REGIONAL OVERVIEW

Sandra B. Hrvatin and Brankica Petković

JOURNALISM TAKEN FROM JOURNALISTS, MEDIA TAKEN FROM THE PUBLIC

There were newspapers founded, and indeed for about ten years, until the big crisis struck, they had been trying to print money, not texts. Money and not newspapers. ... The newspapers owners were more or less companions of the ruling politicians, the ruling elites. ... What should have been a public issue was taken away from the public and what should have been journalism was taken away from journalists, but no one did it alone, they them-selves [journalists] *had part in it, unfortunately. In my opinion, journalists and editors are most to blame. There was no defence of professional integrity there. There was over-willing-ness to serve owners and their interests, more willingness even than owners could expect, and more than any market factor could expect. In the meantime, the profession degenerated in terms of craft and ethics. After all, it is a profession in which human reputation is under scrutiny. ... In fact, media's most important capital is credibility and quality that is taken for granted. The entire system caved in. Advertisers fled. ... readers. ...*[1]

The above is a description of the current state of media and journalism in the words of the renowned Croatian journalist Predrag Lucić. The media (and journalism) are not "where they are" by accident, but as a result of years-long processes of "euthanasia and analgesia" (as Lucić put it) of the profession and system that should have served the pub-lic rather than particular interests. His assessment can by no means be said to describe the "local" situation only, or to be characteristic solely of the media and social systems analyzed in this book. It can be applied to any media system and any society in which for decades the media were exposed to owners' self-will, inefficient regulation, the absence of state's involvement in the protection of the public interest and the absence of efficient policies that could take the media back to where they belong – to public service. A decade ago, in 2004, our research "*Media ownership and its impacts on media independence and pluralism*" set the framework for the questions posed in the present study.[2]

The main findings of this research are still valid today. The only difference is that the prob-lems identified in 2004 have in the meantime become part of the system which itself has be-come sacrosanct and therefore impervious to change. Moreover, what at first glance appeared to be a "problem of post-socialist countries," has turned out to be a global media problem. In this respect, no differences between the East and the West exist any longer. What remains is the global world of media inequality, which consequently calls for global measures.

1   MEDIA REFORM SHOULD BE GLOBAL

In February 2014, journalists of the French *Libération* staged a warning strike to draw attention to the unacceptable moves planned by their media shareholders in an attempt to resolve financial difficulties. *"'We are a newspaper,' the giant headline, below, thundered. 'Not a restaurant, not social media, not a TV studio, not a bar, not a startup incubator.' … An editorial said the shareholders' latest plan … had no chance of success and would 'reduce Libération to a mere brand.'"*[3] The newspaper that was established to give voice to those "who have none" became a victim of media policy which treats journalism and journalistic content as a postscript to advertisements. The scandal involving the British newspaper *News of the World* made it clear that the western[4] media, too, began to challenge the sacrosanctity of existing ownership models and predominant modes of regulation. *"Corporate corruption of the media has shown itself to be a threat to free expression, as well as democracy. But it's only part of a wider corruption of public life, driven by privatisation above all"* wrote Seumas Milne in *The Guardian*.[5] The early cursory interpretations of the "scandal," describing it as a matter of "several bribed journalists and several problematic shareholders" were eventually placed in the right context.[6] Corrupt practices within the media and journalism are not structural but systemic in nature. Put differently, at a certain point in time the existing media systems, and above all the existing models of media funding and ownership structures, necessarily transform journalism from the "fourth estate" into the most lucrative supporting business of the advertising industry and the industry of political communication. *"The corporate media is a gigantic astroturfing operation: a fake grassroots crusade serving elite interests. … Journalism's primary purpose is to hold power to account. This purpose has been perfectly inverted"*[7] says George Monbiot and proposes the introduction of a journalistic version of Hippocratic Oath (a higher level of the nonfunctioning self-regulation), which would oblige journalists to work in the public interest. *"Our primary task is to hold power to account. We will prioritise those stories and issues which expose the interests of power. We will be wary of the relationships we form with the rich and powerful, and ensure that we don't become embedded in their society. We will not curry favour with politicians, businesses or other dominant groups by withholding scrutiny of their affairs, or twisting a story to suit their interests."*[8] If we ignore for a moment the fact that journalists should already work in the public interest (it is what sets apart journalism from other persuasion-oriented professions such as advertising and PR), the main problem that journalists should tackle is conflict of interest unacceptable in journalism, which in other spheres of public activity is readily labelled corruption.

Despite the existence of self-regulatory bodies, the most influential among them being the UK Press Complaint Commission on which were modelled self-regulatory bodies in Central and East Europe, it has become obvious that the media have unchecked power and that they abuse it without being accountable to anyone. At the time of debate on media's influence on politics and on the degree to which media is fused with (mediated) politics, perhaps the most tragic consequence of the breakdown of trust in institutions is precisely the fact that none of the mechanisms devised so far to establish efficient control over the media worked. Moreover, the very institutions established by the media industry to regulate its own power clearly demonstrate media's inability to serve the public interest[9] and develop on their own (not under external pressure from the state) respect for professional standards that are meant to safeguard the public interest. The idea of self-regulation remained "buried" under the jumble of corrupt and clientelistic relations between media and politics.

Therefore, we can safely argue that, at the moment, there does not exist an effective mechanism for the protection of citizens' right to receive quality and credible information, either on the national or on the supra-national (EU) level. The absence of efficient media regulation and reliance solely on the goodwill of the media to serve the public interest clearly demonstrates why the state cannot (and should not) relinquish its active role in the protection of fundamental rights. We should not forget that freedom of expression and media freedom are fundamental rights, so any attempt to leave the protection of these rights at the mercy of media industry's goodwill is a typical example of the privatisation of public interest (a shift from *res publica* to *res privata*) – it is something on which consensus within public politics never existed.

2   MEDIA THAT DO NOT SERVE THE PUBLIC INTEREST ARE CORRUPT

To be able to understand the detrimental effect of the current forms of relationship between politics/politicians and the media, we must tackle the issue of corruption. The fundamental thesis of this analysis is that media which do not serve the interests of the public are – corrupt. In saying so, we do not have in mind any specific media outlet or a specific journalistic practice but rather the media systems within which these media operate.

Speaking at an international forum on communications in the economy held in February 2010 in Brussels, Wolfgang Hetzer, the adviser to the Director General of the European Anti-Fraud Office (OLAF), stated that financial industry, the economy and politics became partly a domain of organized crime. He continued to point out that the

financial crisis is not a crisis but a result of predictable and unavoidable consequences of the systemic mistakes caused by the collapse of ethics, professional incompetence, negligence of politicians and criminality. The financial needs of political parties, politicians' wish to influence, and commercial companies' drive for profit merged in a destructive manner. In his opinion, the main problem of contemporary society is corruption, since it enables organized crime to attain its goals in an elegant manner without resorting to armed violence. It is true that money can corrupt people but it can also remove all obstacles. With this, says Hetzer, the vicious circle is created.

Antonio Maria Costa, formerly the Executive Director of the Vienna based UN Office on Drugs and Crime (UNDOC), similarly stated that globalisation transformed the world financial market into a casino, with disastrous consequences. Moreover, international organized crime networks infiltrated the economy and spread across the world. At the core of it all is corruption: the governments allowed the systems and their most important elements to run wild, and they also turned a blind eye when these systems collapsed and financiers and businessmen continued to amass wealth unhampered (Schneider 2011, 178–179).

Corruption is primarily *a strong indicator of a poor health of democracy, since it points to a political class that has become cynical, immoral, exempt from checks and set apart from the public* (Crouch 2013, 18). Proof that the media are corrupt will be sought on several levels. We will first show why media cannot serve the public interest, although this mission constitutes the framework of journalistic work. In the next step, we will show that it is the predominant source of media income (advertisements) that prevents the media industry from being "democraticized from the inside." In this context, we will dedicate special attention to the situation of journalists, prevailing journalistic practices and their (in)ability to critically reflect on their own conduct. Finally, we will draw attention to the problem of lost trust in governmental institutions (distrust as a consequence of society's higher expectations of democratic standards) and show that demands for a radical transparency of institutional operation should be accompanied with the mechanisms of pragmatist democracy, i.e. democracy oriented towards joint resolution of problems. In this process, the primary role of the media is to define and interpret meta-concepts that extend beyond the existing interpretations of social processes.[10]

We should also point out several other analytical frameworks. Although the analysis covers the countries that are within politics (and politically guided academic discourse) referred to as "countries in transition" or post-socialist and post-Communist countries, it is obvious that the problems discussed are characteristic of all countries regardless of their (past or present) ideological structure. What is important for the analysis, however, is to take into account particular sets of circumstances that influenced the shaping of media systems in these countries. The first to be considered is the requirement to bring the legal

framework in line with EU standards (predominant discourse of "moving closer to the EU" has been the main argument in adopting laws). Although most of these countries already had one or another kind of a legal system and although their media did not operate in a "legal vacuum," the change of the political system spurred a non-reflected adoption of certain legal standards that were simply transported from other countries without deliberation or a broader public debate. Apart from the lack of political will, this is the main reason why this legislation has not been implemented in practice.

One of the peculiarities of the media systems covered by this analysis is a result of donations. Donations enabled the development of parallel (artificially created) media systems which, in the long run, when the inflow of donors' money ground to a stop,[11] led to even more intransparent media privatisation and to media becoming the prisoners of political interests. It is necessary to add that the collapse of this part of the media sector that relied on external funding sources, and was therefore able to maintain certain professional standards for some time at least, had a negative impact on public trust as well. Its disintegration and subsequent plundering on the part of local owners (the second round of privatisation) led the public to lose its trust in the possibility of another kind of the media system. Finally, there is the issue of instrumentalized civil society. In fact, the largest portion of active civil society has become part of politics through the political changes mentioned above, while the vacated space has been filled with institutions whose primary goal was the satisfaction of the political and economic interests of financiers rather than of citizens. All this should also be placed in a wider context. In fact, the decision took by most of the countries – to equate democracy with the capitalist production system and to stigmatize the state in its role of the active protector of the public interest in the face of a supposedly neutral operation of the market – created a situation in which the issue of privatisation of collectively owned and state-owned property became an exclusively political issue rather than the economic one.[12] The result was corrupt privatisation leading to a replacement of state ownership with apparently private ownership of politically motivated clientelistic groups. The current ownership relations in the media sector vividly demonstrate how the revolving door between politics and media functions. To understand how corruption works, one should understand its fundamental principle, that is, the way in which corruption influences governance, or to be more precise, poor governance that destroys democracy. Democracy requires from those in power to rule to the benefit (not in the interest) of all. Democracy rests on freedom of expression, freedom of speech and media freedom. Corrupt media spell the death for democracy. They are a deeply undemocratic institution that transforms the state into a private company. Democracy, however, is neither a noun nor an adjective. It is a verb, denoting ongoing checks of how much those who happen to be in power at a given moment operate to the benefit of all (West 2005, 68). Accordingly, corruption has no national

prefix nor is it geographically locatable – it is a global problem. The crisis that engulfed the media industry and journalism is above all the crisis of the existing models of media operation. Therefore, we agree with Paul Starr who correctly draws attention to a direct connection between the decline of the newspaper industry and the rise of new forms of corruption:

News coverage is not all that newspapers have given us. They have lent the public a powerful means of leverage over the state, and this leverage is now at risk. If we take seriously the notion of newspapers as a fourth estate or a fourth branch of government, the end of the age of newspapers implies a change in our political system itself. Newspapers have helped to control corrupt tendencies in both government and business. If we are to avoid a new era of corruption, we are going to have to summon that power in other ways. Our new technologies do not retire our old responsibilities (Starr 2009).

