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A COMPARATIVE PERSPECTIVE ON TWO CRISES IN THE FOREIGN POLICY DISCOURSE OF THE EMOTIONS OF MILOŠ ZEMAN

Hana NAXERA HLAVÁČKOVÁ and Lucie HRUBÁ[1]

The article examines Czech President Miloš Zeman's foreign policy stance on the 2015 EU migration crisis and 2022 Ukraine war, with an emphasis on emotions in comparative perspective. The migration crisis in the presidential discourse triggered criticism of the EU and NATO, emphasizing national sovereignty, while the Ukraine war shifted the focus to cooperation with them. Dominating emotions were anger, fear, and trust, but their proportions changed in the two crises. Anger dominated the 2015 migration crisis for the measures taken and the failure to address the situation efficiently. On the contrary, emotion of trust was prominent in the later crisis, where the collective solutions were considered the path forward. The findings show that observed crises triggered specific foreign policy attitudes expressed through emotions, with the identification of emotions facilitating the identification of foreign policy attitudes in the future.

Key words: Czech politics; president; emotions; migration; Ukraine War; comparative politics.

1 INTRODUCTION

The article examines the foreign policy of the Czech Republic in Miloš Zeman's discourse, focusing on the emotions that emerge in the context of two international crises. The migration crisis in 2015 brought challenges not only to foreign policy and security issues, but also to questions of continued integration within the EU. The war in Ukraine, which began in 2022, shows yet another level of relations affected by this crisis. The article demonstrates how emotions and topics that appear with emotions are changing based on two ongoing crises.

This article goes beyond classical foreign policy analysis and adds a psychological perspective. The theoretical framework is based on the study of emotions in foreign policy (e.g. Crawford 2000; Sasley 2011; Mercer 2006). Research starts

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from the premise that studying individuals, specifically politicians who form foreign policy, is beneficial (cf. Sasley 2013; Pace and Bilgic 2018) because they set the mood in society and wield influence in international fora.

Two different situations have been chosen for the research, which are reflected in the study of emotions. These are expressed by the President in front of different audiences, both on the domestic stage and in front of an international forum. The emotions he expresses in his speeches indicate the beliefs he has about the situation and the purpose of his speeches. The president's use of emotions influences the nature of foreign policy and how it is perceived abroad (Drulák 2024). Emotions in times of crisis show how the president reacts and makes policy in escalating situations from a security perspective. And the use of emotions is also a strategy to bring himself and his policies closer to the people. We also consider the conscious use of emotions by politicians as a strategy to influence their goals and gain benefits such as power.

Tracing how basic emotions are used by the president is the main purpose of the article. The second purpose is to compare emotions. What do they mean in the context of different crises? What is anger in one crisis? What is anger (and the rest of eight emotions) in the other? Each of the emotions is presented in its broader perspective and is analysed multidimensionally.

The article works with eight basic emotions: fear, anger, joy, sadness, trust, disgust, anticipation and surprise (Plutchik 2001; Plutchik 2009). These provide a general overview of how the president perceives and relates to a given situation. The research findings reveal the multidimensional model of emotions associated with foreign policy during crises. The findings show that the crises under study triggered different foreign policy attitudes expressed through emotions, with the identification of emotions. Comparison of the two crises shows, that the emotion of anger prevailed, however the deeper meaning has changed, same as fear of the measures taken and the failure to address the situation (Zeman's dissatisfaction with the actions of the European Commission, interference with sovereignty, irresponsible behaviour in the case of migration policy and a total failure to protect the borders, and thus the member states, fear from war), sadness and anticipation. Joy and confidence were the emotions whose meaning did not change.

The article begins with the conceptualisation of emotions that allows a deeper look into the themes of Zeman's foreign policy. The next part operationalises the emotions and explains on which corpus and how the analysis was conducted. The interpretive section on the influence of crises on the discourse presents the eight primary emotions, revealing Zeman's motivations for his actions and showing the transformation of the Czech foreign policy in his discourse. The last section summarises the findings from the comparison of the two crises through the lens of emotions.

2 EMOTIONS IN FOREIGN POLICY ANALYSIS

In this section, the theoretical framework of emotions in foreign policy is outlined. At the same time, specific emotions employed in the research are presented here. Psychological approaches in IR can reveal elements in behaviour that do not correspond to rational considerations one makes in a certain role but rather correspond to one's personality characteristics (cf. Forsberg and Pursiainen 2017). Emotions are thus necessary elements of understanding in-depth

discussions about foreign policy motives and decision-making. According to Finnemore and Sikkink (1998), current world politics cannot be observed by rationalist approaches alone because the world (including politics) is full of emotions such as passion, fear, etc., as Ross (2006) shows in his research on anger and the 9/11 attacks. The inclusion of emotions in foreign policy research in IR is increasingly popular. For example, Sasley (2011), Bleiker and Hutchinson (2008), Mercer (1997), and Crawford (2000) have blazed trails, and many others have followed up with their own practical research (Pace and Bilgic 2018; Van Hoef 2018; Forsberg and Pursiainen 2017).

Emotions help to describe and explore real-world problems (Bleiker and Hutchinson 2008). When considering the role of emotions in IR, Sasley (2011) claims that they are an essential tool when detecting the process of state's decision-making. We also argue (and others, see Van Hoef 2018) that this is of value for studying individuals involved in decision-making. Emotions have their function in the states' policies, when politicians use them consciously as a strategy that influence their aims and bring benefits such as power (Mercer 2006), which proves that emotions are deliberately employed in political speeches. At the same time, the use of emotions in speeches makes listeners more likely to be convinced of what the individual is saying (cf. Salama and Aboukoura 2018).

By using emotions as a tool of inquiry, a different insight can be gained. Emotions themselves help to expand the range of meanings derived from discourse analysis. This is due to the importance of language in the creation of reality and identity (according to constructivism), where the possibilities of exploring discourse are expanded thanks to the effect of emotions on language (Koschut 2018). Using emotions in speeches evokes certain feelings just by employing emotionally tinged words and can influence the overall discourse and framing of world politics (Zappettini, Ponton and Larina 2021). Emotions are therefore essentially another lens through which the world can be seen. They are always part of a particular discourse, which changes depending on our experiences and creates feelings that subconsciously tell us what is socially acceptable. Emotions thus help in subsequent decision-making in various aspects of life, including politics (Hutchison and Bleiker 2017). They trigger memory, recollection, habits, and become a public mood. Van Hoef (2018, 83) adds that emotions can influence future relationships or the development of a situation.

There are different ways of approaching emotion research – the state as an actor, examining individuals, or examining group emotions (Sasley 2013). The article focuses on the individual who is in power at a particular time, the president.

Miloš Zeman became the third president of the Czech Republic in 2013. He encountered foreign policy as prime minister, an office he held from 1998 to 2002; in 2013, he became president by direct election. Zeman is interesting from a comparative point of view during both crises. His attitude towards the EU during the migration crisis was the most critical of European leaders (even within V4), not during the war in Ukraine.

Zeman has been studied several times in the Czech context (Mudde 2004; Naxera and Krčál 2018; Naxera 2022; Brunclík and Kubát 2016). The Czech politics was evaluated in relation to the EU, as Koller (2016) called, the emancipation phase, which also support other authors (cf. Csanyi 2020; Csanyi and Kucharčík 2023). Drulák's (2024) research shows that genuinely critical positions continued to emerge in relation to the crisis, which influenced the emotions that Zeman displayed.

This article fills a research gap as there has been no previous study of emotions in Zeman's speeches, making this research unique. At the same time, it also expanded research on emotions in the Czech Republic's foreign policy, which has not been extensive either (Hrubá 2024). This research selected from a multitude of models of emotions (e.g., the models of Panksepp and Watt 2011; Ekman and Cordaro 2011; Jack, Garrod and Schyns 2014; Izard 2007; Levenson 2011) that differ in various characteristics, such as the number of basic emotions, the one conducted by Plutchik. He identified eight basic emotions that come in polarity pairs. It is fear – anger, joy – sadness, trust – disgust, anticipation – surprise. A brief description follows.

3 RESEARCH DESIGN AND OPERATIONALISATION

In this section, we present how the research was conducted at a specific time and on a specific corpus, explaining how we established the corpus and why. We follow a tradition where discourse is considered a relevant source for analysis (Meernik and Ault 2013). By discourse we mean the speeches of President Miloš Zeman from 2013–2023. For the choice of methodology, we use Clément and Sangar's (2018) arguments that qualitative content analysis has merit in foreign policy research in conjunction with emotions. It is possible to focus on the individual and their significance. The emotions in Zeman´s statements reveal how he perceives certain events. Emotions cannot be seen, which is why it is difficult to include them in social science research, but with adherence to clear methodological rules it is possible.[2]

The data corpus was created from all public speeches of Miloš Zeman in the two periods, for migration crisis 2015-2018 were chosen and for the war in Ukraine two last years of Zeman´s presidential mandate 2022-2023. The corpus contains speeches, interviews, transcript audio, and video performances that are published on the official website www.zemanmilos.cz[3].

We analyse each individual paragraph that contains information about foreign policy attitude and emotion. The corpus was subjected to a multi-step analysis – first, the reading process was combined with qualitative coding, identifying foreign policy claims; second, emotions were identified in these statements; third, a multidimensional model of emotions were done and performed in the interpretation in two time periods.

In the interpretation, we work with the eight basic emotions. Anger arises when an individual tries to eliminate a threat. This emotion appears aggressive and seeks to destroy the obstacle to survival. Anger leads to the individual feeling important, suddenly feeling much more courageous and not afraid to go directly into confrontation, trying to assert and enforce their opinion (Plutchik 2001; Dennison 2024). Anger itself also leads to more aggressive behaviour, reduced decision time, increased acceptance of risk or reduced demands for information, and generally negatively biased perceptions (Lerner and Keltner 2000; Van Kleef et al. 2008, cited in Koschut et al. 2017).

[2] Researchers agree that the influence on the perception and experience of emotions depends on the environment in which the individual grew up, and what his or her upbringing was like (Plutchik 2009).

[3] As of April 2024, the site is down and under auction.

Fear, which is the parity of anger, aids survival, protecting the individual. If fear acts for a long time, it will turn into anger. Fear leads to the individual feeling unimportant and preferring to retreat or submit to the situation. Joy expresses the desire to possess or expand influence. Joy manifests itself in a desire for connection with others or with the stimulus given. It is an emotion much associated with meeting, contacting or conversing – a very social emotion. Sadness is caused by the loss of something or someone and exposure to isolation. Often the purpose of this emotion is to reintegrate the individual into society or a preferred group. When an individual is feeling sadness, their behaviour is more passive. He often turns inward, withdraws, and tends to avoid the stimulus. Trust indicates inclusion or belonging to a group. Trust can be seen in the acceptance of a given stimulus or situation. If an individual has confidence in each stimulus, they will support and accept it, sometimes even celebrate it. Seeking acceptance leads one to seek partners or friends. Disgust captures rejection by someone trusted. An individual feels disgust when they encounter something that annoys them and therefore interferes with their functioning. Effectively, disgust may look like distancing oneself from the stimulus, disengaging from a group or action, or removing the stimulus itself. (Plutchik 2001; Dennison 2024). Anticipation is an assumption about the future (positive and negative) and brings with it expectations about how the future will unfold. Surprise is caused by shock, new, unexpected information - does not occur in interviews due to the nature of interviews where the subject is questioned rather than presented with new information.

The studied emotions are expressed in the corpus in different ways depending on the dimension of use. It was easiest to identify the emotions if they were directly mentioned in the speeches (I am happy that... I am sorry that... I trust...), but even then, it was necessary to be careful about the meaning (in the case of Zeman, sarcasm often appeared). In Table 1, we operationalise what is happening in the discourse when Zeman expresses a particular emotion. Also, in Table 1 we operationalize the multidimensionality of the emotions. Each of the emotions studied has its own definition. If we look at them more closely, we can elaborate on them. It's not just being afraid of something; it's also being afraid of something. We elaborate this multidimensional view in the context of our study of emotions in foreign policy. In doing so, we provide a more comprehensive, coherent and systematic analysis of each emotion we identify in the discourse. We observed emotions in Zeman's statements on foreign policy. We were interested in what emotions and related themes emerge in times of crisis, and we created multidimensional models of each emotion, showing which themes are associated with fear and what possible reasons Zeman has for expressing fear (what is the purpose).

TABLE 1: OPERATIONALISATION OF EMOTIONS IN THE DISCOURSE

Emotion multidimensionality of the emotion	Operationalisation of the emotion	Example of the emotion in the discourse
Fear Fear for security Fear of the consequences of the solutions adopted, of threats to sovereignty	Protecting an important matter from a threat, the emphasis on it and ways of protecting it Czech loss of sovereignty, EU policy, US meddling in European affairs, threats outside the EU	"...I fear that in the next six months at least another half a million refugees will arrive on the European continent, perhaps more." (Zeman 2016)
Anger Anger at the undermining of state sovereignty, hence the inclination towards individual partners rather than the whole	Objections to functioning, efforts to overcome obstacles by drawing attention to the situation EU policy (inadequate border protection, violation of Czech sovereignty, insufficient measures against the migration wave, use of sanctions), NATO policy (withdrawal of troops from Afghanistan), UN, US policy (lack of effectiveness, action against terrorist threats)	"...when Europe-wide protection of external borders does not work, I am of the opinion that we must defend ourselves from illegal immigrants, and I stress the word illegal, with our own forces..." (Zeman 2015)
Joy Joy about economic cooperation and new partnership, new opportunities, expansion	New opportunities, expanding the sphere of influence Economic cooperation (China, Russia, etc.), Czech membership in the EU, cooperation among EU countries	"Every morning we should repeat our gratitude that we are not at war and that our country is a member of NATO and the EU,..." (Zeman 2022b)
Sadness Sadness about something lost, difference of opinion about what is best for the Czech Republic and other countries	The loss, the unfulfillment of something important EU policy (inability to effectively defend borders, use of sanctions), Czech loss and withdrawal of troops from Afghanistan, end of friendly relations with Russia after the beginning of the occupation of Ukraine, functioning of NATO, UN	"Unfortunately, I have not yet succeeded in convincing everyone that the terrorism I have been talking about is as dangerous as Nazi terrorism, even though the number of victims of Islamic terrorism has not yet reached the number of victims of Nazism." (Zeman 2019)
Trust Trust in joint activity to ensure security; in cooperation that will result in economic stability or alliances that will strengthen the country; in the power of change for the better	Praising words towards subjects of trust, faith in their functioning EU, EU member states, UN, NATO, V4, Russia	"Look, thank God for Visegrad, because it is only thanks to Visegrad that the monstrous idea of migration quotas has been destroyed." (Zeman 2018)
Disgust Expressing displeasure at something the subject does not like and does not identify with (various topics)	Insulting the other side, sarcasm Czech political behaviour (submissiveness, moralising), different approaches of states to dealing with issues (mostly USA), UNHCR comic strip	"... it's another idiotic project of the UN High Commissioner for Refugees, these comics, ... I think that is as naive as the Bolshevik propaganda, which, although it did not take the form of comics, was basically just as stupid." (Zeman 2016)
Anticipation Expectations of how foreign policy will evolve	Assumption of the future (positive and negative) The EU's reaction to the Czech rejection of sanctions, the future role of the V4, dealing with the migration wave, the future focus of Czech arms spending on national defence	"I consider China to be the most important, ...Whoever constantly swears by human rights and consorts with the Dalai Lama will come when the best is taken already. " (Zeman 2015)
Surprise Shock reaction to new information from different sectors	Shock, new, unexpected information - does not occur in interviews due to the nature of interviews, where the subject is questioned rather than presented with new information	"...the attack on Ukraine was surprising..." (Zeman 2022a)

Source: Authors based on data corpus.

4 EMOTIONS OF MILOŠ ZEMAN IN THE FOREIGN POLICY

In this section the research focuses on the comparative perspective of the emotions of the two crises under study. This part brings their multidimensionality and concludes how the crises differ from each other. First, there is need to outline the president's apparent intentions in his speech. The main activity of the president is usually to protect the security, sovereignty and economy of the state. In raising these issues, he was following the traditional

policy towards the EU at that time - criticism of the EU, efforts to strengthen the position of the Czech Republic within the EU and promotion of his own issues and views. However, these situations evoke different emotions in the context of the two selected crises. They are different, but they evoke similar emotions, which differ from each other on closer examination. There is no fear like fear. But some themes remain.

4.1 The 2015 migration crisis

The migration crisis brings a range of emotions. This is due to the breadth of issues – the (in)active EU and NATO, security, terrorism, migration, ineffectiveness of the organisations, low responsiveness, incoherence – that influence the Zeman's experience and his attitudes. The emotions appear in this order – anger (38% of all emotions in foreign policy statements), trust (32%), fear (13%), joy (7%), sadness (4%), anticipation (6%), disgust (6%), surprise did not occur here.

Tracking the emotions used by President Zeman during the migration crisis showed that the main link was the identification with the institutions and their failures, setbacks and slow actions. The president was heading for another election term (in 2018), so defining himself against the institutions that affect the sovereignty of the state was important in this period and in this political mood of society.

Anger comes from trying to remove a threat. Zeman was more likely to point out the threat, to engage in verbal confrontation, but not to try to remove obstacles. A multi-dimensional view of the emotion of anger reveals an attachment to certain institutions. Indeed, Zeman has expressed anger at the passivity/ineffectiveness in providing international security. In fact, he has often called for a deepening or broadening of activities in international forums. This is typical of a statesman of his stature, since his professional goal is to ensure the security of the state. Instead of trying to eliminate the threat, he also created it with his speeches (disunity might be a threat). Zeman has expressed himself against the activities of the EU (slow and insufficient actions, insufficient border protection, interfering with the sovereignty of the Czech Republic, economic sanctions, quotas, threatening the entire V4), against NATO (insufficient actions against terrorism); against the behaviour of the USA (withdrawal of troops from Afghanistan); against the UN (for not listening to Zeman's call for more activity); criticism of the government of the Czech Republic (for being submissive, reflecting the relationship between the president and the prime minister). Here he expressed anger, often returning to the past, I told you so.

If we look at the multidimensional model of fear, it turns out to have several layers. Fear of sovereignty (subdivided into fear that the EU is interfering too much and a general loss of sovereignty caused, for example, by restrictions on Schengen or the location of foreign troops on Czech territory). Another dimension is the fear of security (fear of migration and migrants, but also of Islamism and terrorism). Fear that the broader concept of security will not be guaranteed (fear that the EU and NATO will not be able to guarantee security). Zeman has also shown fear of cultural integrity and fear of the economy (by restricting Schengen at the beginning of crisis).

The meaning of the emotion of fear has changed over the years. First Zeman expressed fear of the limitations of the sovereignty of the Schengen area, later he transformed fear towards the incoming migrants and their cultural difference.

Shift is clearly visible on these statements: “The European Union still does not have a common foreign policy. As for the so-called soft, informal policy, I must say critically that sometimes it looks to me like a repeat of the appeasement of the 1930s” (Zeman 2014). “If we let them in as a migration wave, we will suffer the consequences, because we will create new no-go areas here, new excluded localities, and of course we will cause such scenes as there were now in Vienna” (Zeman 2017). By fearing and at the same time criticising the EU’s actions, Zeman encouraged fear of migration in the society.

A multidimensional view of the emotion of trust shows to whom and in what context the emotion was expressed. Zeman, somewhat surprisingly after his very critical statements, showed trust towards the European Union (it was about the future, common ideas and alliance). Another dimension was trust in other international organisations and their solutions to international security (UN and NATO). He also showed trust in the Czech government to handle the whole situation. At the same time, an emotion of trust appeared in statements about the V4 and the importance of regional cooperation. Confidence in economic cooperation with partners, especially China and Russia, was also a very strong component of this emotion.

A brief stop at the topic of V4. During this crisis was V4 a tool to raise the voice against quotas, to have more political power in institutions. Zeman argued “Poland, the Czech Republic, Hungary and Slovakia should form a kind of indivisible unit within the European Union to promote their common interests. This concerns the migration crisis, the proposal for migration quotas, relocations [...]” (Zeman 2018).

The multidimensional model of joy shows that it appeared in specific situations related to foreign policy. One dimension of joy was related to economic cooperation (mainly from cooperation with China, and to a lesser extent with other countries - Iran, Austria, Russia). Foreign investment and the acquisition of new resources. Another dimension of joy in times of the migration crisis was joy about new alliances, still connected to the economy. Zeman placed importance of the economy (also in case of sanctions) above other topics. Finally, Zeman also expressed joy at cooperation with the EU. Expectation was another emotion that Zeman expressed in his speeches and interviews during the migration crisis. He expected economic cooperation with China to deepen, the EU to change (in the context of the change of leadership in the European institutions in 2016) and expectations in the dimension of V4 cooperation (that the V4 would be the engine of change in the EU and the issue of Dublin IV). Zeman linked the expectations to the future, how the current situation will develop. The emotion of disgust also had several dimensions that reveal Zeman's interests and political traits. Zeman's disgust was expressed at Czech subservience. At the US, and at the UN - first at the fact that the Human Rights Council was chaired by Saudi Arabia, and then at the comix that spoke in favour of accepting refugees. The multidimensional model of the emotion of sadness pointed in the direction of the EU. Zeman showed sadness during the migration crisis that there are still sanctions (feel of isolation), lack of border protection and inability to protect the borders. Another dimension of sadness was related to the fact that trade is not developing as it could because of sanctions. And sadness was also expressed in foreign policy statements about the loss of Czech soldiers in Afghanistan. The migration crisis of 2015 started a process of realisation for Zeman as to whether it is beneficial to remain a member of the EU and under what conditions. As the impact of the migration crisis was coming to an end, Zeman came to a clear position that a sovereign state can function in the EU/NATO if it has enough power to express its interests and possibly seek other allies.

4.2 War in Ukraine

Now, in the interpretation, the focus turns to emotions that Zeman expressed in connection with the war on Ukraine. Order of the eight emotions appear is – trust (30%), anger (20%), joy (18%), fear (12%), sadness (8%) and surprise (8%), anticipation (4%), and disgust did not occur here. The war in Ukraine has shown that despite all the disagreements with the institutions mentioned above, it is worth renewing cooperation in the name of ensuring security. Zeman´s opinion brings a critical stance towards NATO's activities; this, compared to the previous crisis, replaced the critical attitude towards the EU. In this situation, President Zeman has assessed, and it is logical to preserve the security and integrity of the state in the event of a threat, that he is in favour of support for European integration and common interests, and the same regarding cooperation with NATO.

Multidimensional view of trust here revealed several topics. First layer of trust was cooperation (mainly security and economic cooperation). The trust that emerged in response to the Ukrainian crisis in 2022 was directed towards both the EU and NATO. With the institutions there was another layer - trust in common defence. Zeman clearly explained his opinion: "The Czech Republic is a small to medium-sized country and issues of war and peace will, whether we like it or not, be decided by the superpowers. On the one hand Russia, on the other hand the United States, but also France or Germany. So yes, we can and should be part of the European Union and the North Atlantic Alliance" (Zeman 2023). Trust was expressed to the V4 group again, but it was divided in the wake of the Russian aggression. Hungary's Prime Minister Orbán expressed sympathy for Russian gas and more general cooperation, an opinion not shared by other V4 leaders. Zeman, however, expressed trust that the group would overcome these divisions and continue to function. The emotion of anger showed the change in Zeman's relationship with Russia. He was very angry about Russia's unprovoked aggression in Ukraine. He showed by anger the importance of the threat: "almost beyond our borders and we cannot pretend that this war does not concern us" (Zeman 2022b). Another layer of anger pointed to the international community for failing to prevent it. "We as an international community have underestimated the believed historical wrongs, emotions and the lowest human instincts that lead to violence. The world has moved a little closer to its end on the imaginary Doomsday Clock." (ibid). Joy was associated with the fact that the Czech Republic had avoided war (and that the Czech Republic was connected to others). Although he emphasised that this does not mean that it does not concern us. Zeman points out that "Every morning we should repeat gratitude for the fact that there is no war in our country and that our country is a member of NATO and the EU. At the same time, we should realise every day that we must fight for our security, even if the war is taking place beyond our borders." (Zeman 2022a). Zeman also expressed his joy at the successful joint actions to defend Ukraine.

As in the previous crisis, there remained the joy of bilateral relations that strengthened economic cooperation and economic growth of the country. Zeman has emphasised many times that economic diplomacy should play a leading role in foreign relations. Expanding cooperation with existing partners, or new economic partnerships, triggered joy in his speeches. In a multidimensional view, fear had several layers. One concerned the failure of the international community and its implications for the future. The underestimation of historical wrongs has led to the situation in Ukraine. There was also the fear of a widespread military conflict, i.e. a threat not only to Czech security. This was also linked to the issue

of terrorism, which Zeman often mentioned in his speeches. He wanted to prevent an increase in the number and strength of terrorist organisations. He was referring to the withdrawal of allied troops from Afghanistan. He argued, "[...] today [the situation in Ukraine, authors note] we are in a somewhat similar situation. Even at the beginning of Operation Enduring Freedom, the Alliance was united in Afghanistan, and this unity has gradually crumbled. I would very much not like a similar process to take place in the case of the Ukrainian conflict" (Zeman 2022c). In the emotion of sadness, Zeman pointed to the need to stay in the alliance, even at the cost of higher spending. Zeman argued that not since the mid-20th century has the West been more united than it is now. He expressed sadness at the situation, which he said was a "wake-up call" for the West. He also expressed sadness for the Ukrainian refugees, about his opinion of the situation in the past. He claimed that Russia would never attack. The emotion of surprise appeared several times in the president's discourse during the period under review. Zeman expressed his surprise at the Russian aggression. The anticipation was expressed to his own government that he hoped we would remain a trusted ally and participate in the resolution of the war as part of the Alliance. Another layer was to the Czech Army about the integration of drones into the arsenal.

4.3 Same emotions, different meaning

In this section, a comparative perspective of the two crises is added. Zeman's foreign policy through emotions was presented, here is provided insight into differences between emotions and his motives or purposes for his opinion. The distribution of emotions in the discourse changed in the context of the two crises. The multidimensional view of emotions revealed that there are fundamental differences in the perception. This is because of the different conditions, the different purpose of his talks and speeches. Deeper understanding through emotions reveals that the war itself presents a new topic for security changing attitudes. Zeman reflected it for example by reestablishing ideological links with the organisations. The analysis of the emotions in the discourse shows several trends. (1) The diminishing importance of the relationship with the EU, which dominated during the migration crisis, but increased in importance during the war; (2) The emphasis on sovereignty remained, but the threats changed (EU, in the migration crisis, Russian attack in the war in Ukraine); (3) The mistrust of state security on the part of the EU, which subsequently changed to trust in both the EU and NATO, given the dilemma of the war in Ukraine. (4) The prioritisation of economic cooperation in the first crisis, while the issue changed and revealed a super-priority (i.e. aid in the war and to the war refugees); and (5) the focus on the states of the region, indicating deeper relations - this remained a tool of power in the migration crisis, but was not visible in the second crisis. The emotion of fear had different connotations in the two crises. During the migrant crisis, the strongest fears were of the threat to sovereignty posed by the EU, the migrant wave itself, Islamism and the undermining of the integrity of the EU. During the war in Ukraine, the fears were about international security, the use of nuclear weapons, that the international community was not helping Ukraine enough. The logic is the opposite. In the first crisis, the fear was that the EU was too active, that it was interfering in sovereignty. In the second crisis, the fear was also about sovereignty, but that the measures would be insufficient. The emotion of anger had different manifestations in the two crises studied. They differ in terms of who the anger was directed at. During the migration crisis, Zeman was divided on whether he was angry at EU or NATO politicians. The difference was that during the war in Ukraine he used anger to express his desire for unity (Green Deal, Gender and other policies are destroying families and Europe will be a helpless victim). However, during the war in Ukraine he used anger in

connection with the failure of the international community. And he also showed anger at Russia as a specific aggressor, which it was not in the first crisis. Then there was anger at the violation of the sovereignty of the Czech Republic. In both periods there is still anger about the withdrawal of NATO and the US from Afghanistan.

On the contrary, the expression of joy associated with economic cooperation was the same across crises. The fact that joy during the war in Ukraine had a higher proportion was caused by joy from joint successful actions in protecting the security of the Czech Republic. One of the reasons for the change in discourse is the view of security. Looking deeper, it is possible to add another element that influenced the results of the discourse, namely Zeman's view on migration. While in the first crisis Zeman perceived the newcomers as economic migrants, in the second crisis there were, in his view, refugees from war. “The Ukrainians, that is, the refugees, are mostly women and children because the men are fighting at home. While the Arab refugees were young, healthy men who, on the other hand, left their women and children at home” Zeman (2022a).

The dimensions of sadness were also different in the two periods. While in the first period he expressed sadness about the sanctions that hindered the economic growth of the Czech Republic and about the incompetence of EU and NATO policy, in the second period he expressed sadness about the war and about his past attitudes that did not assess the situation well. The emotion of trust was used in a similar way in both crises. Zeman trusted the institutions and the Czech Republic's commitment to them. Ideologically, they agreed with him. He also cited trust in proactive approaches, such as foreign missions that could help fight terrorism. This was identical in both crises. The trust mentioned during the migration crisis was less frequent and less rhetorically strong. Zeman mentioned it in passing, alongside all the criticism of organisations. During the war in Ukraine, however, trust was at the forefront. He trusted in joint action, in NATO, which he described as the strongest military alliance in the world, and in the fact that the fight in Ukraine was a fight for the entire West. Interestingly, even trust in the V4 has been maintained, despite the rather strong criticism of Orbán's policies in Hungary. Zeman, however, opted for a conciliatory tone, saying that the problems would be solved. Disgust did not appear in the discourse in the years 2022–2023. In the migration crisis disgust has emerged over the Czech Republic's attitude of being submissive and the US actions in Afghanistan.

During the migration crisis, for example, the anticipation was that external actors would change and that a change of personalities in the EU would bring about a change of policy. In contrast, during the war in Ukraine, the anticipation was that the Czech Republic would remain a credible ally. Surprise did not occur during the migration crisis, however it did during the war in Ukraine, about the war itself. For a long time Zeman declared that there would be no war, that only a fool would do that.

5 CONCLUSION

The research showed that both crises under study fulfilled the potential to influence Zeman’s discourse. There was a transformation of the attitudes that had previously been common in his conception of foreign policy. One finding was that the 2015 migration crisis influenced Zeman’s view of foreign policy to such an extent that in his speeches he strongly criticised the EU (and possibly NATO) for inaction or bad actions that undermined the Czech Republic’s national

interest and often even its sovereignty (in the case of migration quotas). During this period, Zeman was very critical and rather than talking about constructive solutions and advice on what the Czech Republic could offer as a solution, he talked about what should not be done and how the EU is a growing bureaucratic apparatus. The emotions of anger and fear were expressed frequently. In the reflection of the 2015 migrant crisis, we also find hints of an emotion of trust based on Zeman's trust in common solutions or solutions created at the Central European level. Zeman's reaction to the war on Ukraine was different. He did not question the actions of the EU or NATO but instead supported joint activities and promoted common solutions. This shift is logical. War is an existential threat, and in this case, instead of criticising disagreements and inadequate solutions, Zeman moved towards expressions of trust in cooperation and joint action. This is not the case in the migration crisis. The reason may be, to some extent, that the image of the migration crisis in Czech society has been constructed and exploited by populist rhetoric, to which Miloš Zeman also resorted. The contribution of this topic to the comparative analysis goes beyond the scope of this paper. It would be very interesting to make a comparison of the V4 leaders during the crises studied. In fact, it would be very interesting to make a comparison of the emotions of the leaders of the whole of Central and Eastern Europe.

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PRIMERJALNA PERSPEKTIVA DVEH KRIZ V ZUNANJEPOLITIČNEM DISKURSU ČUSTEV MILOŠA ZEMANA

Članek analizira zunanjepolitično stališče češkega predsednika Miloša Zemana do migracijske krize EU leta 2015 in vojne v Ukrajini leta 2022, s poudarkom na čustvih v primerjalni perspektivi. Migracijska kriza je v predsedniškem diskurzu sprožila kritike Evropske unije in Nata, s poudarkom na nacionalni suverenosti, medtem ko je ukrajinska vojna preusmerila pozornost na sodelovanje z njima.

Prevladujoča čustva so bila jeza, strah in zaupanje, vendar so se njihova razmerja v obeh krizah spremenila. V migracijski krizi leta 2015 je prevladovala jeza zaradi sprejetih ukrepov in neuspeha pri učinkovitem reševanju situacije. Nasprotno je v kasnejši krizi prevladovalo čustvo zaupanja, kjer so bile kolektivne rešitve obravnavane kot pot naprej. Ugotovitve kažejo, da so opažene krize sprožile specifične zunanjepolitične odnose, izražene skozi čustva, pri čemer je prepoznavanje čustev olajšalo prepoznavanje zunanjepolitičnih odnosov v prihodnosti.

