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'TRAFFIC LIGHTS REPORT' 2017 **KOSOVO***

Monitoring Report of the 'EU Guidelines for Media Freedom and Media Integrity 2014-2020' for 2017

1. Introduction

In 2017, [TACSO](#) was responsible for establishing a monitoring system and conducting the monitoring, in coordination with other stakeholders, relevant to the constituting parts of the Results Framework¹ of the '[EU Guidelines for Media Freedom and Media Integrity 2014-2020](#)' (**Media Guidelines**). The Media Guidelines is a monitoring tool that serves as an important source providing useful information on the European Union's (EU) political and financial support for media development in the region and enabling governments and media communities in the EU enlargement countries to use the comprehensive data for their own policies and actions. The aim of the monitoring exercise is to provide a systematic, comprehensive and efficient assessment of the situation in the EU enlargement countries by applying the same methodology and approach in all the countries concerned. The monitoring was conducted in six countries: Albania, Bosnia and Herzegovina, Kosovo, the former Yugoslav Republic of Macedonia, Montenegro and Serbia.

The following report contains the monitoring methodology and information about the situation according to the indicators of the Results Framework of the Media Guidelines in Kosovo.

2. Methodology for the monitoring

The methodology for monitoring the Media Guidelines was primarily developed by a team of media consultants and professional researchers; some instruments used for the monitoring were developed in consultation with key media experts and media professionals from the six countries included in this project.

The main features of the monitoring system include the following:

- The need for a unified methodological approach in all countries of the region;
- Regional comparison and tracking of national progress;
- For the majority of the indicators, no data is available from reliable sources of information in the region;

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

¹ In addition to representatives of the EU, elements of the Results Framework were developed in 2013 through regional and national consultations encompassing media experts and media professionals from the countries of the Western Balkans and Turkey.

- The need for a synthesized and comparative way of presenting the monitoring findings;
- Sound and reliable research methodology, along with innovative and participatory approaches.

Information collected for the purpose of monitoring was developed from the following sources:

- 1) Expert panel country meetings, discussing and assessing the full list of indicators;
- 2) On-line survey with members of expert panels, assessing the full list of indicators;
- 3) In-depth interviews with representatives of relevant interest group organisations/ institutions, assessing selected indicators from the full list;
- 4) On-line survey with representatives of relevant interest group organisations/ institutions, assessing selected indicators from the full list;
- 5) General population survey among adult citizens in all target countries.

For the purpose of information collection, survey instruments were developed for each part of the methodology:

- The questionnaire used in the expert panel country meetings, as well as the on-line survey of experts and representatives of relevant interest group organisations/ institutions;
- The interview guide used for the in-depth interviews with representatives of relevant interest group organisations/ institutions;
- The questionnaire used in the general population survey.

The basis for all survey instruments was the 'EU Guidelines for Media Freedom and Media Integrity 2014-2020' (Media Guidelines), which specifies 4 objectives and 20 indicators. The survey instruments are in fact an operationalisation of the Media Guidelines.

In order to quantify indicators, in the process of monitoring media freedom and media integrity in the region, an index system was developed. The main purpose was to include all the gathered data, to summarise it and calculate measures, i.e. indices that enable comparison between the target countries on all indicators.

Each of the listed methodological sections is explained in Annex 1, along with the instruments developed and the process of index creation.

Given that the Media Guidelines (which formed the basis for the survey instruments) do not provide us with target values for items or indicators (nor for different countries in the region), the best possible solution was to create a system allowing comparison between the target countries on all indicators, in order to identify those areas where the situation seem to be the most favourable, but also those areas where the situation is critical and requires rapid intervention. This is why the system of indices is a relative system, which depends on the countries included in the calculation, as well as the indicators, which are compared altogether. All results ought to be considered relative to other countries included in the survey and relative to other indicators being covered.

The monitoring report for each country therefore incorporates the results of quantitative analysis of the survey, which are presented in the main graph and in the colours specified near each indicator and objective. The colours indicate the following:

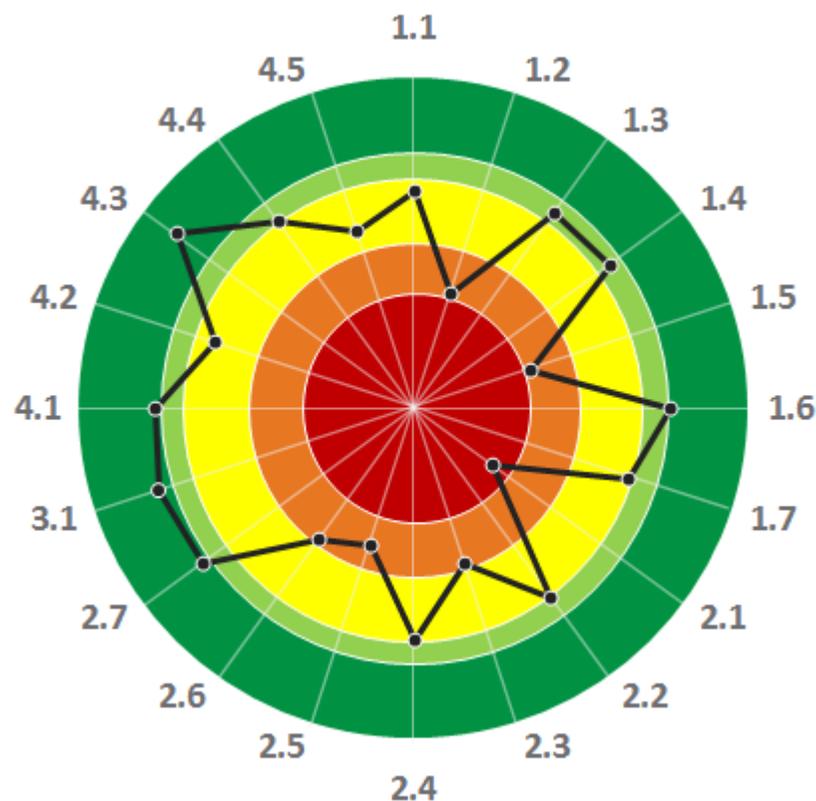
Red		The worst evaluated indicators in the region
Orange		The second worst evaluated indicators in the region
Yellow		The middle of the regional ranking
Light green		The second best evaluated indicators in the region
Green		The best evaluated indicators in the region

