generated hate speech and incivility

#### Coding protocol and codebook for user generated hate speech and incivility

##### *Definitions:*

“*hate speech* ---the use of words as weapons that terrorize, humiliate, degrade, abuse, threaten, and discriminate based on race, ethnicity, religion, sexual orientation, national origin, or gender” (*Encyclopedia of Political communication, 2007:301*)

“Obscene, defamatory, slanderous, or hateful, speech that holds a reasonable potential to be harmful” (Lederer & Delgado 1995).

“a form of verbal aggression that expresses hatred, contempt, ridicule, or threats toward a specific group or class of people” (Asante 1998).

“Verbalizations, written messages, symbols, or symbolic acts that demean and degrade, and, as such, can promote discrimination, prejudice, and violence toward targeted groups.”

“Hate speech functions to distort the history of targeted groups, to eliminate the agency of targeted groups, to create and maintain derogatory cultural, racial, and ethnic illusions about targeted groups, and as a vehicle for expressing pejoratives” (Asante 1998).

*(Hate speech and ethnophaulism - in International encyclopedia of Communication, 2007:2051)*

**Based on the above encyclopedic definitions for the purpose of this codebook hate speech is defined as:**

Comments containing speech aimed to terrorize, humiliate, degrade, abuse, threaten, ridicule,

demean, and discriminate based on race, ethnicity, religion, sexual orientation, national origin, or gender (Encyclopedia of Political communication, 2007:301) Expressing prejudice, and contempt, promoting or supporting discrimination, prejudice and violence. Seeking to distort the history of targeted groups, to eliminate their agency, to create and maintain derogatory cultural, racial, and ethnic illusions about targeted groups . Also including pejoratives and group based insults, that sometimes comprise brief group epithets consisting of short, usually negative labels or lengthy narratives about an outgroup's alleged negative behavior. (International encyclopedia of Communication:2051).

### *Coding frame:*

Comments will be coded on three levels. The first level codes are 'hate', 'incivility' and 'legit' comments can only be coded in one of these codes. The second level codes refer to types of 'hate' and 'incivility' and multiple codes can be assigned to one comment with the exception of 'legit' that cannot be assigned to comments that have any other sub-codes. Non-hate, uncivil comments that should not have been allowed according to the terms and conditions or terms of use of the sites will be coded with 'insult', 'violence', 'name-calling' 'demeaning' and 'junk/spam' according to their description all other comments that have not been assigned a code will be automatically assigned by the software the code 'legit' i.e. to legitimate discussion. 'Hate' refers to comments targeted to members of groups/communities or the groups/communities themselves, while the incivility group refers to comments targeted at individuals without making reference to their group belonging. 'junk/spam' – refers to comments that have no content or contain advertisements, or other similar content. The nicknames/usernames and the subject lines are also considered as being part of the comment. In the sub-codes 'group A' refers to in-groups while 'group B, C, D' to out-groups. Out-groups mean any ethnic, racial, or religious group, sexual orientation, conviction as well as gender that is not dominant in the context in the comment; while in most cases the comments will be targeted against a minority group it can happen that hateful or uncivil messages are directed against members of the majority these are considered 'hate' in the same way as comments targeting minorities as they are based on group characteristics.

## Codebook

### *Hate*

Comments containing speech aimed to terrorize, humiliate, degrade, abuse, threaten, ridicule, demean, and discriminate based on race, ethnicity, religion, sexual orientation, national origin, or gender (Encyclopedia of Political communication, 2007:301) Expressing prejudice, and contempt, promoting or supporting discrimination, prejudice and violence. Seeking to distort the history of targeted groups, to eliminate their agency, to create and maintain derogatory cultural, racial, and ethnic illusions about targeted groups. Also including pejoratives and group based insults, that sometimes comprise brief group epithets consisting of short, usually negative labels or lengthy narratives about an outgroup's alleged negative behavior. (International encyclopedia of Communication 2007:2051)

*This is a top level code. Please assign it to comments that contain any of the elements of the above definition. After you coded the comment with the top-code 'hate' you may choose additional sub-codes referring to the type of hate speech in the comment. You may also choose a sub-code first in this case the comment will also be automatically coded with the top level code.*

### *'Hate' type sub codes*

Insults (hate)	Comments that contain insults/ derogatory epithets/labels based on or referring to group appartenance also including gender. E.g. faggot, bozgor Insults that make no reference to group appartenance should be coded with the Insults/profanity code in the non-hate category.
Violence	Comments that make open threats or calls to violence against members of communities also including comments that advocate for violent actions against members of communities or based on gender. Please also add the code 'extermination/murder/rape for