Fight *against* corruption in the media, including the exposure of intransparent ownership relations and funding methods and a critique of the fall of journalism as a practice of public control over the operation of governmental institutions, is simultaneously a fight *for* democracy. The purpose of this analysis is not solely to identify negative practices in media operation but also to establish new forms of media operation in which the struggle for media integrity would be one of the key political demands. An efficient media policy is one that establishes a dialogue between the media (journalists) and the public and creates an environment for media operation that would enable the media to cast off the yoke of dependence on private centres of power and become dependent on the public. To attain this goal it is necessary to challenge the existing management, funding and ownership models in the media sector.

3   THE HIJACKING OF THE PUBLIC INTEREST

Since it is not our goal to address corruption as such or define it, for the purpose of this analysis we will try to challenge the two "myths"[13] on which the operation of the media industry rests. One involves the thesis that the media/journalists work in the public interest, and the other purports that media are not constrained by ownership relations and not dependent on advertising money. Before we proceed to explain why these notions are myths and what repercussions this mythology has for the imagery of the journalistic work, we should first determine the meaning of several concepts used in this text. Let us first look at the concept of corruption. We will focus on the consequences created by the "money at a wrong place," that is, the special economy of giving and receiving favours – "dependence corruption" to use Lawrence Lessig's term,[14] or the governance practices that lead to "horizontal accountability," as O'Donnell put it. For O'Donnell, horizontal accountability

is a manner of control and power balancing that "includes the executive, legislative, and judicial branches, but in contemporary polyarchies also extends to various oversight agencies, ombudsmen, accounting offices, fiscalías, and the like" (O'Donnell 1998, 119). When speaking about the conditions needed to increase accountability. O'Donnel mentions media in particular, because of the key role of information in modern societies. A problem with this otherwise useful analytical tool is that the author presupposes that media are independent and autonomous (horizontally accountable) and that they pursue the public interest. However, we want to demonstrate that the media are much more intertwined with politics and the economy than with civil society, that they are not capable of a critical self-reflection or of challenging institutionalized conventions that govern the selection and processing of news, and that the concepts of responsibility and accountability (to the public, by the public and in the public interest) have become the main "battlefield" of the public in its attempts to establish control over the media. If mechanisms of checks and balances are needed to ensure an efficient and responsible operation of the three branches of government, then similar mechanisms should be introduced to establish control over the fourth estate – the media. Media accountability and their concern for wider social problems cannot be regulated by way of professional standards adopted by the media industry (on its own or with the help of the carefully chosen representatives of the public interest). On the contrary, it should be a result of wider negotiations and consensus within society. As we will show later in the text, the issue of responsibility is of key importance for understanding media operation. In *The Communitarian Persuasion*, Selznick says that "*accountability imposes an external standard. Responsibility internalizes standards by building them into the self-conceptions, motivations, and habits of individuals and into organization's premises and routines.*" (Selznick 2002, 100). Responsibility is different from accountability. An individual sense of responsibility implies personal commitment, while accountability to (someone) involves solely respect for external mechanisms of control (the government, the public, law). Naturally, responsibility and accountability are intertwined. Present day politics wrongly attempts to strengthen the sense of responsibility by strengthening the external standards of control. "*The real problem of our public life is the failure of responsibility, not accountability.*" (Ansell 2011, 134). The result is a complex issue of diminishing administrative and democratic self-responsibility, which is manifested as a growing distrust of practically all political institutions. The public and various interest groups place various demands on state institutions (including contradicting ones), requiring (legal) responsibility but devoid of self-responsibility for their success or failure. One of the key problems, as Ansell argues, is the inability and unwillingness of both political institutions and citizens to accept "ownership of the problem" and develop a sense of

responsibility for its resolution (ibid, 136–137). In the case of media, unwillingness to "own the problem" is not a consequence of the shortage of repressive and autonomous forms of legal protection but of the absence of self-responsibility and accountability. The media indeed give an ear to the public now and then, but they are not ready to respond to or understand various interpretations. This unwillingness to "own the problem" renders media incapable of reflecting on how media ownership affects their ability to internalize mechanisms of self-responsibility.

In this sense, what is important for our analysis is to perceive democracy as a method of governance and a representative democracy as a republic – *res publica* – or a way of managing public affairs. The binding fabric of this method of governance is a public interest which does not imply only a distinction between the private, or particular interest, and the public good, but also includes its "material" aspect. The basic function of a republic is to recognize this difference and to take it into account in the process of governance. The meaning (or content) of the public interest cannot be determined in advance. Rather, its content becomes defined through a public debate in which particular interests of all participants become confronted. The public interest does not imply a consensus within society on a specific (public) issue, but it is rather a guideline that determines a particular method of governance. In this sense, the public interest is *public benefit*, enjoyed by the public as a whole regardless of what the interests of individuals are at any given moment. If good governance takes into account this distinction, then a similar dimension should also be the driving principle for civil actions. Citizenship should primarily be understood as a public service employment. A citizen who thus performs a public service is obliged to pursue public benefit rather than solely his/her private interests. Zephyr Teachout says: "*Citizens can be corrupted and use their public offices for private gain, instead of public good. They are fundamentally responsible for the integrity of their government.*" (Teachout 2009, 359–360). O'Donnell holds a similar opinion. A premise that political authority emanates from every individual member of the *demos* is an important factor in the strengthening of horizontal accountability. Democracy, says O'Donnell, requires from those who manage public affairs to work in the name of good for all. If power emanates from the people (members of the public), then people are obliged to take part in the adoption of collective decisions and ensure that content of these decisions and decision-making procedures are public (O'Donnell 1998, 121). If we now juxtapose the notions of political transparency and dependence corruption, it becomes obvious that good governance (on which republic is based) means dependence on *demos* and only *demos*.

It should be added that taken-for-granted positive connotations of the public interest also need to be questioned, and even more so the meaning of the public interest that

should be the fundamental guiding principle of (media) journalists' work. If the pursuit of public interest is primarily aimed at taming passions, an important question to be asked is which passions are tamed and which profits/benefits are gained.

To move beyond a description, however meticulous, of what happens in a television studio, in order to try and grasp the explanatory mechanisms of journalistic practice, says Pierre Bourdieu in *On Television,* it is necessary to introduce the idea of the journalistic field. "*Journalism is a microcosm with its own laws, defined both by its position in the world at large and by the attractions and repulsions to which it is subject from other such microcosms. To say that it is independent or autonomous, that it has its own laws, is to say that what happens in it cannot be understood by looking only at external factors.*" (Bourdieu 2001, 35). If we want to understand what happens in a media outlet, we must take into account all that happens inside the universe of objective relations among various media that compete on the market. Competition, on the other hand, is invisibly defined by power relations that cannot be pinpointed but can be assessed using the indicators such as the market share, the weight of a media outlet (the price of the advertising space), collective capital of reputed journalists and the like. The structure of the journalistic field is not obvious; what we (readers, viewers, listeners and journalists) perceive are its effects. If we want to understand what a journalist has said or written or understand the editorial policy adopted by a media outlet (i. e. self-evident fact) we should first know which position in a specific environment a media outlet occupies, that is to say, its specific power. The latter is measured using the criteria such as economic power, market share, and a symbolic weight (which is harder to determine in terms of quantity) (ibid, 38).

In this contribution, we would like to challenge the taken-for-granted idea that the media are independent from centres of power. Indeed, we will try to prove that owing to ownership structures and the prevailing funding method, media are in fact part of these centres of power. We further believe that in fighting corruption in the media, the main emphasis should be placed on the need to make media *dependent on the public.* This, however, should not be mixed with the notion of public service, which is repeatedly pointed out by the media in an equally taken-for-granted manner. If the traditional criteria for moral conduct are difficult to *meet*, the interests are difficult to *define*, says Hirschman (2002, 41).[15] It is precisely the source of one part of the problem. Although public interest is a fundamental guiding principle of journalistic work (or the fundamental criterion for moral conduct, one could say), its definition is far from being clear. In the traditional definition of public interest, the latter inevitably includes the interests of journalists and media owners, meaning that media's concern for the public interest is similar to the pharmaceutical industry's concern for people's health. Put differently, the public interest in this case coincides with the big companies' goal to boost profit.

It is obvious that such a blend of interests can by no means work to the equal benefit of all. One result of the economy of influence is that it re-directs the conduct of those who have power, taking them away from the principle of dependence on the people. A consequence of this process is that we are ruled by corruption (Lessig 2011, 89). In this case, corruption denotes abuse of power to satisfy private interests and abuse of the public sphere and public information to satisfy the interests of privileged fractions which, in turn, abuse their economic, political or media power. Lessig lists three harmful manners of governance: distraction, distortion (regulatory capture) and trust (ibid, 125).

To establish how media's attention is diverted,[16] one only has to look at the issues that dominate their public debate agendas – what they report and what they discuss. In *Winner-Take-All Politics*, Hacker and Pierson point out that governments are insensitive to public preferences and needs of those without power. They distinguish between two kinds of societies, Broadland and Richistan. In Broadland, all income groups across some period of time are doing better, even if not necessarily at the same pace. In Richistan, only the very rich do better across that same period of time. The rest of society is either just holding on or falling behind. Today, Broadland is dead and Richistan has prevailed (Hacker and Pierson 2010, 194).