At the same time, the monitoring report summarises the results of the qualitative methods applied: i.e. the main points from the assessments presented during the expert panel meetings and in-depth interviews with representatives of relevant interest group organisations and institutions.

It is important to note that some items within certain indicators are excluded from the quantitative analysis (index creation/traffic lights) in all target countries, given the small number of quantitative answers provided by the experts and representatives of relevant interest group organisations and institutions. On the other hand, those items might have been discussed during the expert panel meetings and in-depth interviews with relevant interest groups and therefore covered by qualitative analysis. The whole list of indicators and items, regardless of whether they are included in both quantitative and qualitative analysis, or qualitative analysis only, is listed in an Annex 1 providing detailed explanation of the methodology used for the monitoring. It is clearly marked which items were included in quantitative analysis and which ones were excluded.

All findings provided in the narrative report are based on information and assessments provided by the experts and relevant interest groups in all target countries. The final technical review of the text and its composition was done by the project team.

3. Quantitative and qualitative findings obtained by expert panel and representatives of relevant interest group organisations/ institutions - Kosovo



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- 1.1. Legal guarantees and review of their implementation
 - 1.2. The judiciary acts in conformity with Article 10 of the European Convention on Human Rights and applicable case law
 - 1.3. State institutions ensure media pluralism and their independence; law enforcement in media outlets and access to information of public character
 - 1.4. Independent and professional regulators preserve media pluralism and prevent unfair competition in the media market
 - 1.5. State institutions and public authorities stimulate public demand for quality journalism
 - 1.6. Public Service Media – ensure content pluralism in the media environment in an independent and accountable manner
 - 1.7. Initiative and creativity by state institutions in using tools at their disposal to promote free speech and media diversity
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- 2.1. Media outlets voluntarily adhere to principles of transparency
 - 2.2. Media outlets voluntarily subscribe to and implement adequate labour standards
 - 2.3. Self-enforcement of ethical norms and professional standards
 - 2.4. Structures strengthened for basic and continuous training and education of journalists and journalist students on professional standards, freedom of expression and media integrity
 - 2.5. Media outlets promote professional training (including in professional ethics)
 - 2.6. Investment in professional management of companies
 - 2.7. Regaining audience confidence
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- 3.1. Improved conditions for quality investigative journalism including modern/innovative approaches to increase the quality and credibility of investigative journalism
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- 4.1. Media organisations/journalists’ associations act on the basis of long-term vision and strategies to achieve impact. Productive dialogue with authorities established
 - 4.2. Regular dialogue within the media community established on press freedom and integrity issues
 - 4.3. Media organisations monitor and evaluate the results and impact of their own work
 - 4.4. Platforms (journalists’ professional organisations, CSOs, media owners and editors) set up and actively promote professional standards and ethics
 - 4.5. Labour standards developed and upheld
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1.1. Legal guarantees and review of their implementation - parliaments (and governments) in enlargement countries: put forward and adopt policy and legislative proposals in line with the European Convention on Human Rights / conduct periodic assessments of the state of media freedom

The provisions on freedom of expression, access to information and media freedom in the Constitution of the Republic of Kosovo are in line with Article 10 of the European Convention on Human Rights. In this respect, the rights and freedoms specified in the relevant international conventions have become part of the legislation of Kosovo. The media legal framework is consistent with the European standards and was developed under direct patronage of international organisations. Also, Kosovo has a separate law on the right of journalists to protect their sources of information.

However, the implementation of the legal obligations is deficient, given the lack of efficient law enforcement mechanisms and strong political and economic influence on the media, journalists and independent institutions. There is a legal gap for some important aspects of the media system, such as ownership concentration in media and transparency of ownership and financing.

The state does not conduct periodic assessments of the state of media freedom or monitor conditions for freedom of expression in the country. In the process of preparing new law proposals, media industry and journalists associations and other relevant civil society organisations are actively involved in public discussions, but when the proposed law enters into the final procedure in Parliament, it is doubtful whether their recommendations and amendments will be taken into account.

Independent assessments of the media situation in Kosovo are done by CSOs, mostly branches of international CSOs or financed by these. According to respondents, the Government does not take the conclusions of the independent assessments into consideration.