Ključne besede: češka politika; predsednik; čustva; migracije; vojna v Ukrajini; primerjalna politika.

AGEING WELFARE STATE IN TRANSITION: A FUZZY-SET ANALYSIS OF LONG-TERM CARE PROVISION ACROSS LIBERAL, CONSERVATIVE, AND SOCIAL-DEMOCRATIC REGIMES

Zhen TIAN[1]

This study explores the long-term care service landscape across international contexts, attempting to identify and categorise unique typologies within the global environment. It investigates how the structural, organisational, and operational aspects of welfare systems influence social service provision in five typical welfare state models. The study uses qualitative comparison analysis, specifically a fuzzy-set ideal type analysis, to identify significant welfare actors and calibration points. The findings illustrate the intricate interplay of state, market, and societal actors in generating welfare pluralism within LTC systems, which is influenced by route dependency and socio-cultural variables. The results contribute to academic discourses on long-term care system dynamics by utilising a welfare pluralism viewpoint and a fuzzy-set technique that considers the multifaceted character of long-term care service provision. It has significant implications for policymakers and academics working to improve the equity, efficiency, and responsiveness of long-term care service system across various national and subnational contexts.

Key words: long-term care; welfare pluralism; health policy; fuzzy-set analysis; service provision.

1 INTRODUCTION

Concern over the effects of demographic trends on an ageing world population is becoming more prevalent, according to the existing academic research (Khan 2019; Mitchell and Walker 2020). On the one hand, this demographic transition makes the underlying socioeconomic vulnerabilities that many welfare states confront worse (Mulvale et al. 2020). Comprehensive medical and healthcare services for the elderly are necessary due to the increased financial demands on

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welfare systems caused by the ageing population (Spiers et al. 2019). As the elder workforce ages and enters retirement, welfare states must simultaneously deal with projected labour market shortages and possible productivity drops (Naumann 2017). On the other hand, the growing risks of population ageing call for a wide range of assistance for family carers and the creation of customised services to effectively meet the various requirements of the senior citizens (Anisimov et al. 2022). To guarantee the welfare and social inclusion of senior persons within the larger social framework, this complex issue necessitates an all-encompassing, evidence-based policy approach (Pfau-Effinger 2012).

Previous studies have illuminated the diverse characteristics and transformative trajectories within various regional contexts, stemming from the intricate interplay of welfare policies, economic conditions, and the dominant political ideologies of each nation (Bäckman 2016; Szebehely and Meagher 2018). As conceptualized by Esping-Andersen (1989), a spectrum of welfare regimes exists, ranging from those with extensive coverage and service provision for the retirement phase, underpinned by robust welfare states, to those that depend on social insurance-based collective support, and those where such support is facilitated through the mechanisms and policies of a liberal market economy.

Nevertheless, the nature and effectiveness of aforementioned 'early departure' welfare state models in tackling the new challenges connected with demographic transition are still being debated in academia (Ebbinghaus 2021; Häusermann 2020). The necessity of developing sustainable welfare systems that can care for the ageing population while making sure that economic goals are not put before of social and human sustainability has been a prominent issue in public discourse (Schoyen, Hvinden and Leiren 2022). As a result, several initiatives and pilot programmes are now in progress to create novel answers to the intricate challenges brought on by the ageing of the population (Ariaans, Linden and Wendt 2021; Ranci and Pavolini 2015).

Nonetheless, the most effective strategy to build care systems that can successfully handle the changing demographic environment is still a topic of continuous scholarly discussion. Even while many industrialised nations' care systems now offer more substantial service offerings, actual coverage and accessibility are sometimes still very limited (Rostgaard et al. 2022). A growing body of scholarly work highlights the importance of non-profit organisations and for-profit businesses in terms of their social impact and argues that government action alone is insufficient to address these global issues (Blomqvist and Winblad 2019).

This study examines long-term care (LTC) system design from a global perspective, followed by a typological debate (Ariaans, Linden and Wendt 2021). Using an ideal-type fuzzy set approach, this study examines how the structural, organisational, and operational characteristics of welfare systems influence the delivery of social services in five common welfare state models, while minimising the potential lack of uniformity in qualitative statistics.

The research questions investigated in this study are: 1) how are the design features of the long-term care system like welfare systems of specific countries? 2) how does the development of long-term care system further promote the reform of welfare systems in diverse national contexts? To answer these research issues, the study examines five representative nations that encompass the conventional welfare regime typology: Sweden, Germany, Japan, South Korea, and the United States (Hassel and Palier 2023; Yörük, Öker and Tafoya 2022).

The study aims to clarify the intricate relationship between the structure of the welfare state as a whole and the design of the long-term care system by using a comparative perspective. The results expand academic knowledge of how advancements and changes in long-term care delivery might spur more extensive changes in the welfare systems of developed nations dealing with the challenges of an ageing population.

2 LITERATURE REVIEW

The traditional welfare state was built upon the idea of social citizenship, according to which the state oversaw offering a variety of universal public services (Taylor-Gooby 1991). Titmuss expanded on this fundamental principle by making a distinction between the models of residual (minimum) and institutional (maximal) welfare states (Pinker 2017). Based on the institutional arrangements that influence the results of welfare provision, Esping-Andersen (1989) used a more sophisticated typological method to categorise capitalist welfare states into three different regime types: Liberal, Christian Democratic, and Social Democratic regimes.

The Liberal regime, exemplified by the United States, is characterized by a limited role for government in the direct provision of social services. Instead, it encourages dependence on private donations or philanthropy. By contrast, the Christian Democratic regime, as embodied by Germany, is corporatist and conservative. The welfare rights and entitlements within this regime are linked to social insurance contributions based on individual or family income. The Social Democratic regime, typically observed in Nordic countries such as Sweden, is distinguished by the widespread coverage of social risks through universally accessible, tax-funded insurance programmes. This regime values the principle of communal responsibility and the equitable distribution of social risks across the population (Esping-Andersen 1989).

In addition to the three classic welfare regimes observed in Western societies, scholars have identified an independent welfare regime model prevalent in East Asian contexts. The Productivist model is characterised by the prioritisation of welfare service provision for the purpose of economic development, with the influence of cultural standards like filial piety and Confucianism (Lee and Ku 2007; Yeh 2023). As East Asian countries such as Japan and South Korea have continued to develop and engage in policy learning, they have established more comprehensive social insurance systems, which are more like the Christian Democratic welfare regime (Choi 2012). Therefore, more recent academic endeavours have attempted to integrate the East Asia regime into the larger global discussions on welfare state reform and future growth (Yang and Kühner 2020).

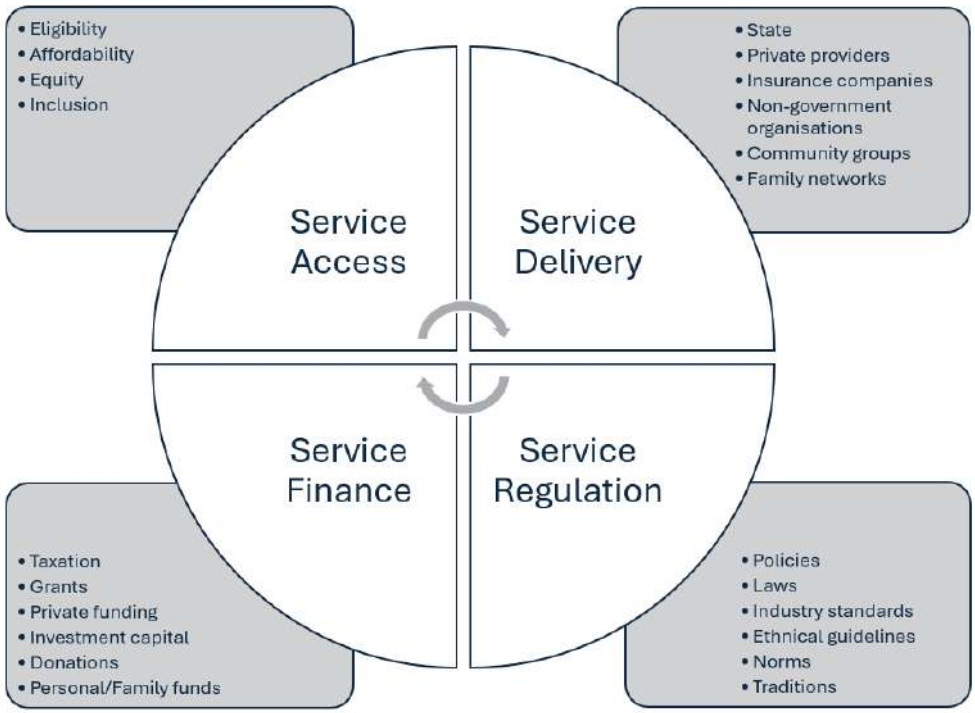
However, the reduction of public spending and the redrawing of public-private borders have had a significant impact on the size and makeup of welfare states as neoliberalism has gained traction. The modern welfare state has demonstrated an increasing trend towards decentralisation, localisation, autonomy, and service diversity in contrast to the traditional welfare state's emphasis on shared risk and collective responsibility (Esping-Andersen 2024). New prospects for inventive social activities in the design and implementation of welfare services are brought about by the expansion of global networks and civil bureaucracy (Breimo et al. 2017).

The developing tendency towards a "freedom market" ideal has been categorised by scholars as "welfare pluralism" or a "mixed economy" (Pinker 1992; Skelton 1998). The former describes a system where the number and variety of service providers are expanded, but the substantial weight of welfare funding remains on statutory agencies of the federal and local governments. The latter emphasizes the social welfare financial system will be privatised because of emerging private service providers. Furthermore, academics provide a comprehensive framework to analyse the mixed division of modern welfare reform, underlining the separation of social supply and funding (Hill 2019; Powell 2019).

When analysing how welfare provision and service system configurations have changed in this dynamic context of welfare pluralism, it is crucial to consider the unique interpretations and implications of their interactions under institutional, cultural, and political circumstances (Yang and Kühner 2020). This study compares the design and implementation of long-term care service systems across five typical welfare regime contexts. Following the scholarly debates on welfare regime typologies and the classification of long-term care system structures proposed in previous studies (Ariaans, Linden and Wendt 2021; Fischer 2022), a conceptual framework comprising four fundamental welfare dimensions—service access, service financing, service delivery, and service regulation—is proposed for the comparative analysis.

As illustrated in Figure 1, this study advanced the actor-centric welfare pluralism paradigm to incorporate the domains of service access in comparative analysis across various socioeconomic contexts. The examination of service access, including service coverage and eligibility criteria, would be a vital aspect of the proposed actor-centric welfare pluralism paradigm. The framework also covers the main facets of welfare pluralism, such as the functions and relationships of different welfare actors in the service financing, delivery, and regulation, including the government, the market, the voluntary sector, and informal care networks.

FIGURE 1: CONCEPTUAL FRAMEWORK



3 METHODS

This study aims to examine and compare the design and implementation of long-term care service systems in various nations while incorporating the welfare pluralism. By employing fuzzy-set ideal type analysis (FSITA) to integrate both quantitative and qualitative data, it overcomes the limitation of quantitative statistical analyses, such as statistical uncertainty, the impact of outliers, and the masking effects of statistical means (Thomann and Maggetti 2020).

The FSITA approach is based on the language of necessary and sufficient conditions as well as set theory. As stated by Ragin (2000), the fuzzy-set methodology combines the advantages of quantitative analytical methods and qualitative case studies. The fuzzy-set theory captures diversity in both kind and degree by conceptualising cases as configurations of multiple dimensions (Ragin 2003). Two qualitative data points—complete non-membership and full membership—as well as the quantitative variance between them—that is, 0 (entirely out) and 1 (fully in)—are necessary for all fuzzy set analysis. Individual cases can have fuzzy set scores ranging between 0.0 and 1.0. Researchers can use their theoretical and empirical expertise to calibrate the sets by setting up these breakpoints in addition to the raw data.

The FSITA combines numerous fuzzy sets using two Boolean logic principles: logical AND (the intersection or minimum principle, denoted by the symbol *) and logical NOT (the negation principle, denoted by the symbol ~). It is possible to formulate the logically possible combinations with multiple aspects as the "property space" by using these two operations (Ragin and Pennings 2005). This study classified long-term care service systems based on partial membership. The operation of fuzzy sets in the analysis process is determined by three logics: set negation, set intersection and set union. Set intersection describes the common area of two or more connected sets. In addition, there are two extremes: complete inclusion and complete rejection.

Building on Powell's (2019) welfare pluralism model and the research framework, a total of ten ideal type can be proposed (see Table 1). The mixed-protective type achieves high scores in all four domains: welfare actor participation and generous service access, delivery, finance, and regulation. In contrast, the weak type scores low on all aspects. The state-protective type has high service access scores, since the state/government is the dominant player in service finance, delivery, and regulation. In contrast, the conditional-protective type has poor service access ratings due to restricted inclusion and coverage, whereas the other three aspects engage various welfare players. The state-regulatory type has high score in service access, finance, and delivery, with generous and diversified service supply, but service regulation is exclusively the responsibility of the state. The conditional-regulatory type also has the state as the primary actor in service regulation, while multiple actors participate in service finance and delivery, but only provide limited-service access to the targeted population. The market-delivery type incorporates several welfare actors alone in service delivery, with the state in charge of service funding and regulation, as well as a generously high service access score. However, the conditional-delivery type has low service access score, indicating restricted coverage and inclusion. Market-finance and conditional-finance models both include various welfare players in service funding, with the state in charge of service delivery and regulation.

TABLE 1: IDEAL TYPES FOR LONG-TERM CARE SERVICE SYSTEM

Ideal types	Service Access (A)	Service Finance (F)	Service Delivery (D)	Service Regulation (R)	Model
Mixed-Protective	Generous	Multi actors	Multi actors	Multi actors	A*F*D*R
State-protective	Generous	State	State	State	A*~F*~D*~R
State-delivery	Generous	Multi actors	State	Multi actors	A*F*~D*R
Market-delivery	Generous	State	Multi actors	State	A*~F*D*~R
Conditional-delivery	Limited	State	Multi actors	State	~A*~F*D*~R
Market-finance	Generous	Multi actors	State	State	A*F*~D*~R
Conditional-finance	Limited	Multi actors	State	State	~A*F*~D*~R
State-regulatory	Generous	Multi actors	Multi actors	State	A*F*D*~R
Conditional-regulatory	Limited	Multi actors	Multi actors	State	~A*F*D*~R
Conditional-pluralism	Limited	Multi actors	Multi actors	Multi actors	~A*F*D*R
Weak	Limited	State	State	State	~A*~F*~D*~R

The following analytical categories were determined to be relevant to the investigation of the design and implementation of long-term care service systems: 1) Overarching policy objectives and system structure, 2) Organisation and regulation, 3) Formal and informal division of care work, and 4) Financial guidelines. This study gathered data on these four analytical categories from national statistics, academic literature, and policy documents from several countries, as well as comparable data from national statistical agencies and the OECD.

4 RESULTS

4.1 Service access

The first initial component of the LTC system is the degree of accessibility with which services are distributed, including the definition of eligibility criteria and the inclusion of beneficiaries. However, each country has different levels of generosity in the services offered to people with long-term care needs, and these differences influence how much a given LTC system offers in terms of service benefits (Villalobos Dintrans 2020). Service access in this study refers to service coverage and LTC eligibility requirements. More precisely, the accessibility is less liberal the more conditions are required to qualify for LTC treatment.

Sweden's long-term care provision aligns with a social-democratic feature that prioritises comprehensive and generous assistance. The Social Service Act and Health and Medical Service Act in Sweden permit elderly citizens to request and utilise long-term care services as required. Similarly, Germany's mandated long-term care insurance scheme covers most of the population. About 79 million of Germany's 82 million citizens have enrolled in the long-term care insurance scheme (Busse et al. 2017). In contrast, Japan and South Korea have introduced national long-term care insurance programs with more specific eligibility requirements based on age, income, and family status (Kim et al. 2022; Rhee, Done and Anderson 2015).

The United States' Medicare and Medicaid programs have a more restricted coverage group for long-term care services since they are more geared towards medical assistance than social insurance. A person's eligibility for services is frequently based on their financial situation rather than their total care requirements, and the U.S. long-term care system is made up of a variety of public, private, and medical providers (Hest, Alarcon and Blewett 2022).

To standardise LTC eligibility criteria, most nations have adopted activities of daily living (ADL) assessment scales, which may be roughly classified into three approaches: personalised, ADL-based, and resource-quantified (Hardy, Acciai and Reyes 2014). Sweden illustrates the personalised approach by conducting in-depth interviews with people and their families to evaluate care requirements rather than relying on broad ADL criteria. Since 2010, Sweden has also mandated local governments to create personalised care plans for recipients (Matscheck and Piuva 2025). In contrast, the United States' long-term care eligibility examination based primarily on an individual's financial resources rather than a comprehensive assessment of their care needs.

Nations with public LTC insurance schemes, like as Germany and South Korea, use standardised ADL-based evaluation tools to determine care need and eligibility. These assessment tools assign individuals to predefined categories based on the nature and severity of their physical, cognitive, and psychological impairments. Japan's LTC eligibility examination is significantly more involved, with a 74-item questionnaire used to establish seven levels of care requirement certification (Yamada and Arai 2020).

4.2 Service finance

The long-term care system has traditionally been funded by the collection of resources such as taxes, voluntary or required contributions, and out-of-pocket payments (Villalobos Dintrans 2020). To balance coverage and sustainability, most nations have set variable amounts of benefit spending for different recipient categories. While the option between cash and in-kind reimbursement for LTC services is an important aspect in the literature, this study solely focusses on the role of welfare actors in service finance to investigate the diversity within LTC systems.

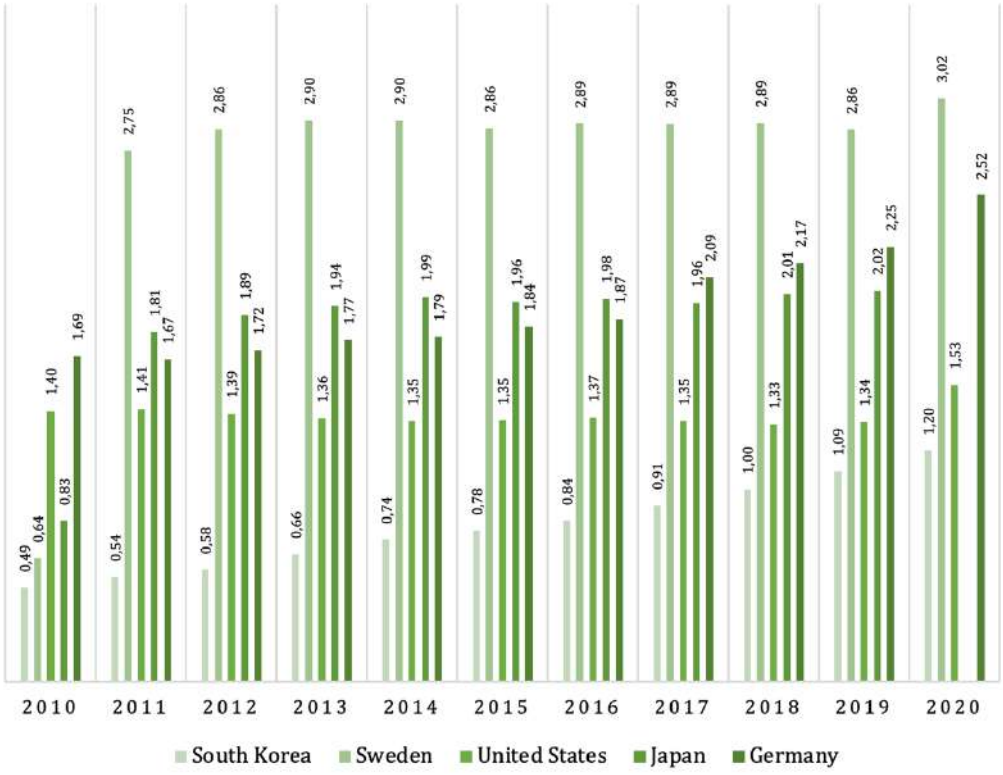
In Sweden, municipalities oversee a substantial amount of the entire public budget for LTC service, accounting for around 85% of financing for older persons and 70% for people with disabilities (Lagergren 2002). Less than 5% of Sweden's total LTC costs are privately funded, with the majority coming from public tax revenues. According to data from the Swedish Ministry of Health and Social Affairs, more than 20% of home care recipients receive services at no cost because their incomes fall below the established threshold. However, this type of comprehensive, tax-financed LTC system is uncommon in other countries because it necessitates significant capital accumulation and a well-balanced supply-demand dynamic. Notably, Sweden's public spending on long-term care, which includes both older persons and those with disabilities, is 3.9% of GDP, which is higher than in other European and North American nations (see Figure 2).

Alongside the typical public-funded long-term care system, numerous nations have established social insurance schemes to reduce the financial risks involved with LTC service. These long-term care insurance (LTCI) initiatives are principally funded by mandated, income-related payments from the working population, as specified in the individual legislative frameworks (Rothgang 2010).

In Germany, LTCI premiums accounted for 3.05% of total revenue in 2019. Japan's LTCI system receives income-based premiums from those aged 40 and over, which contribute for around half of public financing, with the remaining 10% coming from user co-payments (Sano et al. 2022). South Korea has taken a

similar approach, with mandated income contributions of around 0.68%, accounting for 60-65% of LTCI funding by 2020, supported by government subsidies from general taxes (Kim and Kwon 2021). In contrast to the social insurance models, the United States attempted but failed to implement a non-mandatory, self-funded LTC social insurance programme as part of the 2010 health reform, which was eventually abandoned due to concerns about moral hazards and adverse selection (White 2013). The long-term care system in United States is typically funded by a combination of public health insurance programs, such as Medicaid and Medicare, and private sources, such as personal savings and private LTC insurance. The US finance model is more reliant on private investment and out-of-pocket spending, whereas South Korea and Germany take a balanced approach to public and private financing.

FIGURE 2: LONG-TERM CARE PUBLIC EXPENDITURE AS A SHARE OF GDP AND PER CAPITA TILL 2020



Source: OECD Health Statistics 2020, https://doi.org/10.1787/health-data-en.

4.3 Service delivery

The service delivery dimension of long-term care systems is characterized by the participation of providers and the attribution of service autonomy. Three different models for service delivery arrangements across different national contexts have been proposed by Colombo et al. (2011): (1) centrally directed, (2) multi-integrated, and (3) fragmented network. These models differ in terms of the nature and importance of welfare actors involved in service delivery and provision. The primary difference between centrally directed and fragmented network models is the extent to which the central government decides the service delivery paradigm rather than allowing the market to produce it. In contrast, the multi-integrated approach emphasises more contact and coordination among service providers.

The United States illustrates the fragmented network model, with the LTC provider landscape being complicated, multilayered, and confusing for customers, with several agencies regulated by a web of federal, state, and local regulations and processes (Glied and Jackson 2017). Despite changes in the delivery of long-term care services since the repeal of the Affordable Care Act in 2016, the US system remains fragmented and commercialised arrangement.

In contrast, Sweden reflects a multi-integrated LTC delivery model, with the state largely responsible for care for the weak and vulnerable (Winblad, Blomqvist and Karlsson 2017). While Sweden has integrated well-developed volunteer organisations and civil society into LTC service delivery, the overall system is limited by local governments' significant autonomy and involvement in determining service arrangements and assigning tasks to various providers (Mailand and Hansen 2016). The structure of the multi-integrated model varies based on the dominant kind of service provider and the extent to which the family's involvement is recognised and supported.

In South Korea, the LTCI programme was implemented between 2009 and 2016, resulting in a rapid increase of private providers from 2,600 to 5,000 institutions and 11,900 to 12,900 home-based care organisations (Jeon and Kwon 2017). This has led in the formation of a network of multi-corporate alliances, with private service providers playing an important role. In contrast, Japan's emphasis on community-based care within its LTCI system has prioritised the importance of local comprehensive care centres and social associations in LTC service delivery over the role of family caregivers (Noda et al. 2021).

The LTC service delivery arrangement in Germany is most closely aligned with the multi-integrated approach, which is defined by a complimentary interaction between the state, market, society, and family. Germany actively assists families with their caregiving obligations by offering monetary rewards to female family members who provide informal long-term care, as well as free volunteer training courses (Riedel, Kraus and Mayer 2016).

4.4 Service regulation

Service regulatory has frequently been combined in prior studies on the examination of long-term care service delivery. Given the government's shifting role from direct administration to governance, it is crucial to view regulation as a significant component (Barr 2020). Considering the possibility for market and third-party failures, a complete set of rules is essential to assure the quality, accessibility, and financial feasibility of long-term care services. The welfare service regulation goes beyond the kind and location of providers to include wider governance guidelines (Longo et al. 2015). Drawing on the debate of welfare decentralisation and new public administration, this study conceptualises the service regulatory domain by considering the degree and scope of government involvement in monitoring and regulating LTC providers.

Sweden has established a comprehensive and multi-level government regulatory framework. General regulation is the responsibility of the federal government, but local and county governments have been given considerable latitude in the specific planning, financing, and allocation of resources for long-term care services. The National Board of Health and Safety and other central health organisations are principally responsible for making ensuring that services are in line with the objectives of national policy. The main regulators of LTC service delivery are still local and municipal authorities, even though private health and

social care organisations are present in specialised housing and home care provision (Mailand and Hansen 2016).

Germany's long-term care insurance system stands out for its state regulatory framework, which serves as a firm foundation for local self-management and regional control (Nadash, Doty and von Schwanenflügel 2018). Regional and municipal governments oversee administering and financing long-term care services. Compared with Sweden, Germany lays a stronger focus on limiting the breadth of services. In Germany, local governments collaborate with civil society and for-profit service organisations to develop social infrastructures. In addition, a national system of tax deductions is used to promote paid care provision within private households, though this system follows centralised principles. Furthermore, Germany has developed a "Medical Advisory Service" to regulate all long-term care services and support providers. Its principal role is to yearly assess whether licensed care facilities meet the performance and quality improvement standards outlined in national rules (ibid.). The Association of LTCI Funds, which is made up of representatives from service providers and insurance funds, set these regulatory rules. A publicly available website launched by the state gives information on nursing homes and care facilities open for market and social regulation (Nadash et al. 2018).

Both Japan and South Korea are primarily concerned with regulating eligibility standards and service access, reflecting the legacy of their respective health insurance systems (Rhee et al. 2015). In Japan, local governments oversee regulating long-term care social insurance systems, while national and health insurance agencies give support and assistance. Local governments' primary tasks include generating insurance funds, developing budgets, accepting and approving care eligibility applications, providing insurance services, and assessing the quality of those services (Nakanishi et al. 2015). In contrast, South Korea has weaker national standards and quality control measures compared with Japan and Germany (Seok 2010). The National Health Insurance Corporation manages and regulates the long-term care social insurance programme, while local governments regulate the care facilities. There is a regulatory gap proposed by scholars in managing the behaviour of care providers, carers, and service recipients (Chon 2019).

Similarly, the US has adopted a non-mandatory, lightly regulated approach for the long-term care system. The Centres for Medicare and Medicaid Services (CMS), a federal department under the broader US Department of Health and Human Services, is the principal regulatory body in charge of the long-term care industries. However, the CMS regulatory approach is primarily complaint-driven, relying on state survey, licensing, and certification agencies to identify and report violations (Guo and McGee 2012). State agencies and CMS federal offices work together to enforce the regulation standards.

Notably, the standards focus on establishing minimum quality thresholds rather than incentivising maximum quality improvement. State agencies and CMS regional offices work together to enforce these regulations, addressing identified issues and ensuring compliance. The certification standards focus on establishing minimum quality thresholds rather than incentivising maximum quality improvement. Moreover, the regulatory rules are open to interpretation by individual inspectors, who may be affected by local conventions and resource restrictions. Since the states lack a unified regulatory policy or guidelines, the application of sanctions for apparent violations of nursing home regulations varies significantly across states (Miller and Mor 2008). This minimal, complaint-driven regulatory approach in the United States contrasts with more

comprehensive, government-led regulatory frameworks seen in other countries, such as Germany and Japan, where central and local governments play a more active role in overseeing and enforcing LTC service quality standards.

4.5 Summary

By investigating the FSITA results about long-term care service system and welfare pluralism in five selected countries, this study identified four unique typologies among the nations studied (see Table 2).

TABLE 2: SUMMARY THE CALIBRATION OF LONG-TERM CARE PROVISION COMPARISONS

Identified type	Service Access	Service Finance	Service Delivery	Service Regulation	Case Country
Mixed-protective	Universal	Tax-based public finance	State-Voluntary	Strong localized regulation	Sweden
Conditional-regulatory	Qualification assessment	3.05% income contribution	Four-dimensional interaction	Strong centralized regulation	Germany
Conditional-pluralism	Qualification assessment	1.5% income contribution	Public-private	Strong multi-level regulation	Japan
Conditional-pluralism	Qualification assessment	0.68% income contribution	Public-private	Weak multi-level regulation	South Korea
Conditional-marketisation	Income eligibility	Non-mandatory self-financing	Marketization	Weak federal regulation	United states

The long-term care service system configurations in Japan and South Korea shared a high degree of similarity across the four dimensions analysed. However, a significant divergence emerged in their regulatory approaches. Japan maintained a heavily state-regulated LTC system, with the government playing a dominant role in policy development and service regulation. In contrast, South Korea lacked clear national-level policy directives for regulating LTC services, resulting in a more fragmented and decentralised approach. In the field of service finance, both Japan and South Korea implemented a national social insurance mechanism for funding and financing services. Japan emphasises a multi-tiered government support system, whereas South Korea relies on government subsidies but lacks a well-defined distribution framework.

The Swedish model followed a "mixed-protective" typology, in which the long-term care system was designed to benefit the public by balancing contributions from both the state and local community-based entities. The integration of public and social support mechanisms resulted in more comprehensive and equitable access to long-term care services. In contrast, the United States represented a "conditionally weak" service type, with tight eligibility criteria and a strong market orientation in its long-term care system. This resulted in uneven accessibility, with certain segments of the population facing significant barriers to receiving necessary long-term care. Germany presented a conditional hybrid mode, demonstrating a strong state regulatory role while also having the most diverse service delivery system among the countries examined. However, accessibility to LTC services in Germany was not as widespread as in Sweden, indicating potential gaps in service coverage and integration.

The results indicate that the existing long-term care service system does not fully align with the ideal model proposed by theoretical frameworks. The complex interplay of state, market, and social actors in generating welfare pluralism within long-term care systems results in a dynamic and compromised model of policy implementation. When comparing the identified long-term care service types to the theoretical ideal types, path dependence and socio-cultural factors

play an important role in how these systems finance, distribute, and regulate long-term care services (Béland and Marier 2020).

The stark contrasts between Japan's state-regulated system, South Korea's lack of clear national policy guidelines, Sweden's mixed-protective model, the United States' conditionally weak service type, and Germany's unique combination of strong state regulation and diverse service delivery highlight the complex nature of welfare pluralism in the long-term care sector. It is critical to highlight that service criteria and arrangements are generally more consistent in countries with social insurance-based long-term care systems, in accordance with the existing literature on the path-dependent characteristics of welfare state evolution (Inglot 2016). This underscores the importance of considering the historical and institutional variables that influence the trajectory of long-term care systems, as these can have a significant impact on service accessibility and distribution design (Haggard 2020).

5 DISCUSSION

While most countries across the globe are now attempting to extend welfare coverage and enhance service accessibility to serve a larger population, the primary distinctions lie in service financing, delivery, and regulation. Based on the welfare pluralism debate, the study proposes that effective welfare service system results from giving localised welfare providers more autonomy, along with strong regulatory mechanisms (Andreotti and Mingione 2016). The comparative typology produced in this study demonstrates the possibility for more effective local LTC service delivery if regulatory power is assigned to subnational bodies. These differences are mostly caused by the effect of different socioeconomic situations and service provider characteristics among the nations studied (Asmorowati, Schubert and Ningrum 2022).

The institutional theory and the role of cultural norms in driving welfare state reforms provide a good foundation for comprehending the differences in long-term care service provision model between nations. The state has a significant role in Japan's LTC system because to the country's long history of centralised government and the bureaucracy's important involvement in social policy planning (Pierson 2016). In contrast, the market-oriented strategy taken in the United States reflects the country's emphasis on private, employer-based welfare philosophy.

Differences in service criteria and arrangements across nations with social insurance-based LTC systems and those with different funding models might be attributed to differing public expectations and cultural norms of the state's role in providing welfare services. This viewpoint can also help explain why policy learning did not result in the straight adoption of the German LTC service model in Japan and South Korea, but rather the establishment of context-specific systems that reflect the nations' distinct sociocultural and institutional elements. While some nations have greatly increased service accessibility or turned towards more equitable LTC provision, their path-dependent trajectories and institutional inertia may limit their capacity to fully fulfil the policy objectives.