	<p>comments with extreme violence for example that call/advocate/threaten with murder of a minority group or persons belonging to that group. Also add the extreme label for comments calling or suggesting the rape, torture of people belonging to group B.</p>
Extermination/Murder/Rape	<p>Comments with extreme violence that call/advocate for the extermination, murder of a minority group or persons belonging to that group. Example: 'The best solution would be to get rid/hang all of group B.'</p>
Threats	<p>Comments that contain implied threats, without explicit violence for example if members of group B do not modify, their behavior, or abandon their claims for rights. Example: "You should stop what your group is doing or else...". "We tolerated your behavior/claim/existence but our patience is coming to an end", 'You should not provoke us because...'</p>
Superiority/Inferiority/Normality	<p>Comments that claim that group A or (people belonging to group A) is superior according to some criteria (ethnicity/language/race/religion/sexual orientation/gender) to group B, or that the group A is what is considered to be normal, thus superior. Also including comments that argue that group B or persons belonging to group B have no rights, or some of their rights should be limited due to their inferiority.</p> <p>Comments that claim that the inferior group should submit to the will/adopt some of the characteristics (language/religion/sexual orientation) of the superior group due to its superiority. Comments that argue for the preferential treatment of the superior group</p>
Stereotypes/Generalization/Prejudice	<p>Comments arguing that just by being member of group B or all the members of group B have certain negative characteristics/behaviors, that are despicable, or anti-social and would justify their discrimination, certain</p>

	<p>actions against them or invalidate their claims for certain rights or for equal treatment.</p> <p>Example: “We should be suspicious of group B because it consists of separatists who want to dismember the country.” “All of group B are criminals/terrorist.” “All members of group B hate/despise us.” “Members of group B are incapable of living in our country/society.” “People of group B are immoral who will corrupt our (A) youth”. “Group B has some despicable customs/traditions that threaten our society”. “Group B is not to be trusted because of characteristic X.”, “Group B are thieves so they should be sterilized” \All B-s are terrorists\</p>
Exclusion/This is our country	<p>Comments that claim that the majority group is the rightful “owner” of the country and therefore: invalidate claims for rights of group B based on the argument that the country belongs to a group A therefore group B has no legitimacy to ask for rights/exist/keep its customs or traditions on the territory of the country. Also comments implying that members of group A have a tolerated status/are guests/immigrants and therefore have less grounds for claims because the country belongs to group A or because the majority of the country is in group A.</p> <p>Comments that call for the expulsion of group B based on the argument that the country belongs to group A.</p>
Animals/Sub-human /Pest	<p>Comments that compare or call the members of a group to animals/pests, similar to animals/pests or sub-human. Also including comments that call the presence/activity of the out-group an illness/cancer and/or call for their eradication on that ground</p>

Silencing (hate)	Comments that deny the right to participate in the discussion or disqualify an argument, other comments, users or the author of the article on the basis of their author belonging to a minority or target group “you must be a ...to say this” “...shouldn’t have an opinion about...” “shut up you....” “only a... could say this”
Homosexuality-Pedophilia/Slippery slope	Comments that argument explicitly or implicitly that homosexuality is related to, leads to pedophilia or that homosexual people have pedophile tendencies are pedophiles or are dangerous to children. Comments that equate homosexuality with criminal behavior e.g. necrophilia, zoophilia, murder or argue if homosexuals rights are recognized other types of criminal or deviant behavior could be recognized just as well.
History	Comments that disqualify the claims for rights or justify the discrimination or mistreatment of people belonging to group B, based on acts or injustices allegedly done by members of that group to group A along the history. Comments that call for actions against an out-group based on historical arguments.
Religious extremism	Comments that threaten or call for action against or for limiting civil (secular) rights of group B, insult demean, or express contempt for group B based on religious arguments.
Conspiracy/Foreign interests/Enemies/Threat	Comments that imply that members of a group B are part of conspiracy against the country/society, or serve some foreign or malicious interests. Comments that imply that by being member of a group or seeking rights for that group, its members or leaders are enemies of the state/people/society, or that they are a threat. E.g. “these ... want to destroy our country” “the