1.2. Judiciary acts in conformity with Article 10 of the European Convention on Human Rights and applicable case law.

According to representatives of the Association of Journalists of Kosovo (AJK), cases related to media freedom are treated relatively correctly by the police, but when the cases are processed by the prosecutors and judges, things begin to slow down. Judges' case overload is generally a major problem in Kosovo.

Training courses for judges and prosecutors are organised on a regular basis. A recent training session on "Proceedings of the European Court of Human Rights" was dedicated to explaining how to apply the standards expressed in these materials in local cases related to media freedom and freedom of expression. Such training contributes to better understanding of the media freedom concerns by the group of judges, but the court cases related to media freedom are not necessarily designated specifically to those judges.

The AJK plans to translate several cases of the European Court of Human Rights' judgements related to media freedom and will disseminate materials to all judges. Pressure from the media community, journalists' associations, CSOs and international actors has produced some positive changes. The conference on "Safety of Journalists," held in February 2017, was the main driving force in having the Kosovo Chief Prosecutor's Office appoint a National Coordinator to deal with threats against and attacks on journalists. At the local level, there will be a local coordinator in each local prosecution office who will report to the National Coordinator in the Chief Prosecutor's Office about any cases of threats against, or attacks on journalists.

Despite recent progress in the court and Prosecutor's Office practice, journalists still feel unsafe in the field. Unsolved cases of missing or murdered journalists remain the most pressing problem. In 2017, there were several physical attacks on investigative journalists: Arbana Xharra (recipient of the 2015 International Women of Courage Award), Parim Olluri (director of the Insajderi investigative journalism web portal), and Vehbi Kajtazi (a journalist from Insajderi). According to respondents, there are 24 ongoing cases in court, none of which has been solved. The report summarising media cases in the courts was never completed, or at least, it has never been made public. In the absence of official reports, the AJK's annual reports state the number of attacks during the year, but no data exists on follow-up in the judicial institutions.

In 2017, there were dynamic discussions on the possibility of including attacks on journalists in the Kosovo Criminal Code and on the possibility that attacks on journalists be treated as attacks on officials in service. However, such an idea was not well accepted, and discussions are ongoing.

1.3. State institutions, public authorities and others influencing self-censorship in the media or restricting access to information by the media

It can be assumed that both censorship and self-censorship are present in the media in Kosovo. In several studies, a number of journalists alleged that in certain cases they faced censorship. The main reason is economic rather than political pressure on journalists and media.

The economic conditions for media and journalists are unfavourable. According to respondents, as much as 30% of journalists work without contracts, and a number of media outlets are barely hanging on. Private media facing the challenge of ensuring income depend on advertisements by state institutions and/or private businesses. Being aware of that fact, journalists filter the topics they choose to address, so as not to criticise the source that provides funds to their media outlets.

According to respondents, in order to prevent censorship and self-censorship, enforcement and harmonisation of the legislation are needed.

One of the greatest challenges that journalists in Kosovo face is the poor implementation of the Law on Access to Public Documents. Although there is an obligation on the part of state institutions to provide information to the media and the public, state institutions usually obstruct such requests or delay their processing. The Law on Access to Public Documents sets forth the Ombudsman as an appeal mechanism to ensure accessibility of information from state institutions. The Ombudsman plays the role of the institution that receives complaints in case of denial of or dissatisfaction with the received document. In practice, complaints lodged with the Ombudsman by journalists are mainly related to denial of access to public documents.

1.4. Independent and professional regulators preserve media pluralism and prevent unfair competition in the media market

The Independent Media Commission (IMC), established in 2005, is responsible for the regulation, management and monitoring of the broadcasting frequency spectrum in the Republic of Kosovo. The regulatory authority's independence is specified in the Article 141 of the Constitution of the Republic of Kosovo.

According to respondents, the IMC's approach needs to be stricter in order to ensure law enforcement and higher professional standards of programming of the licensed broadcast media.

The IMC has responsibility and instruments for monitoring media content regarding the quota of advertisements, protection of minors and trademark protection. By law, the IMC collects license fees from media outlets; however, these resources are not at IMC's disposal for its own services, and IMC is dependent on allocated financial resources from the state budget.

After changes to the Law in 2012, the IMC has been much criticised as being influenced by political parties or economic lobbies. Parliament gained the right to select the IMC members. A Parliamentary ad hoc committee consisting of representatives of all political parties' interviews candidates for the IMC members and votes on them according to political interests.

The IMC does not cover media ownership or concentration rules. This regulatory gap has been continuously underlined in the assessments of media situation in Kosovo as an issue of concern that needs urgent solution, but the IMC is refusing to enter into the process of regulating media concentration and ownership.

Since 2008, the Kosovo Government has not been allowed to advertise in the media, except on its own official web site. That was done to prevent the practice of giving state budget money to media on a corrupt basis.

There is no transparent and verified data on the media market in Kosovo to enable media policy development and implementation in the field of media pluralism. Currently, there is no audience research in Kosovo. It existed in the past when USAID supported it. A group called the Joint Industry Committee (JIC), composed of major stakeholders (3 national TV stations and national radio stations), used to organise audience surveys conducted by various professional companies. The results were made available to all stakeholders. Today, the media industry is unable to support audience research, because of lack of funds, so this activity important for media development no longer exists. Individual media outlets do their own research of questionable quality.

Apart from the obligation to monitor the compliance of the licensed broadcast media with the legal requirements, the IMC is not monitoring or analysing the broadcasting sector performances.

