

Council of Europe
Division for Cooperation on Freedom of Expression
Activities Report 2024

Introduction

The Council of Europe Division for Cooperation on Freedom of Expression supports its Member States in enhancing policies, legislation, and capacities related to freedom of expression, media, and access to information. These efforts are aligned with European standards and encompass collaboration with ministries, parliaments, media regulators, law enforcement agencies, journalists, self-regulatory bodies, civil society, and media watchdogs.

More specifically, its cooperation projects include advising on policies and legal frameworks, as well as providing capacity building, training, and awareness-raising in the following areas:

- Promoting the role of media in democratic societies
- Safeguarding media pluralism, diversity, and transparency of media ownership¹
- Aligning the national legal framework and practice with Council of Europe standards and the European Court of Human Rights' case law related to freedom of expression (Article 10 of the European Convention on Human Rights)²
- Strengthening governance of public service media³
- Reinforcing independence and capacity of national regulatory authorities in the age of digital transformation⁴

¹ See the Recommendation CM/Rec(2018)1 of the Committee of Ministers to member States on media pluralism and transparency of media ownership.

² Article 10 of ECHR.

³ The Committee of Ministers Recommendation on public service media governance (2012)

⁴ Recommendation CM/Rec(2022)11 of the Committee of Ministers to member States on principles for media and communication governance.

- Promoting media literacy⁵
- Countering disinformation⁶
- Improving quality of journalism in relation to media coverage of elections and sports, combatting hate speech, promoting green journalism and gender equality in media⁷
- Ensuring the safety of journalists and media actors, including during times of war and conflict⁸
- Advising on Anti-SLAPPs legislation and defamation frameworks and practices⁹
- Ensuring access to information in the context of freedom of expression¹⁰

The Division works closely with the Steering Committee on Media and Information Society (CDMSI), the Platform for Safety of Journalists, and other relevant Council of Europe and international bodies.

Highlights of 2024 Activities

In 2024, the Division implemented projects in eighteen countries, with a total budget of approximately eleven million euros.

Twenty-five legal opinions and policy advice documents (listed in the Appendix) were prepared, and over hundred workshops, peer exchanges, conferences, and training sessions for over a thousand of participants were organised. In addition to this, the Division developed, invested in, and implemented multiple training and capacity building actions, and is continuing to develop further guidance and programmes as outlined below. Some core highlights this year have been the Division's contributions to the implementation of the Recommendation to

⁵ Recommendation CM/Rec(2022)4 of the Committee of Ministers to Member States on promoting a favourable environment for quality journalism in the digital age.

⁶ Guidance Note on Countering the Spread on Online Mis- and Disinformation through Fact-checking and Platform Design Solutions in a Human Rights Compliant Manner (2024).

⁷ Recommendation CM/Rec(2022)4 of the Committee of Ministers to Member States on promoting a favourable environment for quality journalism in the digital age.

⁸ Recommendation CM/Rec(2016)4 of the Committee of Ministers to member States on the protection of journalism and safety of journalists and other media actors.

⁹ Recommendation CM/Rec(2024)2 on countering the use of strategic lawsuits against public participation (SLAPPs).

¹⁰ The Council of Europe Convention on Access to Official Documents (Tromsø Convention)

counter SLAPPs, the Safety of Journalists Campaign,¹¹ work to counter disinformation, and the commencement of work to address “green” SLAPPs pertaining to environmental journalism and activism.

Training and Capacity Building

Council of Europe Training Programme to counter SLAPPs

The Division has updated and upgraded the [Council of Europe Training Programme on Countering the use of SLAPPS](#), taking into account the new Council of Europe Recommendation and the EU Directive, and designed for judges, prosecutors, legal professionals, civil society and journalists. The programme has been successfully piloted in several countries, it will be further refined, adapted and implemented on a larger scale in 2025.

Council of Europe Training Programme on Safety and Protection of Journalists

This training programme is to be focused on Council of Europe Recommendation CM/Rec(2016)4¹² on the protection of journalism and safety of journalists and other media actors, designed for police and law enforcement. It draws upon and incorporates elements from existing trainings and implementation guidance, such as the HELP course on Protection and Safety of Journalists and both the Implementation Guide to Recommendation CM/Rec(2016)4¹³ and the Extended Implementation Guide.¹⁴ In addition, the curriculum will include learnings from and references to established good practices, such as the Netherlands’ Persveilig programme and the role of police within it, as well as emerging good practices as compiled by the Journalists Matter Campaign.¹⁵

¹¹ Journalists Matter Campaign. See <https://www.coe.int/en/web/freedom-expression/safety-of-journalists-campaign>.