	.... are part of a global conspiracy to ...our country/Europe”
Denying rights (political/civil)	Comments that dispute or deny civil or political rights of members of out-groups including rights for political representation/political activity, right to demonstrate, right to appear or speak in public on the ground that they are a minority or belong to group B. Call for group based actions to prevent the access to rights. Example: “Let\’s all true A get out to vote so not to allow the B-s to get into the parliament” “B-s should not be allowed to appear/speak in public”, “B-s have no right to have political representation/education”
Expulsion	Comments that explicitly call for the expulsion of a group from the territory, with or without specific reasons or arguments for that action Ex. \’Out with B-s from the country\’ “We should get rid of B’s” “All B-s should be deported”
Holocaust/Genocide/Terrorism - blame shifting	Comments that shift the blame for the holocaust on the victims. Examples: “The jews have themselves to blame for the holocaust”. “The jews deserved what happened to them”. ”You westerners are to blame themselves for this attacks”.
Holocaust/Genocide denial/minimization	Comments that seek to minimize or deny the existence of the Holocaust, seek to minimize the role of the state X in the holocaust, or claim that there was no holocaust in Country X. (Criminal offense Belgium, France, Hungary and Romania)
Holocaust/Genocide/Terrorist-apologetic/glorification	Comments that seek to present persons involved in the Holocaust, genocide or terrorist attacks as heroes, find justifications or glorify for their actions. (Criminal offence in Belgium, France and Romania)

Disgrace for the country	Comments that argue that minority group B is a disgrace for the country or it is to blame for the bad image of the country.
Discrimination	Comments that call/advocate for discrimination - Discrimination is considered to be any differentiation, exclusion, restriction or preference based on group appartenance and any other criteria, that is aimed or has the effect of restricting, limiting recognition, use or exercise in conditions of equality, of human rights, and of fundamental freedoms, or of rights recognized by law, in the political, economic, social and cultural and any other domains of the public life
General hate/Discrimination – other hate	Comments with discriminatory content which does not fit into any of the above categories - Comments containing speech aimed to terrorize, humiliate, degrade, abuse, threaten, ridicule, demean, and discriminate based on race, ethnicity, religion, sexual orientation, national origin, or gender (Encyclopedia of Political communication, 2007:301) Expressing prejudice, and contempt, promoting or supporting discrimination, prejudice and violence. Seeking to distort the history of targeted groups, to eliminate their agency, to create and maintain derogatory cultural, racial, and ethnic illusions about targeted groups. Also including pejoratives and group based insults, that sometimes comprise brief group epithets consisting of short, usually negative labels or lengthy narratives about an outgroup’s alleged negative behavior. (International encyclopedia of Communication:2051).

*Incivility*

Profanity/Vulgarity	Comments containing non violent profanity, vulgarity, pejoratives not directed to a particular person specific to the given language. English examples: “idiot” “.hole” “fool” “scum” “dirt” “bastard”, the mention of genitals
Insult/Name calling	Comments containing insults/derogatory epithets addressed to individuals, the author of the article or other commenters not based on group appartenance. Mean-spirited or disparaging words directed at a person or group of people.(Coe et al. 2014) Words and context that make the subject look foolish, inept, hypocritical, deceitful or dangerous (Sobieraj and Berry, 2014) e.g “conservative/labor sheep” “clowns” “traitors” ‘femi-nazi’ ‘tree hugger greens’
Belittling/Demeaning	Comments that dismiss an argument or another user based on the other persons standing, dispute or seek to disqualify the others viewpoint by undermining her/his standing eg. “this is just ....quacking’ ‘stop your.... bleating’
Silencing	Comments that aim to end the discussion without considering other viewpoints, claim that there is the only correct view or dispute other’s right to make a contribution or have an opinion
Threat/Violence	Comments containing direct personal threats or verbal attacks against individuals or other contributors based on their opinion not on group appartenance.
Impolite	Comments containing all caps words (equivalent of shouting), or excessive sarcasm
Thrash/Spam	Comments which have no textual content, have no argument, or text relating to the topic of the article or to the newspaper. Usually contain advertisements.
<b>Legit (automatically coded by the software)</b>	All non-coded comments will be automatically coded by the software as ‘legit’ – i.e. legitimate comments that respect the ethical guidelines of the site and the legislation

## Appendix 2. Interview guide

### Interview guide

#### *1. Role of comments*

Q: Why have comments? Do you consider them valuable or useful for your newspaper and for public debate in general? Follow up—> How do they compare to feedback you receive on other platforms such as on twitter and Facebook? I recently spoke to the engagement editor of a major US website that has a very strong social media presence and considers it and engaging with readers very important yet they have no comments because they consider that they do not worth the effort and resources? How do you see this?