The IMC presents an annual report to the Parliament with detailed information on activities and financial interventions. After the report is endorsed by the Parliament, it is published on the web site.

1.5. Stimulate public demand for quality journalism. Increase media literacy and understanding of the role of professional and ethical journalism in off-line and online media.

There is certain progress in media literacy programs in Kosovo. In October 2017, the OSCE Mission in Kosovo launched a media literacy initiative, with a two-day training seminar for 14 teachers from seven schools in Pristina, Mitrovica, Prizren, Peja/Pec, Ferizaj/Urosevac, Gnjilan/Gnjilane and Gjakova/Djakovica. The training was held with the support of the Ministry of Education, Science and Technology. The teachers were trained by an international media literacy expert, and will pilot media literacy in their schools and then disseminate the knowledge gained from the training to their peers. There was also the Critical Media Literacy Workshop, organised by UNICEF Innovations Lab Kosovo, in partnership with PEN and the OSCE Mission in Kosovo, with the aim of improving critical thinking skills, focusing on critical media literacy.

There is no data on state regulation or practice of organised blocking of Internet content.

The public authority's strategies or measures for supporting of "new"/online, local and/or alternative media are not known.

1.6. Public Service Media – ensure content pluralism in the media environment in independent and accountable manner.

Radio Television of Kosovo (RTK) is financed mainly from the state budget, applying a funding model that exposes the public service media to the risk of political control.

The Law on Radio Television of Kosovo from March 2012 introduced a financial solution, limited to a 3-year period, during which it was assumed that a long-lasting solution for independent financing will be agreed upon. Based on this law, from 2012 until 2015, RTK was financed with an amount equal to 0.7% of the state budget. However, owing to unwillingness on the part of the RTK Board and management, political parties and especially the Parliament members to find a solution for the financial sustainability of the public service broadcaster, no solution was found.

Consequently, since 2015, RTK has depended fully on the Kosovo Parliament, which now decides every year on the amount of the RTK budget. Respondents claim that only political parties have any benefit from the situation that enables them to use their influence.

After extensive internal consultations, RTK proposed to Parliament a budget of 20 million euros for 2018, but the Parliament's response was that RTK would receive 11 million. This disparity reflects the power relations between the public media and the political institutions in Kosovo.

The procedure for election of members to the RTK's governing board is used as another instrument of political control over the public broadcaster. According to respondents, the Kosovo Parliament has appointed the RTK Board members despite concerns that they did not possess the required qualifications.

The public service media is obliged by the law to report to the Parliament of Kosovo and to publish both the program and the financial report on an annual basis. However, since 2015, a new system has been in practice: the Parliament requested that RTK submit a financial report every three months to the Parliamentary Committee for Budget and Finance, and twice per year to the Parliamentary Committee for Media. This is seen as direct pressure by MPs on the RTK. RTK is also examined by external and internal audit, and submits regular reports to them. RTK also submits a financial report to the regulatory authority IMC, although the law does not require such an obligation.

According to BIRN data, RTK television is the market leader and is watched by more than 90% of the population.

RTK has its own investigative journalism program, but this activity has been mainly outsourced to independent investigative productions. In 2017, RTK established an own section on investigative journalism with four journalists and a producer.

The internal Code of Ethics has lately been adapted in line with new media developments. To deal with violations of ethical and professional standards, RTK has a Disciplinary Committee in charge of this issue. RTK also have a five-member body that deals with audience complaints.

Turkey based International Balkan University (IBU) opened the Eurovision academy in the RTK with training courses such as Investigative Journalism, Journalism and New Technology, Training for editors, Training for the staff and for the upper management. RTK also has a Centre for Professional Skills and the RTK Academy.

Since 2015, RTK independence has drastically deteriorated as a result of the funding model and the procedure for election of members to RTK's governing board.

1.7. Initiative and creativity by state institutions in using tools at their disposal to promote free speech and media diversity

No actions undertaken by state institutions aimed at promoting media freedom and media diversity were recorded.

2.1. Media outlets voluntarily adhere to principles of transparency. Professional associations of media owners/publishers have been established.

Lack of transparency is one of the main problems affecting the media in Kosovo. Some respondents believe that the hesitation of foreign owners to enter the Kosovo media market has been influenced by the absence of reliable data on the market indicators.

Kosovo newspapers do not publish their circulation figures, and the fast-growing, unregulated online media market is not covered by any monitoring or analysis. Neither are there any reliable data on ratings of the broadcast media; the ad hoc surveys are not trustworthy as there is no people meter measurement of the audience in Kosovo.

The Kosovo media fulfil their reporting obligations to the state authorities, such as tax authorities. Broadcast media also submit annual financial reports to the regulatory authority, the Independent Media Commission (IMC), but those data are not publicly available.

There are no specific data on the sources of media financing or individual media income from the state. The structure of ownership is generally unclear, as there are cases when the registered owner's name is used to hide the real owners.

Because of the lack of funds, the regulatory authority, IMC, cannot afford to conduct regular market research, and the media market shares are unknown.

2.2. Media outlets voluntarily subscribe to and implement adequate labour standards. Labour relations are no longer a factor in self-censorship.