For instance, both scholars and citizens have long criticised service coverage and accessibility in the United States, and legislative improvements to target less limited and more generally inclusive public care services remain extremely difficult (Jaramillo and Willging 2021). Similarly, recent studies have criticised

the real beneficiaries of Sweden's universal long-term care system, claiming that the service system continues to prioritise the most disadvantaged people above providing complete coverage for the whole population (Rostgaard et al. 2022). Scholars argued the changes have raised unmet need, informalisation of care and privatization in the use of topping up with market-based services in Nordic long-term care systems (Tynkkynen et al. 2022).

Despite the significant path dependency demonstrated in welfare state transformations, changes in political leadership, cultural attitudes, or external shocks (such as demographic shifts, economic crises) may open the door to more transformational reforms in long-term care systems (Maags 2020). The LTC system reform in South Korea, which was impacted by political leadership changes and external shocks like as the global financial crisis, highlights how important such circumstances may be in a country's growth or reform of its current service system and providing model (Kim and Kwon 2021). The global health crisis of 2020 has also been demonstrated to have a significant influence on welfare regime changes, notably in the healthcare sector (Mok, Ku and Yuda 2021).

While path dependencies and institutional inertia present substantial hurdles to comprehensive welfare reforms, the findings of this study indicate that political, sociological, and external forces might generate opportunities for more revolutionary changes in the LTC sector. Policymakers and academics should pay close attention to these possible windows of opportunity and investigate how they might be used to promote real changes in the accessibility, equality, and responsiveness of long-term care systems.

Future studies could assess how policy innovations could mitigate welfare-state path dependence while improving fiscal sustainability. Most nations are now adopting social-sector financing reforms, which range from tiered subsidy schemes to phased adjustments of tax incentives (Bortnyk and Sievidova 2023). Rigorous comparative evaluations are required to separate the causal impacts of these policies on care models and larger social-service systems. Such evidence would guide the development of solutions that go beyond short-term fiscal adjustments and directly address the institutional and behavioural factors that sustain structural vulnerabilities.

Moreover, empirical case studies could help elaborate how contextual factors—such as political-economic constellations, institutional capacities, and the structure of traditional regimes aimed at sub-national welfare actors—condition the effects of national policy levers on care systems. Future research can provide light on the causal pathways that link macro-level policy goals with micro-level incentives by methodically mapping these connections. Such data would provide practitioners and policymakers the accuracy they need to tailor interventions to local institutional conditions and promote long-lasting and revolutionary transformations.

6 CONCLUSION

To put the conclusion first, the findings suggest that varying service outcomes in LTC policy design and implementation may result from localised collaboration among diverse national service providers. This shows that a one-size-fits-all model to LTC system design and service provision may not be enough, needing context-sensitive policy frameworks that account for regional and local

differences (Poškutė, Kazlauskaitė and Matonytė 2022). This study contributes to the scholarly conversation on LTC system dynamics by using a welfare pluralism perspective, shedding light on how the interplay of state, market, and civil society actors impacts finance, regulation, and service arrangements within diverse welfare systems. The fuzzy-set approach considers the multidimensionality of long-term care service provision and welfare pluralism by examining quantitative and qualitative variations among instances concurrently and systematically. The set-theoretic method, including the FSITA method utilised in this work, offers a systematic way to understanding differences across situations (Yang and Kühner 2020).

Overall, the classification of long-term care service provision type has significant implications for policymakers and academics working to improve the equality, efficiency, and responsiveness of long-term care service provision across a variety of national and subnational contexts. However, it is noteworthy to acknowledge the limitation of the study. The current study recognises the intrinsic constraints of its analytical timeline, necessitating a degree of caution in the inferences derived. Furthermore, the study's primary focus on comparing institutional arrangements across nations overlooks other crucial drivers, such as the intricacies of policy execution, financial sustainability, and reform trajectory (e.g. Chan and Kukovič 2025; Häusermann 2020; Szebehely and Meagher 2018). Therefore, to capture how administrative capacity and fiscal mechanisms affect the transformation of national policy designs into service-level results, future studies could employ dynamic fiscal impact assessments and process-tracing analyses of discrete service delivery cases.

Despite these limitations, the study clearly shows that different configurations of long-term care service provision types across countries result in variable patterns and logics of inclusion and exclusion for target groups. While these findings should be interpreted with caution, the conceptual framework and typology developed in this study are expected to provide a solid foundation for future research on the dynamics of welfare pluralism, as well as the changing roles and interactions of welfare actors within national welfare state systems. Such comparative, multi-level analyses are critical for improving our understanding of the complex interplay of welfare service systems across various national and subnational settings (Toplak Perovič and Tomažič 2023; Vampa 2024).

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STARAJOČA SE DRŽAVA BLAGINJE V PREHODU: ANALIZA ZAGOTOVLJANJA DOLGOTRAJNE OSKRBE V LIBERALNIH, KONZERVATIVNIH IN SOCIALDEMOKRATSKIH REŽIMIH

Študija raziskuje krajino storitev dolgotrajne oskrbe v mednarodnih kontekstih in poskuša prepoznati in kategorizirati edinstvene tipologije znotraj globalnega

okolja. Avtorica raziskuje kako strukturni, organizacijski in operativni vidiki sistemov socialnega varstva vplivajo na zagotavljanje socialnih storitev v petih tipičnih modelih držav socialnega varstva. Študija za identifikacijo pomembnih akterjev socialnega varstva in kalibracijskih točk uporablja kvalitativno primerjalno analizo, zlasti analizo idealnih tipov z mehkimi množicami. Ugotovitve ponazarjajo zapleteno medsebojno delovanje državnih, tržnih in družbenih akterjev pri ustvarjanju pluralizma socialnega varstva znotraj sistemov dolgotrajne oskrbe, na katerega vplivajo odvisnost od poti in družbeno-kulturne spremenljivke. Rezultati analize prispevajo k akademskim razpravam o dinamiki sistemov dolgotrajne oskrbe z uporabo vidika pluralizma socialnega varstva in tehnike mehkih množic, ki upošteva večplasten značaj zagotavljanja storitev dolgotrajne oskrbe. To ima pomembne posledice za oblikovalce politik, ki si prizadevajo za izboljšanje enakosti, učinkovitosti in odzivnosti sistemov storitev dolgotrajne oskrbe v različnih nacionalnih in podnacionalnih kontekstih.

Ključne besede: dolgotrajna oskrba; pluralizem socialnega varstva; zdravstvena politika; analiza mehkih množic; zagotavljanje storitev.

DIGITAL ENERGY SYSTEMS AND FUNDAMENTAL RIGHTS: SMART METERING IN THE EU AND THREE CEE COUNTRIES

Zsófia BIRÓ, Dorottya DEÁKI and Luka Martin TOMAŽIČ[1]

Article provides a comparative legal analysis of smart metering regulations in Hungary, Slovenia, and Croatia, assessing how national frameworks align with EU objectives on energy efficiency, consumer rights, and data protection. While Hungary applies a pilot-based, cautious rollout with unclear long-term goals, Slovenia offers detailed technical standards and data categories but shows enforcement gaps. Croatia adopts a forward-looking, consumer-oriented and cybersecurity-aware model, yet requires refinement in definitions and data retention rules. The article concludes that an optimal regulatory model could combine Hungary's flexibility, Slovenia's data precision, and Croatia's consumer protection. However, effectiveness depends on full alignment with the GDPR and the establishment of clear, enforceable rights for data subjects. The article also proposes two follow-up directions: (1) developing a practical guide for consumers on their rights regarding smart meters, and (2) exploring competition law implications related to exclusive access to consumer data in liberalized energy markets. Without harmonized EU-level data governance, smart metering may risk reinforcing regulatory inconsistencies and market imbalance.

Key words: Smart metering; energy regulation; data protection; legislative quality; consumer rights.

1 INTRODUCTION

While the cost-of-living crisis of recent years boosted the acceptance of utilizing devices aiming to optimize consumption, their popularity had already been increasing due to legislative mandates (Directive (EU) 2023/1791, Article 9)[2]

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[2] Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on Energy Efficiency and Amending Regulation (EU) 2023/955 (Recast). 2023. OJ L 231: 1.

and the broader shift towards digitalized energy systems to achieve – first and foremost – climate goals.

Smart meters are advanced devices that enable real-time monitoring and recording of energy consumption and can maintain two-way communication with the utility provider, which allows remote monitoring for optimized billing. They are "an electronic system capable of measuring electricity fed into the grid or electricity consumed from the grid, providing more information than a conventional meter, and transmitting and receiving data for information, monitoring, and control purposes using electronic communication." (Directive (EU) 2019/944, Article 2).[3] They often support dynamic pricing models and facilitate energy efficiency by empowering users to adjust their consumption patterns based on real-time feedback.

The advantages of putting smart meters into operation are diverse. It provides consumers with detailed insights into their energy consumption to address the growing sustainability awareness, encouraging a more conscious behaviour in reducing energy waste. For utility service providers, smart meter technology streamlines billing, improves demand forecasting and troubleshooting and reduces operational costs by removing human intervention. Moreover, these devices support overall modernization and would have the potential to connect themselves to a higher order of arrangements supporting other innovative concepts, such as smart cities.

Although smart meters offer significant benefits, their implementation is accompanied by various challenges. Privacy and transparency concerns are prominent as these devices collect granular data about household energy use, potentially revealing personal habits. Additionally, cybersecurity (Directive (EU) 2023/1791, Article 18) risks arise from the increased digitization of energy infrastructure as the internet connection is the ultimate platform for transferring information. The upfront cost of deployment, combined with technical issues such as interoperability (Commission Implementing Regulation (EU) 2023/1162), have also generated resistance among stakeholders.[4]

It is essential to analyse the legal context surrounding individuals who utilize smart meters, examining their status and defining characteristics. Typically, such individuals possess attributes that qualify them as subjects under data protection regulations (Regulation (EU) 2016/679, Article 4).[5] Furthermore, they often meet the criteria for being classified as consumers (Directive 2011/83/EU, Article 2), natural persons who, under civil law, enter contractual relationships with service providers.[6] These providers are frequently in significantly more powerful positions, resulting in a profoundly asymmetrical relationship. When comparing various regulatory frameworks, evaluating the effectiveness of the protection of the rights in place they offer to such individuals is crucial.

[3] Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on Common Rules for the Internal Market for Electricity and Amending Directive 2012/27/EU (Recast). 2019. OJ L 158: 125.

[4] Commission Implementing Regulation (EU) 2023/1162 of 6 June 2023 on Interoperability Requirements and Non-Discriminatory and Transparent Procedures for Access to Metering and Consumption Data. 2023. OJ L 154: 1.

[5] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data (General Data Protection Regulation). 2016. OJ L 119: 1.

[6] Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on Consumer Rights, Amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and Repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council. 2011. OJ L 304: 64.

This study aims to uncover the regulatory surroundings within select Central and Southeast European countries, exploring some particularities and underlining good practices and legislative challenges while considering the relevant EU framework. Through comparative analysis, we aim to evaluate and identify the most optimal approach regarding smart metering that captures the ideal relationship and balance concerning fundamental rights. In achieving that, we would explore the relevant case law and utilize testing tools to determine the quality of legislation used. The study exclusively examines the EU regulatory framework and the Hungarian, Slovenian and Croatian regulations on this subject, focusing solely on residential consumers and the application of smart meters in the context of electricity.

The three CEE countries were selected for comparative analysis based on the relatively similar yet divergent post-socialist transition histories and comparable but different paths in energy market liberalisation and digitalisation, including smart meter penetration. The broader relevance for EU and the region is in how mid-sized economies with comparable energy infrastructure challenges highlight regional regulatory inconsistencies, that could be informative regarding broader EU harmonization efforts. Research will be limited to the policy and legal aspects of digital energy systems.

This study will utilize a combination of logical, dialectical, dogmatic-normative, and comparative methods. The logical method will be used in an informal manner to ensure the acceptability of the legal argumentation employed (Dewey 2013, 181–191). The dialectical method will be used to weigh and counterbalance different arguments and achieve a conclusion according to the principles of rational discourse (Valauri 2010, 415). The normative-dogmatic method will be employed in the sense that law will be treated as a normative phenomenon, exerting influence on pressing societal issues (Vachev 2023, 289–299). The discussion section will use a comparative method to critically assess the merits and shortcomings of legal solutions in select national jurisdictions (e.g., Hungary, Slovenia, and Croatia) (De Cruz 2024). A state-of-the-art legislative quality analysis per the model of Xanthaki will support it (Xanthaki 2010, 111–128), adapted to the needs of the present study.

Within the confines of this article, a smart meter will be a device that fits the definition of an IoT (Internet of Things) device. It is a connected device that collects, transmits, and potentially processes data to improve consumer experience. It is important to acknowledge that it performs its activity on a greater scale during the application of AI technology—by its very nature. It collects data so extensively that we might not even comprehend it. As a result, the scope of personal data extracted may expand with the proliferation of AI, making information relevant that previously was not deemed significant. This lack of transparency can lead to a "function creep" (Koops 2021) where data is used for purposes beyond those initially disclosed, as under GDPR, personal data should only be collected for specific, explicit and legitimate purposes and should be limited to what is necessary. However, AI and machine learning systems often require large datasets to function effectively, potentially conflicting with these principles.

The structure of the present article is such that after the introduction, the second section will analyse the European Union-level provisions on smart metering. In the third section, solutions from individual national jurisdictions (Slovenia, Hungary, Croatia) will be discussed in three subsequent subheadings. In the

fourth part, a discussion will be performed, and a legislative test quality will be employed. Conclusions and recommendations for further research will wrap up the scholarly article.

2 EUROPEAN UNION REGULATION ON THE UTILISATION OF DATA FROM SMART METERS

The serious attempts by the European Union to regulate the utilization of smart meters began in 2012 when there were already commission recommendations for the roll-out of smart metering systems (2012/148/EU). [7] The real breakthrough, however, came with the European Green Deal, as Baumgart and Espinosa note, the "Twin Transitions" of the EU – green and digital – reinforce each other, and smart meters are a central enabler of this combined transformation (Baumgart and Espinosa 2024). The European Green Deal is the EU's overarching strategy to make Europe climate-neutral by 2050. This ambition covers several areas, including increasing energy efficiency and integrating digital technologies into energy systems. To achieve these goals, the importance of smart meters has increased significantly, leading to changes in legislation (European Commission 2024). The integration of smart metering is crucial for the EU's Digital Single Market and energy union, yet varying national regulations pose significant barriers to achieving a cohesive framework (Dąbrowski 2022, 92–119). The question is that while the EU legislation has succeeded in defining the objectives of smart metering, the means of achieving them are often left too flexible, causing diverging national regulatory practices which may hinder internal market integration or not (Baumgart and Espinosa 2024).

According to Article 2, (23) of EU directive 2019/944, 'smart metering system' means an electronic system capable of measuring electricity fed into the grid or electricity consumed from the grid, providing more information than a conventional meter, and transmitting and receiving data for information, monitoring, and control purposes using a form of electronic communication. It is therefore clear that the smart metering system also raises serious data protection issues on the consumer side. As Lavrijssen and others highlight, the co-existence of energy law and data protection law creates tensions, particularly due to the potentially conflicting obligations under the GDPR and the directive 2019/944 (Lavrijssen, Espinosa and ten Caten 2022, 1088).

The use of smart meters is inevitable for developing sustainable, flexible energy systems and achieving the energy targets set in the European Green Deal. Smart metering systems allow consumers to monitor their energy consumption in real-time, so they can manage it more consciously, reducing energy use and associated costs, and therefore contribute to optimizing energy consumption; also, with their use, it is possible to have access to dynamic electricity price contracts. Moreover, these tools support the integration of renewable energy sources such as solar and wind energy into the grid by providing accurate data on the balance between generation and consumption and, last but not least, contribute to grid stability and resilience: real-time data allows operators to manage energy allocation better, react to changes in demand and prevent grid congestion (European Commission n.d.; EU directive 2019/944). On the other hand, as Slate et al. point out, the integration of digital solutions and artificial intelligence into

[7] Commission Recommendation 2012/148/EU of 9 March 2012 on Preparations for the Roll-Out of Smart Metering Systems. 2012. OJ L 115: 1.

energy utilities brings major opportunities for automation and optimization, but also raises concerns about explainability, trustworthiness, and ethical deployment, especially when AI systems make near real-time decisions based on personal consumption data. Furthermore, the integration of AI introduces concerns about explainability, human oversight, and unintended consequences, especially when automated decisions affect system-critical infrastructures (Slate et al 2024; Szuchy 2023).

Smart metering systems, their functions and the rules for their installation are regulated in detail in Articles 19 to 21 of EU directive 2019/944. Article 19 requires Member States to promote the installation of smart meters to increase energy efficiency. The devices must be interoperable with consumer energy management systems and smart grids. The deployment of smart meters may be subject to a cost-benefit analysis, and Member States must ensure that the devices comply with EU standards. Old meters cannot remain in service after 2031 if they do not meet the new requirements. In this manner, the member states have a relatively wide margin of appreciation in smart meter implementation, allowing for flexibility regarding deployment strategies. At the same time, this discretion is not unlimited. It should namely be compliant with GDPR and avoid fragmenting the internal market (Baumgart and Espinosa 2024).

Article 20 sets out minimum functionalities for smart meters, including providing real-time energy consumption data, compliance with cybersecurity and data protection rules, and accurate energy measurement fed back into the grid. Consumers should have free access to their data and be supported to use smart meters to their full potential. Also, Article 20 states that smart metering systems and the related data disclosure shall comply with relevant Union security rules, and that the privacy of final customers and the protection of their data shall comply with relevant Union data protection and privacy rules; the issues related to data management are explained in more detail in Article 23.

Under this provision, Member States – or, if they have so provided, the competent authorities designated by them – are required to lay down the rules under which authorised parties may have access to end-users' data. The data includes consumption and metering data, as well as any data that is necessary for switching providers, demand-side response or other services. Member States are required to establish a data governance system that ensures efficient, secure and privacy-appropriate access to and exchange of data. Regardless of the data governance model used, data should be provided to all right holders in a non-discriminatory, simultaneous and easily accessible manner, and access procedures should be made publicly available. The applicable rules for data processing must comply with EU law, particularly the General Data Protection Regulation (EU) 2016/679 (GDPR) (Camões 2023, 89-116). Member States or competent authorities have the power to authorise, certify and, where appropriate, supervise data management parties and may also decide on the appointment of compliance managers to monitor the provision of non-discriminatory data access and compliance with the directive. End users should not incur any additional costs if they request access to their own data or if they make their data available to others (Holéczy and Varallai 2022, 47–64). Member States determine the fees for which right holders can access this data and are obliged to ensure that the fees charged by regulated providers are reasonable and duly justified.

Article 21 details consumers' rights if a Member State does not introduce a mandatory smart metering system. All consumers have the right to apply for

installing a smart meter on fair terms and to receive clear information on its features, services, and costs. The devices should be installed within four months, and the authorities should regularly update the relevant prices and information.

This has clarified why energy legislation is important from an energy management perspective. However, the data protection issues for residential consumers should also be considered regarding their use; furthermore, addressing privacy concerns is essential for fostering consumer trust, necessitating a legal framework that mitigates risks associated with data handling (Orlando and Wandevelde 2021), because – for instance – legislation mandates that all new meters in multi-apartment buildings be remotely readable, emphasizing the need for compliance with data protection regulations due to the personal data processed by these systems (Polčák 2023).

As regards the obligation of Member States, when it comes to data protection regarding the use of smart metering systems, Article 9 (2) b) of Directive 2012/27/EU [8] has already mentioned that Member States shall ensure the security of the smart meters and data communication, and the privacy of final customers, in compliance with relevant Union data protection and privacy legislation. Preamble (57) of EU directive 2019/944 states that following the introduction of smart metering systems, Member States have now developed or are developing different data management models. Regardless of which model is used, it is paramount that Member States establish transparent regulation that guarantees non-discriminatory access to data, the highest level of cybersecurity and data protection, and the impartiality of data controllers.

From a data protection standpoint, some authors argue that smart meter deployment may conflict with the principle of data minimisation under the GDPR. Since smart meters measure and store data at very short intervals, the potential for profiling increases significantly. It has been suggested that anonymisation and purpose limitation need to be enforced more stringently to ensure legal compliance (Lavrijssen, Espinosa and ten Caten 2022; Camões 2023; Szuchy 2022a). This concern is empirically supported by large-scale studies, which show that smart meter data – collected at high temporal granularity – can reveal highly specific occupant behaviour patterns, including presence, routines, and even appliance use. This level of inference significantly increases the risk of profiling, as well as potential secondary uses of data beyond the original energy service context (Horvath et al 2019).

Article 34 highlights the Tasks of distribution system operators in data management and emphasizes that Member States shall ensure non-discriminatory data access for all eligible parties under equal terms while implementing compliance measures to prevent unfair advantages for distribution system operators and vertically integrated undertakings in smart metering data management, under data protection regulations and relevant directives. This was mainly handled by the unbundling of distribution system operators, mentioned in Article 35.

Regarding the pace of smart metering system deployments, ANNEX II of EU directive 2019/944 earmarked for those Member States that have started the systematic roll-out of smart metering by 4 July 2019, at least 80% of end-users must be equipped with a smart meter by 2024 (Jones 2025). Overall, while the EU has established a foundational regulatory structure, ongoing challenges

[8] Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on Energy Efficiency. OJ L 315: 1.

remain in harmonizing national laws and enhancing consumer confidence in smart metering technologies (OECD/KDI 2021).

As noted by Noorman et al., it must be emphasised, that the use of AI and digitalisation in energy systems increases the risk of privacy violations and cybersecurity breaches, necessitating robust legal and technical safeguards (Noorman, Espinosa Apráez and Lavrijssen 2023, 2110). According to the ANNEX IV of the Regulation (EU) 2024/2847 of the European Parliament and of the Council of 23 October 2024 on horizontal cybersecurity requirements for products with digital elements and amending Regulations, smart meter gateways within smart metering systems as defined in Article 2, point (23) of Directive (EU) 2019/944 of the European Parliament and of the Council are counting as critical products with digital elements.[9] In this regard, ANNEX I summarises the essential cybersecurity requirements of these critical products with digital elements.

The main statements are that advanced encryption mechanisms must protect the confidentiality of data, while its integrity must be preserved against unauthorized modification, and any breach must be reported. The principle of data economy requires that only data necessary for operations should be collected, while users should be able to delete or transfer their data to other systems securely. Systems should detect and report data breaches and ensure that security updates are available quickly and free of charge to minimize vulnerabilities and maintain data security. Article 8 of the Regulation (EU) 2024/2847 states that to ensure device compliance, the Commission will be empowered to adopt legal acts to determine which products containing digital elements should obtain a European cybersecurity certificate with at least a "substantial" trust level.

Overall, smart metering systems have privacy, competition and cybersecurity implications. Having outlined the European Union's comprehensive framework for smart metering, which emphasizes energy efficiency, consumer empowerment, and robust data protection under directives like 2019/944 and regulations such as 2024/2847, it is evident that member states face the challenge of aligning national policies with these standards while addressing local contexts (Hoffman 2023, 65; Ručinská et al 2023, 26). The following section turns to the national implementing measures in Hungary, Slovenia, and Croatia, examining how each country translates EU requirements into domestic legislation, with particular attention to consumer rights, data management, and legislative alignment, laying the groundwork for a comparative evaluation of their approaches.

3 NATIONAL IMPLEMENTING MEASURES

3.1 Hungarian smart metering regulation

Regarding regulatory specificities, Hungary's approach is one of Europe's most extreme and long-lasting forms of government intervention in energy pricing. While other European countries implemented temporary caps and subsidies during, e.g. economically challenging periods, Hungary maintained artificially low, fixed prices as a core economic policy (Böcskei 2015, 94–114) for nearly a

[9] Regulation (EU) 2024/2847 of the European Parliament and of the Council of 23 October 2024 on Horizontal Cybersecurity Requirements for Products with Digital Elements and Amending Regulations (EU) No 168/2013 and (EU) No 2019/1020 and Directive (EU) 2020/1828 (Cyber Resilience Act).

decade – a model rarely seen elsewhere (Fischerauer and Johnston 2016, 458–474).

The household utility cost reduction program ("rezsicsökkentés") refers to a series of government measures introduced in 2013 to lower household energy prices. The primary goal was to protect households from fluctuations in global energy prices and to prevent energy providers from increasing costs. The process unfolded through several stages and expanded in 2014, covering water, sewage, waste collection fees, gas, electricity, and district heating prices. Until 2021, households continued to receive energy at regulated prices, and the system was financed through state-owned energy companies and various taxes. In 2022, the angle shifted. As the global energy crisis led to a sharp rise in energy prices, the government had to amend the utility cost reduction program as it had placed a substantial financial burden on the country: households continued to receive energy at regulated prices up to a designated consumption threshold. However, businesses lost access to regulated utility prices and had to purchase energy at market rates. Consumers exceeding the average consumption limit also had to pay the higher, market-based rates.

The household utility cost reduction program was narrated as a social policy (Bouzarovski et al 2016, 1151–1170) measure (to prevent energy poverty) but has been heavily contested concerning EU regulations, particularly regarding energy market competition, state intervention, and fair pricing practices. The European Court of Justice addressed Hungary's energy price regulations in Case C-771/18, highlighting the importance of fair network access charges which were part of the broader concept of the household utility cost reduction program.[10] While the ECJ found that Hungary failed to ensure effective judicial remedies, it did not find the price regulation itself (e.g. restrictions on passing cost to consumers) to be in breach of EU law.

The Internal Energy Market Directive (2019/944) in Article 5 emphasizes that electricity prices should be cost-reflective and encourage energy efficiency. It also suggests that while suppliers shall be free to determine the price at which they supply electricity to customers, Member States shall protect energy-poor and vulnerable household customers with public intervention which the Hungarian regulation evidently considers.

However, according to paragraph 4 of Article 5, public interventions in the price setting for electricity supply shall be clearly defined, transparent, non-discriminatory and verifiable, amongst many other conditions. The most significant criticism of the Hungarian regulation has been that it lacks transparency regarding price (Weiner and Szép 2022) generation. It is therefore welcomed that in 2016 the government proposed a regulation to support the roll-out of smart meters in a carefully thought-out and rational manner. The Government Decree No 26/2016 suggests a program sought to ensure that smart meters would be fully compliant with EU requirements and contribute to Hungary's long-term energy goals, including cost-reflective pricing and integrated smart grids.

While the relevant European Union regulation contains a regulatory framework, the Hungarian legislator has used a particularly distinct approach regarding smart metering systems and national implementing measures. This divergence in national implementation is also highlighted by Szuchy, who explains that although EU law has significantly shaped Hungarian energy legislation, domestic

[10] Case C-771/18, European Commission v Hungary, EU:C:2020:584.

policy remains cautious and often fragmented in its uptake of smart grid technologies (Szuchy 2024, 305–334). According to the Act LXXXVI of 2007 on Electric Energy, Section 3, point 48a, 'Smart meter' shall mean remotely accessible metering equipment capable of receiving remote instructions for information, control, monitoring and inspection purposes. At the same time, the law does not deal with the regulation of smart meters any further.

However, in Section 170, subsection (1), point 19 gives authorization to the government to decree the rules for the implementation of pilot projects for the roll-out of smart meters, including the rules relating to and for the installation of smart meters, also covering the rights and obligations of those participating in the pilot projects, the related duties, data processing and data protection regulations, and regulations for the disclosure of data and information relating to the pilot projects and the conclusions thereof.[11] At the same time, on April 4, 2024 that 650 thousand smart meters were in operation in the country (E.ON 2024), in other words, the Electricity Act has not been updated for some time, moreover, Szuchy highlights that while the government has initiated several smart grid-related actions, these often remain at the policy level without comprehensive implementation in the legal corpus (Szuchy 2022b, 553–575).

Regarding the installation of smart meters, based on Section 14/B. of the Government Decree No. 273/2007 (X. 19.) on the implementation of certain provisions of Act LXXXVI of 2007 on electric energy, the DSO is required to install a smart meter at low-voltage connection points (with a maximum of 3x80 A) where no indirect or prepaid meter is installed, in the following cases:

1. New installations or capacity upgrades where the total power demand (excluding separately metered controlled circuits) reaches or exceeds 3x32 A,
2. Household-sized renewable energy generators (HMKE) are connected to the electricity network at the consumer site,
3. The certification period of the existing meter expires in a location with a household-sized generator,
4. The site's annual electricity consumption (excluding controlled circuits), calculated based on a profile-based distribution tariff, reached or exceeded 5000 kWh/year during the previous billing period,
5. Upon user request, if the consumer pays the applicable fee for voluntary installation.[12]

If any of these conditions are met, the DSO is obligated to install a single smart meter that measures the total electricity consumption outside the controlled circuit. The regulation also states that if the existing meter already complies with smart metering settlement requirements, the DSO is not obliged to replace it. Once a smart meter is installed under these conditions, the DSO is only allowed to replace it later with another remotely readable (telemetric) device. Importantly, refusing to install a smart meter in cases where installation is required by law constitutes a breach of contract, which may result in penalty payments by the DSO. Beyond the mandatory cases, any consumer has the right to request smart meter installation from the relevant DSO, provided they pay the legally defined installation fee.

[11] Government Decree No. 26/2016 (II.25.) on the Rules for the Implementation of the Central Pilot Project Related to the Introduction of Smart Metering.
[12] Hungarian Act LXXXVI of 2007 on Electric Energy.

The Electricity Act has strict regulation related to Data Disclosure, Treatment of Restricted Information, Confidentiality chapter. Section 150, subsection (4) deals with the processing of the data of natural persons -although, indeed, the law does not explicitly state that this would also apply to data measured by smart meters. Authorized distribution network operators and electricity suppliers shall exchange data under the Data Exchange Code regarding the particulars of natural person users and other relevant persons, in particular data for the identification of final customers and the service location and the details of supplies and data required for administrative purposes, concerning the operation of the electricity market and for handling customer submissions, to improve the efficiency of electricity supply and services. Although the Hungarian legislation refers to data protection in formal terms, it does not adequately address the legal status of the data generated by smart meters. In particular, the distinction between technical data and personal data suitable for profiling is not explicitly clarified, which raises concerns under the GDPR (Szuchy 2021, 239–247).

Regarding which participants in the electricity market, for what purpose and type of user data is stored is set out in Section 155. The provisions of Section 155 govern the processing and use of data collected by remotely accessible metering equipment. According to subsection (1), authorized network operators shall be entitled to process such data for purposes including the development of the public utility network, monitoring of the security of supply, improving energy efficiency, conducting settlement procedures, identifying cases of unauthorized electricity usage, analysing consumption patterns, operating metering equipment, customer switching, and the provision and use of system services and distribution flexibility services.

Subsection (2) sets out the categories of data that authorized distributors must manage under specific regulatory provisions. These include voltage quality data, network quality data, data stored in error registers, equipment data and identifiers, event log entries, and load curves. According to subsection (3), these data shall be retained by the authorized network operator for five years. As provided in subsection (4), other authorized operators may only access this data to the extent necessary for fulfilling their duties as specified in their operating license.

According to Subsection (5), electricity suppliers may process the data collected by remotely accessible metering equipment for settlement with customers, customer switching, providing distribution flexibility services, the combination of power plants, electricity storage and customers, and improving energy efficiency. In line with Subsections (6) and (9), aggregators are entitled to process such data for settlement among market participants involved in aggregation, for providing distribution flexibility services, combining different energy system components, improving energy efficiency, and aggregator switching. Aggregators are also required to retain the data for five years.

Subsection (7) stipulates that aggregators shall make the data collected by their metering equipment available to authorized network operators in the composition and at the frequency specified in the Distribution Code. Finally, under Subsections (8) and (9), energy communities are likewise authorized to process data for the purposes of internal settlement among members, provision of flexibility services, energy system integration, and improvement of energy efficiency. The duration of data retention for these entities is also limited to a maximum of five years.

In practice, the Hungarian Energy and Public Utility Regulatory Authority (MEKH) oversee smart metering implementation, including approving pilot projects, monitoring compliance with data protection standards, and enforcing installation obligations through audits and penalties. For instance, MEKH has facilitated the rollout of over 650,000 smart meters by 2024 (E.ON 2024), providing practical guidance on cybersecurity and consumer complaints, though challenges persist in scaling beyond pilots (Szuchy 2024).