However, the most important issue to address is not the growing inequality between the two but the circumstances that created the chasm and the manner in which this happened. In short, the problem is not (only) that some are getting rich (richer) while others are not, but that those who are getting richer amass their wealth with the help of the state and its regulatory measures. Therefore, when discussing corruption risks, one should pay attention to lobbying, or "legislative subsidies" granted to those that have formal or informal power to influence legislative decisions or to affect regulation of a specific area. In their study of the influence of lobbying on the legislative process, Hall and Deardoff want to prove that lobbyists concentrate on those politicians who already have a definite political (and legislative) viewpoint on a specific public issue. Their strategy is not to change the opinion of those they try to persuade, but to create a kind of "natural harmony" between selected politicians and lobbyists. Put differently, lobbyists influence those who already have clear-cut standpoints with a view to strengthening them and making them ready to act. To be able to identify corruption risks in the media field, it is necessary to monitor carefully how the media legislation is adopted and to establish which (potential) legal subsidies are available to individual media owners (Hall and Deardoff 2006). The examples analyzed in this book prove the correctness of this approach.

4   HOW SHOULD CORRUPTION IN THE MEDIA SPHERE BE ANALYZED?

There are practically no research studies trying to identify the presence of corrupt practices in the media.[17] The first step in shaping an adequate methodological framework could be to focus the analysis on the three main areas: media ownership, distribution of advertising money and state advertising, and privatisation of the public service. A special part of analysis should be dedicated to the identification of the "mother of all corruption cases" – politically guided privatisation to which only a small group of individuals had access. Privatisation of the media is one of the topics that only rarely received in-depth analysis by the media (because the media are entangled in the political sphere). A focus on journalistic reports that clearly demonstrate a negligence of the public interest is a trap to be wary of. In saying so, we want to emphasize again the above-mentioned Bourdieu's thesis that it is necessary to be watchful of the method in which the journalistic field functions rather than concentrate on the operating manners of the media. Edward H. Spence's (2008) excellent text *Corruption in the Media* demonstrates the most frequent forms of neglecting the proper conduct in reporting (although these practices could hardly be termed "news reporting"): fictional news, biased news, and news for sale ("*the enemy within*"), as well as fake news, staged news and cash for comment ("*sleeping with the enemy*"). What Spence's analysis does not offer, however, is answer to the question of how much such corrupt practices contradict professional standards of the journalistic profession and to what extent these practices are an unavoidable product of media operation (what we earlier named dependence corruption)?

In conclusion of this subjective overview of academic deliberations on this subject, let us mention the most symptomatic approach to analysis found in Hallin and Mancini's very influential book *Comparing Media Systems* (Hallin and Mancini 2004, 34–36). The authors argue that one of the main indicators of the level of democracy of a media system is professionalisation of journalism (whatever the meaning of this notion is). In short, professional values (or professional myths) constitute a defining feature that enables the categorisation of journalistic practices into "good" and "bad." While the journalistic community may be in favour of this explanation, it contributes practically nothing to the understanding of journalistic work in the process of producing public (political) knowledge. Hallin and Mancini start from the assumption that professional (objective) journalism is possible if journalists adhere to specific (shared) values. The problem is that such shared values are an alibi for particular media practices that unavoidably lead to non-professional journalism. One could say that

these are the values to which journalists aspire but cannot easily respect because of media's involvement in the economic sphere. As a result, the media world is replete with individual stories of mythical journalists who resisted the system, published a true story and paid with their life for what they did, then suffering victims and stars who publish books explaining the background of their stories, and journalists who dare and persist in their hope that journalism freed from the yoke of ownership relations is still possible.

A common trait of all these approaches is a deliberate sidestepping of the issue of the link between the economic system in which the media operate and the manner of reporting. At this point it is necessary to cut short those critics who brand references to political economy as an economy-based approach that cannot help in understanding why media reporting is as it is. This is the crux of the problem from which ensues our fundamental thesis – that analysis of the manner of news reporting (or of specific media practices) has no practical value, and that we should strive to identify mechanisms that produce specific media practices rather than some other. The only way to do this is to concentrate on the fundamental production relations. In doing so, there is no need to resort to conspiracy theories, evil owners, corrupt journalists and dumb publics. What suffices is the basic premise – that media are capitalist enterprises *par excellence* and as such their primary task is to perpetuate the capitalist system. Below are the foundations of what we named the holistic approach to the analysis of corruption in the media.

5   METHODOLOGY

In order to capture the whole set of qualities of the media sector crucial for its ability to serve the public interest and democracy, the research conducted within the project South East European Media Observatory introduces the notion of "media integrity".

Media integrity encompasses several qualities of the media system – policies, structures and practices in the media field, and their relations – which enable the media to serve the public interest and democratic processes, demonstrating in their operations and content:

- freedom and independence from particular/special private or governmental interests;
- transparency of own operations and interests including clear disclosure of exposure to or dependence upon particular private or governmental interests;
- commitment to and respect for ethical and professional standards, and
- responsibility and responsiveness to citizens.

Media integrity more specifically refers to media's ability to:

- provide accurate and reliable information to citizens without being dependent upon, having clientelistic relations with, or serving particular/special private or governmental sources, and
- ensure that citizens have access to and are able to express a wide range of views and opinions without being exposed to bias and propaganda.

Media integrity also implies journalists' and other media professionals' capacity to adhere to professional autonomy and standards, demonstrating commitment to serve the public interest in contrast to relations and practices which corrupt and instrumentalize the profession for particular/special private or governmental interests; this capacity includes transparency of dependence upon particular interests and sources and commitment of journalists to protect professional standards in such circumstances.

Media integrity relates to the notions of media freedom and independence, as well as to media pluralism, but within attempt to capture causes for and manifestations of dysfunctional democratic role of the media in South East Europe, it tends to develop additional analytical category focusing on *institutional corruption* in the media system, on manifestations of *economy of influence and conflicting dependence*[18] as well as on *political clientelism* in the media sector (Hallin and Papathanassopoulos 2002).

In order to grasp the scale of the issues covered by the concept of media integrity as a new analytical category, we applied a holistic approach in the methodology design. The purpose of such approach was to check how this concept works in various aspects of the media system, and how much it is useful in analysis and understanding why the media (systems) in the countries of South East Europe are as they are, and what influences their ability to serve public interest and democracy.

The holistic approach sought to explore the media systems in the region on various levels: on the level of media policy development and implementation, but also on the levels of media structures and institutions, and of journalists and their professional practices. Within that analytical framework, we put special focus on media ownership and finances. In the part of the research on media ownership patterns, a strong reference was made to the research on media ownership conducted in 2003/2004 within the same regional network of civil society organisations – South East European Network for Professionalisation of the Media, also under the leadership of the Peace Institute, Ljubljana.

The current research on media integrity focused on five countries of South East Europe – Albania, Bosnia and Herzegovina, Croatia, Macedonia and Serbia. It was conducted from July 2013 to February 2014, aiming to identify and elaborate sources and mechanisms that systematically corrupt the role and ability of the media to serve democracy.

Applying the holistic approach and adapting the risk-based analytical framework we identified four risk areas for media integrity – media policy development and implementation, media structures (including ownership, finances, and public service broadcasting), journalists and journalistic/media practices – and specific risks for each of them.[19] Different research methods and presentation formats were used to explore, elaborate and illustrate processes, policies, structures, practices, mechanisms, techniques and actors which constitute risks for media integrity in the selected countries of South East Europe. The research focused on current situation, but applied also diachronic/historical assessments where necessary.

The methodological framework of the media integrity research included also identification and elaboration of examples of policies, structures and practices in the media field in individual countries and on the regional level which are considered good examples in terms of media integrity.

The research was complemented by six investigative journalism projects conducted between September 2013 and January 2014 with the support of the South East European Media Observatory (through sub-granting) to examine corrupt practices in the media sector in Albania, Bosnia and Herzegovina, Croatia, Macedonia and Serbia.

Media integrity research was guided by the following general research questions:
- Whether and in which way media systems in the countries of SEE integrate risks of institutional corruption and political clientelism?
- How these risks influence the ability of media to serve public interest and fulfill their democratic role?
- Particularly, how these risks are manifested in four areas: media policy development and implementation, media structures and institutions (specifically media ownership, finances and public service broadcasting), journalists and journalistic/media practices?
- Which policies, structures and practices can be considered "agents of change" in terms of the protection of media integrity and advancement of democratic media reforms?

The examination of four media integrity risk areas was guided by specific research questions and by a detailed inventory of risks identified in each area.[20]

MEDIA INTEGRITY RISK AREA: POLICY DEVELOPMENT AND IMPLEMENTATION
- Why policy development and implementation do not result in efficient measures and operational media systems based on respect for media freedom, independence and pluralism? What are the forms of institutional corruption and conflicting dependence in this area, and which factors influence them?

- Which are the key patterns in establishing, governing, sustaining and controlling media structures such as media ownership, media finances and public service broadcasting, and how much these patterns are based on political clientelism, institutional corruption and conflicting dependence?

- How much and in which way are private and commercial media businesses dependent on and sustained by financial sources connected to the state on the basis of clientelistic relations between media structures and political groups in power, and how much and in which way are the state owned media controlled by and instrumentalized for private interests of particular business and political groups?

- What are the forms of institutional corruption and conflicting dependence in this area? How do they differ in public and in private media institutions?

MEDIA INTEGRITY RISK AREA: JOURNALISTS

- How much and in which way journalists and editors are made victims or constituents of structures and relations that obstruct the democratic role of media? Which conditions, capacities and status of journalists and editors within media structures and in the society contribute to their ability and decisions to take part in or to confront relations and practices which corrupt and instrumentalize the profession for particular business or political interests?

MEDIA INTEGRITY RISK AREA: JOURNALISTIC AND MEDIA PRACTICES

- Whether and in which way journalistic and media practices – dominant patterns in gathering, selection, reporting and framing the news on social phenomena and actors, and dominant formats of media content – reflect and support structures and relations based on the instrumentalisation of media for particular political and business interest, and diminish its democratic role?

The research applied mainly qualitative research methods and techniques, such as interviews and focus group discussions with relevant actors and stakeholders, case studies and desktop research of secondary sources. The synthesizing of data available in the existing reports and documents and their use in elaboration of the issues identified within the analytical framework for media integrity research have been commonly used.