There are no adequate labour standards implemented in the media in Kosovo. Almost 40% of the journalists lack an employment contract. According to information collected through field research, only RTK has permanent contracts with employees. The biggest mainstream media have approximately 15% of the journalists and other media workers with long-term contracts, and there are people who have been working for years who are still on short-term contracts. Generally, in private media, employers offer temporary annual contracts, with the possibility of annual renewal. In online media and local media, the situation is worse, and working conditions are considered among the most pressing problems in the Kosovo media scene. The journalists and editors are not protected but are economically vulnerable and unsafe without defined legal status. The average salary in the media in Kosovo is below the average in the country.

Several respondents referred to Koha as one employer in the media sector in Kosovo that does have adequate conditions for journalists and other media workers, including proper employment contracts.

Only a few media have their own Code of Ethics or statute.

2.3. Self-enforcement of ethical norms and professional standards.

There is no internal ombudsman in Kosovo media outlets, and only RTK has a special department for communication with its audience.

2.4. Structures strengthened for basic and continuous training and education of journalists and journalism students on professional standards, freedom of expression and media integrity. No legal restrictions on the profession of journalism. Fair, transparent and politically independent accreditation procedures in place.

The University of Pristina and the private universities AAB College and Kolegji UBT have media departments. Media studies at universities are old-fashioned and lack the basic technical means for practical education. Generally, students or young journalists that come directly from the universities to work need to be trained by editors and older colleagues literally from the beginning. The Press Council of Kosovo has been offering training courses on ethical journalism. BIRN Kosovo does investigative journalism training. Recently, the media have been keener to provide in-house training of their own staff because they cannot afford to send journalists on training courses that last for several days. After the war, there were a number of high-quality training programs for journalists in Kosovo. Owing to a lack of financial support, several good programs for journalism education, such as the program at the Kosovo Institute for Journalism and Communication (KIJAC), in cooperation with Cardiff University, the Faculty of Journalism of Norway and University of Nebraska, ceased to exist.

2.5. Media outlets promote professional training (including in professional ethics)

According to respondents, the media in Kosovo have no conditions to develop a decent corporate governing structure inside individual outlets because of financial difficulties in a small, saturated media market. Only RTK, the public service media organisation, has staff development policies, human resources department, and can afford to send journalists on professional development programs.

2.6. Investment in professional management of companies. Improved economic performance of the outlet in changing markets

Given the absence of normal market relations, the business plan is not used as a management tool by media outlets in Kosovo.

2.7. Regaining audience confidence.

A general population survey report shows that trust in the media in Kosovo is well above the regional average. As much as 61% of the population have trust or mainly have trust in the media. That freedom of speech as a fundamental human right should be strictly protected is believed by 73% of respondents (the lowest percentage in the region), and that freedom of the media is a precondition for a free democratic society is believed by 69% (also the lowest percentage), while as much as 31% think that the government should be allowed to restrict media freedom.

3.1. Improved conditions for quality investigative journalism including modern/innovative approaches to increase the quality and credibility of investigative journalism

BIRN is the strongest centre of investigative journalism production in Kosovo. Only a few media outlets practice investigative journalism, such as Koha Ditore or the online news media Insajderi. Radio Television of Kosovo, a public service broadcaster, has an investigative unit, but the production of that type of programming has been outsourced to BIRN. A large majority of media have no interest in investigative journalism production, unwilling to take the risks it implies.

According to respondents, dissemination of investigative stories in Kosovo is not a problem; after being published, within a minute they are spread all over online media. But after publishing the findings, the investigative journalists and their editors often face a series of threats, attacks, harassment and intimidation, even by police. In 2017, there were three brutal attacks on and a number of threats against investigative journalists and editors, mirroring the dangerous environment for investigative journalism in Kosovo.

The financing for investigative journalism in Kosovo comes mainly from international donors.

4.1. Media organisations/journalists' associations act on the basis of long-term vision and strategies to achieve impact. Productive dialogue with authorities established.

There are two main professional associations in Kosovo: the Association of Kosovo Independent Electronic Media (AKIEM), which represents the interests of leading private broadcast media in Kosovo, and the Association of Kosovo Journalists (AKJ), representing Kosovo journalists' interests.

At the present, the Association of Kosovo Independent Electronic Media has a membership of 35 private broadcasters. It operates as a non-governmental organisation and depends on membership fees.

The Association of Kosovo Journalists has been funded with the support of international donors with main purpose to organise journalists to promote and protect freedom of expression. It has around 500 members. There is also the Association of Serbian Journalists, which represents journalists working for local and national media in the Serbian language in Kosovo.

Without trade unions in private media, their journalists and editors take any complaint to the Association of Kosovo Journalists to process their cases further. The Association of Kosovo Journalists reacts promptly to any case of threats or violence against journalists and to campaigns against them.

The AKJ has established a hotline to report threats against journalists.

4.2. Regular dialogue within the media community established on press freedom and integrity issues. Broad platforms (journalists' professional organisations, NGOs, think-tanks, editors and owners) formed.

There was regular dialogue neither on press freedom nor on integrity issues within the media community.

4.3. Media organisations monitor and evaluate the results and impact of their own work.

Media industry associations, such as the Association of Kosovo Independent Electronic Media (AKIEM), are required to submit annual reports to the authorities, and also to their own members; some elements of self-evaluation are an integral part of such reports. Similarly, annual reports of the journalists' association are submitted to their Board or Assembly at first. As a registered NGO, it also submits an annual report to the Ministry of Public Administration. Reports are sent to donors too.