When it comes to metering and data protection, Act on Electricity regulates smart metering through precise provisions on measurement, data reading, and data protection. According to Section 40 Subsections (1)-(4a), authorized network operators are responsible for meter readings, which must occur at least annually, or quarterly upon customer request. Customers may also transmit readings via mobile apps (Subsection 4c). Section 43 mandates that all metering data be processed through certified billing systems that meet strict information security standards, verified by accredited bodies (Subsections 4-5). Regarding household-sized power plants, Section 45/A requires active users to cooperate with the national energy data platform and other market actors to enable non-billing data handling under government decree. This supports transparent, secure, and GDPR-aligned data management in the smart metering ecosystem.

It is worth noting that Section 24 Subsection (1) d) requires network operators to take cybersecurity principles into account when maintaining their systems. These operators are also responsible for facilitating the central pilot projects, which the users may join as a project participant by applying for a smart metering device.

Still, as Baumgart and Espinosa (2024) argue, national laws should not only establish retention limits but also provide strong guarantees for transparency, auditability, and consumer rights in accessing, controlling, or deleting their smart meter data. Legal systems must catch up with the hybrid role of smart meters as both technical and behavioural monitoring tools.

3.2 Slovenian regulatory framework on smart metering

The Slovenian national implementing measures on smart metering are the relevant provisions of the Electricity Supply Act (ZOEE).[13] The law uses the terminology 'advanced meter', which, according to paragraph 41 of Article 4 ZOEE, means electronic meters, which measure inbound or outbound energy in the electricity grid (Tomažič 2025, 49). Such meters must collect more information than regular analogue or digital meters and include functionalities for measurement in hourly or shorter intervals. They must, per legal definition, be part of an advanced measurement system, which, per paragraph 40 of Article 4 ZOEE, consists of advanced meters, measurement centres and communication infrastructure connected to the national data hub.

Paragraph 1 of Article 28 ZOEE prescribes a right and obligation to advanced metering. On the one hand, it gives each end consumer the right to have a smart meter installed and measure consumption using an advanced metering system. On the other hand, the distributor may demand that consumers allow the installation of smart meters, with unclear ramifications if they do not comply. According to paragraphs 3 and 4 of the same provision, advanced meters must enable gathering the necessary data according to relevant standards, best

[13] Slovenian Electricity Supply Act (National Gazzette, no. 172/21 and 47/25).

practices, development of the advanced network, and be technically compliant (Batič 2025, 75).

While according to paragraph 5 of Article 28, ZOEE end users contribute to expenses connected to the advanced metering system, paragraph 6 of the same provision enshrines the right to install advanced meters for free. Paragraph 7 of the same provision requires the Slovenian Energy Agency to follow the advances in the state of technics to keep in line with novel technological developments, following the principle of cost efficiency.

Per Article 29 ZOEE, advanced meters must accurately measure energy consumption and production in real time, providing consumers with easy and secure access to this data at no extra cost. These meters must comply with EU cybersecurity and data privacy regulations, including GDPR, ensuring the protection of personal information. Distribution operators must offer consumers guidance on meter management and data processing. Additionally, the meters should enable time-interval metering aligned with the national market's balancing period. Real-time consumption data must be accessible to consumers and authorized third parties for energy efficiency and demand response programs. The meters must also account for electricity fed into the grid by active consumers, and operators must provide accessible consumption and production data for easy comparison of energy offers.

Personal data management, use, storage, and transmission regarding smart metering in the Slovenian legal framework is subsumed to Regulation 2016/679/EU and the Slovenian Act on Personal Data Protection (ZVOP-2). A special legal basis for data protection and legitimate processing is enshrined in Article 30 of ZOEE. The legitimately processed data includes personal information such as name, surname, address, and tax number, the identifier of the delivery point with corresponding unique identifiers of measurement points, and the name and address of that point. Additionally, measurement and billing data directly associated with the system user are processed, including measured working energy in 15-minute or shorter intervals and time aggregates of this energy.

Especially the measured working energy in 15-minute or shorter intervals is of utmost importance for the functioning of the smart metering systems (Chandrasekaran et al 2015, 120–124). This data is stored for a maximum of three years after the end of the year in which it was generated, to ensure data for the efficient operation of the electricity market, the provision of energy services, and for the purpose of operating and ensuring the reliability of supply. However, monthly or longer time aggregates of this data relating to the system user are stored for up to five years. Other personal data of system users arising from contractual relationships are stored as long as necessary to implement pre-contractual measures at the individual's request, to fulfil the contract, and to enforce rights and obligations from the contract or until the expiry of the legal protection period for the contracting parties.

3.3 Croatian legal framework on smart metering

In the Croatian legal framework, the main implementing measures for advanced metering systems are included in the Act on Electrical Energy Market (Beus et al 2018, 346). In paragraph 57 of Article 3, the best available techniques principle is included, which extends specifically to data protection and advanced metering as the most effective, advanced, and appropriate techniques to provide a

foundation for compliance with European Union data protection and security rules.

Smart metering is regulated in the context of systems of advanced metering, which are defined in paragraph 100 of Article 3 of the Act on Electrical Energy Market as an electronic system capable of measuring both electricity delivered to and electricity consumed from the grid, providing more information than a conventional meter, and capable of sending and receiving data through some form of electronic communication for information, monitoring, and control.

Per Article 30 of the Act on Electrical Energy Market,[14] the Croatian minister responsible for energy needs to adopt a decree to prescribe the usage of advanced metering systems (Borozan, Krkoleva Mateska and Krstevski 2021, 8730–8741). These need to fulfil specific requirements; namely, the advanced metering system must accurately measure and deliver real-time electricity consumption data to customers, with secure access to historical and near real-time information. It must adhere to cybersecurity and data privacy standards per EU regulations. The system must display grid contributions to the electricity suppliers' meters. Upon customer request, it must facilitate the sharing of consumption and supply data for comparison purposes. Comprehensive information regarding meter capabilities and data handling must be provided to customers. Finally, the system must enable precise measurement and billing for electricity consumed from and supplied to the grid, supporting system balancing.

Advanced meters are part of advanced metering systems, and electricity system users have the right to such smart meters based on a request to the system operator per Article 33 of the Act on Electrical Energy Market, even when the system operator does not install the advanced meter based on the economic assessment for an individual user.

In Article 35 of the same act, data management and protection are regulated. The Energy Agency is responsible for regulating the management, exchange, and access to end-customer electricity data, including measurement, consumption, and data necessary for supplier switching and demand management, per EU regulations. Data management must ensure secure access, efficient exchange, and data protection. Transmission and distribution system operators are obligated to provide non-discriminatory, simultaneous access to qualified parties. Personal data processing must comply with GDPR. The Agency requires the appointment of compliance officers to oversee non-discriminatory data access, and distribution system operators must also appoint a compliance officer. Access to or requests for data must be provided without charge.

4 COMPARATIVE AND LEGISLATIVE QUALITY ANALYSIS

The analysis and critical assessment in comparative terms and regarding the legislative quality of the three distinct national implementing measures or national legal frameworks more generally need to be performed with a certain degree of systematization. The frameworks are prima facie not wholly distinct, given that they all implement relevant European Union directives at the national level. However, approaches and execution in legislative drafting, content and quality, and individual legal solutions differ to some degree. These differences regarding smart metering implementation will first be ascertained on the axes of

[14] Croatian Act on Electrical Energy Market (National Gazzette, no. 111/21, 83/23 and 17/25).

installation policies, consumer rights, data protection and alignment with European Union standards. Then the slightly limited Xanthaki's test of legislative quality will be performed (Xanthaki 2010, 111–128).

Regarding installation policies, Hungary's approach relies on pilot projects in line with the Electricity Act. It is a controlled, state-driven process that stops short of a nationwide deployment. Compared to the Slovenian and Croatian approaches, the focus on testing through pilots might limit scalability. In this sense, the Slovenian approach is more normatively driven. The right to advanced meters is semi-mandatory as the distribution network operators may demand installation, with the possibility of users opting out in certain circumstances. On the other hand, users may also demand the installation of smart metering systems. Legal consequences of refusal to install smart meters on either the part of end users or the distribution company are not entirely clear and might entail lengthy legislative proceedings in the case that interested parties want to pursue them. The Croatian approach lies on the other end of the spectrum, with voluntary installation based on consumer and end users' requests. It thus takes a voluntaristic approach.

Regarding consumer rights, Hungarian electricity legislation generally lacks specific provisions on smart meters. Protection is limited to the rights and obligations of individuals or companies participating in pilot projects, and the utility cost reduction program prioritizes cost-effectiveness and low prices. However, a right to universal access to smart meters or their free installation is lacking. Slovenia grants consumers the right to free installation, real-time data access, and transparency. However, a broader protective framework focused specifically on smart metering, like that of pilot project participants in Hungary, is lacking. Croatia similarly to Slovenia, grants consumers the right to smart meters and emphasizes consumer choice and data sharing for comparing energy offers. Such a consumer-centric approach is closely aligned with the fairness principles of the European Union law (Michaelis et al 2024) and fosters market participation by consumers and other end users.

Regarding data protection, the Hungarian Electricity Act (in Sections 150 and 155) allows for broad processing by many actors, like network operators, suppliers, aggregators and energy communities. While implicitly, the data protection is tied to the rules of GDPR, the explicit connection is missing. The required data retention period is five years. According to Section 40, responsibility for readings is with the authorized network operator and a wide array of methods for data transmission, including with the use of mobile apps is available. Croatia mandates GDPR-compliant data management, with free consumer access and non-discriminatory sharing. In cybersecurity, the principle of best available techniques is a welcome addition (Tomažič 2022, 153–172). The Croatian framework is unnecessarily ambiguous about data retention length. The Slovenian approach from Article 30 ZOEE lists specific data types, with a retention period of three years for detailed data and five years for aggregate data.

From the standpoint of legislation as national implementing measures (Ferrod et al 2023), all three national legislative frameworks are, in principle, compliant with minimum European Union standards. While more specific data protection rules could improve the Hungarian approach in the sectoral legislation, Croatian could be emphasized as a model on the issue of cybersecurity, and the Slovenian approach has very precise and appropriate data protection provisions. The differences reflect the centralized approach of Hungary and Croatia's consumer-driven normative framework, with Slovenia falling between the two extremes. A

general legislative quality test will be applied before ascertaining the best practices from each approach.

It will follow the Xanthakian approach, focusing on legislative quality, which is seen through the lens of legislation's effectiveness, supported by clarity, precision, and unambiguity, as well as cost-effectiveness (Xanthaki 2024). Since the economic analysis of law is beyond the scope of the present article, the test will be performed in a limited manner, focusing on a qualitative and logically supported understanding and analysis of the national implementing measures (i.e. legislative frameworks) on smart meters in the Hungarian, Slovenian and Croatian legal systems.

In this sense, clarity, precision and unambiguity are three connected but slightly differing criteria with clarity relating to how well the particular or general auditorium can understand the legislation it addresses (Long 1983, 107–117), precision pertaining to specificity in defining rights and obligations and unambiguity referring to the absence of unclear or contradictory provisions (Xanthaki 2016, 1–18; Harašić 2011, 64).

In comparing the three national approaches on clarity, Section 3, point 48a of the Hungarian Electricity Act sufficiently and appropriately defines smart meters as pieces of remotely accessible metering equipment, but the focus on pilot projects from Section 170 leaves the consumers and other stakeholders in the fog regarding the long-term goals, which might only be inferred by looking at policy priorities at the national and EU level. While the Slovenian framework defines smart meters as advanced meters in Article 4, paragraph 41 of ZOEE, it also defines advanced metering systems with a slightly differing definition without resolving the relationship between the two. The Croatian approach is very clear and straightforward regarding the consumer-centric focus and the best available techniques to bolster the cybersecurity of smart meters. However, it is subject to a similar drafting lack of clarity in terms of the relationship between advanced meters and advanced metering systems, leading us to the conclusion that while all three national frameworks are clear enough, they are both lacking a bit in execution and could be improved in this segment.

Regarding precision, the Hungarian approach sufficiently lists the rules for installation, data processing and obligations of participants in pilot projects in Section 170 and data categories in Section 155. However, imprecise consumer protections and lack of a specific prescription of a universal right to smart metering limit their applicability, throwing doubt on the preciseness of implementing measures as outcomes of legislative intent and European Union goals. Slovenian ZOEE is precise in defining the functionalities of smart meters, especially regarding real-time data from article 29 and data types from article 30. However, imprecisions are present regarding the legal remedies and enforcement in case of instalment refusals, both on the side of the distributor, and the end user. Croatian approach is very precise regarding consumer rights from Article 33 of the relevant act, operator obligations from Article 30 and data management from Article 35; however, explicitly stated data retention periods are lacking in electricity sector legislation.

Although it is scarce regarding specific issues, the Hungarian approach is clear in its execution and language from the drafting standpoint. In the Slovenian framework, the cost-sharing provisions in connection to free installation requirements from Article 28 of ZOEE entail potential ambiguity and conflicting provisions. The keyword approach from Article 4 ZOEE is very welcome and

appropriate. The wording in the Croatian system is very clear, with few vague or open-ended notions left unexplained.

To summarize the findings, Croatia's approach seems to be the strongest contender for the best of the three analysed national frameworks on smart metering systems, with minimal issues regarding the implementation and interpretation of the rules for end users. If we were to piece together a best normative framework based on the findings, it would incorporate elements of all three systems.

A combined approach to smart metering regulation should thus be based on Croatia's consumer-centric model. This namely grants free installation and data access upon request. Slovenian data-protection rules are the most precise of the three analysed implementing measures and should be taken as a benchmark. Hungary's pilot framework is a welcome approach to inform the initial testing of new solutions, combined with Croatian best techniques and principles regarding cybersecurity.

Such a hybrid model should, however, avoid ambiguity in consumer rights and GDPR linkage as witnessed in the Hungarian model, the Slovenian model's unclear refusal consequences, which could lead to prolonged court disputes or lack of protection of rights, as well as steering clear of double, unclear definitions of smart meters versus smart metering systems as seen in the Croatian and Slovenian legal frameworks. Mandatory elements should be balanced with opt-out options based on network capabilities and a normative right to smart metering systems.

5 CONCLUSIONS

The study's comparative legal analysis showed that while Hungary, Slovenia and Croatia are striving to meet the EU's regulatory objectives on smart metering, there are still significant differences in national implementation in terms of legislative accuracy, consumer rights protection, data management practices and cybersecurity. The cautious, pilot project-based approach of Hungarian regulation does not provide a clear picture of long-term objectives and does not ensure sufficiently articulated and enforceable rights for consumers and data protection. While the Slovenian model has the merit of defining detailed data categories and technical requirements, it also contains enforcement and conceptual inconsistencies. The Croatian regulation is explicitly consumer-oriented and forward-looking from a cybersecurity perspective but needs further clarification on the use of definitions and the rules on the duration of data storage.

An optimal regulatory model could be developed by combining elements of the three regimes: the Croatian consumer protection and cybersecurity solutions, the Slovenian data protection granularity and the Hungarian pilot-based flexibility. However, all this can only be effective in terms of legal certainty and consumer confidence if national regulations avoid conceptual ambiguities, are fully aligned with the GDPR and provide explicit and enforceable rights for data subjects in the context of the use of smart metering.

In summary, the overarching trend reflects a heightened regulatory intent, signalling the onset of a new wave of legislative measures aimed at addressing both the risks and the benefits associated with digital products and connected devices (Regulation EU 2024/2847). This evolving framework is likely to give

rise to legal and operational complexity, accompanied by corresponding growth in litigation (see CJEU Case C-468/24) as stakeholders and citizens seek greater clarity.[15]

As a potential continuation of this study, a practical and societal value could be added by developing a public-facing, consumer-oriented guidebook based on the findings of the comparative legal analysis. This guidebook would translate the complex regulatory landscape into accessible language, helping household consumers understand their rights and obligations regarding smart meters. It would include practical instructions, identify the relevant supervisory authorities for data protection and energy regulation, and provide contact information for filing complaints or inquiries. Furthermore, the handbook would highlight the significance of user data protection and empower consumers to exercise control over their personal information in compliance with the GDPR (Fratini and Pizza 2018).

Further research integrating the findings into a broader electrical engineering and computer science driven studies would obviously also be of merit as would scaling the research to include other countries.

Another promising avenue for further research lies in exploring the competition law implications of smart metering systems. As smart meters generate vast amounts of consumer data, service providers with exclusive access to these datasets may gain significant market advantages. This raises concerns regarding market entry barriers for new players and the potential for anti-competitive behaviour, both at the EU and Member State levels (Jianxiao et al 2023). A robust regulatory framework would therefore not only protect individual data rights but also ensure a level playing field in liberalized energy markets.

In this context, the design of a harmonised, interoperable EU-wide data governance system emerges as essential. Such a framework would allow data portability and equal access while safeguarding cybersecurity and data minimisation principles as outlined by the GDPR. By addressing these challenges, policymakers can simultaneously enhance consumer trust and foster innovation in the energy sector.

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DIGITALNI ENERGETSKI SISTEMI IN TEMELJNE PRAVICE: PAMETNO MERJENJE V EU IN TREH DRŽAVAH SREDNJE TER VZHODNE EVROPE

Članek ponuja primerjalno pravno analizo ureditve pametnega merjenja na Madžarskem, v Sloveniji in na Hrvaškem ter ocenjuje, kako se nacionalni okviri usklajujejo s cilji EU na področju energetske učinkovitosti, pravic potrošnikov in varstva podatkov. Medtem ko Madžarska izvaja previdno uvajanje na podlagi pilotnih projektov z nejasnimi dolgoročnimi cilji, Slovenija ponuja podrobne tehnične standarde in kategorije podatkov, vendar izkazuje vrzeli pri izvajanju. Hrvaška sprejema napreden, v potrošnika usmerjen in kibernetsko varnostno ozaveščen model, ki pa potrebuje izboljšave pri definicijah in pravilih hrambe podatkov. Članek ugotavlja, da bi optimalni regulativni model lahko združeval madžarsko fleksibilnost, slovensko natančnost podatkov in hrvaško varstvo potrošnikov. Vendar je učinkovitost odvisna od popolne usklajenosti z GDPR ter vzpostavitve jasnih in izvršljivih pravic nosilcev podatkov. Članek predlaga tudi dve nadaljnji smeri raziskovanja: (1) izdelavo praktičnega vodnika za potrošnike o njihovih pravicah v zvezi s pametnimi števci ter (2) raziskovanje pomena prava konkurence v zvezi z izključnim dostopom do potrošniških podatkov na liberaliziranih energetskih trgih. Brez usklajenega upravljanja podatkov na ravni EU, glede pametnega merjenja, tvegamo, da bo to okrepilo regulativne neskladnosti in neravnovesje na trgu.

Ključne besede: pametno merjenje; energetska regulativa; varstvo podatkov; kakovost zakonodaje; pravice potrošnikov.

COMPARATIVE ANALYSIS OF SENIOR CARE POLICIES IN SELECTED EU COUNTRIES

Lenka LACHYTOVÁ and Kristína DEMČAKOVÁ MIHAĽOVÁ[1]

The issue of care for older adults is gaining importance in the context of population ageing in Europe. Demographic projections of the European Union indicate a continuous rise in the share of older persons, affecting health and social care systems, fiscal sustainability, and the quality of life of the ageing generation. This paper conducts a comparative analysis of current trends in long-term care in four European Union countries - Malta, Italy, Sweden, and Spain, which record the highest life expectancy at birth among their populations. The aim is to identify common features of successful models and assess the potential to transfer those elements to other contexts. The findings underscore the importance of community-based care, strong support for informal caregivers, and investment in prevention and healthy ageing. These results provide inspiration for policy development in other countries, including Slovakia, where an integrated and functional framework for long-term care is lacking.

Key words: long-term; care; comparison; demographic ageing; European Union.

1 INTRODUCTION

Demographic development in the European Union countries define population ageing as the increasing share of people of retirement age within the overall population structure. In the 21st century, population ageing has become a significant demographic trend, shaped by economic development and advances in medicine. The growth rate of people in the post-productive age group surpasses that of other age cohorts, which constitutes a fundamental challenge for social and health care systems. It is projected that the share of individuals aged 65 and over across European regions will increase from 16% in 2010 to 27.8% by 2050. This trend is associated with a rising number of older adults

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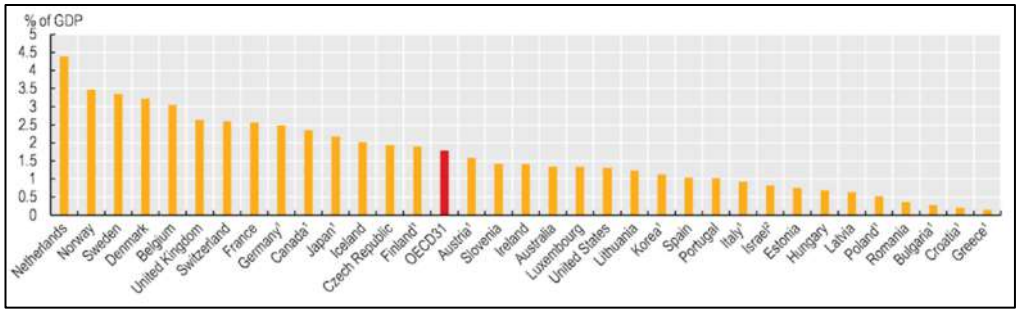
experiencing deteriorating health and functional limitations, thereby requiring long-term care (LTC) (Van Eenoo et al. 2016).

European countries face growing fiscal pressure as demographic ageing increases financial demands for pensions, health care, and long-term care (Eble et al. 2025). Although EU member states, in line with the principle of subsidiarity, retain the authority to shape their own models of social policy, European Union institutions, particularly the European Parliament and the Council of the European Union, actively contribute to fostering transnational cooperation (Díaz-Tendero and Ruano 2024). In practice, however, persistent shortcomings remain in the availability and quality of services for older adults across individual countries, despite their progressive development at the international level (Monteiro, Martins and Schoeller 2022). Figure 1 illustrates the share of long-term care expenditure as a percentage of gross domestic product (GDP) in EU and OECD countries.

FIGURE 1: SHARE OF LONG-TERM CARE EXPENDITURE IN THE GROSS DOMESTIC PRODUCT OF COUNTRIES



Source: OECD (2023).

The experience of advanced countries demonstrates that investments in elderly care, which in some cases exceed 4% of GDP—as in the Netherlands—can mitigate the negative consequences of demographic ageing (Asadzadeh et al. 2022). On average, European Union countries allocate 1.7% of their GDP to long-term care (LTC), although there are significant differences in investment levels among them. Higher shares of expenditure indicate structured and publicly funded systems in which formalised care prevails over informal, for instance, family-based models of care. Such a substantial share of public spending on LTC in some countries reflects more comprehensive and sustainable systems capable of alleviating the negative impacts of demographic ageing (OECD 2023).

The European care strategy builds on an analytical assessment of the current state of LTC systems in EU countries and points to the fact that approximately one-third of households requiring home care services do not utilise them due to financial inaccessibility. This aligns with OECD's cross-country assessment indicating that OOP expenses for LTC frequently absorb a very large share of older people's income, especially among those with severe needs and low resources (OECD 2024a). At the same time, nearly half of persons aged over 65 who depend on the assistance of another person do not actually receive such support. According to projections, by 2050 approximately 38.1 million people will require LTC, representing an increase of 23.5% compared with 2019 (European Commission 2022b). Regardless of whether resources are channelled through public or private providers, most analyses show a strong correlation between the level of public investment in LTC and the extent to which the needs of dependent persons are met (Díaz-Tendero and Ruano 2024).

Long-term care already represents one of the fastest-growing components of

health expenditure, particularly in higher-income European countries. This trend is driven by population ageing, technological progress, and rising labour costs in a resource-intensive sector. Since most LTC expenses are concentrated in the final years of life, higher life expectancy implies a further increase in total expenditure that is not fully balanced by longer healthy life years. These growing costs may burden both public budgets and households, especially where fiscal consolidation limits public spending, thereby increasing inequalities in access to quality care (Eble et al. 2025).

The European Pillar of Social Rights, under Principle 18, guarantees that "Everyone has the right to affordable long-term care services of good quality, in particular home care and community-based services." These LTC services should be accessible to all, regardless of socio-economic status or insurance coverage. Furthermore, it is essential that such services meet high-quality standards and reflect the dynamics of recent developmental trends (European Commission 2022a).

The objective of this paper is to compare models of elderly care in the European context, focusing on Malta, Italy, Spain, and Sweden, which, according to Eurostat, record the highest values of life expectancy at birth among older populations. Demographic changes affecting all European countries present a major challenge for public policymakers. The health and social care systems of these states will have to respond to the increasing number of people with LTC needs by ensuring accessible and high-quality care, while at the same time protecting individuals and households from excessive financial burdens (Lussi et al. 2024). Comparing selected approaches to care is key to understanding how different social, health, and political arrangements influence the quality and sustainability of care for the ageing population. Identifying and contrasting these models makes it possible to define strategies that may be applied or adapted in other EU member states.

2 LIFE EXPECTANCY AS AN INDICATOR OF THE QUALITY AND EFFECTIVENESS OF CARE POLICIES

One of the indicators of the quality and effectiveness of health and social care systems is the demographic measure of life expectancy at birth in individual European Union countries. Table 1 provides an overview of life expectancy across EU member states by age, with particular attention paid to those countries that achieve the highest values of this indicator within the Union. According to Eurostat statistics for 2023, life expectancy at birth in the European Union reached 81.5 years, representing an increase of 0.9 years compared with 2022 and 0.2 years compared with the pre-pandemic level of 2019. In 15 member states, life expectancy exceeded the European average, with the highest levels recorded in Spain (84.0 years), Italy (83.8 years), and Malta (83.6 years). Among European regions, the Spanish region Comunidad de Madrid achieved the highest life expectancy at 86.1 years. Conversely, the lowest average life expectancy was recorded in Bulgaria (75.8 years), Latvia (75.9 years), and Romania (76.6 years) (Eurostat 2024). Countries achieving the highest life expectancy face particularly intense challenges in ensuring high-quality and sustainable care for older adults and may thus contribute to identifying effective solutions in the context of the shared European challenge of population ageing.

TABLE 1: AVERAGE LIFE EXPECTANCY IN SELECTED EU COUNTRIES BY AGE

Country	2019	2020	2021	2022	2023	2024
France	83.0	82.3	82.4	82.3	83.0	83.1
Luxembourg	82.7	82.2	82.7	83.0	83.4	83.5
Malta	82.7	82.1	82.3	82.4	83.4	83.3
Italy	83.6	82.3	82.7	82.8	83.5	84.1
Spain	84.0	82.3	83.3	83.2	84.0	84.0
Sweden	83.2	82.4	83.1	83.1	83.4	84.1

Source: Author's calculations based on Eurostat data (2025a).

These differences in life expectancy at birth across countries result from multiple factors, including the quality of health care, the effectiveness of social policies, economic stability, and the availability of support services for the older population. Countries with longer average life expectancy typically possess more comprehensive health and social care systems that emphasise prevention, early intervention, and high-quality services for older adults. Conversely, in states with lower average life expectancy, elderly care tends to be less developed, which is reflected in higher mortality rates and lower quality of life in old age (Eurostat 2024).

Health and social service systems are characterised by significant variability, reflecting the specific conditions of individual countries. They are primarily determined by the nature of the welfare state, the model of social policy, and the method of health care financing. The growing proportion of older adults in society requires strategic adjustments in health and social care, as well as the implementation of comprehensive and sustainable long-term solutions that reflect the rapidly changing needs of an ageing population (Hromková 2013).

The effectiveness of social care systems for older persons is conditioned by the principles of accessibility, sustainability, and cooperative financing, which are embedded in strategic and policy frameworks at both the national and international levels.

3 METHODOLOGY

This paper focuses on the analysis and comparison of elderly care policies and plans, with the aim of identifying opportunities for improvement based on international experience. The research was conducted as a comparative study employing a mixed-methods approach, combining quantitative analysis of statistical indicators with qualitative content analysis of strategic documents, academic sources, and analytical databases. Within the comparative framework, policies and strategies of four European countries were selected which, according to the latest Eurostat data (2024), achieved the highest levels of life expectancy at birth among EU member states. Emphasis was placed on the practical application of these strategies and their impact on the quality of life of older adults. The selection of documents was guided by the criteria of relevance and currency, with preference given to materials published between 2021 and 2025, due to their timeliness and accessibility. The study's findings provide a basis for optimising existing elderly care strategies, with particular attention to their sustainability and effectiveness.

3.1 Study design

The research is guided by three principal research questions:

1. What are the differences in the structure, financing, and organisation of elderly care systems in the observed countries?
2. What common characteristics can be identified in successful care models within the European context?
3. Which elements of these models are applicable to the conditions of Slovakia?

3.2 Context

Country selection was based on life expectancy at birth according to Eurostat (2024) data. The analysis included Sweden, Spain, Italy, and Malta, which represent diverse models of elderly care (the Nordic universalist model, the Mediterranean family-based model, a regionally fragmented model, and a centralised model). This approach enabled the application of the Most Different Systems Design (MDSD), which allows for the comparison of countries with distinct care models but a shared challenge - demographic ageing.

3.3 Data analysis

The quantitative component was based on data from Eurostat, the OECD, the WHO, and European Commission databases. The following indicators were analysed: the proportion of the population aged 65 and above (%), life expectancy at birth, expected healthy life years (HLY) at age 65, LTC expenditure as a percentage of GDP, and the institutionalisation rate (percentage of older adults in residential facilities). In addition to descriptive analysis, basic statistical measures (mean, median, minimum, maximum, and standard deviation) were employed, enabling a more comprehensive picture of the differences among the studied countries. The qualitative component focused on the analysis of legislative and strategic documents in the selected countries, with particular attention to the Swedish Social Services Act, the Italian reform Legge Delega of 2023, the Spanish Law No. 39/2006 on the Promotion of Personal Autonomy, and the Maltese National Strategy for Active Ageing 2023–2030. Data processing combined descriptive statistics (quantitative part) with content and thematic analysis (qualitative part). The quantitative analysis enabled the comparison of key performance indicators of the systems, while the qualitative analysis revealed structural and policy differences among care models. The comparative analysis concentrated on identifying similarities and differences between countries and on highlighting so-called “good practices” that may serve as inspiration for Slovakia. Research validity was supported through source triangulation—combining statistical data, legislative frameworks, and secondary academic literature. The timeframe of 2020–2025 made it possible to capture the most recent trends in elderly care and enhanced the explanatory value of the results.

4 RESULTS

4.1 Sweden

Similar to most countries worldwide, Sweden is experiencing an increase in the proportion of older citizens within its overall population structure. At present, Sweden is implementing several initiatives aimed at anticipating and meeting the needs of this demographic group. In order to address demographic challenges effectively, without undermining the quality of social security, it will be necessary to extend the working lives of the population (Swedish Institute 2024).

The core principle of elderly care in Sweden is to enable older adults to live independent lives, with health and social care forming an integral part of Swedish social policy aimed at safeguarding quality of life.

Out of Sweden's current population of 10.5 million, people aged 65 and over represent approximately 20% of the demographic structure. By 2040, this share is projected to reach 23%, reflecting the continuing trend of population ageing and the growing demands on health and social care systems. Sweden ranks among the countries with the highest life expectancy at birth globally, reaching 81.58 years for men and nearly 84.9 years for women. More than 5% of the population is aged 80 or above (Eurostat 2024). Sweden is also among the countries with the highest LTC expenditure relative to gross domestic product, at approximately 3.5% of GDP (OECD 2023). Funding is predominantly public, drawn from municipal budgets and complemented by state transfers (Swedish Institute 2024).

The Swedish model strongly favours non-institutional, community-based care, primarily through the development of home care services, assisted mobility, and specialised housing. Residential care is reserved for those with a high degree of dependency, and the institutionalisation rate is among the lowest in Europe. A key feature of the system is decentralisation, whereby municipalities hold direct responsibility for service provision. Entitlement to municipal support in Sweden is regarded as an individual right of the citizen, and municipalities are not only responsible for social services but also provide selected health services. The system is regulated by the Social Services Act, which broadly defines the municipal obligation to provide support, while leaving the specifics of services to local discretion. Section 1 of the Act highlights the crucial role of social services as an integral component of Swedish social policy. This approach contrasts with the universalist nature of the social insurance system and state benefits, which are structured on the basis of general criteria (Konečný 2022).

Key challenges include rising demand for services combined with shortages of qualified personnel. While decentralisation allows for flexibility, it also creates disparities in quality and access among citizens. A solution lies in stronger coordination between municipalities and the state. Further challenges include an ageing workforce and the need to strengthen community capacities. From a fiscal perspective, pressure is exerted on the pension, health, and LTC systems (Hinrichs 2021; European Commission 2022b). Sweden thus represents an example of a universal, publicly funded model of LTC that is highly decentralised and focused on promoting independent living among older adults, distinguishing it from Mediterranean and centralised models. The strength of the Swedish system lies in the integration of social and health services, strong municipal autonomy, and guaranteed access to care. Nevertheless, fiscal challenges and regional inequalities call for further modernisation of the system and

reinforcement of its infrastructure.