The goal to identify patterns of establishing, governing and operations of the media structures, primarily patterns of ownership and financing, was in focus of our research, and in that context our guiding principle was to collect relevant data to the level that

makes us able to identify patterns, and check how they work in terms of the risks for media integrity we have identified.

Consequently, despite its holistic approach in terms of the scope and areas to be examined, the research of media integrity did not aim to provide representative data, but rather to identify patterns and trends, as well as conditions and circumstances allowing certain patterns.

6   RESEARCH FINDINGS

Our research in 2004 showed that ownership matters. Ten years later we have to conclude that integrity matters too! There are obstructing patterns appearing across media systems that prevent media from serving the public interest. These patterns constitute a system of corrupt relationships that has pervaded the media sphere infecting all of its sections, from media policy to journalism as a profession.

6.1   MEDIA POLICY

A comparative view reveals that the current media situation in the countries analyzed is not solely a result of lacking or non-existent media policy, or lacking legal framework within which the media operate. It is rather a consequence of the political and economic system which literally forces media to establish "incestuous relations" with various centres of power. In this context, it is necessary to devote attention to the manner in which political elites in these countries created circumstances that enable a particular type of control over the media system. The concept of transition is not of much help here, and moreover, it may even distort the analysis of the situation.

The problem lies in the fact that over the past two decades or so, since the fall of socialism, none of these countries has launched a comprehensive public debate on the systemic, normative and institutional changes that have been taking place under the banner of transition. What kind of media do we want? No consensus on this question has ever been sought or reached. Instead, the goal was to adopt and imitate one or another model of a media system, laws and institutions found in the countries generally perceived as democratic which provided assistance during the "transition" process. A conclusion that imposes itself on reviewing the analysis of media policies in the countries covered by this study is that transition is still in progress and that it will never end.

The process began in the 1990s and the motto was: *As little of the state as possible, as much of the market as possible.* Marked by the experience of restrictions on freedom of

speech and media freedom during the period when the state played the main role and held the levers of repression, the new governments apparently relinquished regulation but in reality retained all "invisible" levers of influence on the media. Public interest was simply exchanged for the special interest of political and economic elites.

Media legislation hence only legalized and legitimized the actual state of affairs that existed in reality. Therefore, it is not surprising that successive governments over the past two decades did not radically differ in terms of their attitude to the media. References to the "European standards," "examples of good practice," and "implementation of the EU AVMS Directive,"[21] but without a thought given to their implications for media development, led to a peculiar "pre-accession" copy-and-paste policy. However, the areas in which European standards required a principled approach by the state (e.g. the autonomy of the regulator and media pluralism) remained deficient. Regulatory institutions that emerged were only apparently autonomous but in reality very dependent, and instead of regulating the media they protected particular interests of powerful players on the media market (often with the help of significant political connections).

In Bosnia and Herzegovina, almost two decades after the end of the war, the situation is even worse. Not only that state institutions are not capable of governing, but the entire political and economic sphere is split along ethnic lines. The media legislation formulated with the assistance of the international community is in place, fully supporting media freedom, but its implementation depends on the whims of local political elites. The international community established an independent broadcasting regulatory body, CRA/RAK, thus setting the foundations for efficient regulation, but the local political elite, through continuous political pressure, blocked all possibilities for its efficient operation (Jusić and Ahmetašević 2013). Even the decriminalisation of libel, which was meant to protect journalists against the danger of the criminalisation of news reporting, did not produce a desired effect. In fact, politicians exploited this change and they now file civil lawsuits frequently demanding high damage payments from journalists and the media, endangering in this way primarily critical media. Although the idea of self-regulation has taken the deepest root in Bosnia and Herzegovina, in the environment where the laws are implemented in accordance with political interests its effect is restricted in scope. In Serbia, the processes described above were delayed, starting one decade later than in other countries in the region. Although Serbia now has a broad media coalition composed of all key actors in the media sphere (journalists' association and associations of various media organisations) which reached a consensus and adopted a media strategy (in 2011), most of the key requirements have not yet been met. Adoption of laws without a previous analysis of past mistakes and shortcomings, the absence of methodology for establishing (and measuring) media pluralism, the absence of a definition of the public interest, media market surveys

and fundamental information on the scope of media sector, can eventually lead to a legislation that is adequate in form but difficult to implement.

A comparison of fundamental laws regulating the media sector shows that a majority of analyzed countries have inbuilt mechanisms that should ensure free operation of the media. However, in practice certain provisions are not implemented or their implementation is lacking, responsibility is re-delegated from one institution to another (the result being that eventually no one performs control) and relevant institutions do not have information on the real state of affairs on the media market. This situation is mirrored in media content and eventually media are used as the main trump card in negotiations between media owners and politicians.

In shaping the normative framework and consequently the media system, there were conflicting interests of many players on the media market. The analysis of the role of international assistance in media reform in Bosnia and Herzegovina has shown that crucial factors that caused a stalemate in media reform were the absence of cooperation and coordination among many donor countries and organisations, and the opposition of the local elites to changes that threatened to restrict their control over the media (Jusić and Ametašević 2013). The three pillars of a successful media reform are an open and inclusive public debate, support of political elites that should accept ownership of the problem, and support of key media players – ranging from media owners to journalists and the public.

6.2   MEDIA OWNERSHIP

The absence of the market, a strong dependence on the financial flows involving the state, vague regulation on unlawful concentration, hidden ownership and intransparent trading in media shares led to a growing media's dependence on the state, or rather political parties and their agendas, in all the countries covered by this analysis. Instead of serving the public interest, strengthening democracy and democratic institutions, the media remained entrapped in the web of intransparent clientelistic relations. The large number of active media outlets by no means points to media pluralism but rather indicates an artificial maintenance of the levers of influence on political decisions. In certain cases, political links are obvious, but most of the time these can be only discerned based on editorial policies. The online media that were promoted as a mechanism for ensuring pluralism of voices on the media market, have proved to be the most intransparent in their operation; many among them operate under the patronage of business-political groups and are funded with the money of suspicious origin. How these links work has been shown through the investigative journalism project *MediaPedia* in Macedonia, which looked into the hidden ownership networks in which the Macedonian online news media are entrapped.[22]

In Croatia, the case known as Fimi Media affair and the sentence (still not final) given to the former Prime Minister Ivo Sanader, showed how dependence corruption works.[23] An important conclusion resulting from this process is that former PM would not have been able to build such a complex corrupt system to manage his political party and the state had he not been assisted by both the state and media owners who, in turn, were awarded through receiving money from the state budget or banks that were under Sanader's control (favourable loans for media purchases). A thorough analysis of the Croatian media space shows how the market has been increasingly concentrated despite a plethora of radio and television programs. In fact, an increasing number of outlets strive to connect into networks in an attempt to reduce costs, while online media can survive only if their owners have other lucrative businesses. Media owners have become so powerful that they are almost untouchable.

To understand the relation between the state authorities and media/media owners, the key question that needs to be answered is how those who exert influence on the media benefit from them. The answer derived from the case of Macedonia is quite unequivocal – media owners are the owners of public opinion. The most important in this respect is journalistic content, i.e. how and what media report and what they do not report. Ownership of radio and television stations in Macedonia is already transparent, and the new legislation passed towards the end of 2013 (and amended shortly after, in January 2014) requires from the owners of print media to disclose their media stakes. The web media outlets which, in the opinion of analysts, represent the last sanctuary of critical journalism are not subject to any regulation that addresses transparency of ownership or the constitutional right of reply and right of correction.

An overview of media owners in Macedonia showed that nothing has changed significantly in the past decade, including the ways the media are abused for political purposes. Local radio and television channels, mainly owned by individual businessmen-small owners, are the most powerful instrument for ensuring political support of the ruling party. Media owned by individual businessmen-big owners live in symbiosis with the ruling elite until the owner decides to be critical of the current politics. The ruling political elites tolerate only owners who are willing to support their politics unconditionally. This type of relationship precludes any possibility of critical journalism.

In Serbia, the transparency of media ownership is one of the key political issues. It is not known how many media are owned by the state. Owing to state funding, the media are less oriented towards market-based operation, while the state has many levers of influence to affect media content. Foreign owners, on the other hand, are exclusively driven by profit and they mainly publish tabloid media. A specific feature of the Serbian media environment is political tabloids which appear and disappear in accordance with the

dictates of hidden, business-political networks aided by criminal and intelligence providing circles. Tycoon-businessmen usually conceal their media shares by registering their companies off-shore or by establishing an incomprehensible network of companies registered in Cyprus, Austria or Russia. Such media are completely dependent on politically guided financial flows (advertisements for large state companies), and their mobilisation for political purposes becomes most conspicuous at the time of elections. In a typical local media ownership model, it is a small (local) entrepreneur who owns a local media outlet. Journalists are obliged to observe the business interests of their media owners because they depend on them for their livelihood. The owner of Pink Media Group, Željko Mitrović, built his television empire during the reign of Slobodan Milošević, and was able to retain and expand it after the change of government. Mitrović has always used his media outlets to promote his own business and private interests and interests of the political structures in power. In contrast to many other (former) media owners in the region, who strove to become actively involved in politics with the help of their media and eventually lost everything, Mitrović always put his media outlets at the "disposal" of ruling politicians, regardless of their political prefix. The media owned by journalists have been most affected by the financial crisis. Their survival in the environment in which the "market" operates in accordance with political and clientelistic principles is uncertain.

In Albania, all media except the public service broadcaster and the national news agency are privately owned. Very few media owners are willing to admit publicly that they have political links, but their entrance into politics has become a common occurrence. Owing to the specific features of this market, practically no media outlet can survive unless supported by a behind-the-scenes, more lucrative business of the owner. A commonly found pattern in media companies is the rotation of the same group of family, relatives or trusted persons through the positions of general administrators, board members or shareholders (e.g. national +2Radio and Top Channel TV). The conduct of media owners, their concealment of ownership links and various forms of media instrumentalisation have proved to be among the most important factors preventing media integrity.

6.3   MEDIA FINANCES

Media policies depend for their efficiency on the transparency of data (on ownership and funding sources) and the presence of adequate, independent institutions that provide credible informaton about the media market. In the countries analyzed here, both present a problem. In Albania, after 23 years of market liberalisation, there are still no reliable and accessible data on the state of affairs in the media sector. A situation in which something is known or assumed and in which the money travels from various businesses of media owners to their media outlets (parallel business) with the help of state advertising, creates

a media market whose operation is guided more by political and private interests than market principles. In Bosnia and Herzegovina, the war that broke out among audience measurement companies clearly shows that this data is frequently adjusted to the needs of the most powerful market players. In countries where this data is accessible, the regulatory body's measures have been missing. Obviously, in such circumstances it is pointless to talk about a media market.