¹² Recommendation CM/Rec(2016)4.

¹³ Implementation Guide to Recommendation CM/Rec(2016)4.

¹⁴ Extended Implementation Guide.

¹⁵ Journalists Matter Campaign. See <https://www.coe.int/en/web/freedom-expression/safety-of-journalists-campaign>.

Access to Information in the Context of Freedom of Expression

A two-day training programme for legal professionals, civil servants, and media actors on access to information in the context of freedom of expression will be finalised by the end of the year, to be presented and delivered in 2025.

Other training

Other training programmes being developed and delivered by the Division address freedom of expression, disinformation, quality journalism, media coverage of elections, and other relevant issues.

Council of Europe Guide on Limiting the Use of Criminal Law to Restrict Freedom of Expression

This Guide provides an overview of the European standards applicable to the imposition of criminal sanctions on the exercise of the right to freedom of expression. It is aimed at legislators, civil society, civil servants, media, and other policymaker stakeholders, providing a user-friendly and accessible overview of standards developed through the judgments of the European Court of Human Rights as well as the policy guidance issued by the Council of Europe bodies such as the Committee of Ministers, the Parliamentary Assembly, and the European Commission for Democracy through Law. It sets out the main risks associated with the use of criminal law to sanction particular forms of expression and the overarching principles as developed by Council of Europe to mitigate against those risks. It will be submitted to CDMSI for approval in 2025.

Key Events Organised by the Division

World Forum for Democracy 2024

In November, the Division hosted a Forum Talk on ‘Fighting Disinformation: Media at the Frontline’¹⁶ as part of the World Forum for Democracy. The panel focused on the vital role of the media in debunking, targeting, and combating disinformation.

¹⁶ Forum Talk 6 – Fighting Disinformation: Media at the Frontline - world-forum-democracy.

It gathered representatives and experts from the Ukrainian public service media, Deutscher Welle, UK experts as well as other international participants to engage in the discussion surrounding current threats to information internationally as well as the urgent and specific threats posed by Russia's information war on Ukraine.

Vilnius Dialogue

In October 2024, the '[Vilnius Dialogue: Fostering the Culture of Public Debate on Freedom of Expression in Europe](#)' was organised jointly with the Supreme Court of Lithuania and under the Lithuanian Presidency of the Committee of Ministers of the Council of Europe. The conference discussed ways of strengthening judicial capacity to implement Council of Europe standards and instruments protecting freedom of expression, in addition to the European Court of Human Rights' case law on Article 10.

Key Activities by Country

Ukraine

In April, with the support of the Project [Safeguarding Freedom of Expression and Media in Ukraine](#) helped launch the National Chapter of the Council of Europe 'Journalists Matter' Campaign on Safety of Journalists, making Ukraine one of the first European countries to start the Campaign at the national level. In June the project supported a side event at the Parliamentary Assembly session¹⁷ in Strasbourg, to call for the liberation of the Ukrainian journalists held captive by the Russian Federation. In September, the 16th Ukrainian investigative journalists conference¹⁸ was organised with attendance from 439 participants. Additionally, 111 judges were trained jointly with the National School of Judges of Ukraine on the issues related to access to information. Legal opinions on four draft laws related to public service media (PSM), media, advertisement, and SLAPPs were prepared at the request of government and parliament.

¹⁷ CALL TO FREE UKRAINIAN JOURNALISTS: Join online PACE side event online on 26 June! - Council of Europe Office in Ukraine.

¹⁸ 16th Ukrainian investigative journalists conference.

Moldova

The project's activities contributed significantly to building capacities in many areas. In July, a continuous e-learning course for public administration institutions and staff on the newly adopted Law on Access to Information of Public Interest was developed. In August, a series of ten training sessions with the Media Monitoring Department of the Audiovisual Council, following the revision of the Elections Methodology of monitoring audiovisual media service providers took place. In September, a two-year Peer Support Activity between the Audiovisual Council of Moldova and the UK's Ofcom, culminating with a Peer Support Workshop on countering disinformation and harmful content for ten European National Regulatory Authorities was concluded in Chisinau. A Media Literacy Strategy for the Audiovisual Council of Moldova was developed. Lastly, three documentaries on social and human rights were produced jointly with the Telefilm-Chisinau and screened at a public event.

Armenia

A Joint Opinion on the draft Law on Amending and Supplementing the 'Law on Mass Media' of Armenia was prepared in cooperation with the Venice Commission, at the request from the government.