4.2 Italy

Italy, like many advanced economies, faces increasingly complex social challenges stemming from demographic change, which has significantly transformed life expectancy and the population's age structure. Older adults (65+) now represent 24.1% of the total population. As noted by Dicorato and Mazza (2025), Italy's demographic dynamics are strongly shaped by pronounced territorial disparities. The publicly funded care system is regionally fragmented, with substantial variations in the scope and quality of services across regions (Brugiavini, Carrino and Pasini 2023). The Italian care system is characterised by a regional public model based on decentralisation of competences (García-Pereiro 2018). Since 2001, regional governments have held extensive authority in the planning, financing, and provision of health and social services (Poscia et al. 2017). Coordination of care is achieved through national and regional health plans, while service delivery takes place at the local level. Due to decentralisation, the organisation of the system, financing mechanisms, and access conditions fall primarily within the competences of regional governments. This governance model leads to substantial disparities in the availability and quality of services across regions. At the same time, the private LTC market remains underdeveloped (European Commission 2021). A key milestone was the adoption of the 2001 constitutional reform, which further expanded the powers of regional governments and reinforced their responsibilities, thereby transforming the Italian health care system into a model of a "regionally" organised national health service (Poscia et al. 2017).

Long-term care is financed through general taxation combined with patient co-payments. However, a considerable proportion of costs is borne directly by older adults or their families, especially when relying on informal or private services (European Commission 2021). The private insurance sector for LTC is weak and insufficiently developed. The Italian model is marked by the strong role of the family and a high prevalence of informal care, often based on family ties and supported by an informal labour market dominated by unskilled caregivers operating within the shadow economy. In practice, it is common for older persons to combine publicly funded services, private care, and informal family support in order to meet their care needs as cited in Brugiavini, Carrino and Pasini (2023).

The main challenges of the Italian elderly care model include regional inequality in service provision, insufficient integration of health and social care, and the heavy burden placed on families. Approximately 83.8% of care recipients rely on informal support, while only 34.7% use formal care services. In response, Italy adopted Law No. 33/2023 (Legge Delega), which represents a reform of social and health care systems with the goal of improving the quality of life of the older population. The legislation focuses on strengthening coordination, integrating service provision, and supporting active ageing. The reform encompasses the reorganisation of existing measures and the introduction of new initiatives to enhance the autonomy and independence of older adults (Brugiavini, Carrino and Pasini 2023). The Italian model reflects a high degree of decentralisation and family solidarity, in sharp contrast to the Nordic universalist model. While fragmentation reduces system efficiency, the 2023 reform represents an important step towards greater coordination and integration of care. A common feature with other countries is the ongoing search for effective forms of integrating health and social care.

4.3 Spain

From a demographic perspective, Spain has undergone a transformation in recent decades that has significantly reshaped its population structure. A notable shift has occurred from the "baby-boom" period, characterised by high fertility rates and a predominance of younger cohorts, to the current trend of an ageing society. Spain belongs to the so-called "long-lived societies," with the share of people aged 65+ surpassing 20% in 2024 (Pérez Fructuoso et al. 2025). The Spanish system is organised as a community-based, multi-level model founded on decentralisation. Its key legal instrument is Law No. 39/2006 on the Promotion of Personal Autonomy and Care for Dependent Persons, which enshrines the right to care and expands existing services. Service implementation lies with the 17 autonomous regions (European Commission 2021; Díaz-Tendero and Ruano 2024). Each region independently sets its own health plans and manages resources, while financing is provided by the central government through budgetary transfers (Lasmarías et al. 2023). The Spanish LTC model, as part of the broader Mediterranean social care framework, retains a multi-level governance structure characteristic of other areas of public policy. Regional governments play a decisive role in service delivery and management, while the central government defines the regulatory framework and basic standards. Increasingly, private actors are becoming involved in the infrastructure of health and social care provision (Díaz-Tendero and Ruano 2024). LTC in Spain is financed through a mix of public expenditure and private contributions, with informal care, primarily provided by families, largely covered by citizens themselves. System contributions can also be used to support informal caregiving in cases where formal services are unavailable. Overall, the LTC sector is predominantly family-oriented, with the family remaining the main source of social care (Kraus et al. 2010).

Spain has a low institutionalisation rate and prioritises ageing in place. Services include home assistance, day centres, rehabilitation, telemonitoring, and residential facilities, the latter of which expanded following the adoption of Law No. 39/2006. Private providers also play a significant role. Nevertheless, families remain the primary source of care—up to 83% of dependent persons rely on informal support (Díaz-Tendero and Ruano 2024). Spain faces several challenges, including regional disparities in service quality, the heavy burden placed on family caregivers, and a shrinking pool of potential caregivers due to demographic shifts. The COVID-19 pandemic exposed systemic shortcomings, prompting the launch of a Shock Plan financed in part by the Next Generation EU initiative. Key priorities of this plan include deinstitutionalisation, strengthening community-based care, and developing a new national legal framework (European Commission 2021). The Spanish model exemplifies the Mediterranean approach to elderly care, grounded in family and community support, decentralised governance, and low institutionalisation. Yet the challenges posed by population ageing, regional inequalities, and gender disparities call for continued reforms to ensure more accessible and sustainable care. The Spanish model shares similarities with the Italian system in its strong reliance on family support and regional decentralisation, while its emphasis on strengthening community-based care aligns with trends seen in the Nordic universalist approach.

4.4 Malta

The Maltese islands have a well-developed health care system, which has significantly contributed to increased life expectancy at birth and improvements in the overall health status of the population. Over the next three decades, the number of people aged 80 and above is expected to triple. This demographic shift will have a profound impact on several areas of public policy, particularly in acute and long-term care (LTC). The Ministry for Active Ageing (2022), in its National Strategic Policy for Active Ageing 2023–2030, anticipates multidimensional challenges closely linked to cultural norms, value frameworks, and societal expectations in Malta. The Maltese elderly care model is highly centralised, with no regional differences in organisation or service availability. All key decisions fall under the competence of the Ministry for Active Ageing, while local councils function as coordination centres for community-based services. Services are delivered through a mix of public and private providers with an increasing emphasis on home-based services. Financing of LTC is secured through mandatory social security contributions directed into a consolidated state fund. Residents of public facilities contribute between 60% and 80% of their pension income towards the costs of care, while a minimum disposable income (€1,397.62 annually) must be safeguarded. Services such as HomeHelp are provided for a symbolic fee, supporting ageing in place (European Commission 2021). Malta's policy framework favours ageing in place and has expanded home- and community-based services; however, the institutionalisation rate remains comparatively high among the countries analysed. The government supports these preferences through investment in home and community-based services, including HomeHelp, day care, respite care, and night care. Residential placement typically occurs only when ageing in place is no longer sustainable. The government facilitates this preference by providing financial support either for family-based caregiving or for the employment of formal caregivers on a full-time or part-time basis. The number of private facilities has increased in recent years, but waiting times for admission to public facilities remain a challenge (Ministry for Active Ageing 2022).

A major milestone in the enhancement of Malta's LTC system was the adoption of national minimum standards for LTC facilities in 2015. These standards improved the quality of life for older residents in institutional settings, despite their advanced physical and cognitive decline (Formosa 2019). The policy domain of ageing is governed by the National Strategic Policy for Active Ageing, which recognises that LTC facilities may risk prioritising collective needs over individual preferences, potentially limiting privacy, choice of leisure activities, dietary habits, and the scheduling of health care services. In response, the strategy proposes three key recommendations:

1. To promote LTC provision in ways that respect the autonomy of older adults.
2. To establish mechanisms that enhance the decision-making autonomy of older persons, including access to relevant health, legal, and community services.
3. To implement measurable national minimum standards in LTC and establish the legislative framework necessary for their enforcement and monitoring (Formosa 2019).

The Maltese model is characterised by centralised governance, a strong emphasis on home-based care, and extensive family support. The absence of regional disparities and the legislative guarantee of equal access provide the system with a stable foundation. Nevertheless, the growing demands of an ageing population

require additional investment in community-based services, deinstitutionalisation, and further quality enhancement. Cross-country comparison reveals that institutional arrangements strongly influence both expenditure and service accessibility. While Sweden's decentralised system achieves a balance between local autonomy and service equity, Italy's regional fragmentation leads to pronounced territorial disparities. Spain's mixed governance model, despite lower overall expenditure, shows relatively efficient outcomes in community-based care. Malta, in contrast, maintains universal coverage through a centralised scheme, but with limited flexibility for local adaptation. These findings indicates that governance structure, rather than expenditure level alone, determines LTC outcomes. Reiners (2025) similarly emphasises that the quality of public administration and the effectiveness of governance structures are key conditions for implementing complex social policies. This helps to explain why Nordic countries, supported by strong administrative capacity and coherent coordination between government levels, tend to achieve more consistent and equitable outcomes in long-term care compared with Southern or Central European systems.

4.5 Comparison of Selected Approaches to Care in the European Context

Every society is shaped by distinct expectations and cultural models regarding the balance between the state and family institutions in the provision of care for older adults. In designing supportive structures, it is essential to take these diverse socio-cultural traditions into account. Research conducted by the OECD highlights substantial regional differences—while in Southern European countries older adults tend to prefer care provided within the family, in Northern European states care delivered through formal social and health care services is more strongly favoured (Pérez Fructuoso et al. 2025). These differences are also reflected in the core indicators of elderly care systems across countries. Table 2 presents a comparative overview of key aspects of long-term care (LTC) systems, underscoring both similarities and differences between Malta, Italy, Spain, and Sweden.

TABLE 2: KEY INDICATORS OF LONG-TERM CARE SYSTEMS IN SELECTED EU COUNTRIES

Country	Long-term care expenditure (% of GDP)	The dominant model of care	Share of home-based care	Degree of institutionalisation	Policy focus
Malta	1.5% (2022)	Centralised, institutional model	Low	High	Investments in institutions and residential facilities, development of home-based care
Italy	0.84% (2024)	Mediterranean, family-based model	High	Low	Informal care, family support
Spain	0.94% (2023)	Fragmented regional system	Moderate	Moderate	Reform of the system and promotion of community-based care
Sweden	3.07% (2023)	Universalist, community-based model	High	Low	Ageing in place, community-based services, public financing

Source: Author's calculations based on OECD (2023); Gubert and Perobelli (2024); Costa-Font et al. (2023) ; Eurostat (2025b).

The organisational structure of long-term care (LTC) services across European countries is diverse; however, this diversity does not preclude the existence of several fundamental common features observable across most states. In general, nearly all countries recognise the subjective right of individuals meeting the legally defined criteria to access services, provide some form of publicly secured care regardless of the specific eligibility conditions, and offer a comparable range of services—particularly in the areas of home-based and residential care, as well as specialised support services. Furthermore, they employ dependency assessment mechanisms that serve as the basis for the development of individualised care plans (Díaz-Tendero and Ruano 2024). A more detailed view of the analysed countries through selected indicators of quality and sustainability of care systems is presented in Table 3. The table summarises key statistical indicators concerning the quality and sustainability of elderly care systems. These indicators allow not only an assessment of the volume of invested resources but also of their efficiency, reflected in the achieved health and social outcomes.

TABLE 3: COMPARISON OF SELECTED INDICATORS OF CARE FOR OLDER ADULTS

Country	Share of the population aged 65+ (%)	Life expectancy at birth (years)	Healthy life years at age 65 (years)	Expenditure on long-term care (% of GDP)	Institutionalisation rate 65+ (%)
Sweden	20.9	84.1	13.9	3.07	4.2
Italy	25.1	84.1	10.8	0.84	0.8
Spain	21.6	84.0	10.3	0.94	2.2
Malta	20.5	83.3	12.5	1.5	7.6

Source: Author's calculations based on Eurostat (2025b); UNECE (2025); Eurostat (2023); OECD (2023); European Commission (2022c).

The quantitative analysis revealed several differences among the countries under review. The results show that Italy has the highest proportion of older adults (25.1%), while Malta records the lowest (20.5%). Sweden stands out in terms of healthy life years (13.9 years) and also reports the highest expenditure on long-term care (LTC) (3.07% of GDP). In contrast, Spain and Italy allocate significantly less to LTC (0.94% and 0.84% of GDP, respectively). Differences are also evident in the institutionalisation rate, which is highest in Malta (7.6%), reflecting a stronger reliance on residential services, whereas in the Mediterranean context, home- and family-based care predominates. To provide a clearer understanding of cross-country differences, basic statistical characteristics of selected indicators were calculated. Table 4 presents the mean, median, minimum, maximum, and standard deviation of the analysed variables.

TABLE 4: SUMMARY STATISTICAL INDICATORS

Indicator	Mean	Median	Minimum	Maximum	Standard deviation
Share of the population aged 65+ (%)	22.0	21.3	20.5	25.1	1.9
Life expectancy at birth (years)	83.9	84.1	83.3	84.1	0.4
Healthy life years at age 65 (years)	11.9	11.7	10.3	13.9	1.4
Expenditure on long-term care (% of GDP)	1.6	1.2	0.84	3.07	0.9
Institutionalisation rate 65+ (%)	3.7	3.2	0.8	7.6	2.6

Source: Author's calculations based on Eurostat (2025b); UNECE (2025); Eurostat (2023); OECD (2023); European Commission (2022c).

Table 4 summarises the basic statistical indicators of the analysed variables. The average proportion of seniors aged 65+ in the examined countries is 22%, with a gap of more than five percentage points between the minimum and maximum values. The low standard deviation (1.9) confirms modest cross-country variation. Life expectancy at birth is relatively homogeneous across all countries (83.3–84.1 years). Healthy life years (HLY) at age 65 average 11.9 years, although with a higher standard deviation (1.4) and a range spanning from 10.3 in Spain to 13.9 in Sweden. This indicator therefore highlights inter-country differences in the quality of life in older age, which are primarily associated with the level of prevention, health care, and support for active ageing. The most pronounced disparities emerged in the institutionalisation rate of older persons, which ranges from 0.8% in Italy to 7.6% in Malta, with an average of 3.7%. The high standard deviation (2.6) illustrates the divergent approaches to the placement of seniors in residential facilities.

To complement the descriptive findings, a brief statistical comparison of the indicators presented in Table 4 helps clarify the relationship between financial inputs and care outcomes. Countries with higher public expenditure on long-term care, such as Sweden, where spending exceeds 3% of GDP, tend to report the lowest institutionalisation rates (around 3–4 %) and a higher proportion of community-based services. In contrast, countries with lower expenditure, such as Italy or Spain (around 1% of GDP), display higher institutionalisation rates and greater reliance on family or informal care. Malta, representing a centralised model, falls between these two extremes. These patterns suggest a broadly inverse relationship between the level of public LTC spending and the degree of institutionalisation. This statistical observation supports the interpretation that not only the amount but also the allocation and governance of expenditure significantly shape the accessibility and structure of care provision across welfare regimes. Similar tendencies have been highlighted in comparative analyses by Kraus et al. (2010) and in the OECD (2023) report on long-term care, both of which underline that decentralised and community-oriented financing arrangements generally yield more sustainable and equitable care outcomes.

Based on the comparative analysis of elderly care systems in Sweden, Italy, Spain, and Malta, several common trends can be identified, alongside specific differences linked to the historical, cultural, and institutional development of each country.

1. Differences in the structure, financing, and organisation of care systems (Research Question 1):
Sweden represents a universal decentralised model, characterised by the strong role of municipalities and the integration of social and health care services. Financing is predominantly public, with the institutionalisation rate among the lowest in the EU. Italy operates on the basis of a regionally fragmented model, where the scope and quality of care depend on the economic capacity of individual regions. A strong reliance on family-based care is complemented by an underdeveloped formal system, which undermines equality of access. Spain applies a decentralised community-based model in which autonomous regions play a central role. The family remains the primary provider of care, combined with a low institutionalisation rate. By contrast, Malta represents a centralised model without regional disparities, placing emphasis on home-based care and equal access guaranteed by legislation. Financing is mixed, combining mandatory social contributions, pensioner co-payments, and state subsidies.

2. Common Features of Successful Care Models (Research Question 2):
Despite national differences, several shared trends can be identified. All four

countries emphasise the preference for home-based and community-based care over institutional care, with institutionalisation regarded as a measure of last resort. A crucial element is the gradual process of deinstitutionalisation, supported by legislative reforms (e.g., the Italian Legge Delega reform of 2023 or Spain's Shock Action Plans). Another common feature is the growing emphasis on autonomy and the active participation of older persons in decisions concerning the type of care they receive, alongside the sustainability of system financing. These features indicate that successful models must combine legislative flexibility, adequate public funding, and mechanisms that strengthen family-based care.

3. Applicability of Elements to the Slovak Context (Research Question 3):
From the perspective of knowledge transfer, several inspiring elements can be identified for Slovakia. Although international experience offers a number of tested and innovative solutions that could be applied in the Slovak context, their implementation has in the past encountered tangible practical limitations. These constraints persist despite several national-level initiatives, including the adoption of the Strategy for Long-Term Social and Health Care in the Slovak Republic in 2021, which formally reflects modern principles of integrated care, community-based ageing, and the concept of "ageing in place." Nevertheless, it has not yet resulted in fundamental reforms that would establish a functional and legally anchored model of integrated care (Ministerstvo práce, sociálnych vecí a rodiny SR a Ministerstvo zdravotníctva SR 2021). While these policy documents declare the need for systemic change, they remain largely at the level of programmatic visions. The Slovak system continues to be characterised by the duality of health and social care, which operate as separate and only minimally interconnected systems—whether in terms of legislation, financing, or the day-to-day coordination of services (OECD 2024b). This situation leads to fragmentation, duplication of competences, and deepening inequalities in citizens' access to care.

From the Swedish model, Slovakia can draw lessons from the integration of health and social care, which eliminates service duplication and reduces the administrative burden on care recipients. The Italian experience highlights the risks of excessive decentralisation, while also offering valuable insights into flexible planning at the regional level, which could be particularly beneficial in areas with a higher share of the ageing population. Spain provides inspiration through the systemic anchoring of the right to care and the development of community-based services co-financed by European funds, which could strengthen efforts toward deinstitutionalisation. The Maltese model illustrates the benefits of a centralised system that guarantees equal access for all citizens, thereby reducing regional inequalities. However, such a model requires substantial public investment, which represents a major challenge in the Slovak context.

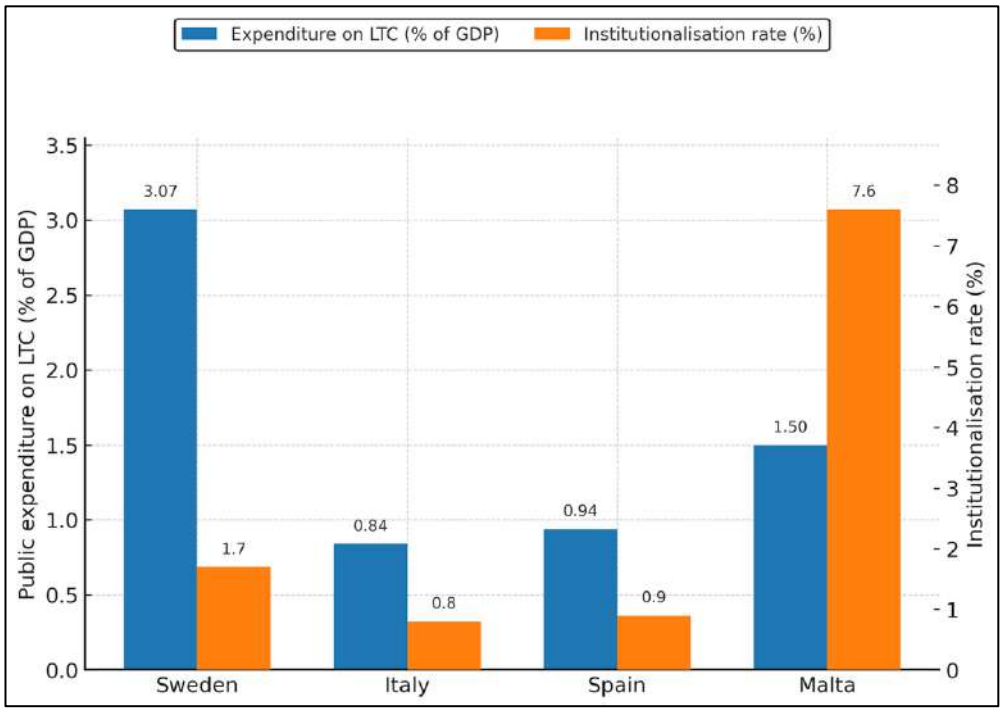
The discussion of the Slovak case confirms that implementation barriers are not only institutional but also territorial. Hornek and Maškařinec (2025) highlight that small municipal size and limited administrative capacity constrain the delivery of public services in Czechia. A similar challenge can be observed in Slovakia, where many municipalities lack the organisational and financial resources to expand community-based long-term care. These local-level constraints further complicate the practical transfer of decentralised LTC models into the Slovak context.

The overall applicability of foreign elements is constrained by Slovakia's cultural and institutional specificities. Unless Slovakia establishes a clear legislative basis

for integrating health and social care and ensures long-term financial stability, these objectives will remain aspirational. The findings of this research also highlight the strong cultural embeddedness of care, which limits the direct transferability of foreign models.

Although some differences in the organisational models of long-term care can be partially attributed to the demographic and health indicators specific to each country, a significant share of these differences arises from the distinct foundations of welfare state models and the associated diversity of care policies. This aspect helps to explain why Nordic countries systematically assume primary responsibility for the provision of formal care services, while in Southern and Eastern European countries this responsibility is more heavily delegated to the family. Consequently, in these regions, greater emphasis is placed on informal (non-professional) care, which is typically compensated through economic transfers rather than through an extensive system of publicly provided services (Díaz-Tendero and Ruano 2024). The following figure compares the relationship between the level of public expenditure allocated to long-term care in the observed countries (as a percentage of GDP) and the institutionalisation rate of elderly care in these countries.

FIGURE 2: EXPENDITURE ON LONG-TERM CARE VS. INSTITUTIONALISATION RATE



Source: Author's calculations based on OECD (2023); Eurostat (2023).

The data presented in the figure indicate that Sweden contributes the highest share of public expenditure to long-term care (LTC) among the countries under review (3.07% of GDP), combined with a medium institutionalisation rate and a strong orientation toward community-based care. This model illustrates that higher levels of public investment enable the development of a balanced system that integrates institutional and community-based care. By contrast, Italy and Spain allocate a relatively low share of resources (0.84% and 0.94% of GDP), which is reflected in their low institutionalisation rates. These countries are characterised by the strong role of the family and informal caregivers, while institutional infrastructure is distributed unevenly across regions (OECD 2023).

Malta represents a model with intermediate expenditure levels (1.5% of GDP)

but the highest institutionalisation rate (7.6%), indicating the predominance of traditional residential care. This centralised approach ensures equal access to care for all citizens but simultaneously generates a high dependency on institutional capacity. The results highlight that higher investment in LTC does not automatically lead to higher institutionalisation rates. What proves decisive is the way financial resources are allocated between formal and community-based care, as well as the extent of engagement of family and informal caregivers.

Countries such as Sweden, the Netherlands, and Belgium not only allocate the largest volume of public resources to LTC but also achieve the highest levels of availability and coverage of services. In contrast, in states such as Poland or Bulgaria, where public spending in this sector is significantly lower, service coverage remains considerably more limited. This trend corresponds to the typology of countries that apply strongly state-regulated models of social care, where public expenditure ranges from around 2% of GDP (e.g., France, Belgium, Finland) up to 3.5% of GDP (the Netherlands, Sweden, Denmark). In sharper contrast stand countries such as Spain, Portugal, and several Eastern European states, which allocate less than 1% of GDP to LTC (Joseba 2022). Current approaches to elderly care increasingly reflect an institutional shift within public administration, particularly in the form of decentralisation of social policies toward lower levels of governance. An effective ageing policy cannot be conceived exclusively at the central level; greater potential is demonstrated by multi-level approaches that align national objectives with regional and local initiatives. Such arrangements also allow for better adaptation of interventions to the specific needs and conditions of individual communities, thereby enhancing the effectiveness and targeting of public services (Barbosa et al. 2016).

At present, the structure of LTC provision is evolving more dynamically, primarily due to the demographic shifts across European countries. Among the growing trends in this sector are privatisation and commercialisation. In many countries, the share of private providers is increasing, while that of public providers is declining. Furthermore, the international dimension of the LTC market is expected to expand, as both the workforce and service providers increasingly operate across multiple markets. These changes, particularly the growing demand for LTC, may significantly affect long-term fiscal sustainability. In addition to an expansion in the volume of services, price increases are likely, which could hinder access for vulnerable groups. Such developments may generate a greater need for government support, leading to higher levels of public expenditure. The degree of public support is therefore crucial in ensuring equitable access to quality long-term care services (European Commission 2022a).

5 CONCLUSION

Population ageing ranks among the most significant demographic shifts of the 21st century, fundamentally shaping the conditions for the formulation of social and health policies. As the proportion of older adults within the population increases, so does the need for a sustainable long-term care (LTC) system, one capable of addressing the evolving needs of the population, reflecting principles of social justice, and safeguarding dignity in old age.

The issue of providing LTC for older adults has acquired growing strategic importance within public policies across the European landscape. Although organisational models, levels of public expenditure, and the extent of state

involvement vary among countries, the analysis highlights the existence of common systemic elements. These include the combination of cash and in-kind support, assessment of care dependency, and the increasing orientation toward community-based and home care services.

Marked cross-country differences stem primarily from diverse welfare state traditions, which determine the extent of public provision, as well as from efforts to promote deinstitutionalisation and to strengthen the autonomy of older persons within active ageing policies. Nordic countries exemplify systematically managed models in this regard, whereas Southern and Eastern European states continue to emphasise family-based and informal care.

The results of the comparative analysis reveal that systems of elderly care range from highly decentralised (Sweden, Italy, Spain) to strongly centralised (Malta). Financing is predominantly public, yet the share of private expenditure and informal support rises significantly in Mediterranean countries. Successful models share common features: emphasis on community-based care, prevention, and the promotion of independence among older adults. For Slovakia, particularly inspiring are the integrative components of the Swedish and Maltese models (linking social and health care, and legislated quality standards), as well as Italian and Spanish experiences with addressing regional disparities and reinforcing family care. These findings align with the conclusions of European Commission (2022b), which stresses the need for accessible, high-quality, and sustainable LTC for all EU citizens. While international models offer several promising solutions, their transfer into the Slovak context encounters significant implementation barriers, as confirmed by past attempts at application.

The compared countries demonstrate that there is no universal solution. Nonetheless, successful models converge in the integration of services, prioritisation of community-based care, and legislative guarantees of quality. For Slovakia, this underscores the necessity of strengthening community services, adopting unified quality standards, and supporting families, which remain the primary providers of care. In the broader European context, these findings point to the essential need for coordination among member states and the sharing of best practices, since demographic ageing constitutes a common challenge that transcends national borders.

In summary, the comparative findings highlight that effective LTC systems depend less on total expenditure levels and more on institutional design and governance capacity. Future research may extend the analysis to include countries such as the Netherlands or France, where policy innovations in ageing and community-based care provide valuable lessons for Central and Eastern Europe.

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PRIMERJALNA ANALIZA POLITIKE OSKRBE STAREJŠIH V IZBRANIH DRŽAVAH EU

Vprašanje oskrbe starejših odraslih postaja v kontekstu staranja prebivalstva v Evropi vse pomembnejše. Demografske projekcije Evropske unije kažejo na nenehno naraščanje deleža starejših, kar vpliva na zdravstvene in socialne sisteme, fiskalno vzdržnost in kakovost življenja starajoče se generacije. Članek ponuja primerjalno analizo trenutnih trendov dolgotrajne oskrbe v štirih državah Evropske unije - Malti, Italiji, Švedski in Španiji, ki beležijo najvišjo pričakovano življenjsko dobo ob rojstvu med svojim prebivalstvom. Cilj članka je opredeliti skupne značilnosti uspešnih modelov in oceniti potencial za prenos teh elementov v druge države. Ugotovitve poudarjajo pomen oskrbe v skupnosti, močne podpore neformalnim negovalcem ter naložb v preventivo in zdravo staranje. Rezultati so

navdih za razvoj politik v drugih državah, vključno s Slovaško, kjer primanjkuje integriranega in funkcionalnega okvira za dolgotrajno oskrbo.

Ključne besede: dolgotrajna oskrba; primerjalna analiza; staranje prebivalstva; Evropska unija.

FROM RECIPIENTS TO DONORS: CENTRAL EUROPE AND EU DEVELOPMENT AID

Petra BEZDĚKOVÁ[1]

Amid global political tensions, Central European countries, once aid recipients, have emerged as donors under EU and OECD supervision. Drawing on critical approaches to Europeanisation and donor identity, this article applies a four-dimensional framework of donor identity (discursive, institutional, behavioural, and external) to analyse how the Czech Republic, Slovakia, and Poland construct their roles within EU development policy. While aligning formally with EU and DAC norms, these states often resist the traditional donor model by drawing on their post-socialist experience, lack of colonial legacy, and emphasis on regional proximity and solidarity. Their engagement subtly challenges dominant development narratives, revealing internal tensions and overlooked variation among EU donors. By conceptualising donor identity as a multidimensional and underexplored aspect of development studies, this article contributes to research on the CEE region, Europeanisation, and the evolving role of smaller EU states in global development governance.

Key words: donor identity; EU development cooperation; post-socialist donors; EU aid; CEE Development Donors.

1 INTRODUCTION

While many rules and guidelines exist for providing aid, all the EU Member States' bilateral development cooperation policies have not evolved equally. Mainly shaped by Western European countries, 'traditional donors' and the OECD Development Assistance Committee (DAC) founding members, little room has been left for others to influence the development assistance landscape. Although DAC membership offers donors a voice in the field, it requires them to follow

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already set and widely recognised rules on 'good donorship'. In international development research, traditional donors are often contrasted with other large bilateral donors who are not DAC members and choose a different donorship path, particularly China, emerging donors, Arab countries or South Africa (Kondoh 2015; Mawdsley 2012). However, minimal research exists on the position and donorship of Central and Eastern European (CEE) countries, transitioning from recipient status within a regional union like the EU and under an established set of rules of the OECD DAC.

Article operates with the term 'CEE countries', as it is commonly used in the academic literature, and presents an underexplored region. However, this article focuses on the Czech Republic, Poland and Slovakia, and argues that they frame their development role through discourses of transition experience, regional solidarity, and non-colonial legitimacy, despite rules and commitments arising from their EU and DAC membership. As these identity narratives subtly challenge the technocratic, depoliticised norms dominant in the EU and OECD DAC development frameworks (Horký-Hlucháň 2015), does it mean these three countries construct a distinct *donor identity* within the EU development cooperation field?

Article was primarily built on constructivist approaches to nation-state identity and its formation (Alexandrov 2003; Tulmets 2014; Wendt 1999), as 'donors' are states that provide development assistance. Viewing *donor identity* as a socially constructed and contextually performed role, this article used a discourse analysis to examine how the Czech Republic, Poland and Slovakia construct and legitimise their identities. Based on an analysis of available concepts related or relevant to *donor identity,* this article introduces a resulting framework of four distinct dimensions of *donor identity* formation, in which countries become donors through narratives, self-positioning, interactions with external actors, and institutional setups or aid volumes. Considering the historical formation of these countries is essential for this analysis, in terms of the construction of nation-states, their foreign policies (mainly European and OECD integration), and their emergence as development donors. While important work on differences between various donor paths exists (Kondoh 2015; Mawdsley 2012; Alesina and Dollar 2020; Lancaster 2006), none consider the specifics of CEE countries, and there is no consistent donor typology or framework. Existing research tends to overwhelmingly focus on donors' aid behaviour, aid volumes and flow, but neglects donors' own and/or perceived identity. Therefore, this article introduces a four-dimensional, conceptual framework that considers different aspects of development aid provision to better understand the constructed and recognised *donor identity* in multilateral contexts.

The first section of this article aims to frame the concept of *donor identity* based on the constructivist theories on the formation of nation-states. It provides an overview of existing research on *donor identities* that inspired this article's four-dimensional framework, which is introduced in the following section. The third section provides a historical and contextual insight into the formation of the CEE countries' bilateral development cooperation policies. The framework is applied in the following section, which dives into the four dimensions' key indicators and presents the analysis results, which are debated in the final section.

