MEDIA INTEGRITY MATTERS

UNDERSTANDING THE MEANING OF AND RISKS TO MEDIA INTEGRITY



HOW TO DEFINE MEDIA INTEGRITY?

In order to capture whole set of qualities of the media sector crucial for its abil-
ity to serve the public interest and democracy, the research conducted within
the project South East European Media Observatory has introduced the notion
of »media integrity«. It denotes public service values in media and journalism.

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:

	lia to serve the public interest and democratic processes, demonstrating 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 ii	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 ir	ntegrity 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.

WHAT PUTS MEDIA INTEGRITY AT RISK?

Applying the holistic approach and adapting the risk-based analytical framework,
the South East European Media Observatory's research methodology established
four risk areas for media integrity:

media policy development and implementat	ion;
media structures (media ownership, finance service broadcasting);	– s, and public
journalists, and	_
journalistic/media practices.	

Specific risks to media integrity were identified for each of these areas. Following that, the media integrity research was designed and conducted to elaborate patterns of relations and practices as well as actors relevant for understanding how specific risks to media integrity are manifested in each country covered by the research.

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 demo-

cratic 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.

2.2 MEDIA FINANCES 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.

2.3 PUBLIC SERVICE BROADCASTING

RISKS

Composition of governing bodies of Public Service Broadcasting (PSB), 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.

$\label{thm:change} Key management and editorial personnel change with the change of the government.$
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

confront but serve such political and business interests.

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

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 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

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.

THIS PUBLICATION elaborates part of the methodology for the 2013/2014 research conducted within the regional project »South East European Media Observatory — Building Capacities and Coalitions for Monitoring Media Integrity and Advancing Media Reforms«. The research results were published in the book »Media Integrity Matters — Reclaiming Public Service Values in Media and Journalism«. For more information and free access to the book visit WWW.MEDIAOBSERVATORY.NET.