The distribution of state advertising and various forms of state subsidies represents an area of very high corruption risk. Who receives this money and for what purposes? (Officially, state subsidies are earmarked for the support of media pluralism.) A large part of these funds is given to PR agencies, advertising, marketing and production agencies that are mainly owned by political party activists and persons connected with them. A consequence of politically motivated distribution of state funds to influence media operation is the (ab)use of media as a means of shaping public opinion, boosting political ratings (of political parties or individual politicians) or increasing individual wealth. The trends are unambiguous. Political parties and politicians, using funds from the state budget, maintain a web of politically affiliated and politically motivated agencies whose owners use a network of a small number of powerful people to establish control over the media sector. Owing to this hijacking of funds, most of the media are never critical of the state bodies' operation, except in cases when it suits the interests of certain political parties or a part of the political elite. Media as watchdogs over the operation of state institutions have become themselves subject to control. The awarding of funds to the media that are close to political parties particularly increases during election periods. In the Albanian polarized media world, television stations closely connected with the government are awarded the largest portion of state advertising. The major part of the advertising fund of the Ministry of Defence went to the television stations owned by Aleksander Frangaj, closely connected with the former PM in the government of Sali Berisha and his Democratic Party.[24]

Croatian media are in the "tight embrace" of political elites and large advertisers. The state still plays an important role in media funding, distributing various forms of state subsidies to both national and local media. For some local media, state subsidies are the main source of finances. In addition to direct forms of co-financing, the state may also influence the financial stability of the media by way of tax policy. Most commercial media are dependent on advertising revenues. Croatian Agrokor, T-HT and VIP are among the five largest advertisers in Croatia. Agrokor is the owner of the largest print media distribution network, while the telecommunication company T-HT has large stakes in online media. Such intertwining of media and their financial sources enables direct influence on the attitude of the state to media operation: large media are simply untouchable. The most indicative example is the weekly *Feral Tribune*, established by journalists who during the

reign of Franjo Tuđman were the most important producers of critical journalism. *Feral Tribune* survived political pressure and many lawsuits, only to be eventually destroyed by market censorship. Despite stable readership, in 2008 the newspaper perished because it was boycotted by advertisers. Independent, critical journalism is today mainly pursued by smaller online media funded on the project basis. Apart from them – as an intriguing subversion occurring on the margins of the media system – a newspaper of the minority Serbian community financed from public funds, strategically employed the former editors of *Feral Tribune* and transformed into a political weekly *par excellence*.

In Macedonia, the largest advertiser in 2012 was the Government. The analysis of clientelistic financing of media in Macedonia and Serbia revealed several main methods used to conduct financial transactions between the state and media, with advertising agencies playing the role of an intermediary. Since the state has no media policy or clearly defined public interest in the media sphere, the subsidizing of individual media and media content is based on political criteria.

A review of advertising agencies' revenues shows that many of them are fully dependent on "deals concluded with the state" and very little, or not at all dependent on the sales of their services on the market. A change of government or of the executive staff of a ministry, office, agency or a public company usually entails the engagement of a new advertising/marketing agency. Political parties have their own "confidential" agencies which move around with them.

6.4   PUBLIC SERVICE BROADCASTING

Public service broadcasters remain the part of the media system that is most exposed to risks when it comes to particular political interests and prevention of independent operation in the service of society as a whole. The PSB management and funding system are arbitrarily determined and changed by political players, via legislation or direct measures, which are practically never aimed at ensuring the independence or stable operation of PSBs. Changes to the appointment procedures for supervisory and management boards and definition of their authorities are mainly motivated by the wish to install in the key positions persons who are loyal to the ruling political party of the moment. An example is the latest, 2012 amendment to the Croatian Radio and Television Act, which came after the change of government – it entrusted the appointment of a PSB director to the Parliament. In general, too, the managing boards of PSBs, especially when such an organisation is financially weak, are rarely independent from ruling politics. In Macedonia, every government up to the present day had its own people in the leading position within the PSB. The new Albanian government that came to power in 2013 immediately announced reform of the public service, since its most senior management body whose members are nominated

by the Parliament has been incomplete for two years because of political disputes over the appointment procedure.

Although laws in all of these countries stipulate that positions in the management and supervisory bodies of public services should be occupied by competent representatives of various segments of the public and civil societies, in practice these bodies are mainly composed of people with clear political profiles loyal to individual political parties. In BIH, the appointment procedure takes into account ethnic membership in addition to political affiliations, while candidates' skills and experiences are irrelevant.

And what is the real power and reputation of these bodies that are supposed to supervise PSBs' operation on behalf of the public? In Albania, a PSB regulatory body is fully passive; in Macedonia, the role of the Council is rather ceremonial, and a similar could be said of Serbia's public service, where the Director General was for a long time more influential than the Governing Board. In Croatia, the Supervisory Board, owing to conflict of interests, demanded a dismissal of the newly appointed director general, but the Parliament rejected the request.

The operation of PSBs' management and supervisory boards is mainly completely intransparent, with the broader public or in-house staff usually having no insight into their work or decisions. Such a grey zone operation threatens the independence and integrity of public services. In Albania, this problem has been pointed out several times in the past, but the 2013 amendments to the media law ignored it and once again failed to establish a system of checks and balances.

The organisational structure of public services is complex to the point of unmanageability. This is especially true for BIH, where three PSBs are in place, one in the Federation of Bosnia and Herzegovina, one in Republika Srbska and one established on the state level. This structure reflects the complex constitutional arrangements in the country. The provision in the 2005 law, adopted under the influence of the international community and stipulating the establishment of the Corporation of public RTV services in BIH as a separate organisational unit, has never been implemented. Much like in other common areas of operation of the state of BIH, the political leadership of Republika Srbska obstructs and prevents the strengthening of common, state-level institutions.

Serbia has two public services – the public service of Serbia and the public service of Vojvodina. The state treats them differently and often controversially. In fact, Serbia has not yet defined the concept of PSB, either in legislation or through a public debate. A law on PSB in Serbia is currently being drafted under a watchful eye of the international community, and especially the European Commission; various interests and concepts are at play, and the issue in the foreground of the process is that of the funding method.

In addition to functioning as "lightning conductors" for political relations in the country, public services are also economically significant entities. In many cases they are the largest employers in the media sector, with big budgets, production capacities and ramified infrastructure. This is another reason, in addition to programming content, why they are often the targets of clientelistic networks.

In Serbia, the 2011 report of the anti-corruption commission lists many indications of corrupt activities in RTS commercial operations. Co-produced and independently produced programs are also ensnared in corrupt networks.

Information on finances and business activities of PSBs is difficult to access. In Serbia, the late Director General of the PSB rejected to disclose this (public) information, preferring to pay a fine for the breach of law. In Macedonia, the law stipulates that financial plans and annual reports should be published on the PSB's webpage, but none of this data is available there.

A special analysis conducted by CRA in 2013 in BIH contained data on commercial revenues of public services in BIH, but the report remained hidden from the public for some time. This situation, in which an important role was played by competing commercial television companies, clearly demonstrated that data on the volume and flow of advertising money is under control of hidden interests, while the interest of the public to have insight into the operation of a public service is ignored by everyone. In BIH, advertising revenues accounted for a large part of PSBs' revenues, at *Federal TV* even as much as 40 percent. In Macedonia and Albania, by contrast, the share of advertising revenues in the total income of public services is very low.

The largest public service broadcasters in the region, the PSBs of Serbia and Croatia, operate with a loss; this fact is especially worrying in the case of the Croatian HRT, for years the richest and the most stable public service in the region whose more than 80 percent of income comes from licence fee set at more than 10 euro per month, with the collection rate exceeding 95 percent of issued bills. One of the main reasons for such poor business results, in addition to dwindling advertising revenues, was the 2010 reduction of advertising time on HRT during prime time by more than one half. It was a political decision, much like decisions on the licence fee rates and the method of licence fee collection.

The laws that regulate public service broadcasters seem to be designed to keep PSBs hostages of the governments.

In Macedonia, for example, this was for years the main lever of control and perpetuation of dependence relationships and culture. Owing to a dysfunctional licence fee collection system, the Macedonian public service was so instable that it was at the mercy of the government, depending on the state budget for its bare survival. Similarly, in Albania, the minimal

licence fee revenues (0.756 euro per month per household) paid by only a fraction of house-holds, ended in the state budget instead of on the account of the public service. However, in both countries the licence fee collection method has been enhanced during the past few years, obviously thanks to a political decision that a more efficient system is needed.

In Serbia, the development has taken a different direction. Populist political promises that licence fee would be abolished prompted many to stop paying it, so the already mea-gre licence fee revenues further decreased and brought both public broadcasters to their knees. The public service of Vojvodina was about to wind up its operation when it re-ceived funds from the state budget, and this did not occur for the first time, since state aid was previously also given to *Radio Television Serbia*. There is even a chance that the new law on public service broadcasters in Serbia will suspend the licence fee as a PSB funding method, although it symbolizes the commitment of a public service to serve the interests and needs of citizens. Direct funding from the state budget, which is allegedly only a tem-porary solution, is supported not only by the government but by public service broadcast-ers as well, since the illusion of safe haven provided by state funding is very strong. Very paradigmatic, and also alarming, is the absence of determination in the leading figures in Serbia to establish an independent system of PSB funding. The Serbian RTS is one of the largest media organisations in the region and also the only public service broadcaster that over the past years outstripped its commercial competitors in terms of viewership.

Our research sought to establish the indicators of public service broadcasters' integri-ty by examining the methods of their management and funding. The analysis showed that what is involved is a long lasting and deliberate obstruction of public broadcasters' trans-parent, independent and stable operation, through the actions of governments as well as supervisory boards and managements. It is clear that stable funding from licence fees, the appointment of independent, credible and competent supervisors and skilled and up-right executives could turn these media into transparent institutions committed to public service, and that they could become the best employers for best journalists and other pro-gramming and technical personnel who could produce truly public service content. No other media has such a potential to do that. But who will bring them to do that?

6.5 JOURNALISTS

The question of whether journalists are victims or part of the structures and relations that prevent media from fulfilling their democratic role yielded an answer that justifies a conclusion that journalists, in addition to the public and society as a whole, have been the biggest losers in the two-decades long process.