4.4. Platforms (journalists' professional organisations, CSOs, media owners and editors) set up and actively promote professional standards and ethics.

The Kosovo Press Council (KPC) is a joint platform of print media sector in Kosovo set up to promote professional standards and ethics. It is the only self-regulatory body in the Kosovo media operating on national level. The Press Council has 27 regular members, mainly newspapers and news agencies. It is trying to include also online media in its membership, but only a few have joined the Press Council and accepted self-regulatory principles. KPC deals with complaints against print and online media, while professional standards of audiovisual media are subject of supervision by the Independent Media Commission. KPC was established in 2005, and has managed to keep going for years, have regular meetings, receive and discuss complaints and issue decisions, only for Council members. The decisions are not obligatory, and the Council has no mechanism of coercion. The member media are obliged to publish and respect the decisions. Decisions are usually taken by consensus after carefully reviewing the problem. On average, the KPC Board handles around 100 complaints yearly.

The operations are not proactive, as KPC is unable to carry out systematic monitoring because of a lack of financial resources and its limited staff of four. KPC handles only complaints about ethics violations as its primary task and treats cases at the media level, not the cases of journalists individually. KPC investigates complaints against all print media and online media, whether or not they are Press Council members. For non-members, KPC issues opinions but it hands down decisions for members.

The Press Council has its own Code of Ethics, and there is also the Kosovo broadcast media Code of Ethics, which was approved by the Independent Media Commission.

The worsening of media ethics is caused by the rapid expansion of the online media sector, where the new trend in reporting is characterised by the spread of misinformation, along with a lack of fairness and accuracy in journalism.

The Press Council is acting as a non-governmental organisation and is mainly financed by donors. The budget share from the membership fee is rather symbolic.

KPC organises training on ethics in journalism twice a year. The training course is attended by students of journalism and young journalists. There is extraordinary interest in these training sessions. Currently, KPC is preparing a child protection project for UNICEF: Child Reporting Guide.

4.5. Labour standards developed and adhered to.

Freedom of association and the right to collective negotiations in Kosovo are provided by the Law on Labour, adopted in 2010. There is also the Law for Organising Trade Union in Kosovo, adopted in 2011. However, the circumstances which determine the economic, social and legal status of private media in Kosovo have been unfavourable for unionising and such activity is practically prohibited. There is neither union of journalists nor collective agreement bargained of or signed in the media sector. Public service media is the only media with syndicate organisation. Any initiative or effort by journalists in the private media to address the issue of labour rights usually ends with their suspension. If journalists want to protest about working conditions, they do that through the Association of Kosovo Journalists. The Association of Journalists is the only entity with some activities addressing journalists' working conditions in Kosovo.

4. General population survey on the perception of media freedom and media integrity²

News consumption: More than 60% of citizens in Kosovo follow the news on daily basis, which is close to the regional³ level. On the other hand, only 4% don't follow news at all.

Trust in the media in general: The same percentage of citizens (61%) trust the media in Kosovo, compared to 38% of those who don't. On average, 53% of citizens in the region express trust in the media, so it can be concluded that Kosovo stands out with greater trust.

Access to information through the media: Less than half of citizens state that information about relevant issues is completely accessible or accessible to a large degree through the media in Kosovo, which is the same as the regional level.

Freedom of the media to report critically and express their view: Again, less than half of citizens believe that journalists and media outlets in Kosovo are free to express their views and report critically about relevant news, which is higher than the regional average.

Current state of media freedom - pressure on journalists and media reporting: One fifth of people believe that there is high pressure on journalist/media reporting in Kosovo, which is lower in comparison to the regional level. However, bigger share of them, 60%, believe that pressure is present to some degree.

Self-censorship: Somewhat more than one fifth of citizens believe that public officials in Kosovo tend to give statements which might influence journalists and/or media not to publish their information.

Importance of freedom of speech and media freedom: About 70% of people in Kosovo agree that freedom of speech, as a fundamental human right, should be strictly protected, as well as that freedom of media is a precondition for a free democratic society. On the other hand, even 31% state that the government should be allowed to restrict media freedom.

Awareness of investigative journalism: Approximately one half of citizens noted that the media in Kosovo do engage in investigative reporting, at least to some extent. Less than one fifth believe that the media engage in investigative reporting to a sufficient extent, which is in line with the regional average. Additionally, according to citizens, only a few media outlets are engaged in investigative reporting.

Awareness of journalists' professional associations: Although countries in the region vary greatly when it comes to their awareness of journalists' professional associations, they mostly agree that the work of journalists' professional associations improves the situation of media and helps journalists in their country – it is the case with 49% of citizens in Kosovo.

² Data collection conducted from July to October 2017.

³ The survey was conducted in six countries: Albania, Bosnia and Herzegovina, Kosovo, the former Yugoslav Republic of Macedonia, Montenegro and Serbia.

Annex 1 - Outline of the monitoring methodology

1. Developing survey instruments

1.1 Questionnaire used in the expert panel country meetings, as well as the on-line survey among experts and representatives of relevant interest group organisations/ institutions

Prior to information collection, the survey instrument was developed. The basis for the survey instrument was the Media Guidelines, 2014-2020. It specifies 4 broad objectives:

- 1) Enabling an environment for and resulting responsibilities of the main actors;
- 2) Advancing media to a modern level of internal governance;
- 3) Qualitative and trustworthy investigative journalism available to citizens;
- 4) Increasing capacity and representativeness of journalists' professional organisations.