Georgia

Throughout the year, there has been a major focus on SLAPPs and access to information legislation which will continue to be prioritised by the Freedom of Expression Project in Georgia. Additionally, Media Monitors from the civil society organisation were provided trainings on pre-election media monitoring, including the Training of Trainers (ToT) course. The staff of the National Audiovisual Regulatory Authority (ComCom) was trained on the implementation of the Broadcasting Law (case-management).

Azerbaijan

A Conflict Reporting Textbook in Azerbaijani for Universities in Azerbaijan was developed, and a series of trainings on Green Journalism (environmental investigative reporting) for Azerbaijani journalists and other media professionals were delivered.

Western Balkans – Regional Level

The Regional Action “Protecting Freedom of Expression and Media in the Western Balkans (PRO-FREX)” was launched in 2024 and focused on:

Regulatory Authorities

The National Media Regulators participated in a regional exchange between seven regulatory authorities in Budva. This event served as a platform for the Balkan regulators to discuss the regulation of harmful content, share experience with representatives from other European countries, and learn about the European standards in the field. The project aims to set up a network of regulatory authorities of the Western Balkans as a follow-up to this exchange, and to continue organising similar regional peer exchanges in the coming year.

SLAPPs

Following the adoption of two new and innovative European standards (the Council of Europe Recommendation Rec(2024)2 on countering the use of SLAPPs and the EU Anti-SLAPPs Directive 2024/1069), a [Regional Exchange on countering SLAPPs](#) was organised in Strasbourg on 15 November, opening a discussion on the legal challenges concerning the implementation of the anti-SLAPPs standards. This event gathered twenty-nine participants, including journalists, members of the judiciary and representatives from relevant ministries from the six Western Balkans’ jurisdictions.

Additionally, a Regional Baseline Assessment¹⁹ of Legislative and Policy Needs for Implementation of the EU and CoE Anti-SLAPPs standards was prepared, to guide both the local-level and regional actions when it comes to alignment with European standards.

Access to Information

A Training Course on Access to Information in the context of Freedom of Expression is being finalised and will be implemented in 2025.

¹⁹ Council of Europe Regional Baseline Assessment: <https://rm.coe.int/regional-baseline-assessment-of-legislative-and-policy-needs-for-implement/1680b2e38f>.

Western Balkans – Beneficiary Level:

Montenegro

The Action on capacity building for judiciary and legal professionals enhanced the skills and knowledge of judges and prosecutors through key initiatives, including: a training on Article 10 of the European Convention on Human Rights focusing on freedom of expression in the digital space. The Project also organised two roundtable discussions with judiciary and journalists, fostering open dialogue and paving the way for improved court regulations to ensure better information distribution during judicial proceedings. In addition, on the topic of strengthening legal and policy frameworks, the Action supported the drafting of three cornerstone media laws, helping Montenegro to fulfil conditions for a positive Interim Benchmark Assessment Report (IBAR) from the European Commission. Moreover, it contributed to the development of rulebooks for the media regulator, enabling the implementation of new responsibilities under the Law on Audiovisual Media Services.

North Macedonia

As a result of the activities organised by the PRO-FREX project, trained judges and prosecutors have advanced to higher courts and prosecution offices, referencing landmark ECtHR cases in rulings, creating a national case-law based on European standards. The Academy for Judges institutionalised peer-to-peer Freedom of Expression and Safety of Journalists training, which is now provided by the judges, prosecutors, and lawyers trained through the project. The local pool of trainers was expanded by 20 experts through two Training of Trainers sessions. In April, a thematic event on countering SLAPPs brought together all stakeholders to discuss protection of journalists from legal harassment, threats and violence.

National legislation and by-laws in the area of access to information and media services were aligned with the European standards. The new Rulebook on Media Services Accessibility by the media regulator strengthened media accessibility. The Tromsø Convention on Access to Information was ratified, providing legal basis for better access to information.

Bosnia and Herzegovina

Thirty-three lawyers in Bosnia and Herzegovina were trained on European standards for protecting journalists and countering SLAPPs. As a result, the Council of Europe's Anti-SLAPP Recommendation (CM/Rec(2024)2) was referred to in an appeal to the Constitutional Court, marking a probable first for this Recommendation's use before a European Court. Thirty-two designated Points of Contact (POCs) for journalist protection, from thirteen prosecutorial offices and sixteen police administrative units enhanced their knowledge and capacity to safeguard journalists effectively and independently. Twenty-eight journalists received training on European standards for journalist protection and Anti-SLAPP measures. With regard to promoting co-regulation of harmful content online, a study on co-regulation practices for combatting harmful online content, along with practical recommendations, was prepared and presented to stakeholders.