In former Yugoslavia, journalism was a respectable and influential profession that was accorded rather high social status, and journalists belonged in the middle-income class.

However, to be a journalist in BIH, Croatia, Macedonia and Serbia today means to be socially degraded to a servant of businessmen, professionally reduced to the "microphone holder" (a term often used by interviewed journalists), and economically reduced to a precarious worker without rights, whose salary is often lower than the national average and sometimes delayed by several months. Here we have in mind the average journalist's salary that may be between 250 and 350 euro (except in Croatia, where the wages are higher), that is to say, equal to the price per day of accommodation in Brussels where journalists' representatives are invited to participate in debates about the significance of their work for the advancement of democracy or in negotiations on their countries' accession to the EU.

Professional and economic degradation, however, did not trigger an organized resistance on the part of journalists. Even today, in circumstances which they describe as "worse than ever," they remain passive, polarized and fragmented. Their political and ethnic affiliations often have more impact on their attitude to the problems of journalism than their awareness of the urgency of joint action to build and defend professional standards and identity.

Journalists' association do exist and they did make attempts to raise awareness about the situation of journalists, but their power and capacity are weak. These associations are themselves often polarized and their leaders often strongly politically biased. In Albania, journalists became self-organized on the initiative of donors and international organisations, but their activities usually grounded to a stop once the external financial support was exhausted. Journalists' associations in Serbia have recently engaged in media policy formulation, the drafting of media strategy and media reform; they even put aside previous political disputes and formed a media coalition. However, their engagement in media policy and regulation, although leaving the impression of participation and influence on decision makers, has not yet delivered results. As a result, everyday questions and manifestations of the disastrous state of the profession continue to remain in a shadow or completely neglected. Trade unions have gained some strength here and there, although they are still weak, mainly lacking distinguished, strong leaders and remaining vulnerable to various obstacles. Owners of commercial media outlets hinder or prohibit engagement in trade union organisations. Trade union activists are exposed to pressure; in Macedonia, the president of the national trade union was terminated her work contract.

The research showed that editors' role is often a factor of degradation and instrumentalisation of a journalistic job and journalism as such for the satisfaction of the private interests of owners and/or political interests of clientelistic groups. In Macedonia, they have been described as performing a "broker" role in the clientelistic chain, since it is editors who take care that the interests of the media outlet's patron – a politician, tycoon or advertiser – are realized and reflected in concrete journalistic products and media content, even if this necessitates editor's direct censorship of journalistic articles. However, the most widespread

practice is the appointment of loyal and obedient people to the key newsroom positions, and the marginalisation and sanctioning of journalists who express critical opinion and a desire for autonomy. Editors of the media in countries covered by this study are mainly not the first or the best among the equals (journalists), but the proxies of media owners who qualified for editorial jobs through their servility and lack of ethical reservations.

Journalists working for local media are in a particularly bad situation that would merit a special research study. Local media are in fact most subject to political and business will, while local journalists have few other job options. There are hundreds of unemployed journalists in the countries we researched; anyone can become a journalist without having the needed skills and qualifications, and all that is exploited by media owners to reduce labour costs and exert pressure.

In such circumstances of predatory capitalism, ethical issues in journalism are considered a "luxury" by many interviewed journalists, or something that creates a lot of difficulties for them if they persist on ethical standards.

Journalists are threatened, accused and attacked. In BIH, the journalistic organisation BIH Journalists set up a Free Media Help Line, which registers around 40 cases of pressure, threats and attacks annually. In Republika Srbska, journalists are prevented from work or intimidated by government representatives, while critical journalists are prevented from accessing information or reporting on events organized by governmental bodies. In Serbia, a progress has been made recently in investigations of some past assassinations of journalists, but at the same time there are journalists who had to be given 24-hours police protection in the face of threats.

Investigative journalists are especially in danger. And yet, rare optimism regarding journalists' options to perform their job with integrity and commitment to the public, has been found precisely among investigative journalists. For example, Artan Hoxa (Albania) explained that journalists who perform their job with passion and courage not only refuse to succumb in difficult circumstances but even step up their efforts and enhance their professional level.

Investigative journalists only rarely work for mainstream media companies (as in the case of the *Insider/Insajder* broadcast on B92 television). Most of them work for alternative organisations, such as centres for investigative journalism, the Balkan Investigative Reporting Network or the like. These organisations are supported by donations, and their investigative stories are often disseminated through the online media established and managed by journalists themselves. Put differently, in the region covered by this research, investigative journalists and investigative journalism are a kind of outcast expelled from the mainstream media that are controlled by local political and business elites. At the same time, they are a kind of journalistic knights-errant working under the patronage of

the international community. Their story is an allegory of what has befell the media systems in these countries on their eternal march towards democracy.

6.6 JOURNALISTIC AND MEDIA PRACTICES

The mainstream journalism has practically completely succumbed to instrumentalisation for commercial purposes and political parallelism. The case studies presented in this book reveal drastic examples of political bias, for example, politically orchestrated brutal campaigns featured in political tabloids in Serbia that were aimed against specific political actors during political struggles. The reporting on ethnically driven events in Macedonia was a textbook example of bias and manipulation employed by the two public service channels. The subordination of journalism to commercial goals in Croatia is illustrated by the fact that there is not one broadsheet daily in Croatia any more. Reporting on social protests in BIH clearly demonstrated that every socially complex topic has become something beyond media's capacity to deal with, and that a view taken by the ruling structures always prevails in reports. The announced but unrealized disobedience of private television stations in Albania, which were forced by the election commission into broadcasting footage prepared by political parties, testifies to the betrayal of viewership and the victory of political interests over the public interest.

6.7 EXAMPLES OF GOOD PRACTICES

Are there any encouraging signs pointing to the integrity of media policy, media structures and practices in the countries under study? Are there any indications that media have been making efforts to ensure that interests of the public are met? In seeking to find such examples, we hoped to identify circumstances, conditions and actors that enabled good practices which could possibly be extended to other parts of media systems or other countries in the region.

In all five countries, the governments now more engage in consultations with civil society representatives, professional and interest associations before adopting legislation This is obviously a result of the demands placed by foreign actors, especially as part of the European Union integration processes. The progress has been especially evident in Albania where legislation adoption was previously the domain of political actors. In Macedonia, Bosnia and Herzegovina, Serbia and Croatia civil society increasingly engages in public debates and events bringing in this way the issues of media policy closer to the broader public. Journalists' associations and trade unions, media institutes (Macedonia) and coalitions formed by previously split professional associations, have systematically engaged in the struggle against governments' measures that could be harmful for media freedom and integrity. Various actors organized themselves to protect the already acquired rights and

to prevent the backward steps in legislation (regarding access to public information, BIH). In Croatia, the government has made a step forward by introducing two instruments that strengthen the influence of civil society in the very process of media content production. Since 2013, three percent of the lottery income has been earmarked for non-profit media published by civil society organisations. In the same year, a pilot project was carried out in which investigative projects were financed. The experiment also covered the application procedure and selection of projects, and the general public was invited to vote online to select the topics to be investigated ("public commissioning").

The first country to introduce a strategic approach to legislative amendments through the adoption of "media strategy" that was a result of a joint effort involving the government, interest groups, civil society, local and foreign experts, was Serbia (in 2011). The effects are not yet palpable, although any further step in media reform would be even more uncertain without this document and lessons learned by participants.

Self-regulatory mechanisms have also been strengthened, again through international efforts. A press council in BIH has shown signs of vitality and initiative and could serve as a model, although it is questionable whether these mechanisms/bodies can achieve stability, durability and wider operation in the environment where the media industry, which is supposed to maintain the self-regulatory system, operates on such a low budget.

The transparency of media ownership has been improving gradually. In Albania, the National Centre for Registration has been established and the Commercial register digitalized; in Croatia, the regulatory body improved the transparency and accessibility of its database of AV media owners.

Positive ownership models can be found among the publishers of online media, mainly non-profit centres owned by journalists. These media, which are more magazines than news media, provide information, analyses and research independent from political and commercial power centres.

Journalistic investigation of the abuse of state advertising in Albania created a public pressure that led the new government to include in its program commitment to introduce a more transparent and fair system of the distribution of state advertising. The instrument of direct or indirect state financial support to the media in Croatia proved to be a good leverage leading to the introduction of statutes in media companies that regulate internal relations between the management and the editorial desk. Those Croatian media that wish to implement a reduced tax rate or receive money from the fund for media pluralisation must have internal relations regulated through a company statute.

Albania and Macedonia have lately managed to increase the licence fee collection rate, and as a result, both public service broadcasters improved their performance, in terms of programming and technology. Croatia is an exemplary model of how to set up an efficient licence fee

collection system and how to determine a licence fee rate based on economic indicators – the law stipulates that the monthly licence fee rate is 1.5 percent of the average salary.

Centres for investigative journalism and rare investigative teams within other media outlets offer significant public service contents. The most widespread form of investigative journalism is centres established by journalists themselves, e.g. in Sarajevo and Belgrade. However, they completely depend on donations, meaning that their journalists are in a specific position that can be sustained only as long as donations last, which again constitutes a unique hazard for journalists and their audeinces. Another model involves a small investigative team within a large media company (e.g. Insajder at B92). It mainly rests on personal enthusiasm, professionalism and ethos of individual journalists (making the team), and partly on the outlet's commitment not to obstruct their work. Whatever their form, these oases of investigative journalism send an important message across the media world – that good journalism largely depends on individual journalists. What we have in mind here is quality journalism concerned with important social issues that is accessible and easily understood by the broader public, and as such an invaluable contribution to society as a whole.