2 FRAMING A *DONOR IDENTITY*

2.1 Existing *Donor Identity* Literature

The existing research on the identity of donors mainly concentrates on topics such as aid models, differences between DAC members and emerging donors, Southern development actors, and donor behaviour. Approaches to such research differ widely, from normative or altruistic to governmental. This section provides a summarising overview that helped form the four-dimensional approach. Tulmets (2014) highlights how the historical formation of CEE nation-states shapes their foreign policy identities. Drawing on constructivist perspectives, she argues that responses to European integration vary depending on each country's historical sense of 'self'. Drawing on Marcussen et al. (1999), she adapted a set of factors to explain the CEE context: 1. underdeveloped consolidation of values due to limited or delayed nation-state formation – the Czech Republic and Slovakia gained independence after World War I, and they identify more with a multinational tradition than a nation-state, with Poland being an exception; 2. political elites make decisions based on perceived interests, especially during critical junctures like the post-Cold War revolutions; and 3. national identity, shaped by political consensus and institutionalized through socialization, is resistant to change. The last factor is also presented by Lancaster (2006), who argued that it is difficult to change organisational arrangements institutionalising aid provision, once they are in place.

Regarding application to development donors, the existing literature is minimal and inconsistent. Lancaster (2006) argued against using a theory on aid provision, stating that existing theories overlook the significance of domestic politics. Focusing on traditional donors, her book examines the shifting purposes behind aid provision. While insightful on a general aid provision basis, her book does not reflect on CEE donors.

Alesina and Dollar (2000) argued that aid is primarily driven by political and strategic interests, colonial ties, and recipients' democratic progress, rather than purely altruistic or poverty-based motivations. They identified different donor types: those driven by need (e.g., Nordic countries), colonial history (e.g., France, Portugal), or geopolitics (e.g., the U.S.). They also introduced UN voting patterns to capture donor–recipient political alignment. While they documented why aid has often failed to reduce poverty, they excluded former communist countries, noting their limited aid history prior to the end of the Cold War. Parts of this research inspired the four-dimensional model, especially considering colonial history and political alliances, and focus points, such as democratisation policies, focus on specific political or economic regimes, etc.

Mawdsley (2012) applied gift theory to South-South cooperation, identifying four key traits: shared developing-country identity, development experience, rejection of traditional hierarchies, and mutual benefit. She contrasts its emphasis on reciprocity with Western aid, often seen as unreciprocated charity shaped by OECD DAC norms. South-South cooperation offers dignity and status through reciprocal exchange, something traditional donors lack due to their postcolonial framing and universalist assumptions. Although CEE countries cannot be considered Southern development donors, they share a level of reasoning for aid provision, mainly regarding transition and experience sharing, as well as mutual and reciprocity opportunities.

Kondoh (2015) defined emerging donors as non-DAC members and identified four identity types to differentiate aid models. A 'superpower identity' refers to alternative norm-makers with global aspirations but limited influence in the already established field, who contest the status quo (e.g. China or India). An 'African middle-power identity', mainly South Africa, stresses South-South cooperation and its distinction from traditional donors. An 'Islamic identity' and an 'Asian middle-power identity' are usually aligned with DAC norms. Although CEE countries cannot be categorised under any of these identities, a degree of similarity can be found in the 'superpower identity'.

Perhaps the most relevant research is by Szent-Iványi and Lightfoot (2015), who applied a governmental politics approach to foreign aid policymaking, which they adapted to the CEE countries and included domestic and international non-governmental actors as political influencers. Their model operates with different stakeholders and their interactions – international actors and national governments, domestic actors and national governments, and interactions between government agencies. They argue that the 'social learning', based on constructivist institutionalism, happens through various national as well as international actors and that *'nation states will adopt international norms and laws not because the costs of adoption outweigh the benefits, but because these rules become internalised and a conviction gradually develops that they represent the only proper way to act'.* They further argue that three specific variables determine the power and influence of governmental actors – institutions, agencies' capacities, and their ability to build coalitions and mobilise allies. While their research explains CEE countries' reasons and incentives for their decision-making in bilateral development assistance, this article strives to provide a picture of their 'donor identity', going beyond behavioural and policy analysis. Smolaga and Zajaczkowski (2024) classified CEE countries as emerging donors and argued they follow a 'donor interest' model of aid allocation, prioritising their own geopolitical and economic goals. They argued that while changes linked to DAC membership suggest a possible shift toward a 'hybrid model', their aid behaviour still contrasts with traditional donors. Their ODA data analysis supports the behavioural dimension of this article.

2.2 Four-dimensional *Donor Identity* Framework

Article was inspired by Tulmets' (2014) methodology on CEE countries' national identity in foreign affairs, building on constructivist theories of state identity that consider actors' behaviour shaped by norms, beliefs and values constituting their identity, which is multilayered and can evolve (Wendt 1999). Tulmets concentrated on the overall role of CEE countries in their foreign affairs policies, particularly in relation to how these nations shape their identities. This article has tailored that approach to development cooperation. An inductive method was used to gather empirical data on the concepts of *state* and *donor identity*, which then informed the creation of a four-dimensional framework based on the findings.

The following framework is inspired by the significant research directions in nation-state identity and studies in donor behaviour and aid models. The literature review in the previous section overwhelmingly focuses on the relations between countries' actions via their foreign policies and donor behaviour. Considering the historical background of forming CEE countries' foreign affairs policies, this article also touches on Europeanisation to explain the pressure for convergence, institutional mimicry, and the adoption of certain norms and values.

However, it is also an example of negative Europeanisation in some instances, mainly due to the EU's inability to ensure that Member States adhere to rules and commitments.

The framework resulting from this research and analysis focuses on four dimensions of *donor identity:* discursive, institutional, behavioural, and external/perceived (*Table 1*). These dimensions capture the complexity of policy formation and implementation, shaped by historical context, political ties, and internal or external pressures. They consider donors' institutional and financial capacities, democratic transitions, and relationships with other actors. Rather than focusing solely on aid volumes, they highlight context, purpose, and narrative.

TABLE 1: FOUR-DIMENSIONAL FRAMEWORK OF DONOR IDENTITY

	Description	***Key indicators & Analysis***
DISCURSIVE	How donors frame their identity, legitimacy, and values through narratives, e.g. how they speak about their donor role.	Framing of development aid, references to self-perception and priority values, e.g. through national strategies, programming, etc.
INSTITUTIONAL	Aid systems' structure, capacity and legislative and institutional setup, e.g., organisational structures and policy tools.	Agency formation and functioning, coordination with the EU, ODA budget, staff size and organisational charts, policy coherence across institutions, etc.
BEHAVIOURAL	What donors do, where and how.	Geographical or sectoral focus, aid volumes and flows, modalities, e.g. aid allocation data, country-specific ODA profiles, EU implementation partnerships, etc.
EXTERNAL	How other actors perceive countries as donors, e.g. EU institutions, recipient countries, NGOs, etc.	Inclusion in EU strategic dialogues, feedback from recipient countries, visibility in international forums, etc., e.g. through third-party evaluations of aid and aid effectiveness and academic or NGO commentary.

While this typology offers a comprehensive tool for future comparative analysis, this article focuses on the discourse that constructs and reflects *donor identity*. As identity is constructed in language and discourse reflects why and how countries perform their donor roles, this article uses a discourse analysis to assess development cooperation strategies, programming, setup, priority areas, etc. Discourse is therefore considered a social practice connecting discursive events with situations, institutions, and social structures; it is shaped by them but also influences them. Thus, this article also considers that discourse cannot be constructed without context (Fairclough and Wodak 1997).

3 CEE DEVELOPMENT DONORS

3.1 Development of the CEE countries' donor roles

During the Cold War era, CEE countries under communist rule did provide some development assistance. However, it is unclear how such political decisions were made or how comparable those policies were to today's standards. Aid was directed towards other countries with communist regimes, and the narrative of providing aid to the 'Third World' countries was rejected as a responsibility of former colonial powers in the West. Aid was primarily provided to secure political, military, or trade influence, but was always aligned with the foreign policies of the Soviet Union. Such aid consisted mainly of technical and scientific cooperation based on tied aid and higher education scholarships. After gaining independence in the 1990s, CEE countries primarily focused on their own economic transformation and international standing, with previous development policies disappearing in the process (Szent-Iványi and Lightfoot 2015; Szent-Iványi and Lightfoot 2024).

Polish foreign policy has since been clearly focused on Eastern Europe rather than Western Balkans, arguably drawn from interwar ideas based on 'Polishness', a sense of responsibility derived from a common destiny of population from the Commonwealth of Poland and Lithuania, Ukraine and Belarus. The Czech Republic has, on the other hand, been emphasising its role as a central European country, prioritising the Western Balkans in its foreign policy. Historical ties, such as shared Austro-Hungarian heritage and interwar relations with Yugoslavia, reinforced this focus. Eastern Europe became a formal priority only with the 2009 EU presidency, previously carrying negative public perceptions linked to immigration and the Ukrainian minority (Tulmets 2014).

With aspirations to become OECD and EU members, CEE countries relaunched their bilateral development policies in the early 2000s to align with the EU *acquis*. However, full compliance was not enforced, as all faced institutional, legal, and financial limitations that hindered effective implementation (Szent-Iványi and Lightfoot 2015). In the 2000s, CEE countries received substantial capacity-building assistance from established donors, from reporting ODA figures to OECD DAC, project cycle management and efficient institutions, to managing tenders and contracts, monitoring and evaluation, etc. The most extensive programs were provided by the Canadian International Development Agency and UNDP (Szent-Iványi and Tétényi 2013). By the time of the CEE countries' accession to the EU in 2004, they were formally classified as high-income countries that must be ready to provide development assistance. However, their GDP was below 40% of the EU average, and some recipient countries of the EU Development Policy had higher incomes. CEE countries were aware of this; societal and governmental support for development policy at the time was relatively low, and their perception was to give support at home first. It is, therefore, almost certain that the key driver in the creation of development policies in CEE countries was the EU (Granell 2005; Szent-Iványi and Lightfoot 2015; Lancaster 2006).

3.2 Strategies and priorities of bilateral development assistance

Regarding the EU's goal of development assistance, only the Czech Republic and Slovakia emphasised their international commitments to reducing poverty as core elements of their development policies, focusing on promoting human rights, democracy, and sustainable development. Polish strategy, however, focused on democracy promotion and long-term social and economic development, thus referencing poverty reduction as an indirect goal (Szent-Iványi and Lightfoot 2015).

In terms of the strategic direction of the CEE countries, despite the EU *acquis* and OECD DAC recommendations, none have achieved satisfactory results. The Czech Republic was considered highly donor-driven in the 2000s, with recipients having almost no influence on development assistance planning and programming, questioning the level of recipients' ownership of aid results (OECD 2007). Poland did not make its country strategies public, but Slovakia began providing strategy articles in 2009; however, this effort has not been consistent. Although the Czech Republic provides some level of project and financing information online, the 2013 Aid Transparency Index assessed all three countries as poor or very poor in terms of transparency (Publish What You Fund 2013).

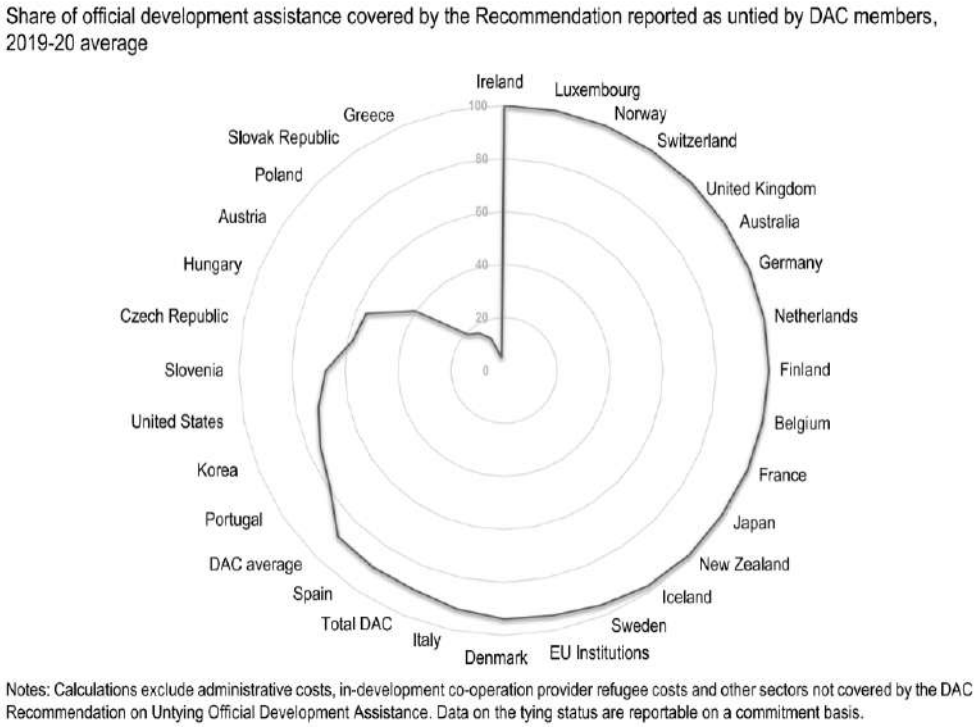
Most recently, all three countries have broadly aligned their strategies and priorities with the 2030 Agenda for Sustainable Development and the SDGs. The Slovak strategy identifies programme and project countries and regions with

exceptional humanitarian needs, while focusing on seven priority sectors like education, healthcare, good governance, agriculture, water, energy, and market environment, alongside cross-cutting issues such as environmental protection, gender equality, human rights, and good governance. Poland operates under its 2021–2030 'Solidarity for Development' multiannual programme, which sets a limit of ten priority partner countries, predominantly in Eastern Europe, and traditionally focuses on democratic transition, good governance, civil society, and human rights, though it has recently broadened its thematic scope to include areas like health, sustainable cities, and climate action. The Czech Republic has a long-term strategy (2018–2030) that concentrates on six priority countries and additional territories for post-conflict stabilisation, with thematic priorities encompassing stable and democratic institutions, sustainable natural resource management, agriculture and rural development, inclusive social development, and economic growth, strongly leveraging its own transition experience to promote human rights and democracy. All three countries also emphasise multilateral cooperation, particularly with the EU, and view policy coherence for development as a critical element (OECD 2018; OECD 2023b; OECD 2023c).

Both the Czech Republic and Slovakia reference their transition experience in official strategies. While Poland used to position itself as a promoter of democracy in Eastern Europe, its current development policy strategy does not mention transition experience or support for democracy, instead referencing only good governance. The Czech strategy mentions adopted EU norms and practices, in contrast with the Polish one, which vaguely includes key EU strategies. The Czech Republic is the only country of the three that regularly conducts and publishes project evaluations (Szent-Iványi and Lightfoot 2024).

Another aspect of development aid provision that CEE countries have been struggling with is tied aid. OECD DAC members are required to meet the target of untied official development assistance, meaning the removal of any conditions that require recipients to procure goods or services from the aid provider. The objective is to provide value for money and contribute to the goal of recipient country ownership. While the OECD (2009) claims that untied bilateral aid increased to 82% in the 2000s, it remains most noticeable in the CEE countries. Less than half of the provided aid in 2019–2020 was reported as untied by the Czech Republic, Poland and Slovakia, while the latter two neared 0% (Figure 1). Arguing for strengthening competitiveness for their domestic NGOs in the international arena, aid was widely provided through national actors, despite increasing pressure from the OECD. While Poland references creating export opportunities for Polish companies as part of its development strategy, the Czech Republic and Slovakia only mention their private sector to increase resources for development activities (OECD 2010; Szent-Iványi and Lightfoot 2015; Szent-Iványi and Lightfoot 2024).

FIGURE 1: SHARE OF ODA AS UNTIED BY DAC MEMBERS, 2019–2020 AVERAGE



Source: OECD (2022).

Generally, while all three countries have clearly defined their official development cooperation in line with the EU, OECD DAC and UN guidelines and commitments, their prioritised geographical focus reflects their historical ties. It expresses perceived solidarity with the countries that share a common past with them and possibly the same or similar values (Tulmets 2014).

3.3 Aid volume and flows

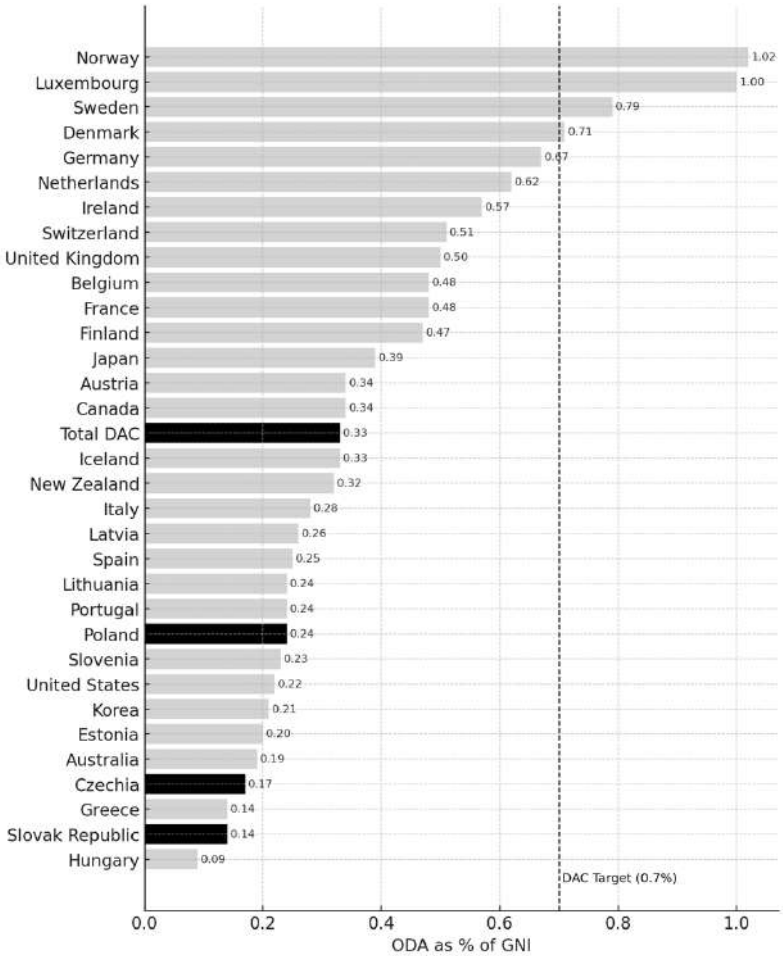
The EU encouraged all new Member States to 'strive to increase' their ODA to 0.33% of GNI by 2015, with an interim goal of 0.17% by 2010 (The European Consensus on Development 2006). Attributed to several factors, including the end of co-financing from international donors, EU accession, a lack of knowledge on how to report ODA correctly, and, finally, the 2008 economic crisis, CEE countries saw a significant gap in ODA performance and their commitments (CONCORD 2011). Apart from the Czech Republic, which established a multi-annual indicative timetable for development assistance in 2010, no CEE countries had any explicit commitment or a legally binding financial strategy to achieve the ODA/GNI goal set by the EU (European Commission 2011). Despite significant progress, all three countries do not comply with most of the EU's requirements for bilateral development assistance. There are, however, differences among them. The Czech Republic provides increasing amounts of aid to the poorest countries, has a well-established legal and strategic framework, has made clear efforts to concentrate its aid allocation, and is the most transparent, doing the most in terms of donor coordination (Szent-Iványi and Lightfoot 2015).

Regarding pre-existing external relations that typically influence development assistance strategies, all three had limited engagement with Africa and the Least Developed Countries (LDCs), partly due to the absence of a colonial history. Since the start of their DAC membership, CEE countries have primarily focused on countries with good macroeconomic policies, a degree of quality institutions and

aid-supported economic growth, as well as geographical proximity and geopolitical importance, such as Moldova, Ukraine, Bosnia and Herzegovina, Belarus, and Georgia. Therefore, this suggests a 'donor interest' model, with donors prioritising their own interests over the recipient country's needs (Smolaga and Zajaczkowski 2024).

In the 2000s, there were three major groups of recipients for CEE countries: 1. Iraq and Afghanistan, due to international obligations, 2. the Balkans, Eastern Europe and Central Asia, due to democratisation goals in the region as well as potential EU accession, 3. former Communist allies from the developing world due to some level of path dependence from their Communist legacy – except Slovakia, for the Czech Republic it was Ethiopia, Cambodia, Palestine, Vietnam, Yemen and Mongolia; for Poland it was Vietnam and Angola. All three countries clearly focused primarily on their Eastern neighbourhood and claimed their support for Sub-Saharan Africa through multilateral actors, mainly the EU's European Development Fund (Szent-Iványi 2012; OECD 2025). OECD DAC sets the standards for aid delivery and oversees development aid flows globally, providing important data. The latest data (Figure 2) show that the Czech Republic, Poland and Slovakia remain in the lower third of DAC contributors, underscoring their limited fiscal engagement despite nearly two decades of EU membership. Their levels remain well below the DAC average of 0.33% and far from the collective EU commitment of 0.7%.

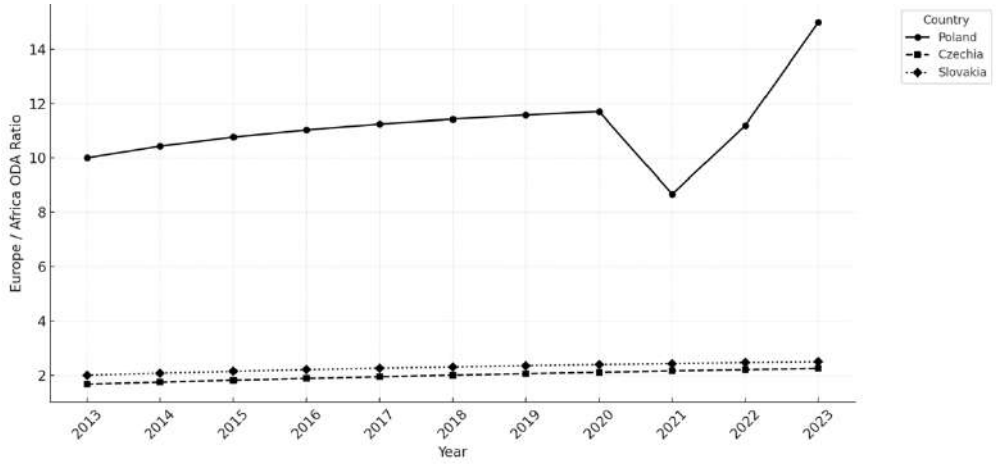
FIGURE 2: OFFICIAL DEVELOPMENT ASSISTANCE BY COUNTRY



Source: OECD (2022).

The Europe-to-Africa ODA ratio (Figure 3) illustrates how strongly each CEE donor prioritises its regional neighbourhood over more global commitments, contrary to OECD DAC recommendations. Poland stands out with a dramatically increasing ratio, exceeding 15:1 by 2023, indicating an overwhelming concentration of its aid in Europe. In contrast, the Czech Republic maintains the most balanced approach of the three, with a ratio of around 2:1; however, it is slowly but visibly shifting in favour of regional partners. Slovakia exhibits a similarly slow and gradual increase in regional focus, with a ratio peaking just below 3:1 by 2023. These differences highlight not only variations in strategic orientation and donor narratives but also the influence of scale: smaller donors, such as the Czech Republic and Slovakia, tend to maintain broader geographic engagement, while Poland's larger and more politically driven aid portfolio increasingly reflects its geopolitical priorities.

FIGURE 3: RATIO OF ODA TO EUROPE VS. AFRICA (2013–2023)



Source: Author's calculation based on data from OECD (2025) and OECD (2023a).

For example, the Czech Republic's ODA flows increased from 0.11% to 0.15% of GNI between 2003 and 2017, and no development cooperation strategy included a plan to increase them to meet the commitment targets. The Czech Republic allocated only about 8% of its total ODA to the LDCs between 2000 and 2018, despite its development strategies designating them as priority countries. It is, however, the highest amount among the three countries. While Slovakia increasingly targets European countries over the LDCs, the Czech Republic shows an increasing commitment to the EU's overall goal of poverty eradication (Kovářová 2021; Szent-Iványi and Lightfoot 2024).

3.4 Relations with external actors

Besides training and informal learning offers, DAC's tool to motivate its members to reform their development policies is the 'special peer reviews'. These are sets of specific recommendations which, however, the CEE countries tend to ignore. The only documented impact they might have had is the Czech Republic's institutional structure reform, centralising ODA under the Ministry of Foreign Affairs (MFA) in 2009, which was aligned with the preceding peer review. DAC peer reviews largely align with the EU's non-binding development *acquis*, but the EU has struggled to pressure Member States into compliance, as CEE countries have learned to overlook the 'soft law'. Therefore, Europeanisation in development policy can be seen as negative in terms of discouraging the CEE countries from complying with the EU's vision of 'good donorship' (Szent-Iványi and Kugiel 2020; Horký 2012; Lightfoot and Szent-Iványi 2014). This can be

partially explained by the perceived limited power of CEE countries to influence EU Development Policy, despite their lack of a formulated vision for its development (Szent-Iványi and Kugiel 2020), or by historical traumas visible in political discourse that are connected to distrust in international actors (Just and Morgado 2023). Considering themselves unable to compete with 'traditional donors' for EU development contracts and grants, CEE countries attempted to push for initiatives in which they believed they had a competitive advantage, such as their experience in democratic transition and focus on the EU's Eastern Neighbourhood. However, CEE countries were not very successful in lobbying for these, although some mentions can be found in key EU policy documents, such as the 2006 European Consensus on Development, or in Poland's support for establishing the European Endowment for Democracy and the Eastern Partnership in 2009. While political interest in development increased in Poland (as it threatened to block EU negotiations on development policy to gain an advantage in other policy areas), the Czech Republic's and Slovakia's low political interest in development policy allowed them to earn a higher degree of independence in decision-making, leading to better alignment and commitment results (Szent-Iványi 2014; Szent-Iványi and Kugiel 2020; Tulmets 2014; Szent-Iványi and Lightfoot 2024).

As OECD DAC peer reviews show, the Czech Republic, Poland and Slovakia face several critical shortcomings in their development co-operation efforts. A prevalent issue is the fragmentation of their bilateral ODA, often dispersed across numerous small, short-term projects and annual calls for proposals. This limits strategic planning, long-term impact, and alignment with partner country priorities. Furthermore, all three countries face challenges in consistently meeting their ODA/GNI targets and progressing towards untying their aid, often having a significant portion of their ODA tied to domestic entities or comprising in-donor costs. They also need to strengthen their results-based management and evaluation systems, moving beyond project monitoring to effectively measure and learn from development outcomes, and ensure policy coherence for development is systematically integrated across government policies. Finally, their partnerships with civil society and the private sector are often hindered by unpredictable funding mechanisms and a primary focus on domestic actors, rather than leveraging local expertise and resources for broader development impact (OECD 2018; OECD 2023b; OECD 2023c).

While it was long believed that the main obstacle for CEE countries was limited financial resources allocated to ODA, Russia's invasion of Ukraine in 2022 showed that CEE countries can mobilise substantial resources and capacities to increase their development budgets and use them effectively (Smolaga and Zajaczkowski 2024; OECD 2023b; OECD 2023c). This aligns with Lancaster's (2006) premise that the dynamics between domestic political realities and goals, and international events, such as geopolitical shifts, shape how donors provide aid.

3.5 Institutional setup

All three countries mimicked the Western development aid models and institutional setup, despite lacking their capacities and resources. Moreover, all three countries created some institutional support for transition experience; the Czech Republic and Slovakia have dedicated programs under their MFAs, and Poland established a separate fund for democracy promotion abroad. The Czech Republic was the only donor that provided sectoral allocation data. (Szent-Iványi and Lightfoot 2015). Besides the Development Cooperation Department in the

Czech MFA, a separate Department for Transition Policy and Human Rights was also created. In 2007, the Czech Republic was the first among the three to establish an institutional body for the management of development cooperation, besides the MFA, in the form of the Czech Development Agency. However, in all three countries, several other ministries created assistance policies, primarily focused on technical cooperation based on sharing transition experience or adopting the EU *acquis* (Tulmets 2014).

CEE countries suffer from a lack of institutional coordination; despite official declarations on ODA allocation seeming to reflect MFA strategies, other ministries and institutions provide development assistance outside of these frameworks. Therefore, there are suggestions on establishing an institutionalised consultation mechanism that could be used for closer coordination (Smolaga and Zajaczkowski 2024). This fragmentation is compounded by institutional and human resources constraints**,** including limited staff numbers, high turnover, and a lack of dedicated expertise in development cooperation within their ministries and agencies, often leading to insufficient policy guidance, weak inter-ministerial coordination, and a lack of delegated authority, particularly to embassy staff (OECD 2018; OECD 2023b; OECD 2023c).

4 UNIQUE PATH OR ADAPTING TO A SCRIPT WRITTEN ELSEWHERE?

Czech Republic, Slovakia and Poland share certain aspects that differentiate them from other European, particularly 'traditional' donors. They all became OECD members by the end of the millennium and DAC members in 2013. This membership requires them to adhere to common, specific obligations related to providing development assistance. Furthermore, the EU adopted even stricter obligations on aid provision, committing its Member States to increase ODA and generally comply with the principles and recommendations of the DAC. Regarding pre-existing external relations that generally tend to shape development assistance strategies, all three had minimal relations with Africa and the LDCs, including the absence of colonial history. Therefore, most of their aid is directed to European and/or politically significant countries. As relatively new donors, they are also characterised by underdeveloped institutional frameworks, lack of human resources and poor institutional memory, further hindering their ability to provide untied development assistance. This section presents the findings of this research within the proposed four-dimensional framework of *donor identity:* discursive, institutional, behavioural, and external. Each dimension reflects how the Czech Republic, Slovakia and Poland position themselves as actors in international development cooperation. The findings draw from data presented in the section above and aim to capture both self-representation and external positioning of these countries.

4.1 Discursive dimension

The first dimension represents the framing and justification of the countries' donor role. Across all three countries, it is articulated through the language of transition experience, regional solidarity and shared historical memory. The Czech Republic and Slovakia often frame their activities as a moral responsibility, drawing on their successful democratic and economic transition and EU integration. While referencing its transformation experience, Poland leans more heavily on a regional security narrative, positioning itself as a stabilising actor, especially in Eastern Europe. All three CEE countries avoid mentioning global justice or colonial responsibility (or similar narratives), clearly distinguishing

themselves from traditional donors. Terms like solidarity, partnership and experience sharing are much more prominent. Discourse also reflects Europeanisation in their bilateral development policies, with OECD, EU, and UN terminology (e.g. SDGs, human rights, rule of law) embedded. Those are, however, often adapted to reflect domestic framing priorities, suggesting selective Europeanisation, and sometimes even resistance to OECD DAC discourse promoted by traditional donors.[2]

4.2 Institutional dimension

This dimension reflects the structure, autonomy, and coordination of the institutional architecture of bilateral development policies. All three countries reveal varying capacities and autonomy of their development agencies from the MFAs. The division of labour is often considered not transparent or streamlined enough to allow for easy understanding and navigation by external actors. All three countries experienced changes in their institutional frameworks after joining OECD DAC to streamline and stabilise their activities. However, functional modifications are still needed in these institutional structures. The Czech policy is the most institutionalised of the three, with a degree of strategic autonomy comparable to Slovakia, though both operate with limited staff. In contrast, Polish policy, despite being fully embedded within the MFA and lacking a separate agency, has significantly expanded its resources and operational capacity over the past decade. Despite earlier struggles to formally align with EU standards, all three countries demonstrate multiannual programming, sectoral, and thematic coherence. However, major criticisms include persistently tied aid as national actors remain the primary implementers of activities, and little space is left for recipient countries to articulate their needs and influence policies. Moreover, within the EU Development Policy, national agencies remain implementers, rather than agenda-setters.

4.3 Behavioural dimension

Considering aid allocation and geographic priorities of all three CEE countries, this part focuses on aid provision patterns to assess the behavioural dimension of their *donor identity.* Regarding volume, aid remains relatively modest (on the EU's lowest end of % of GNI). While previous assumptions referred to limited budgets and capacities as reasons for the countries not being able to meet the EU-set target of 0.7% of GNI, recent geopolitical events in the EU's Eastern Neighbourhood suggest that when recipient countries' needs align with these donors' priorities, they can scale the provision of aid quickly and effectively. Long-term geographical patterns of aid provision show clear regional and thematic preferences for all three countries. Western Balkans and Eastern Europe dominate their bilateral development policies, reflecting geographic proximity, historical ties, strategic interests, and a perceived niche of their added value in the region, despite the OECD DAC recommendations to direct aid provision to the LDCs. The thematic focus revolves around supporting democracy, public administration reforms, and technical assistance, mirroring this self-perceived niche. At the same time, the general EU goal of promoting human rights to eradicate poverty remains stated reluctantly in official strategic documents. While the Czech Republic has expanded to selected African countries (based on the overall government's political priorities) and has increasingly engaged in multilateral projects, Poland and Slovakia remain more regionally concentrated.

[2] Similar resistance of CEE countries to dominant EU narratives can also be observed in other policy areas, such as migration, although much more politicised (Csanyi and Kucharčík 2023).