Albania

The focus of the PRO-FREX Action was on improving Albania's compliance with the EU acquis by supporting beneficiary institutions such as the School of Magistrates and the State Police to achieve the objectives set for 2024 in the national Road Map for the Rule of Law. As a result of the support provided by the project, the School of Magistrates trained the magistrates on countering SLAPP cases. According to a CSO Report, the judges trained through the project made more decisions in favour of journalists, as opposed to those who were not trained. The State Police produced a set of institutional Guidelines on Safety of Journalists, as well as appointed a point of contact for crimes against journalists.

The project helped build the capacities of legal and media professionals, particularly through efforts such as the expansion of the pool of trainers for freedom of expression, seeing an addition of ten prosecutors and fifteen law enforcement instructors, trained on Article 10 of the European Convention on Human Rights (ECHR) case law. Training sessions supported twenty-nine media magistrates, eleven judges, and eighteen prosecutors, enhancing their understanding of the media landscape and improving communication strategies for effective media interactions. With an emphasis on raising awareness and promoting accountability, in collaboration with other actions, journalism students were educated on the harmful effects of hate speech and how to address it effectively as part of the No Hate Alliance initiative.

Serbia

As a result of the project and thanks to the trainings on the ECtHR jurisprudence, the Commissioner for Information of Public Importance and Personal Data Protection in its report requested swift action by government authorities regarding inquiries from journalists, regardless of whether it is a journalistic issue or a request for access to information of public importance. The report, submitted to the parliament, contains for the first time a dedicated Chapter on freedom of expression and journalism.

A comprehensive report on the safety of journalists in Serbia was prepared and published in collaboration with the associations of journalists. The report highlighted safety concerns faced by women journalists. A Policy Advice on Data Protection and Access to Information in the context of Freedom of Expression was provided to the government. Legal assistance to amend the Law on Public Service Media is being discussed.

New by-laws for regulators were developed for the Regulatory Authority for Electronic Media, which, as a result, adopted fifteen by-laws related to the Law on Electronic Media, improving provisions for human rights protection, privacy safeguards for minors, balanced media coverage of election campaigns, and accessibility for persons with disabilities.

Kosovo*²⁰

The PRO-FREX Action was focused on enhancing the capacities of the judiciary and legal professionals. It provided advanced training to certified judges, prosecutors, and lawyers on freedom of expression, including updates on European Court of Human Rights (ECtHR) jurisprudence and legal frameworks. A landmark European training session on countering SLAPPs was piloted for the first time in October, highlighting the importance of addressing legal harassment to protect media freedom. Additionally, a workshop on ‘Combatting SLAPPs to Protect the Environment as a Human Right’ was carried out in collaboration with two other projects, one of which is the ‘Human Rights and Sustainable Environment in South-East Europe’. The Action also provided a legal opinion on the draft law on the Independent Media Commission, a subsequent assessment became a key reference in a Constitutional Court

²⁰ *This designation is without prejudice to positions on status and is in line with UNSCR 1244 and the ICJ opinion on the Kosovo Declaration of Independence.

review. The media regulator and the Central Elections Committee participated in a capacity-building activity on media monitoring during election period, further enhancing regulatory practices.

South Programme Activities

Under the joint Council of Europe and European Union initiative [Protecting Human Rights, Rule of Law, and Democracy through Shared Standards in the Southern Mediterranean](#) (South Programme V), the Division organised a series of activities with the partners from Morocco, Tunisia, Libya, and Lebanon.

A regional conference was held to promote Euro-Mediterranean exchanges on access to information, featuring institutional representatives from Morocco, Tunisia, Lebanon, Spain, Ireland, Portugal, Serbia, North Macedonia and Georgia. The conference facilitated the dialogue through the sharing of good practices and knowledge about the standards of the Council of Europe, and in particular, the Convention on Access to Official Documents (Tromsø Convention). Additionally, a study visit on access to information was organised to foster cooperation between Morocco and Spain as well as to facilitate dialogue between Moroccan and Spanish authorities and civil society organisations to examine institutional frameworks, mechanisms, and recent developments in access to information.

In Morocco, a workshop on legal and regulatory challenges for informed governance and sustainability of the digital transition in partnership with the Ministry of Communication Culture and Youth was organised. A policy advice was prepared for Libya, on the implementation of the institutional strategy of the General Authority for Monitoring Media Content (GAMMC). This included a capacity building for the authority to perform better the monitoring functions. Finally, training on media coverage of elections was organised with the High National Elections Commission (HNEC) in Libya, addressing election result reporting, electoral processes, ethical journalism, disinformation, and combatting hate speech.