7   CONCLUSION

In conclusion, the most pertinent question would be: How should we proceed? Changes will not happen unless there is a clear need for them. An answer to the question of whether independent, critical media are still possible today was provided by Predrag Lucić whom we quoted at the beginning of this overview, the former editor in chief of *Feral Tribune*, an independent weekly that operated from 1993 to 2008 in Croatia. In an interview for the Media Observatory website he said:

If a new media outlet emerges, a one like Feral Tribune*, it will not happen because the system enables it. It will have to go against the system, like in the '90s. … If the people, the journalists, feel a need, they will find a recipe.* Feral *existed for 15 years. Well, when we lauched it, we did not make estimates or predications as to how long it could last; at that moment we only felt the need to get it going. … The events unfolded as they did. … Your only wish is to write about them, to make a newspaper that will freely write about them. It appears so simple, and in principle it is very simple. …*[25]

Media integrity – the goal we pursued in our analysis – can be achieved only if there exists a consensus (and it should be a guiding principle of every media policy) that media are obliged to serve the public interest and satisfy the communication rights of citizens. The legal famework that circumscribes media operation today is a result of predominant

economic relations, not the other way round. It is not possible to change a legal framework unless the economic system that provides its wider operating environment is changed first. The principle we adopted in our analysis proves that the corruption problem and changes in the media system should be contemplated and tackled through a holistic rather than linear approach. If journalists are to fulfil their fundamental mission – act as citizens' representatives and guardians of freedom of speech – they must be ensured basic conditions to be able to perform their task freely. If media are to be free, they must become more closely involved with the public sphere than with the political and economic sphere. The culture of responsibility and accountability to the public should prevail on the individual and systemic level. It can flourish only if it rests on a "natural alliance" between citizens and journalists. To strengthen their integrity, media should enhance their professional performance, the ability to reflect on their social mission, develop professional self-criticism and willingness to engage in a dialog with the public. Media policy that wants to pursue these basic goals should rest on an open dialogue with all players in the media sphere. Concrete recommendations for new media policies are given in individual country sections in this book. A red thread running through all recommendations can be recapitulated as follows: transparency (in legislative procedures, finances, management and supervision), work in the service of public interest, a stronger role of public service broadcasters and their commitment to ensuring the communication rights of citizens, and responsibility and respect for professional standards. Neither top-bottom nor bottom-up changes are feasible. Changes should be achieved through long-term negotiations involving political and economic elites, media owners, media workers and the public.

Finally, what could be said about the concept of transition? Today, it is the global media system that is undergoing a transition. It calls for a deliberation on why we are where we are, why our media are as they are, and what should be done to bring the media to fulfil effectively their watchdog function. At the time of the previous research study, in 2004, the goals in the region were subsumed under the term "European standards." A decade later, the countries covered by this study cope with the same difficulties; the actors, too, are more or less the same, only the problems have acquired new, additional dimensions. However, a significant change did occur. Citizens became more active. The journalists who in the past passively observed the consequences of transition and devastation of the media market began to deliberate on new forms of operation and cooperation. The belief that problems addressed here are specific to the region and that they are a result of deficient liberalisation and lack of confidence in market laws, has also changed. The experiences (negative and positive) described in this book point to possible starting points in shaping new media policies.

ENDNOTES

1   Interview with Predrag Lucić is available at the web site of the SEE Media Observatory at: http://mediaobservatory.net/radar/journalism-taken-journalists. Accessed 6 March 2014.

2   The research, which first exposed the problem of media ownership in post-socialist countries, covered Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Czech Republic, Estonia, Hungary, Kosovo/a, Latvia, Lithuania, Macedonia, Moldova, Montenegro, Poland, Romania, Serbia, Slovakia and Slovenia. The research was coordinated by the Peace Institute within the framework of the South East European Network for Professionalisation of Media, with the support of Open Society Institute, the Fresta Program of the Danish government and the Guardian Foundation. It was conducted at the time when 8 of the researched countries were in the process of joining the EU. The concluding conference at which the findings were presented was co-organized by the Council of Europe. See http://www2.mirovni-institut.si/media_ownership/. Accessed 6 March 2014.

3   Anne Penketh, "Libération journalists fight investors' vision for future of French newspaper", *theguardian.com*, 9 February 2014. Available at: http://www.theguardian.com/media/2014/feb/09/liberation-journalists-shareholders-france. Accessed 6 March 2014.

4   The term "western" is here used as a descriptive tool to denote those media systems that in post-socialist countries were for decades seen as exemplary. While in the 1990s, the western media were "role models" for eastern countries, today it is possible to say that the eastern media have turned into a "monster" that sows terror across the west. The East has exposed all the symptoms of the previously sacrosanct media policy of the West.

5   Seumas Milne, "Ownership is the key to the corruption of the media" in *The Guardian*, 12 June 2012.

6   In Great Britain, Media Reform Coalition exposed all the key issues of media reform. Being a broad platform of civil society organisations and individuals, it provided a systemic context for the discussion of alleged violations of professional standards in journalism. See http://www.mediareform.org.uk/.

7   George Monbiot, "This media is corrupt – we need a Hippocratic oath for journalists" in *The Guardian*, 11 July 2011. Available at: http://www.guardian.co.uk/commentisfree/2011/jul/11/media-corrupt-hippocratic-oath-journalists. Accessed 4 March 2014.

8   Ibid.

9   Our point of departure is that the media cannot serve the public interest because of their involvement in the economic sphere.

10 *A successful meta-concept, however, is more than simply a good boundary object. It also tends to entail a "soft" teleology* (Ansell 2011, 49).

11 A characteristic of the donor funding system is its temporariness and orientation towards specific projects that are not necessarily the priority of local environments; eventually, donors move to other countries that they think are in need of help.

12 Media in Albania were not privatized but the establishment of new media followed the same logic as in other analyzed countries.

13 Vincent Mosco argues that it is not important whether the myth is correct or not, but whether it is alive or dead. And the journalistic mythology is still very alive – despite cynicism which is often an expression of resigned idealism (Mosco 2005, 143).

14 *"Dependence corruption describes the process of governance. It doesn't point to a particular tainted result"* (Lessig 2011, 328).

15 Emphasis by the author.

16 For easier understanding, in this part media are referred to as institutions. We talk about media as economic subjects. The distinction between media as economic subjects (enterprises) and media as cultural products (non-enterprises?) seems to be completely mistaken. Which media operate as non-companies? Is it at all possible for a media outlet (regardless of its institutional organisation and financing model, eg. a public service) to function independent from the market, as non-company? The only real question is who owns the means of production.

17 For the needs of this project we reviewed available literature dealing with corruption in the media.

Some approach the subject by focusing on the media reports on corruption, and others assess the degree of corruption relying on various social groups' perception of the level of corruption. See Agatrwal and Barthel (2013), Ali Nobil (2011), Li (2013), Palau and Davesa (2013), Di Tella and Franceschelli (2011), Samarth (2005) and Hanitzsch and Berganza (2012).

18   See Lawrence Lessig's lectures and articles on institutional corruption, economy of influence and conflicting dependence. Available at http://blip.tv/lessig/institutional-corruption-short-version-2807497 and at http://www.law.harvard.edu/alumni/hlsbrief/media/lessig-video.html and http://www.bostonreview.net/BR35.5/lessig.php. Accessed 2 March 2013.

19   In that part we used the experience in development of a risk-based analytical framework for assessing media pluralism, i. e. Media Pluralism Monitor, a monitoring tool developed on the initiative of the European Commission in 2009. See *Independent Study on Indicators for Media Pluralism*, 2009, available at http://ec.europa.eu/digital-agenda/en/independent-study-indicators-media-pluralism. Accessed 10 March 2013.

20   See the inventory of the risks identified for each media integrity risk areas in the appendix.

21   Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive), OJ L 95, 15 April 2010, p. 1–24, available at: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:095:0001:0024:EN:PDF. Accessed 6 March 2014.

22   Source available at http://mediapedia.mk/. Accessed 15 April 2014.

23   It is symptomatic that the biggest corruption scandal in Croatia was connected with the company whose name includes the term "media." Its task was to re-direct the advertising money from state run companies to obedient media outlets and to the accounts of the then ruling HDZ party.

24   See Besar Likmeta, "Big Advertisers subvert Albanian Media Freedom," *Balkan Insight*, 20 December 2013, available at http://www.balkaninsight.com/en/article/big-advertisers-subvert-albanian-media-freedom. Accessed 6 March 2014.

25   Predrag Lucić, in an interview for SEE Media Observatory, available at: http://mediaobservatory.net/radar/journalism-taken-journalists. Accessed 9 March 2014.

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APPENDIX TO THE REGIONAL OVERVIEW

INVENTORY OF RISKS FOR MEDIA INTEGRITY IDENTIFIED WITHIN THE RESEARCH METHODOLOGY

1   MEDIA INTEGRITY RISK AREA: POLICY DEVELOPMENT AND IMPLEMENTATION

RISKS

Development and reform strategy for media sector has not been adopted, or it lacks support for operationalisation, because of conflicting particular interests. In such circumstances partial media policy interventions prevail following particular interests, dominant in certain period.

Media policy mechanisms and measures are developed without proper analysis, strategies and public consultations, because the procedure of adoption is not based on knowledge and public interest, but on particular political or commercial interests of particular groups.

Media policy mechanisms (including regulatory mechanisms) and measures are introduced on the basis of models imposed to satisfy requests of outside actors, without proper analysis and public consultations, and respect for situation and public interest in concrete country.

Media policy mechanisms, including regulations aimed at transparency, anti-concentration and media independence have not been developed or contain inconsistencies or are not applied efficiently, indicating prevailing interests of dominant political and private business groups to avoid efficient policy mechanisms in that area.

Media regulation is often changed, it lacks consistency and operational solutions. Its level of implementation is low. Changes of media regulation correspond to changes in the government. Adoption of media regulation is not matter of public debate and political consensus, but is rather a subject of high level of political polarisation and conflicts. Such circumstances arise from process of development and adoption of media regulation being captured and media itself instrumentalized by particular (conflicting) political and private interests.

Media policy making institutions (and bodies, officials and formal representatives of the public in such bodies) lack capacities for development of media policy (capacities to collect data, make or commission analyses, to develop "knowledge and vision-based" strategies, regulations and measures; lack of capacities include small number of officials, lack of competences etc.) or their capacities are neglected by ruling political groups. Knowledgeable people with integrity among officials employed in the governmental bodies responsible for the media or in the media regulatory institutions as well as among members of the regulatory bodies are exposed to pressure and campaigns from the side of particular political and private interests.

Media policy making institutions, bodies and officials as well as procedures are exposed to control and influence of particular political or private interests of particular groups (including particular political parties), against common public interest. Dominant actors in media policy development are instrumental for particular political and private interests, often in terms of "quid pro quo" ("this for that", "a favour for a favour").

Independent, non-governmental and non-commercial actors as well as citizens are excluded from the process of media policy development and adoption. Such actors are not self-organised and lack institutional capacities and initiative for participation in the procedures and public consultations.

Politicians – in the government and the parliament – responsible for media policy development and implementation lack competences in the media field or have direct or indirect conflicting interests in that field.

Introduction of new policy mechanisms and legal provisions is not followed by development of new institutions capable to support their implementation, or by building capacities of existing institutions for such tasks.