4.4 External dimension

The final dimension focuses on perceptions and positioning within the EU, OECD, and beyond. While trying to overcome obstacles such as inflexible operational structures or tied aid, they are often excluded from major policy-shaping decision-making, with their influence limited by smaller aid budgets, non-alignment with EU commitments and discourse, and shorter donor histories. This results in limited visibility, smaller-scale interventions, and countries' perceptions of the lack of competitiveness in the EU Development Policy. The aid of all three countries remains marginal within OECD DAC. Although increasingly active in peer reviews and knowledge-sharing platforms, their bilateral development policies are often viewed as small-scale and overly bureaucratic to access.

5 DISCUSSING THE ASPECTS OF *DONOR IDENTITY*

Overall, the findings suggest that CEE donors construct a distinct *donor identity* within the EU and OECD DAC frameworks – neither fully aligned with 'traditional donor' norms nor radically divergent from them. Given their integration into these structures and membership obligations, radically alternative positions were never expected. Their emphasis on partnership, solidarity, and democratic transformation, rooted in shared historical experience, and a strong regional focus, are the key features that set them apart.

Institutionally and behaviourally formally aligned with the EU and OECD DAC, they were able to find loopholes or ways to ignore or adapt these soft laws to pursue their own political and strategic interests. Externally not influential, they become increasingly recognised as reliable partners within the field of regional donors. While CEE countries have created space within EU development cooperation, their identity remains in a state of evolution. Although recently more dynamic, it is marked by agency and structural dependency on leading regional and sectoral actors.

Reflecting the existing frameworks on *donor identity*, while long considered donor-driven by their interests, it can be argued that they have become 'hybrid' (Smolaga and Zajaczkowski 2024). They are shaped by post-socialist legacies, structured through (or despite, in certain instances) Europeanisation, but constrained by limited resources, capacities and lack of flexible institutional arrangements accessible to external actors (including legal and institutional arrangements causing tied aid). The latter represents a resistance to change often mentioned in relation to national identity, once shaped by political consensus and institutionalised through socialisation, which presents Europeanisation and OECD DAC influence (Tulmets 2014; Lancaster 2006).

Regarding Kondoh's (2015) aid models, CEE countries do not fit into his categories; however, a degree of similarity can be observed with the 'superpower identity'. Although CEE countries most probably do not seek global influence or the setup of alternative norms in the international development aid landscape, they have been indirectly contesting the status quo.

An interesting connection can be made to Southern development actors as described by Mawdsley (2012), who also highlighted the problematic role of OECD DAC, a norm-maker created and shaped by 'traditional donors'. Similarities can be observed in donors' strategic positioning regarding the need for

reciprocity and in shaping their identity as donors, rather than just aid recipients. Although CEE countries cannot be considered Southern development actors, they share a level of reasoning for aid provision, mainly regarding transition and experience sharing. Furthermore, rejecting the solidarity narrative based on a legacy of shared colonial/postcolonial past leaves space for alternative partnership narrating (Mawdsley 2012; Alesina and Dollar 2000).

Contrary to Szent-Iványi's and Lightfoot's (2015) premise that *'nation states will adopt international norms and laws not because the costs of adoption outweigh the benefits, but because these rules become internalized and a conviction gradually develops that they represent the only proper way to act',* this article suggests that countries also desire to shape these policies as equal partners within a norm-setting landscape, even if they do not initially agree or align with them. Overall, it can be argued that the main obstacle to making a low-volume aid of CEE countries more effective is tied aid and putting their own strategic interests and benefits first (Bearce and Tirone 2010).

6 CONCLUSION

This article explores whether and how CEE countries construct a distinct *donor identity* within the EU development cooperation landscape. Drawing on existing research, although not always highly relevant to CEE countries, and adapting it into a four-dimensional framework, this article articulated a distinctive donor role represented by the Czech Republic, Poland and Slovakia. Grounded in democratic transition, regional partnerships and solidarity, and accenting non-colonial legitimacy, all three countries subtly contest existing OECD DAC and EU discourse. While formally aligned with their standards, all three countries frame their bilateral development policies through narratives and practices that reflect their unique historical trajectories and geopolitical positioning.

Rather than fully converging with traditional norms or challenging them outright, these CEE countries navigate a middle ground, asserting identity with constraints, carving out relevance in a crowded development field, and offering alternative legitimacy claims rooted in shared experience rather than past power. Their presence complicates assumptions about the EU's uniformity in development cooperation and reveals the nuanced ways the smaller Member States exert agency.

This article aims to introduce CEE countries' *donor identity* within academic research rather than putting them into a DAC donor 'box'. However, further research is necessary to explore the evolving positions and identities of CEE countries regarding development cooperation and to fill a gap in an underexplored field. Contributing to an evolving politics of development in a post-hegemonic world, this article aims to offer an insight into a reimagined development donor environment.

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OD PREJEMNIKOV DO DONATORJEV: SREDNJA EVROPA IN RAZVOJNA POMOČ EU

Sredi svetovnih političnih napetosti so se srednjeevropske države, nekoč prejemnice pomoči Evropske unije, pod nadzorom EU in OECD pojavile kot donatorice. Članek, ki se opira na kritične pristope k evropeizaciji in identiteti donatorjev, za analizo uporablja štiridimenzionalni okvir identitete donatorjev (diskurzivnega, institucionalnega, vedenjskega in zunanjega) ter analizira kako Češka, Slovaška in Poljska oblikujejo svoje vloge v razvojni politiki EU. Čeprav se omenjene države formalno usklajujejo z normami EU in DAC, se pogosto upirajo tradicionalnemu modelu donatorjev, saj se opirajo na svoje postsocialistične izkušnje, pomanjkanje

kolonialne dediščine ter poudarek na regionalni bližini in solidarnosti. Njihovo sodelovanje subtilno izziva prevladujoče razvojne narative, razkriva notranje napetosti in spregledane razlike med donatorji EU. Z opredelitvijo identitete donatorjev kot večdimenzionalnega in premalo raziskanega vidika razvojnih študij članek prispeva k raziskavam v Srednji in Vzhodni Evropi, evropeizaciji in razvijajoči se vlogi manjših držav EU v globalnem upravljanju razvoja.

Ključne besede: identiteta donatorja; razvojno sodelovanje EU; postsocialistični donatorji; pomoč EU; donatorji razvojnih programov Srednje in Vzhodne Evrope.

THE TWO FACES OF THE CAMPAIGN: POPULISM AS A COMMUNICATION STRATEGY OF ANDREJ BABIŠ IN THE CAMPAIGN FOR THE CZECH PRESIDENTIAL ELECTIONS 2023

Denisa CHARVÁTOVÁ and Petr JUST[1]

Populism has become one of the key phenomena of contemporary political communication across European democracies. Communication strategies play a significant role in the success of populist actors, and the crucial influence of social media on this process cannot be ignored. Social networks allow politicians to connect more directly with voters and provide a space for personalized and emotionally attuned communication. This article analyses the populist political communication of Andrej Babiš (ANO 2011) during the 2023 Czech presidential election campaign, with particular attention to differences between his outdoor billboard campaign and his online communication on Twitter (X). The study aims to identify which elements of populist rhetoric were employed in these environments and how they evolved between the first and second rounds of the election. The study uses quantitative content analysis, focusing on key aspects of populist communication such as defining oneself against elites, emphasizing the people as a homogeneous group, and mobilizing through emotional appeals. The findings reveal a distinct platform asymmetry: while the outdoor campaign relied heavily on emotionally charged and fear-based appeals—especially in the second round—Twitter communication was more restrained, serving primarily as a channel for personalization and reference to external content. The study highlights the role of media platforms in shaping populist communication strategies within the Czech political context.

Key words: Czechia; president; elections; campaign; political communication; social media; populism.

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1 INTRODUCTION

The 2023 presidential elections have stirred Czech society. One candidate in particular, Andrej Babiš, has brought populist rhetoric into the public space, built primarily on a discourse of fear of war and strong negation. All this was done with the help of a very sharp and emotionally charged campaign, especially before the second round of the presidential election. As much as it may have seemed that this could be a path to success (especially to discourage the participation of supporters of his opponent Petr Pavel and supporters of the candidates who did not advance from the first round to the second round of the election), it was not enough to win the presidency in the end. On the contrary, in retrospect, this style can be considered counterproductive. After the unsuccessful candidacy, a number of leading and long-standing marketers working for Babiš's communication team either left or were let go (incl. the main figure in Babiš's marketing, Marek Prchal[2], spokesman Vladimír Vořechovský or Tünde Bartha, former head of the Office of the Government during Babiš's tenure of the Prime Minister in 2017-2021 and his candidate for head of the Office of the President should he win), who were directly responsible for the split of society.

Nevertheless, the topic of the use of elements of populism in the communication of politicians and candidates for political offices remains highly relevant, as shown by examples of other elections, whether in the region of the Central and Eastern Europe (incl. the case of key Czech elections to the Chamber of Deputies held in October 2025), or in established Western democracies (Western Europe, the United States). The topic of populism and its various forms and shapes therefore have had and will continue to have a significant place in the future. It remains a relevant research topic not only in political science, but also in communication studies, sociology and / or psychology. In the Czech Republic, this is doubly true given the long-term dominance of the ANO 2011 movement led by Andrej Babiš on the Czech party-political scene.

This is why the Babiš's movement has been a frequent object of research in many social science fields, practically since its foundation. Initially, analyses focused on its categorization within the concept of business-firm parties and placed it in the broader context of the changes in the party-political environment in the Czech Republic from the turn of the first and second decade of the 21st century to the present (see Hloušek and Kopeček 2017; Hloušek, Kopeček and Vodová 2020; Charvát and Just 2016; Just and Charvát 2016; Šárovec 2018). Subsequently, research has already focused on more specific aspects of the movement's internal functioning and its programmatic (see Cirhan and Kopecký 2017; Hájek 2017; Hloušek and Kopeček 2019; Kopeček 2016; Kopeček, Hloušek, Chytilek and Svačinová 2018). A separate broad category of research has been the interconnection between the ANO 2011 movement on the one hand and populism, democratic backsliding and the emergence and strengthening of illiberal tendencies on the other (see Buštíková and Guasti 2019; Císař and Štětka 2017; Dostálová and Havlík 2024; Hanley and Vachudová 2018; Havlík and Kluknavská 2022; Husenicová 2020). More specifically, the question of political marketing and political communication of the movement, either in general or specifically in relation to particular issues or events, has long been a subject of interest, viewed, among other things, through the lens of populism as a

[2] Prchal was even expelled from the Art Directors Club of the Czech Republic, which brings together advertising professionals, because of his harsh election campaign.

communication strategy (see Filipec and Měšťánková 2024; Naxera 2018; Naxera 2022; Stulík and Naxera 2022).

The present study focuses on how Andrej Babiš's populist rhetoric changed between the first and second round of the 2023 presidential election, using the example of two basic ways of communicating with voters. One way is the more classical format of the offline outdoor campaign, i.e. reaching voters through billboards. The second is online campaigning using social media. In our case, this segment will be represented by a campaign on Twitter (now X).[3]

The analysis is based on the following research questions: What rhetorical strategies were used in the outdoor campaign and on the social media platform Twitter at different stages of the presidential campaign? How did Andrej Babiš's populist rhetoric change between the first and second round of the presidential election? Was there as dramatic a transformation in Twitter communication as in the outdoor election campaign? How did the emotionality and appeal to fear in Andrej Babiš's communication in the outdoor election campaign differ from his communication on Twitter?

In the first part, the text presents the theoretical background, defining populism primarily as a communication strategy and explaining its key elements, such as the people, the elites and the so-called "other" group. It then introduces the methodological framework of the research, the quantitative content analysis. The text describes the selection of data, the period analysed and the categories according to which the data were classified.

Then the text introduces the form, and the rhetoric of the outdoor election campaign, especially the different form and targeting before the first and the second round of the presidential election. It will then compare whether the communication strategy used on the social media network Twitter corresponded to this. At the same time, it will focus on the change in populist communication between the first and second round of the presidential election, and whether and, if so, how the nature of populist rhetoric changed.

2 THEORETICAL FRAMEWORK

Before analysing the content of Andrej Babiš's outdoor campaign and Twitter campaign from the perspective of the use of populist political communication, it is necessary to first define the term populism itself. Its current usage is quite broad (Canovan 1999) and it can be argued that it is a somewhat contested concept with plethora of different definitions, while it is also necessary to distinguish between how it is perceived by the public, and thus the media, and how it is treated in professional discourse. Journalists and the public often associate it mostly with pejorative terms used by politicians, journalists or citizens, who most often refer to either emotionally influenced cheap propaganda based on pseudo-arguments, the presentation of simple solutions to complex problems, opportunism based on the mood of society based on public opinion, or tendencies to compromise political opponents (Reinemann, Aalberg, Esser, Strömback and de Vreese 2017, 13).

[3] The text analyses events from the time when today's network X was still called Twitter (the analysis covers the period of January 2023, the renaming occurred in July 2023). Thus, throughout the text, the authors use the term Twitter and other terms derived from the social network's name valid at the time.

The search for a definition in professional discourse is equally difficult. There, too, are several concepts and approaches (Taggart 2004, 275). There is no such thing as a universally valid and acceptable definition of populism. Nevertheless, three prevailing perspectives on how to approach populism can be found. Populism can be understood either as an ideology (e.g., Canovan 2002; Mudde 2007), as a so-called *thin-ideology*[4] , which can be combined with other 'full-fledged' ideologies (Mudde 2004; Stanley 2008; Abts and Rummens 2007; Mudde and Rovira Kaltwasser 2018), or as a communication strategy (Aalberg and de Vreese 2017), resp. political style (Jagers and Walgrave 2007; Moffitt and Tormey 2014; Moffitt 2016), which is built on the contrast of 'us' (ordinary pure people) vs. 'them' (evil and corrupt political elites, not caring about ordinary people and being detached from everyday problems of ordinary people) (Bennett et al. 2020; Schmuck and Hameleers 2020; Bobba 2018; Reinemann, Aalberg, Esser, Strömback and de Vreese 2017; Tomšič 2022, 11–12; Unikaitė-Jakuntavičienė 2022, 100) or as a tool for mobilization (e.g. Jansen 2011).

It should be noted that the individual concepts can be mutually intertwined (Havlík and Pinková 2012, 126; Dvořáková, Buben and Němec 2012, 128). However, across these approaches, three key elements can be found that form the core of populism. These are the people (*peoplecentrism*), anti-elitism and the so-called 'others' or excluded, dangerous groups (Bennett et al. 2020; Bobba 2018; Reinemann, Aalberg, Esser, Strömback and de Vreese 2017; Charvát, Charvátová and Niklesová 2022). The basic assumption is always the unlimited sovereignty of the people.

The first pillar, without which populism would be essentially unthinkable, is the idea of the people (Mudde 2004, 544) as a homogeneous and pure group. The exaltation and glorification of the people are put in contrast to the evil and corrupt elites, i.e. the second pillar of populism, and to dangerous, excluded groups, i.e. the 'others'[5] as the third core element of populism. Therefore, the groups of the people, the elites and the 'others', or the interrelationship between these actors that shapes the identity of each of them (Bennett et al. 2020, 6), will be the object of research interest in terms of the approach as a communication strategy or political style that is presented to followers on Andrej Babiš's Twitter profile.

Populism as a communication strategy, or populist communication, builds on the basic populist definition of "good people vs. bad elites" and complements it with the characteristic in which "the actor is a spokesperson / part of the people" (Naxera 2022, 193). Empirical studies point out that populist communication, or communication of populist subjects, is characterized by several distinctive features compared to the communication of non-populist subjects. These include, for example, more frequent criticism of political opponents, as well as more frequent use of elements of negative campaigning, which fits into the general

[4] Thin ideology means that it is unable to stand alone as a practical political ideology as it lacks the ability to present a broad and coherent program for addressing key issues (Stanley 2008, 95).

[5] Through the lens of populist discourse, one can imagine a group of persons (those who do not belong to the people) who have no right to be part of the true (pure) people, or those persons who have no right to share the will of the people because they lack their virtues (Bennett et al. 2020, 39). This group is also perceived as homogeneous, and the stronger this perception of unity is, the more likely it is to receive a negative evaluation. It is characteristic of the 'others' in populist political communication that they threaten the values, identity and rights of the people. These include migrants, ethnic (or Roma) minorities, LGBT+ communities, welfare recipients. Thus, in the case of right-wing populist discourse, it is not only the evil elites who pose a threat to the values of the people and their rights, but also the dangerous 'others'. Thus, they are not only excluded but also discredited and blamed (Stanyer, Salgado and Strömbäck 2017).

framework of defining populism, which is primarily based on criticism of elites. In turn, this is also linked to the lesser space devoted in populist communication to the electoral programme itself (see e.g. Cassell 2023 for more details).

3 METHODOLOGY

The aim of this text is to compare Andrej Babiš's outdoor (billboard) campaign, which contributed significantly to the division of society in the pre-election period, and Andrej Babiš's communication on the social media network Twitter. Twitter was chosen for several reasons. Social media networks play an important role both in communicating directly with the public and in mobilizing voters and supporters. Moreover, they play significant role in the reflection of emotions in society (Nesiba 2025, 25). Social media networks, along with microblogging platforms, have thus become an integral part of political communication (Charvátová 2024, 57–58), primarily because of the possibility of closer connection and inexpensive communication with potential voters (Blassnig, Ernst, Engesser and Esser 2020; Esser, Stępińska and Hopmann 2017). Platforms such as Facebook and Twitter provide politicians with the space to disseminate their messages directly and carry the potential for successful self-promotion without the necessary dependence on traditional intermediaries (Bracciale and Martella 2017, 3; Ernst, Blassnig, Engesser, Büchel and Esser 2019, 5–11). This is precisely why populist political actors use new media as a useful and effective tool to bypass mainstream media (Esser, Stępińska and Hopmann 2017, 378; Mazzoleni and Bracciale 2018, 3) and to consolidate connections with their supporters by creating a user-generated sense of social presence. As many international studies show (cf. van Kessel and Castlein 2016; Gil de Zúñiga, Michalska and Römmele 2020; Jacobs and Spierings 2018), Twitter is an ideal platform for populist communication, also considering that it is characterized by its speed and potential for virality (Jacobs and Spierings 2018). At the time of the research, Twitter had approximately 1.4 million users in the Czech Republic, representing 13.3% of the population (Kemp 2023), yet many studies have turned their attention to the competing platform Facebook, which is more popular globally. Considering the polarization of society, which has emerged from communication in the public space, the aim was to see if it is visible to that extent on that platform. First and foremost, we will be interested in whether Babiš's communication can be described as populist.

The research period was divided into two parts of the so-called hot phases of the election campaign. The first part represented the period of two weeks before the first round of the presidential election, i.e. from 1 January 2023 at 0:00 a.m. to 14 January 2023 at 2:00 p.m., when the first round of the presidential election officially ended and, in a sense, anything published from 2:01 p.m. onwards by the advancing candidates should therefore already be understood as communication before the second round. Although the election campaign before the first round lasted more than two weeks, the analysis focused only on the two-week period for reasons of comparability with the period before the second round, which is limited just to two weeks. The second round therefore followed immediately and consisted of two weeks before the second round, i.e. from 2:01 p.m. on 14 January 2023 to 2:00 p.m. on 28 January 2023.

First, we were interested in the frequency of use of populist elements, i.e. people centrism, anti-elitism and references to the so-called 'others' group in Andrej Babiš's communication. As a methodology we chose a quantitative content analysis. The analysis of the outdoor campaign evaluated both the visuals bearing

the slogan "Proto Babiš" ("Therefore Babiš"), accompanied by several variations of slogans, and the two billboards that were posted in the public space before the second round of the presidential election. In addition, 169 posts from the social media network Twitter that appeared in the crucial period of two weeks before the first round and two weeks before the second round on Andrej Babiš's Twitter account (@AndrejBabis) were included in the research. In the two-week period before the first round, i.e. from 1 January 2023 at 0:00 a.m. to 14 January 2023 at 2:00 p.m., there were a total of 78 posts. In the two-week period before the second round, i.e. from 14 January 2023 at 2:01 p.m. to 28 January 2023 at 2:00 p.m., there were a total of 91 posts.[6]

We then created identifying categories for the posts that related to the originality of the posts. The frame of reference was whether they were original tweets by Andrej Babiš (or tweets that were authored by the @AndrejBabis account), retweets that were originally authored by someone else, or replies to other tweets. To make our research as specific as possible, we included only original posts published on Andrej Babiš's account. Retweets may or may not necessarily express the position of the account owner in question, whereas the original tweets are unquestionable. The category under consideration (i.e. the original authorship of Andrej Babiš's tweets) included a total of 28 posts before the first round of presidential election and a total of 40 posts before the second round. The second frame of reference was whether the posts were populist, i.e. whether the posts referred to any of the three pillars of populism mentioned above. The quantitative content analysis examined the frequency and distribution of populist elements (people-centrism, anti-elitism, and references to the so-called 'other' group) in both outdoor materials and Twitter communication. The outdoor data included the main billboard series “Proto Babiš” (“Therefore Babiš”) and its subsequent variants displayed before the first and the second round. The online dataset consisted of 169 posts from Andrej Babiš’s official Twitter account (@AndrejBabis), published during the two analysed phases: 78 posts before the first round and 91 posts before the second round.

Those that exhibited features of populism (i.e. references to the people, elites or to the so-called 'other' group) were subsequently subjected to qualitative content analysis, namely in order to determine how the populist narrative is presented to the followers in relation to each of the pillars of populism, or how the construct of the aforementioned us vs. them dichotomy is created at the latent level of communicated content and shared connotations. The media representation of binary oppositions within the controlled discourse was also analysed with regard to the fact, that the way in which information is conveyed and the rhetorical strategies employed in its presentation, fundamentally influence the formation of attitudes, the formation of knowledge structures and the co-creation of opinion orientations, while they can also determine patterns of behaviour in specific social contexts. The research will focus on the temporary fixation of expressions related to the mentioned populist pillars. Through a combination of both methodological approaches, the study will achieve the portrayal of specific aspects of populist rhetoric, language and discursive practices in presidential election campaigns.

At the same time, we were interested in whether and how communication has changed before the first and second round of presidential elections, both in the outdoor campaign and in communication on social media. We focused on whether the narratives presented were repeated, or what transformation occurred within the different pillars of populism. We also focused on the rhetorical strategies used in the communication at each stage and whether the communication can be described as coherent and unified.

The larger number of contributions before the second round logically corresponds to the nature of a two-round election, where the first round is often considered a kind of *(pre-)selection*, while the second round represents the actual *election*. Moreover, in the first round each candidate faces a larger number of opponents from different parts of the political spectrum, which to some extent makes it more difficult to target the campaign more specifically, including its communication element. In the second round, where only two candidates advance, the targeting of the campaign is much more specific. Not only does the number of contributions correspond to the above, but there are also significant differences in the sentiment used in the communication.

4 ANALYSIS OF ANDREJ BABIŠ'S OUTDOOR CAMPAIGN BEFORE THE FIRST AND SECOND ROUND

Before we move on to an analysis of the content of Andrej Babiš's messages on his Twitter account, let's look at the concept of Babiš's campaign on billboards before the presidential election. At the launch of the campaign, Babiš said he would run a positive campaign[6] and before the first round, billboards and posters with the striking, short and easy-to-remember slogan *"Proto Babiš"* (*"therefore Babiš" / "that's why Babiš"*) filled the public space from his side (see Figures 1 and 2). This slogan was the unifying and central element of the campaign and was then supplemented by other expressions in individual modifications. The main slogan, which appeared alongside the slogan *"Proto Babiš"* (*"therefore Babiš" / "that's why Babiš"*), was the phrase *"helps the people"*. The phrase *"helps the people, that's why Babiš"* appeared, among other things, as the background poster at the press conference hall at the Andrej Babiš's campaign headquarters and appeared on the lectern as well. This phrase was also plastered on one side of the caravan that Babiš used in the contact campaign, and a banner with this phrase appeared as the cover photo on Babiš's Facebook and Twitter pages during the campaign. Other promotional materials from the *"Proto Babiš"* (*"therefore Babiš" / "that's why Babiš"*) series included the slogans (in alphabetical order) *"action"*, *"crisis manager"*, *"fighting for Czechia"*, *"I will help you"* and *"not afraid of the powerful"*.[7]

[6] The analysis for the second round included one post published after 2:00 p.m. on January 28, 2023, after the runoff election. It was a congratulatory message to the newly elected president, which Andrej Babiš published on the social media network Twitter at 3:30 p.m. Based on the sentiment analysis of the first round of the campaign in the virtual environment, only 37 % can be said to have a positive charge, and 58 % a negative one (Abdros 2023).

[7] This campaign also provoked a counteraction in the form of negations or parodies. Either directly in conjunction with the original slogan *"therefore Babiš" / "that's why Babiš"* (e.g. *"the president in conflict of interest, that's why Babiš"* on the website of Mikuláš Peksa, then a member of the European Parliament for the Czech Pirate Party, see Peksa 2022; or *"he denounced people, that's why Babiš"*, see Nezvaný host 2022) or in conjunction with the modified slogan *"that's why not Babiš"* (e.g. *"still needs presidential immunity, that's why not Babiš"* on the website of the non-profit organization Million Moments for Democracy; see Milion chvilek pro demokracii, [s.a.]).

FIGURE 1: "HELPS THE PEOPLE – THAT'S WHY BABIŠ"

Source: Andrej Babiš's Facebook page.

FIGURE 2: "ACTION – THAT'S WHY BABIŠ"

Source: Andrej Babiš's Facebook page.

If we look at the above slogans through the lens of the pillars of populism, then whether directly or indirectly identifiable are *people centrism* (*"helps the people"* or *"I will help you"*) and anti-elitism (*"not afraid of the powerful"*). With a simple and understandable slogan, Babiš has created the impression that the entire political reality is reducible to a simple dilemma and a choice between us (the ordinary people) and them (the elites or the powerful). The campaign thus created a contrast between the candidate who *"fights for Czechia"* and the existing establishment. This polarization reinforced the impression that the election of Babiš would bring about a fundamental change that would solve the problems of ordinary people. In combination with selected appeals, emotions were targeted, e.g. with the complementary slogan *"helps the people"*. Here, the emotions of the voters were directly addressed and an image of Babiš as a protector and at the same time a representative of the interests of ordinary people was created. This emotional rhetoric was thus more convincing than complex political arguments. Overall, the first stage can be clearly assessed as a typical strategy of populism – using simple and emotionally charged slogans, Babiš tried to reach out to the widest possible spectrum of voters, creating a clear dichotomy between the people and the elites (us vs. them).

While direct attacks on the opponents did not appear in the campaign materials before the first round, the situation before the second round was diametrically different from this point of view. This corresponds, among other things, to our thesis above about a more specific targeting of the campaign in a situation where only two candidates are advancing to the next stage and face each other. The second round thus greatly facilitates the use of emotional and negative elements of political communication directed against one opponent. Babiš really kicked off the campaign for the second round in a very aggressive style, immediately after the announcement of the results of the first round. Babiš's campaign before the

second round was primarily based on the theme of war, with reference to the conflict caused by Russian aggression in Ukraine. The campaign suggested to voters that his opponent, Petr Pavel (unlike Babiš), did not want to seek the peace. Babiš put himself in the position of a peacemaker and Pavel, on the contrary, in the position of one who would drag the Czech Republic into the war.

For the campaign, he used billboards bearing the slogan: *"I will not drag Czechia into war. I am a diplomat, not a soldier. President Babiš"* (see Figure 3). Under the pressure of circumstances and the wave of criticism coming not only from political opponents, Babiš later said that instead of the word "soldier", the word "general" should have been used.[8] The term "general" was one of identifying elements by the campaign of Babiš's opponent Petr Pavel, originally a soldier by profession, who had reached the highest general rank while in the army, and the term "general" became one of his campaign trademarks.

FIGURE 3: "I WILL NOT DRAG THE CZECHIA INTO WAR. I AM A DIPLOMAT, NOT A SOLDIER. PRESIDENT BABIŠ"

However, even the second version of the billboards did not bring calm. On the contrary. War rhetoric and the tendency to reinforce people's fear of war also appeared in the amended text: *"The General does not believe in peace. Vote for peace. Vote for Babiš"* (see Figure 4). Here Babiš used a distortion of Pavel's statement that permanent peace is an illusion, suggesting to voters that, unlike him, Pavel does not really want peace. However, the statement that "*lasting peace is an illusion,*" which his opponent Pavel uttered in the Czech Television debate on 8 January 2023 (gla and jko 2023), was taken out of context by Babiš precisely to emphasize the distinctiveness of Pavel's position, in contrast to his (Babiš's) frequently used "peacemaker" position.

[8] To a limited extent, criticism of Andrej Babiš's campaign also came from within ANO 2011, for example from the then-mayor of Ostrava, Tomáš Macura (Kubant 2023).

FIGURE 4: "THE GENERAL DOES NOT BELIEVE IN PEACE. VOTE FOR PEACE. VOTE FOR BABIŠ."

It can be clearly assessed that the second stage of the campaign brought fear as the main communication strategy in the outdoor space. The billboards worked with negative framing that clearly evoked potential danger and offered Babiš as a guarantor of safety. The appeal used fear of war as an effective way to mobilize voters. Reality was simplified in the communication to a binary opposition of diplomat vs. soldier, where the opposing candidate was presented as the one who would drag the Czech Republic into war. This was an indirect attack on Petr Pavel. Although his name was never mentioned directly, he was implicitly put in the role of a "soldier" who posed a danger. However, the moment the term "soldier" was replaced by "general" we can no longer speak of an indirect but a direct attack on Petr Pavel. Although he was not mentioned by name on the billboard, as we have said above, Pavel used the term "general" as his trademark in presidential campaign.

In the context of the war in Ukraine, Babiš was attempting to appeal to voters who feared the Czech Republic's involvement in the conflict, but also to older and undecided voters for whom the topic of security and stability might be more sensitive. The first billboard was widely criticized as misleading and manipulative, which paradoxically led to an increase in its reach and visibility. Although it may have been controversial, it consolidated support among supporters and voters of ANO 2011.

The choice of topics that are emotionally strong and widely resonating in society is to some extent a consequence of the adoption of the direct presidential elections, which by its very nature motivates or encourages candidates and their teams to use these elements. One of the members of Babiš's marketing team, Tünde Bartha, expressed in an interview with Deník N that their campaign does not provoke fear, but only responds to the voice of the people (Boubínová 2023). Babiš himself, however, admitted in a lengthy interview after the election that there was a mistake in this part of the campaign. According to him, from the very beginning the billboards should have had the term "general" and not "soldier" and that they should not have talked about "war" (this term was present in the first version of the billboard), but only about "peace" (this term was, however, included only in the second version of the billboard) (Pospíšilová 2023).

However, he shifted the responsibility to *"our marketer"* who according to Babiš *"completely mishandled the campaign"* (ibid.).

5 ANALYSIS OF THE ONLINE CAMPAIGN BEFORE THE FIRST ROUND OF ELECTIONS

Although strong themes appeared intensively on election posters, in Babiš's public and media statements, and at press conferences, they appeared much less on Andrej Babiš's Twitter account. However, this is a somewhat misleading conclusion, as many of the messages on Twitter were very neutral by themselves, but at the same time often referred to highly heated and emotional media appearances. A classic example, which will be discussed in the following part of this text, is Andrej Babiš's first appearance at the press conference after the results of the first round of the presidential election were clear on 14 January 2023, which was reflected on Twitter only in the form of an invitation to watch Babiš's statement and a link to the video channel where the statement in question was running. As such, from the point of view of this research, the Twitter post itself must be described as non-populist, even though the medium to which it refers was streaming a speech that had all the characteristics of populism.

If the campaign, which took place outdoors, turned out to be populist, then the conclusions reached by the analysis of the Twitter communication may seem surprising. Out of a total of 28 relevant posts before the first round of the presidential elections, only two could be directly identified as using elements of populist political communication. The rest were either neutral or could not be assessed as populist.

Both two populist contributions referred to a critique of the elite while simultaneously presenting a narrative of the people as the suffering us, or the people as victims. In both conceptions, the posts portrayed people as being betrayed by the elites abusing their position. Neither post made direct reference to a group of so-called 'others'. Both posts used mobilizing rhetoric and emotive language, which can clearly be seen as key features of populist rhetoric as seen in the outdoor campaign.

In his first such Twitter post, published on 3 January 2023, Andrej Babiš used and combined two elements that were typical of his campaign. Firstly, there was the emphasis on the topic of poverty, *"into which the government of [Prime Minister] Petr Fiala has plunged us"*, and secondly, the linking of his main opponent, Petr Pavel, with the Fiala government:

> *"Our country is suffering. We are getting poorer. We stop trusting each other. The government of Petr Fiala has plunged us into this economic and social crisis. And if they manage to install one of their candidates in the Castle [referring to Prague Castle, the seat of the President – authors' note], they will no longer have any scruples. An avalanche will break loose. And it will be bad"*.