Moving Forward

The Division for Cooperation on Freedom of Expression made significant progress in 2024, promoting the protection of journalists, freedom of expression, media pluralism, and access to information across its Member States. Through various projects and collaborations, the Division has contributed to the development of legal frameworks, strengthened the capacities of media professionals and legal experts, and fostered international cooperation to uphold European standards in the media, legal and political landscapes.

The Division will continue its efforts in 2025 with a focus on countering disinformation and SLAPPs, strengthening media regulations, and ensuring the safety of journalists in challenging environments.

While the Soth Programme project came to an end in 2024, all other projects mentioned above will continue. In addition, several new projects and activities are planned, including a training to counter SLAPPs for judges in Poland, the launch of a new Open Dialogue on Media project in Albania, new projects on Freedom of Expression in Moldova and Ukraine, and on supporting the Belarusian journalists in exile. An International Conference on countering disinformation will be organised in cooperation with the CDMSI and the Maltese Presidency of the Committee of Ministers of the Council of Europe.

Additionally, the Division will continue contributing to the implementation of the ‘Journalists Matter’ Campaign in the Council of Europe member states, focusing on the safety of women journalists and on the role of prosecution.

It will also continue supporting the dialogue with digital platforms and media regulators at the 2025 session of the European Dialogue on Internet Governance - [EuroDIG](#) via a series of discussions on countering disinformation and harmful content online.

Finally, to address environmental and climate change issues, the Division will keep working on the issues related to the environmental SLAPPs, access to information on environment, and the role of investigative and “green” journalism in environmental protection.

The Division can be contacted at foe.cooperation@coe.int for any assistance requests.

Appendix

Policy Advice, Legal Opinions, and other documents prepared in 2024

1. Proposals for the elaboration of the Strategy and operational plan of the General Authority for Monitoring Media Content (GAMMC)
2. Legal Review of the Draft Rulebook on Accessibility of Audiovisual Media Content for persons with Sensory Disabilities
3. Legal Opinion: Montenegro Draft Laws on Media, Audiovisual Media Services and Radio Television of Montenegro
4. Legal Opinion: Alignment with the European Standards of the Draft Rulebooks of the Regulatory Authority for Electronic Media of Serbia PART I
5. Legal Opinion Alignment with the European Standards of the Draft Rulebooks of the Regulatory Authority for Electronic Media of Serbia PART II
6. Legal Opinion on the Draft Law on the Independent Media Commission of Kosovo*
7. Legal Opinion on final amendments to the Montenegro Draft Laws on Audiovisual Media Services, and Radio-Television of Montenegro
8. Recommandations Pour La Stratégie De Transformation Numérique Du Secteur Des Médias Au Maroc
9. Access to Information in Morocco: Recommendations on Self-Assessment Performance Indicators
10. Safeguarding the Right of Access to Information: A comparative study of the oversight bodies in Europe and the MENA region
11. Review of the Draft Law for the Independent Media Commission of Kosovo* addressing the extent to which the recommendations of the Legal Opinion on the Draft Law on the Independent Media Commission [LEX/FoE (2024)6] were taken into account.
12. Policy Advice on Balancing Data Protection and Freedom of Expression: Inputs for consideration in the process of amending Serbia's Law on Personal Data Protection, based on existing legislation and relevant European standards
13. Limiting the Use of Criminal Law to Restrict Freedom of Expression

14. Reporting Guidelines on Freedom of Expression and Information for BiH

Annex to the Reporting Guidelines on Freedom of Expression and Information: Mapping substantive freedom of expression and freedom of information obligations of Bosnia and Herzegovina

15. Mapping and Gap Analysis Report on Freedom of Access to Information in Bosnia and Herzegovina
Annex to the Mapping and Gap Analysis Report on Freedom of Access to Information in Bosnia and Herzegovina

16. Training Module on Human Rights Monitoring and Reporting, Freedom of Expression and Access to information

17. Policy Advice on Media Literacy Strategy for the Audiovisual Council of Moldova

18. Mapping and Gap Analysis Report on Freedom of Expression in Bosnia and Herzegovina

19. State Police Protocol for the Safety of Journalists in Albania

20. Regional Assessment on countering SLAPPs in the Western Balkans

21. Role of regulators in countering harmful content regional peer exchange for regulatory authorities

22. Media Ownership and Ownership Transparency Rules: European standards, and good practices in the EU and the Western Balkans

23. Legal Opinion on the alignment with European standards of the draft amendments to Law on Media in Ukraine

24. Legal Opinion on the alignment with European standards of the draft amendments to the Law on Advertisement in Ukraine

25. Draft Legislative and Policy Proposals for implementation of Council of Europe and EU standards to counter SLAPPs in Ukraine