Regulatory bodies in the media field have no power (de iure and/or de facto) or are not given possibility to develop own capacities and competences to be able to act in public interest.

Regulatory bodies are on governing and decision making level controlled or influenced by particular governmental or private interests. The appointment procedure and actual composition of the governing bodies of the media regulators allow influence of particular political or private commercial interests, and not interests of the public.

Operations and decisions of regulators are not transparent, access to information about their decisions and documents, including finances, is not provided in a way to enable public to follow their work and role.

Decisions by regulatory bodies with regard to allocation of licences or frequencies (spectrum) or to introduction of measures in accordance with own supervising and sanctioning power are made to serve or are influenced by particular political or private interests.

Media policy development related to privatisation has been predominantly influenced by particular private and political interests, contributing to control over important media resources (in terms of financial and symbolic value) being used for benefits of such interests and/devastated by such interests.

Independent state bodies, such as Ombudsman, Information Commissioner, Anti-corruption body, and/or independent body supervising state budget and public spending, lack legal ground, competences, capacities and recognition to engage and intervene in the area of media policy and media sector as such.

Self-regulatory bodies and mechanisms are not developed or they lack recognition and influence due to polarisation in journalists' and media community.

Self-regulatory bodies and mechanisms lack resources due to lack of interest and support from politically instrumentalized and polarized journalists and media community.

2   MEDIA INTEGRITY RISK AREA: MEDIA STRUCTURES AND INSTITUTIONS

2.1   MEDIA OWNERSHIP

RISKS

Media ownership is not transparent. Even when formal owners are known, data on real owners and/or on source of investment are hidden.

Media ownership is not gained for and driven by strategic business interests in the media market, but by political interests to control and use media for promotion of own and disqualification of opposing political agenda, or by particular business groups which use the media in clientelistic relations with political groups (seeking to achieve various "rents" and concessions).

Dominant media owners on national and local markets use media for promotion of own and disqualification of opposing political agenda, and/or for clientelistic relations with political groups.

Media ownership patterns enable excessive instrumentalisation of the media for particular political interests and conflicts or particular private business interests which disregard public interest and democratic role of the media.

Media ownership is concentrated – in terms of horizontal, vertical or diagonal cross ownership – in hands of (small number) of political or business groups to serve their particular political and private interests, disregarding democratic role of the media and public interest in the media.

State owned media (completely or partially) on national and local level are governed and financed to serve particular political and business interest of the ruling political groups. It is reflected in appointment of key personnel and editorial policy. Such media are sometimes taken their resources (infrastructure, buildings, capital, professional capacities) or their resources are neglected or transferred to private structures, leading the state media to financial and professional collapse.

Privatisation of state owned media is made or is still taking place in a non-transparent way and/or in a way to provide for particular political and private interests to gain resources, control and influence based on political connections and clientelism.

Privatisation of state media is delayed or blocked for the reason of preserving control and influence of particular political groups and interests through financial instruments and appointments of key personnel.

The news agency having the dominant position in the market is owned by the state, its governing structure, operations and editorial policy are influenced by interests of particular political groups in the government, and its key personnel is appointed based on political affiliation.

Foreign media owners, including (Western) transnational media corporations, take part and contribute to media integrity risks, integrating in own structures, operations, decisions and practices in our countries non-transparency, political instrumentalisation and clientelism, and disrespect for legal and ethical rules.

Banks gained excessive control of the media, mainly through debt capital of media owners, making the situation instrumental for political and business interests of particular groups who are controlling the banks.

Organised crime and criminal groups are hidden owners of the media outlets, intervening in public and political communication with controversial content based on own particular interests.

Secret services are hiding behind formal/fake media ownership, intervening in public and political communication with controversial content based on hidden interest of particular political and business groups.

Owners of the media established or sustained with donor support – which at the beginning of "media democratisation" attained donations to strengthen democratic role of the media and improve access of citizens to independent news and analyses – have turned to instrumentalize the media for particular political or private interests or sold them to new owners which serve such interests.

Ownership of non-profit, non-governmental, alternative and community media, providing news and analyses, and public space for discussion without dependence on and influence of local/national political and business interests, are based on weak and unstable organisational and financial structure, and dependent on project-based support from international donors and their agenda.

Ownership of ethnic minority media is instrumentalized for particular business and political interests of dominant political group within ethnic minority, diminishing democratic and participatory potential and role of such media.

New media outlets are launched based on non-transparent ownership and source of investment, its operations indicate their instrumentalisation for particular business and political interests.

Withdrawal or collapse of media outlets is not result of failure at competitive media market, but of clientelistic structures and relations disabling regular business operations and competition.

RISKS

Data on media finances are not transparent. Media companies hide sources of their income.

Media are operating despite insufficient legal sources of income.

Media production costs, including data on number, structure, employment status and wages of workforce are hidden.

Key data affecting media finances in competitive media market and transparency of media business are not available or not reliable. It includes data on circulation, subscriptions, sold copies, readership for print media; data on ratings and audience for radio and TV, data on unique visitors for online media, data on advertising market total amount and shares etc. No mechanism for verification of such data through reliable methodology and independent supervision is provided as an instrument of self-regulation and transparency by the media industry. Agencies providing such data are instrumental for particular interests.

Advertisements in the media are distributed directly or through advertising agencies and/or media buying agencies based on political affiliations or clientelistic relations.

State advertising, including advertising of public companies and public authorities on national, regional and local level, as well as advertising of tenders, are distributed in non-transparent way, based on particular political and business interests of the ruling political groups.

State advertising is disproportionately distributed to the media connected/supportive to political group in the government. Critical media don't receive advertisements from the state institutions/companies regardless audience share.

State adverting, sponsorship, promotion campaigns and other financial flows from the state budget on national or local level to the media make substantial part of whole advertising market.

State tax policy measures for the media are used by ruling political groups as an instrument to punish or reward particular media, or media sub-sectors, based on political and business interests of ruling political groups.

State aid to the media (e.g. subsidies) is neither adequately regulated nor transparent, but politically influenced.

Bank loans, debt repayments and other bank arrangements are given to the media based on political affiliations or clientelistic relations.

Media income based on subscription and/or sold cold copies i.e. direct consumer relations with citizens are making small part of income.

Donor media support which made substantial contribution to capacity development and operations of the media committed to promotion of democracy, human rights and equality at the beginning of "media democratisation" was discontinued and not replaced by income from citizens/users or other sources committed to the same values. Consequently such media are exposed to sources of income and influence, connected to particular private business and political interests with no respect for such values.

Investigative journalism aiming at disclosing clientelistic and corruptive practices and connections, misbehaviour of centers of power, receive no financial support within established media outlets or from any independent source in the country, but occasionally from international donors.

PUBLIC SERVICE BROADCASTING

RISKS

Composition of governing bodies of Public Service Broadcasting, procedures and mechanisms of appointment and dismissal of their members as well as the key management and editorial personnel provide prevailing influence of the government or/and of particular political grouping on editorial and business policy of PSB.

Key management and editorial personnel change with the change of the government.

Public service broadcasting lacks sufficient, adequate and consistent financial and other resources.

Allocation of financial resources to PSB is not based on transparent and objective criteria and procedures.

Government decides on the amount of licence fee without public discussion. Direct government financing makes substantial part of total PSB budget.

Government decides about wages of journalists and other employees at PSB.

PSB contracts and arrangements in selling advertising, co-production and purchase of independent production are not based on transparent and objective criteria and procedures. Such arrangements are based on particular business and political interests, and on clientelism.

Financial statements and use of resources of PSB are not adequately and independently controlled and mechanisms of financial accountability are not in place or are not efficient.

Public lack transparent and accountable information about the financial resources and operations of PSB.

3   MEDIA INTEGRITY RISK AREA: JOURNALISTS

RISKS

Journalists lack capacities (in terms of individual competences, including education and skills, and in terms of institutional and horizontal forms of professional socialisation) to confront structures and relations which obstruct democratic role of the media.

Journalists which confront and disclose relations, cases and actors of clientelism, corruption and crime in politics and business, including the media, are exposed to various forms of pressure, threats, attacks and violence.

Journalists adopt the role of clients to political and business patrons in exchange for various commodities and privileges. Such practices take forms of bias reporting and propaganda on political and commercial issues.

Editors are appointed regardless their professional competencies and integrity, but rather on the basis of political affiliation, loyalty to and connections with particular political and business interests of the media owners. Editors don't disclose and confront but serve such political and business interests.

Editors are replaced if disclose and confront particular political and business interests which are instrumentalizing the media.

Polarisation among journalists reflects political polarisation and journalists act as informal spokespersons of confronting political blocks.

Professional solidarity among journalists is low. Number of journalists organised in associations and unions within individual media and on local, regional, national and international level is small.

Labour and professional rights of journalists are inadequately protected through legal or self-regulatory instruments (e.g. collective agreements).

Security of jobs in journalism is low, journalists work in precarious conditions and arrangements without regular contracts, their labour rights and wages are decreasing, altogether affecting dependence relations with and concessions to media employers and their political or business patrons.

Investigative journalists lack support or face various forms of pressure and censorship within own media, escaping to self-employment, occasional financial support of international donors and forms of publications of own work outside mainstream media.

4   MEDIA INTEGRITY RISK AREA: JOURNALISTIC AND MEDIA PRACTICES

RISKS

Adherence to media ethics and other normative instruments is low.

Political bias in reporting is common practice of public service and private media, being exposed to influence and control of particular political and business interests and groups.

Media content is highly politicized reflecting their instrumentalisation for contesting political and partisan interests; it also reflects dominant forms of social organisation and distribution of social power and resources which are based on clientelism and mediated through political parties.

Media role in providing public space for rational political debate and negotiations on common social issues with participation of wide range of political views of various actors in society is replaced by overall commercialisation, as well as reporting patterns, news packaging and content formats based on personalisation, dramatisation and trivialisation of politics and social issues, by pro et contra formats emphasizing political conflicts and polarisations and ignoring complexities.

Media agenda is dominated by issues and events related to contesting particular political and business interests.

Media play important role in blocking, distorting and shadowing historical memory – memory of significant social experiences from recent history, crucial for capacities of citizens to confront new forms of hegemonic ideologies.

Representation of ethnic, religious, sexual and other minorities as well as gender representations in the media contribute to and sustain forms of social organisation, distribution of roles and resources in society based on social exclusion, inequality and dominance of particular political and economic interests.