These objectives are divided into 20 indicators:

- 1.1. Legal guarantees and review of their implementation;
- 1.2. The judiciary acts in conformity with Article 10 of the European Convention on Human Rights and applicable case law;
- 1.3. State institutions ensure media pluralism and their independence; law enforcement in media outlets and access to information of public character;
- 1.4. Independent and professional regulators preserve media pluralism and prevent unfair competition in the media market;
- 1.5. State institutions and public authorities stimulate public demand for quality journalism;
- 1.6. Public Service Media – ensure content pluralism in the media environment in an independent and accountable manner;
- 1.7. Initiative and creativity by state institutions in using tools at their disposal to promote free speech and media diversity;
- 2.1. Media outlets voluntarily adhere to principles of transparency;
- 2.2. Media outlets voluntarily subscribe to and implement adequate labour standards;
- 2.3. Self-enforcement of ethical norms and professional standards;
- 2.4. Structures strengthened for basic and continuous training and education of journalists and journalism students on professional standards, freedom of expression and media integrity;
- 2.5. Media outlets promote professional training (including in professional ethics);
- 2.6. Investment in professional management of companies;
- 2.7. Regaining audience confidence;
- 3.1. Improved conditions for quality investigative journalism including modern/innovative approaches to increase the quality and credibility of investigative journalism;
- 4.1. Media organisations/journalists' associations act on the basis of long-term vision and strategies to achieve impact. Productive dialogue with authorities established;
- 4.2. Regular dialogue within the media community established on press freedom and integrity issues;
- 4.3. Media organisations monitor and evaluate the results and impact of their own work;
- 4.4. Platforms (journalists' professional organisations, CSOs, media owners and editors) set up and actively promote professional standards and ethics;

- 4.5. Labour standards developed and upheld.

The phase that followed was operationalisation of the indicators into items. Each item constitutes an operationalised benchmark from the Media Guidelines. After an initial list of items was created, it underwent thorough review by a number of key media experts from all of the countries included in the monitoring process. One consultative meeting with key experts from all target countries was held in Tirana on 27 and 28 April, 2017. Certain items were reformulated, some were excluded and new items added, as suggested by the media experts. The final list included 249 items, of which 239 items were to be assessed by expert panels and representatives of relevant interest group organisations/ institutions, and 9 of them examined via a survey among the general population.

Answers on the items were obtained on a range of scales:

- *Items provided by the media experts:*
 - *Yes/No answers*
 - *Scales (three-point, four-point and five-point scales)*
 - *Absolute number*
 - *Percentage*
- *Items obtained from the general population survey:*
 - *Percentage of answers*

The whole process of questionnaire design took place between March and July of 2017.

The questionnaire was prepared in English and translated into each local language, in the period from July to August of 2017. These versions were programmed in July, August and early September in order to be administered online.

Members of the expert panels discussed all these points during country meetings and completed the whole online questionnaire, i.e. they assessed the full list of indicators. Taking into account the specific expertise of different interest groups, their representatives, in contrast, assessed only selected indicators from the full list included in the questionnaire.

1.2 Interview guide used for in-depth interviews with representatives of relevant interest group organisations/ institutions

The interview guide was developed on the basis of the online questionnaire developed for experts and representatives of relevant interest group organisations/ institutions (explained above). As in the online survey with interest groups, the interviewees undergoing in in-depth interviews as representatives of interest groups assessed only selected indicators from the full list included in the questionnaire, depending on their specific field of expertise and interest. Additionally, some topics were further developed in order to obtain more in-depth information from interviewees.

1.3 Questionnaire used in a general population survey

The questionnaire used in the general population survey covered several topics, such as news consumption, trust in the media, perception of media freedom, recognition of investigative journalism and journalists' professional organisations.

2. Data collection

2.1 Expert panel country meetings and the online survey with members of expert panels

Six expert panel meetings were held in early October, in each of the target countries: on 2 October 2017 in Sarajevo, on 4 October in Podgorica, on 6 October in Belgrade, on 9 October in Skopje, on 11 October in Tirana, and on 13 October in Pristina. The composition of these expert panels was defined by media consultants within the project team, taking into account the fields of expertise required to assess the full list of indicators. Ten such fields of expertise have been singled out, and approximately ten experts identified in each country and invited to take part in the expert panel and the assessment of the full list of indicators.

Members of the expert panels had opportunity to fill in the questionnaire prior to the meeting, during the meeting or after. During the meeting, main points were productively discussed. Special care was taken to give enough time for experts to fill in the on-line questionnaire – from late September till early November. Extensive efforts were taken to motivate media experts to participate in the on-line survey.