Here we encounter a classic populist narrative, as populists tend to talk about the people as citizens or our country, and populist discourse thus creates a construct of the people, a kind of social identity that is supposed to unite citizens in order to feel a sense of belonging to a particular group (Reinemann, Aalberg, Esser, Strömback and de Vreese 2017, 19). The people are also identified here based on the antagonism of us vs. them, whereby elites are accused of caring only about

themselves and not about the will of the people, which they have pledged to protect (Mudde 2004). The direct accusation of elites is evident here in the personalized message concerning the Prime Minister Petr Fiala. Right-wing populism tends to gravitate towards criticism of the current government. Thus, there is a separation of the elites from the people, since through populist optics elites have no right to belong to the category of the people. Moreover, elites are accused of harming the people and are described as a threat and responsible for negative developments or situations (Ernst, Blassnig, Engesser, Büchel and Esser 2019, 3).

The polarizing language, which the message skilfully uses, also carries the conspiratorial undertone *"if they manage to install one of their candidates in the Castle, they will lose all scruples"*. Here, too, we encounter a catastrophic scenario that is clearly intended to reinforce the sense of urgency and fear of a possible future situation: *"An avalanche will break out. And it will be bad."* Strong emotions (*"we are suffering"*, *"we are getting poorer"*, *"it will be bad"*) are used for this purpose, combined with an appeal to fear and distrust towards the government and elites.

In the second Twitter post, which had a populist narrative, the main substantive topic was the economy, specifically taxes and social benefits. Alongside this, the topic of restricting freedom of speech was also present. All this was again framed by the steps that the current government was allegedly preparing in these areas.

> *"If it's true what I'm hearing that the government is going to want to raise taxes, cut welfare or restrict free speech after the presidential election, I would be the one to stand up to that."*

Here, it is worth mentioning in the first place the conditional construction of the message ("*if it is true*"), which allows the communicator to avoid factual responsibility for the following statement, since he does not say, in the context of the criticism of the elites, that the government is actually planning to do the things mentioned, but presents the audience with the possibility as a probable threat. Thus, once again, the communication shows a separation between the elites and the people, with the elites being accused once again of harming the people, or of preparing steps to harm the people (in this particular case, to worsen the socio-economic situation of the population by raising taxes and cutting social benefits, or even to hit one of the pillars of a democratic society by restricting freedom of speech).

We are operating in the dimension of negativity, where the stylistic tool of crisis rhetoric, exaggeration and declaration of scandal is used in the form of how Babiš tries to portray future developments (more Ernst, Blassnig, Engesser, Büchel and Esser 2019, 10). This is also connected with the timing of the above-mentioned condition, where the turning point is supposed to be the election of the president, after which the government *"will no longer have any scruples"*. At the same time, the Twitter post contains a list of negative impacts on citizens. In the end, Babiš puts himself in the role of a saviour, or one who will save the people from the domination of corrupt elites, i.e. a typical rhetorical figure of populists, using combative language ("*I would be the one to stand up to that*"), which may evoke conflict and the position of the communicator in the role of a leader of resistance. Thus, the message can be assessed as having a strong negative charge, which is disguised by the implication of threats, and there is an absence of positive words.

In the first analysed period, we also find several contributions, 11 in total, in which the message itself does not contain any populist discourse per se, but there

are, for example, references to interviews, recordings of discussions, speeches or statements that already have these elements. However, since our analysis focused only on the messages published on Twitter itself, the content of these posts was not included in the overall results of the analysis. However, as an example, we can show a post published on 5 January 2023. In it, Andrej Babiš refers to a statement he made to the Society for the Défense of the Freedom of Speech. This society approached candidates before the elections with questions about freedom of speech.

> "*My opinion on freedom of speech? Quite clear. Without freedom of speech, there is no democracy. There is not one right opinion and not one truth. Democracy means debate, controversy, criticism and the exchange of often conflicting views. That said, and gladly, @SOS_projevu."*

The actual tone of the Twitter post has no direct or indirect hints of populist rhetoric, it does not create a dichotomy – in this particular case – between the silenced society and the elites attempting to censor or fact-check the information. However, in his own statement to the Society for the Défense of Freedom of Speech, to which Babiš refers, he already makes such allusions. In a statement published by the Society for the Défense of the Freedom of Speech on its website on 4 January 2023, Babiš wrote, among other things: *"Anyone who wants to control and direct public discourse is not a democrat, even if they invoke democracy and its principles every day. (...) Society has always been able to manage itself naturally, we don't need a "ministry of truth" to do that. I find it scandalous that the Prime Minister Fiala said that people have the right to have their information fact checked. I am of the exact opposite opinion – I believe that people have the right not to have their information corrected, especially not by the state, the Ministry of the Interior or the state-subsidized media and NGOs to which this government has allocated 150 million to "fight disinformation". This is nothing more than an attempt to appropriate public discourse, just as it was under the previous regime*." (Sedláčková 2023).

However, a slight majority of the posts analysed before the first round of the presidential election (15 out of 28) did not carry any populist discourse at all, nor were they on the edge. Therefore, the Twitter communication before the first round of the election, unlike outdoor billboard communication, cannot be assessed as populist.

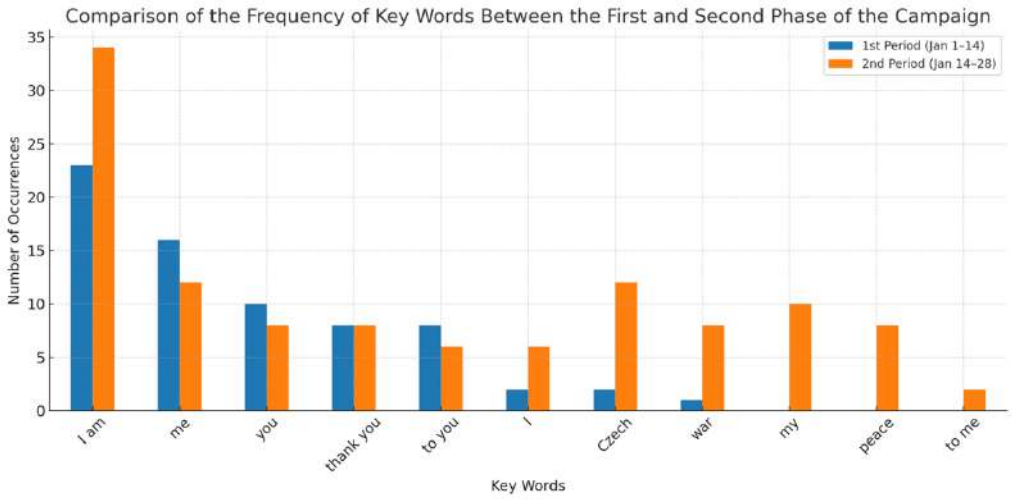
6 ANALYSIS OF THE ONLINE CAMPAIGN BEFORE THE SECOND ROUND OF ELECTIONS

Focusing on second round of presidential election, the total number of published Twitter posts included in the analysis rose to 40 (in the two-week period between the two rounds). The number and the share of Twitter posts that bear the characteristics of populist rhetoric has also increased. We identified a total of 11 such posts published by Babiš on Twitter before the second round (one appeared in duplicate, so there were originally 12 in total, but because it was a completely identical post, it is included only once in the subsequent analysis). Given the significant changes of the campaign in the outdoor space, we compared the most used keywords between the first and second round of the presidential election. The results confirmed a communication frequently using the first-person singular formulations (so-called "*ich* form"), with the pronouns "*I / me / my"* and the verb *"I am*" among the most used ones. The above clearly shows an

emphasis on personal narrative, from which we can infer a desire to put oneself at the lead of *"the people"* (characteristics of direct presidential elections). At the same time, the essentially consistent use of the pronouns *"you / your"* suggests a direct address to the electorate. However, the words *"peace"* and *"war"* are more typical for the second analysed stage, clearly confirming the rise of the conflict narrative and the issue of security in the second round of the election. National identity (*"Czech"*) appears more prominently in the second stage, which corresponds to the strategy of mobilizing national sentiment that was also evident on the billboards (see above).

The first Twitter post, characterized as populist, is from 15 January 2023, in which the ANO 2011 chairman operates with the now-frequented urban vs. rural cleavage in the context of different voting behaviour of these two territorially defined categories. In the Czech context, this is often narrowed to a dimension Prague vs. the rest of the country. Babiš, with a very general reference to unspecified posts by unspecified authors on social media, said that he was sorry that people living in villages and voting for him are being lashed out:

FIGURE 5: KEYWORDS USED IN BABIŠ'S TWITTER POSTS



Source: Andrej Babiš's Twitter account.

> *"I was saddened by the way those who on social media invoke the truth, love and democracy pick on the people living in villages for voting for me. They called them sheep and narrow-minded. They wrote that "Prague and love must triumph over the village and hatred"".*

The message shows a contrast between the common people (who live primarily in the countryside according to this interpretation) and the elites (who live primarily in the city according to this interpretation), and it is a classic populist narrative in the form of an unnamed group that belongs to the liberal elites (a group that espouses truth, love and democracy). The message also implies that these are morally superior elites who have contempt for rural voters (*"they pick on people living in villages ... they call them sheep and narrow-minded"*). Secondly, we have another of the classic populist narratives, namely the necessity of protecting someone, here specifically protecting the people living in the countryside. The very pointing out that *"Prague and love must triumph over the village and hatred*" reinforces the dichotomy, whereby the people living in the countryside (and the communicator's voters) are automatically associated with hatred. The phrase in question functions as a direct appeal to the emotions of rural voters who may feel unfairly attacked. Implicitly, the post implies that the

elites do not accept the democratic choice made by the people. This is clearly underscored by the mobilizing element of *"I was saddened"*, where at first glance this may appear to be a conciliatory statement, but in the context of the post the whole thing comes across more as a defensive narrative that reinforces the moral framework and positions Babiš as one who is standing up for the people who are being unfairly criticized.

The above is underscored by the second Twitter post classified as populist, which repeatedly makes a disparaging statement about the victory of *"Prague and love over the village and hatred,"* thus reinforcing a sense of injustice among the voters. However, in contrast to the previous post, where the people living in the countryside were more distinctly separated from the urban elites, there is an attempt to include both groups:

> *"1 952 213 of you voted for me. Thank you! I appreciate every single one of your votes, whether you live in cities or villages. I read on the social media that "Prague and love must triumph over the village and hatred." Excuse me?! Now, a few words about that*."

Here we encounter a direct address to voters and an expression of thanks, which clearly helps to strengthen the relationship between Babiš and his followers. At the same time, the declared number of voters reinforces this sense of legitimacy and points to the fact that Babiš represents a large share of the people. The rhetorical question (*"Excuse me?!"*) adds an emotional charge to the message and gives the impression of shocked disagreement with elitist statements. The conclusion of the post then gives the impression that the author is going to defend his voters, which is very typical of populist rhetoric, and the promise to clarify the truth is a distinctive element of populist communication style.

In two other Twitter posts that have the characteristics of populism, Babiš defines himself in relation to his opponent in the second round of the presidential election, Petr Pavel. In the first of the posts, dated 16 January 2023, he uses one of the frequent campaign narratives, namely linking Pavel to his earlier statement, made on 8 January 2023 in a candidate debate on Czech Television, that "*lasting peace is an illusion*" (gla and jko 2023). This is the only Twitter post that was in the identical spirit as the outdoor campaign. However, while the billboards never specifically named the opponent, the Twitter post did. As we have already mentioned above, Babiš used this element of the *"me vs. General Pavel"* polarization and attack on the opponent frequently in the campaign, especially in contrast to his (Babiš's) *"peacemaker"* stance. He even mentioned it in a Twitter post, where he directly frames the opponent negatively, although without any specific arguments:

> *"There are many reasons why not to vote for General Pavel. Unlike him, I seek peace, and I don't think lasting peace is an illusion*."

As is clear from the published post, this is more of an emotional appeal than a rational argument. Peace is constructed in the post as a moral value. The statement attributes a positive value to Babiš (peacemaker), while the opponent is implicitly placed in the opposite role (warrior). We encounter here a double opposition, both a personal contrast (me vs. Pavel) and a value contrast (peace vs. war). As in the populist post mentioned above, Babiš uses a direct appeal to the voters and a simple message. The use of the personal form *"I seek"* creates the impression of a personal commitment to the people

He explicitly targeted his opponent Petr Pavel for the second time on 27 January 2023, the first day of the second round of the presidential election, tweeting, "*Mr. Pavel is once again underestimates our nation and makes it incapacitated*." And although this is again a criticism of the opposing candidate (whom Babiš connected with the ruling coalition, i.e. with the elites), the dominant discourse in this case appears to be that of *people centrism*. There is a direct dichotomy of "us vs. Pavel", where the people are explicitly defined in the post as *"our nation"* and portrayed as a victim of the elites, with the fact that the virtue and usefulness of the people is being defiled by Pavel.[9] Consequently, Pavel is portrayed as one who despises and oppresses the nation, while at the same time being positioned as an elite disconnected from the common people. The communication suggests that Pavel does not recognize the people's abilities and that this is a repetitive pattern of behaviour towards the nation (*"once again"*). Babiš puts forward arguments that aim to separate Pavel, as a representative of the elites, from the people, because he is not the one who speaks on behalf of the people and for the benefit of the people. On the contrary, Babiš mobilizes the voters by putting them in the position of those who must protect their dignity from the elites. This is an indirect call to action in defence of national honour, hence a characteristic feature of populist rhetoric.

As he did before the first round of presidential election (see above), Andrej Babiš campaigned strongly against the government of Petr Fiala. Again, one of the frequent anti-establishment elements he used to argue for his election as president was the fact that the governing coalition controlled both chambers of parliament at the time, and that therefore a president from the other political camp would be a healthy balance of political forces in the country. He linked his opponent to the ruling coalition and indirectly he did the same towards the Chief Justice of the Constitutional Court, the person who heads the third pillar of the Czech political and constitutional system, the judiciary:

> *"The five-party-coalition controls the entire country, they have the Chamber of Deputies, the Senate, and the Chief Justice of the Constitutional Court is rooting for them. And if they have a President in the Castle, 46 percent of the voters will not be represented*."

For the second time in the campaign ahead of the second round, he mentioned the government on Twitter in a post published on 19 January 2023 in the context of its stance on Russian aggression in Ukraine. He also recalled his plan to hold a peace summit at Prague Castle if elected president:

> *"I can see my billboards have caught your attention. Are you wondering how I came up with the peace summit? Simple. Come take a look. Prime Minister Fiala was the first to say we're at war, you certainly remember that*."

In this case, Babiš used personal framing (the personal tone of *"I can see"*) to create an informal and direct dialogue with followers. At the same time, he uses the emphasis on *"my billboards"* as a powerful symbol and reinforcement of the impression that this vision resonates among people and emphasizes his own leadership. In doing so, this is the second line that can be traced in the research to the reference to the campaign taking place in the outdoor space. This is, however, the final link of the communication and rhetorical strategy of

[9] In populist discourse, the people are generally described as not being a threat / burden, not being responsible for negative developments / situations, nor committing mistakes or crimes (Ernst, Blassnig, Engesser, Büchel and Esser 2019, 3).

peacemakers vs. warmongers with the outdoor campaign, and the remaining Twitter posts that could be described as populist no longer worked with this narrative. The post in question works with the construct of contrasting Babiš as a peace advocate, when peace is not only a general value but also a personal initiative of the presidential candidate, and Fiala as the one who supposedly legitimized the war. By using the phrase *"you certainly remember that"*, Babiš suggests to followers that Fiala made a problematic statement, which is intended to reinforce the impression that he is on the *"wrong side" of* the conflict. By directly contrasting this with Fiala's statement, he creates a simplified view: either peace (Babiš) or war (Fiala), and indirectly, suggestively, he also criticizes the opposing candidate, Pavel, which allows for a broad interpretation.

The role of the media in the pre-election campaign was a frequent topic of public discussion before the presidential elections (and even afterwards). Criticism and discrediting of the media, especially of certain media streams, is a frequent feature of the populist narrative.[10] Through a populist lens, the media are accused of belonging to elites and not infrequently are even labelled as servants of the political *establishment* (Esser, Stępińska and Hopmann 2017; Bartlett, Birdwell and Littler 2011; Schmuck and Hameleers 2017, 2020) or as enemies of the people (Norris and Inglehart 2019).

Andrej Babiš has long been known for his harsh criticism of the media, which publish critical articles or broadcast critical reports about him (see e.g. ČTK 2020). He has also complained several times about the role of the media in the election campaign. According to him, the media allegedly favoured his opponent and therefore did not act impartially. In an interview with idnes.cz, he said that *"if Putin were running for president of the republic against Babiš, the media would prefer even Putin over me"* (Pospíšilová 2023). At the same time, however, several periodicals belonging to Babiš-owned Agrofert's portfolio advertised Babiš outside the standard advertising space (Berger 2023).

Babiš also reflected the media's alleged hostility towards him during the presidential campaign in some of his Twitter posts. In several posts he expressed his gratitude if someone in the public space took the same or a similar attitude to the role of the media (either the media in general or a specific media outlet) as Babiš had. This category includes a post from 21 January 2023 thanking the editor and commentator of the daily news server Echo 24, Lenka Zlámalová, who in a television appearance was critical of the role of the media in the election campaign:

> *"Thank you, Mrs. Zlámalová, someone finally said it. You're the only one with guts. And you're not hypocritical*."

Zlámalová expressed the media's disfavour as one of the factors that allegedly influenced Babiš's result in the presidential election in her post-election analysis published in the daily Echo 24 (Zlámalová 2023).

Babiš has long been critical of Czech Television (public service broadcaster), which he presented also in his campaign before the second round of the elections. He initially refused to participate in the election duel on Czech Television before the second round, a position he declared on his Twitter account on 17 January 2023: *"Just so you know, I have decided NOT to attend the election debate on Czech Television. I will look forward to seeing you in the duels on Prima, Nova, Blesk and*

[10] In general, populist actors tend to deny communication to journalists of some traditional media or prefer to use live inputs.

Deník." However, on the day of the duel, 22 January 2023, just eight minutes before the start of the live broadcast, he suddenly arrived at the National Museum building from where the duel was broadcasted by the Czech Television. Subsequently, he subjected the election duel to criticism, in particular the moderator Martin Řezníček became the target of Babiš's attacks.

Three days later, Babiš praised on Twitter what he called "*a very informed and detailed analysis of the performance of the Czech Television moderator*" by Petr Bohuš. This former employee of Czech Television publishes regularly comments critical of Czech Television on his website Modrý jelen / Blue Deer (Bohuš 2023). Many critics of the public media, including Babiš, rely on his assessment of Czech Television's performance.

> "*So this is a small miracle. A very informed and detailed analysis of the performance of the Czech Television moderator of the duel will be extremely surprising to those who thought it was fine. The media expert Mr. Petr Bohuš has broken it down to atoms*."

In a comment to this post, Babiš added: "*Those of you who watch Czech Television's public affairs programs should see this analysis first*", which is also one of the fundamental rhetorical populist strategies. When criticizing either the media or the elites, political actors rely on authorities that are in line with their anti-establishment views.

The atmosphere in the period between the first and second rounds of presidential elections was significantly exacerbated by several threatening anonymous letters that Andrej Babiš allegedly received. Naturally, this was reflected in Babiš's public appearances, including his communication on social media. In one Twitter post published on 24 January 2023, he responded to the atmosphere at one of his rallies in Brno, which was supposed to be *"wild"* and which was disrupted by, among other things, alleged *"rude slogans"*, but which he again linked to criticism of the public media:

> *"Vulgar slogans and disruption of our rally. Brno was wild, so watch this short video. Oh, and let me also say something about our independent Czech Television* 🙂 ".

Hours later that day, he tweeted that he had asked the police to grant him temporary protection considering the numerous threats against him. He listed the threats he and his family had faced in recent days:

> *"A live bullet in an envelope addressed to my wife, an anonymous letter threatening to kill me, and now a spent cartridge in the parking lot of the Sokol Hall in Průhonice. I called the police and asked for so-called temporary protection.*"

A Twitter post that appeared on 26 January 2023, the day before the second round of elections, was highly resonant. In it, Andrej Babiš urged his supporters to vote for him and to also bet on him, because "*in Fortuna the odds (betting on Andrej Babiš's victory – authors' note) are 12 (meaning 12:1 – authors' note),*" i.e., if they bet CZK 1,000, they will win CZK 12,000, which he concluded by saying "*Babiš always helps, it will be better under Babiš*":

> "*I was in Fortuna, the odds are 12. Bet CZK 1,000 and come to vote, you will win CZK 12,000* 🙃 *Babiš always helps, it will be better under Babiš* 😎 ."

It is a post that has provoked a range of reactions from the public about whether such behaviour is ethical. And this has come from both critics and internet trolls.[11] It is clear from the available data that the number of bets taken on candidate Babiš has indeed increased in Fortuna. However, it is speculative as to whether the challenge mentioned in the tweet had a direct influence on this. However, a spokesperson for the company said that he was really surprised by the tweet (Pospíchal 2023). The Fortuna Twitter account even responded directly to the post by saying "*Vote with your heart, bet smart!*". The announcement on Babiš's Twitter account saying "*I was in Fortuna"* also seems interesting, as it gives the reader the impression that Babiš was at the bookmaker to place a bet. Which would be more than problematic, as the legislation states that those who participate in a betting event may not bet on it. There have also been several criminal charges filed against Andrej Babiš for various reasons, including for promoting gambling.

Even before the second round of presidential elections, there were several posts published on Andrej Babiš's Twitter account that did not carry a populist narrative per se, but referred to strongly populist statements, interviews or speeches, just like before the first round (see earlier). Among them, one of the most notable was a very heated and emotional speech by Andrej Babiš after the end of the first round of the elections, when it was already clear that he and Petr Pavel would advance to the second round. The link to the streaming platform, where this speech was broadcasted, was published on Andrej Babiš's Twitter account. However, the actual content of the relevant media statement and parts of it were not published on the Twitter account. Twitter account served just as a promotion of the media statement and link to the streaming platform that broadcasted it. In total, we identified 10 such borderline posts, which usually only referred to statements or declarations with populist elements made elsewhere.

Of the 40 Twitter posts analysed, 18 could be evaluated as clearly non-populist, i.e. less than half of them, which is a lower proportion of the total number of posts than in the case of the first round (when 15 out of 28 were identified as clearly non-populist, i.e. a close majority). Thus, anti-establishment rhetoric became the dominant populist discourse in this stage of election campaign. And this is whether we are talking about criticism of the ruling elites or denouncing the presidential opponent for belonging to these ruling elites, as well as criticism of the media, here primarily the public service media, which can also be classified as elites in the populist narrative (more below). The second discourse we encounter is the pillar of the people, which Babiš targets in his communication. The element that we have missed in the pre-election communication is the attacks on the group of so-called 'others'.

[11] For example, a certain Mr. Bahenský wrote in the comments: "*Mr. Babiš. I took your advice, but you lost, so you didn't help me much. Now I will have nothing to eat and no money for rent. Please return my money to my account 2401931745/0800. Show me how Babiš always helps*" (Pospíchal and Vodseďálek 2023). After being contacted by journalists, the author of the comment said: "*My comment was pure irony, which I wanted to point out the real situation around Andrej Babiš. The fact that he has totally immorally challenged voters and people blinded by faith in him to bet a lot of money on him," he explained. He added that his ironic comment was picked up by the media, which cited him as an example of a person who had paid the price for Babiš's challenge*" (Pospíchal and Vodseďálek 2023).

7 CHANGE IN POPULIST RHETORIC BETWEEN THE FIRST AND SECOND ROUND OF PRESIDENTIAL ELECTIONS

As the results of the analysis showed, the outdoor campaign and Twitter communications were not uniform. The first round in the outdoor campaign built its communication on the unifying and simple slogan *"Proto Babiš"* (*"therefore Babiš" / "that's why Babiš"*), supplemented by other slogans (*"helps the people"*, *"fighting for Czechia"*, etc.) The emotional appeal was based on a sense of injustice and the need to protect the people, which is typical of a populist strategy. The communication appealed to social cohesion and the sense of sacrifice of the common man, highlighting the unjust treatment of the people by political elites. Ahead of the second round, the rhetoric of the outdoor campaign changed considerably, shifting sharply towards conflict and security / defence issues. Billboards began to use the themes of war and fear. Babiš presented himself as a peacemaker, while his opponent was implicitly positioned as someone who could lead the Czech Republic into the war. Slogans and supposedly logical phrases such as *"I will not drag Czechia into war. I am a diplomat, not a soldier. President Babiš."* (subsequently modified to the *"general"* variant) clearly show this shift. The campaign has thus shifted from socio-economic issues to emotionally charged and fear-inducing narratives.

An analysis of tweets before the first round showed that only a small number (2 out of 28) contained direct elements of populist rhetoric. In most cases, these were neutral messages or possibly references to populist speeches published elsewhere, but the tweets themselves could not be described as populist in such cases. While the number of populist posts increased in the second round (11 out of 40), the change was not as dramatic as in the case of outdoor campaign, where language and themes were significantly rethought.

This brings us to the answer to two of the research questions, namely how did Andrej Babiš's populist rhetoric change between the first and second round of the presidential election? Has there been as dramatic a transformation in Twitter communication as in the outdoor election campaign? While the outdoor campaign underwent a substantial change from socio-economic themes to a narrative of security and war, there was a softening or shift to more neutral messages on Twitter, and populist elements were less prominent there. Turning to the next research question, how did the emotionality and appeal to fear differ in Andrej Babiš's outdoor election campaign communications on one side and his Twitter communication on the other side, the clear result here is that the emotional charge and fear-inducing narrative was much more pronounced in the outdoor campaign with literally key elements, while on Twitter the overall rhetoric was much more restrained and the direct emotional charge was only marginally present.

The outdoor campaign brought, especially before the second round, strong slogans and visuals that directly evoked emotion and fear. The communication before the second round was highly emotional, confrontational and negatively framed, with fear of war becoming a key theme. Slogans evoked urgency and danger (e.g. *"The General does not believe in peace. Vote for peace. Vote for Babiš."*), thus trying to mobilize voters through the dichotomy (peace vs. war), i.e. a strongly emotional narrative, and catastrophic scenarios, through the fear of conflict and a dangerous future.

On Twitter, the emotions and appeals to fear were only sporadic. Many of the posts were neutral or merely referred to populist speeches published elsewhere. Direct and highly emotional messages appeared in only a few cases mentioned above in the text. Overall, the communication had a more moderate tone, with emotional charge and direct appeals to fear being much more limited. While some Twitter posts did link to press conferences or videos, where the emotional and fear-inducing narrative was evident, Twitter functioned as a distribution channel that merely promoted and disseminated such content, but without itself generating similar direct emotional appeals. When there were some posts on Twitter that explicitly used emotionally charged language (especially before the second round), their number and intensity was lower than that of the outdoor campaigns. This suggests that direct appeals to fear were deliberately subdued on this platform.

8 SUMMARY AND CONCLUSION

The analysis showed that despite the heated and emotional expressions in society in the run-up to the presidential elections, these were neither incited nor reflected largely by Andrej Babiš's communication on the social media network Twitter. This is perhaps also due to the form of the platform, which, despite the dynamic changes in recent months, still retains a predominantly commentator-news form, and political communication is often conducted in that way. There are more frequent interactions between political actors, using the possibility of retweets of individual contributions by fellow party members, or more or less direct communication with journalists (Křovák and Charvát 2022, 24–25). Outdoor campaigns have been designed to immediately reach the widest possible audience with short, emotional slogans that have maximum effect in creating fear and a sense of threat. The strong emotional appeal was intended to mobilize voters and highlight the danger of electing the opposing candidate. The outdoor campaign also targeted voters with limited access to information technologies and social media, mainly older voters, who represent the core of Andrej Babiš's electorate. The above-mentioned facts therefore encouraged for the more frequent use of populist forms of communication in the outdoor (offline) space.

In contrast, Twitter, with its nature of quick messages, often functioned as a mean of referring to other, more detailed speeches where the emotional appeal was more developed, hence the strategy here was more based on information transfer and as a complement to other communication.

In an analysis of Twitter communication aimed at answering the first research question of what rhetorical strategies were used in Twitter communication at different stages of the presidential campaign, several key communication approaches emerged that evolved depending on the stage of the election. In the first stage of the campaign, messages on this social media network often used a personalized narrative, reinforcing the image of the candidate as a representative of the people. This approach also included direct mobilizing outreach, which increased voters' sense of legitimacy and belonging. As already mentioned, several posts were designed to link to externally published media speeches with strong populist elements, allowing for the dissemination of polarizing discourse without the tweets themselves containing explicit populist rhetoric. The second phase of the campaign saw a significant intensification of these strategies and confrontational discourse. The principle of dichotomy was applied in the messages, where value contrasts were used to create a confrontational framework, often complemented by conditional formulations, which allowed

threats to be implied without direct statements, and by elements of irony or humour, which served to lighten the direct confrontation.

An interesting feature of the research presented here is certainly the fact that Babiš did not resort to attacking a group of so-called 'others' in his pre-election communication on Twitter. The dichotomy of us vs. them was built on the reinforcement of a specific aspect of people's identity and different variations of populist political communication associated with anti-elitism (Norris and Inglehart 2019). Anti-elitism consisted of conflicting populist communication strategies towards established elites or mass media, with Babiš discrediting or blaming elites and separating these elites from the 'pure' people. By focusing on the people (often as a nation), he demonstrated his closeness to the people, emphasizing their virtues and describing them as a monolithic group that he would lead out as a saviour from the clutches of the rotten elites. Finally, he denied the sovereignty of the elites in a negative and conflicting manner (Ernst, Engesser, Büchel, Blassnig and Esser 2017: 1349). The above discourses can be seen as the result of fixations of meanings arising from political struggles.

It should be noted, however, that many of Babiš's other public appearances during the presidential campaign (speeches at rallies and meetings with voters, statements to the media, answers in media interviews or in duels with the opposing candidate before the second round, etc.) had the characteristics of populist political communication. At the same time, Andrej Babiš referred to these public appearances on Twitter. The actual post containing the link was usually only in the sense of *"read / see what I said"* and was therefore not classified as populist in terms of the analysis of the content of the tweet itself. However, linked material that already contained elements of populist communication was not included in the analysis. The authors are aware that this fact represents a limitation of the analysis presented here and certainly poses a certain challenge for how to approach such analyses in the future.

Similarly, the comparison with communication on the social media network Facebook, which was also not the subject of the analysis, is interesting, but the nature of populist rhetoric is evident at first glance, whether in the form (or character) of individual posts or in the more personalized style of communication.

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DVA OBRAZA KAMPANJE: POPULIZEM KOT KOMUNIKACIJSKA STRATEGIJA ANDREJA BABIŠA V KAMPANJI ZA ČEŠKE PREDSEDNIŠKE VOLITVE 2023

Populizem je postal eden ključnih pojavov sodobne politične komunikacije v evropskih demokracijah. Komunikacijske strategije igrajo pomembno vlogo pri uspehu populističnih akterjev, ključnega vpliva družbenih medijev na ta proces pa ni mogoče prezreti. Družbena omrežja politikom omogočajo neposrednejšo povezavo z volivci in zagotavljajo prostor za personalizirano in čustveno prilagojeno komunikacijo. Članek analizira populistično politično komunikacijo Andreja Babiša (ANO 2011) med češko predsedniško kampanjo leta 2023, s posebnim poudarkom na razlikah med njegovo kampanjo na zunanjih oglasnih panojih in spletno komunikacijo na Twitterju (X). Cilj študije je ugotoviti, kateri elementi populistične retorike so bili uporabljeni v teh okoljih in kako so se razvijali med prvim in drugim krogom volitev. Študija uporablja kvantitativno analizo vsebine, s poudarkom na ključnih vidikih populistične komunikacije, kot so opredeljevanje sebe v odnosu do elit, poudarjanje ljudstva kot homogene skupine in mobilizacija s čustvenimi pozivi. Ugotovitve razkrivajo izrazito asimetrijo platform: medtem ko se je zunanja kampanja močno zanašala na čustveno nabite in na strahu temelječe pozive – zlasti v drugem krogu – je bila komunikacija na

Twitterju bolj zadržana in je služila predvsem kot kanal za personalizacijo in sklicevanje na zunanje vsebine. Študija poudarja vlogo medijskih platform pri oblikovanju populističnih komunikacijskih strategij v češkem političnem kontekstu.

Ključne besede: Češka; predsednik; volitve; kampanja; politično komuniciranje;

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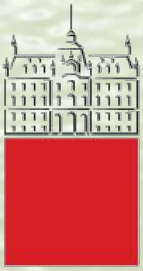

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