#### *2. Policy*

Q: What is your current moderation strategy/technique? Are you satisfied with it? Why did you choose this approach, have you also tried different strategies in the past? Do you have a dedicated team for handling comments and other forms of audience participation or outsource the work?

Q: Why do you moderate/not moderate? In the comments users frequently consider moderation as censorship and a breach of their freedom of expression, also many seem to believe that there is such a right. How do you view this issue?

Q: Where do you see the limits of free expression in the comments? Are you familiar with the relevant regulations? Do they influence the way you are handling comments?

Q: What is your policy on your journalists interacting with comments/commenters? Do the editorial staff receive some training on dealing with user generated content and reaction from the audience?

Q: What are your views on the anonymity/identification of readers posting comments?

Q: If possible can you give me some details regarding the volume of comments, you receive, the people posting them and how much of them get rejected and why? —> Follow up 1: can you estimate the volume of rejected in different categories: insults, hate speech, libel, uncivil content? Follow up 2 —> Have you noticed organized commenters posting on behalf of some organization?

### *3. Role of newspapers and journalists*

Q: How do you see your role regarding comments? (Are you a publisher, editor or host?) What is the service you are providing when talking about comments? Expl:→ On one hand online newspapers are providing a space for discussion, but in some cases readers might spend more time reading the comments than the article itself. It could be argued that they are also providing comments them with an audience.

Q: An unanimous conclusion of research regarding comments is that “no one knows who is responsible”(Singer et al, 2011, WAN-IFRA, 2013). How do you see this issue and who do you think should be responsible? There are some indications such as in the Delfi v Estonia ECtHR case, that newspapers might have to take more responsibility. Are you familiar with the relevant debates around comments? Do newspapers do enough? Should there be some broader regulation beyond a site’s terms of service on audience participation and UGC? What form should this be statutory or some kind of self-regulatory framework?

### *3. Ethics*

Q: Ethical standards regarding comments. We all know that journalists have to abide by a number of ethical and legal rules in their articles. What rules should apply to comments? Should they abide by the same standards? In many cases users say things in the comments that not only would not be allowed in an article but could even have some legal consequences? Is there a justification to have different rules to authors publishing essentially on the same space?

## **Appendix 3. Content analysis sampling keywords**

### **Citizenship**

#### *UK*

immigrants OR migrant OR immigrant OR refugee OR refugees OR immigration OR migrants  
"Sign in or create your Guardian account to join the discussion" site:theguardian.com

immigrants OR migrant OR immigrant OR refugee OR refugees "powered by Disqus"  
site:http://www.telegraph.co.uk/



## *Hungary*

menekült OR menekültek OR migráns OR migránsok OR bevándorló OR bevándorlók OR migránsváság OR menekültváság site:mno.hu

menekült OR menekültek OR migráns OR migránsok OR bevándorló OR bevándorlók OR migránsváság OR menekültváság OR site:nol.hu "komment" site:nol.hu

## **LGBT**

### *UK*

gay OR lesbian OR gays OR lesbians OR homosexual OR homosexuals OR transgender OR LGBT "powered by disqus" site:http://www.telegraph.co.uk/

gay OR lesbian OR gays OR lesbians OR homosexual OR homosexuals OR transgender OR LGBT site:http://www.dailymail.co.uk/

## *Hungary*

meleg OR ungar klara OR lesbikus OR pride OR homoszexuális OR transszexuális OR melegházasság OR biszexuális OR LMBT site:mno.hu

## **Jewish**

### *Hungary*

zsidó OR zsidók OR izrael OR izraeli OR gáza OR holokauszt OR palesztin OR antiszemitizmus OR antiszemita site:mno.hu

holocaust OR jew OR jewish OR israel OR palestine OR antisemitism OR gaza OR israeli OR palestinian OR antisemite "Sign in or create your Guardian account to join the discussion" site:theguardian.com –

## **Minorities: Race**

### *Romania*

tigan OR tigani OR rom OR rrom OR romă OR tiganca OR rroma OR romi site:evz.ro

## **Gender**

feminist OR feminism OR gender OR femen OR abortion OR birth control OR sexuality OR women "Sign in or create your Guardian account to join the discussion" site:theguardian.com

feminist OR feminism OR gender OR femen OR sexism OR abortion OR sexuality OR women site:dailymail.co.uk