The number of experts per country is provided in the Table 1:

Table 1. Number of members of the expert panels who assessed full list of indicators and those who actually participated in the expert panel meetings, per country

Country	Experts who assessed full list of indicators	Experts who actually participated in the expert panel meetings
Albania	6	4
Bosnia and Herzegovina	10	9
Kosovo	8	2
The former Yugoslav Republic of Macedonia	10	9
Montenegro	6	3
Serbia	11	9

2.2 In-depth interviews with representatives of relevant interest group organisations/ institutions

Apart from obtaining information from key experts in target countries, more in-depth information was obtained from personal interviews with relevant interest groups, i.e. representatives of relevant organisations/ institutions. These included the following:

- State/Public officials (from a Ministry or other state body such as an Assembly Committee for media)
- Representatives of the judiciary
- Commissioner for access to public information (Information Commissioner)
- Public service media
- Journalists' professional associations
- Media industry associations
- CSOs - Media/journalism training centers, media institutes

- Media regulatory authorities
- Unions of journalists
- Investigative journalism centers
- Self-regulatory bodies

The number of in-depth interviews conducted per country is provided in Table 2:

Table 2. Number of representatives of interest groups/relevant institutions and organisations who participated in the in-depth interviews, per country

Country	Representatives of interest groups/relevant institutions and organisations who participated in the in-depth interviews
Albania	4
Bosnia and Herzegovina	8
Kosovo	8
The former Yugoslav Republic of Macedonia	6
Montenegro	9
Serbia	10

This activity was carried out in October and November 2017.

2.3 Online survey with representatives of relevant interest group organisations/ institutions

In addition to in-depth interviews, representatives of relevant interest group organisations and institutions were asked to complete the online questionnaire, which included selected indicators from the full list that were deemed relevant to their field of interest and expertise. Additionally, not only those being interviewed, but a wider list of representatives of relevant organisations/ institutions was asked to participate in the on-line survey. The number of representatives of relevant organisations/institutions per country is provided in Table 3:

Table 3. Number of representatives of relevant interest group institutions and organisations who assessed selected indicators relevant to their field of interest and expertise, per country

Country	Representatives of relevant interest group institutions and organisations that assessed a selected number of indicators
Albania	6
Bosnia and Herzegovina	4
Kosovo	5
The former Yugoslav Republic of Macedonia	7
Montenegro	7
Serbia	13

2.4 General population survey

The main aim of the general population survey was to obtain information from citizens in target countries regarding their level of trust in the media, their perception of media freedom, as well as their recognition of investigative journalism and journalists' professional organisations. A brief outline of the methodology is presented below:

- *Target population:* entire 18+ population of permanent residents of the target countries;
- *Type of sample:* A three-stage random representative stratified sample (PSU: Polling station territories, SSU: Households, TSU: Household member);
- *Respondent:* Household member 18+ (randomly chosen);
- *Data collection method:* F2F (Face to Face) in home, Computer Assisted Personal Interviewing (CAPI), except in the former Yugoslav Republic of Macedonia (telephone interviewing);
- *Sample size:* at least 1000 interviews per country;
- *Weighting:* by region, type of settlement, gender, age and education;
- *Questionnaire length:* completion time estimated to be around 5 minutes (with 5 open-ended questions);
- *Data collection period:* from July to October 2017.

3. Index system development - calculating the indices

In order to quantify indicators, an index system was developed. As established, 4 broad objectives, divided into 20 indicators were operationalised by 246 items (237 assessed by expert panels and interest groups, and 9 examined through the survey among the general population). From all the items, 23 were excluded from further analysis, since the data were provided by an insufficient number of media experts, thus preventing reliable analysis. Finally, 223 items were analysed. The number of items per indicator varies, from 1 to 54. Detailed information is provided in Table 4. The whole list of created items and analysed items, i.e. items included in the index system development, can be seen at the end of this section. The excluded items are given in *Italic*.

Table 4. Number of operationalised items and number of items included in the analysis, per indicator

Indicator	Number of items created	Number of items analysed
1.1. Legal guarantees and review of their implementation	32	32
1.2. The judiciary acts in conformity with Article 10 of the European Convention on Human Rights and applicable case law	8	1
1.3. State institutions ensure media pluralism and their independence; law enforcement in media outlets and access to information of public character	19	13
1.4. Independent and professional regulators preserve media pluralism and prevent unfair competition in the media market	54	54
1.5. State institutions and public authorities stimulate public demand for quality journalism	5	5
1.6. Public Service Media – ensure content pluralism in the media environment in an independent and accountable manner	17	17
1.7. Initiative and creativity by state institutions in using tools at their disposal to promote free speech and media diversity	2	2
2.1. Media outlets voluntarily adhere to principles of transparency	12	12
2.2. Media outlets voluntarily subscribe to and implement adequate labour standards	9	9
2.3. Self-enforcement of ethical norms and professional standards	4	3
2.4. Structures strengthened for basic and continuous training and education of journalists and journalism students on professional standards, freedom of expression and media integrity	4	4
2.5. Media outlets promote professional training (including in professional ethics)	4	4
2.6. Investment in professional management of companies	2	2
2.7. Regaining audience confidence	1	1
3.1. Improved conditions for quality investigative journalism	10	10

including modern/innovative approaches to increase the quality and credibility of investigative journalism		
4.1. Media organisations/journalists' associations act on the basis of long-term vision and strategies to achieve impact. Productive dialogue with authorities established	21	20
4.2. Regular dialogue within the media community established on press freedom and integrity issues	8	8
4.3. Media organisations monitor and evaluate the results and impact of their own work	8	8
4.4. Platforms (journalists' professional organisations, CSOs, media owners and editors) set up and actively promote professional standards and ethics	10	9
4.5. Labour standards developed and upheld	17	9
TOTAL	249	223

Answers from all parties involved (media experts, interest groups and the general population) were treated in the same way. However, taking into consideration that the media experts responded to the full list of indicators, while interest groups responded only to selected indicators, and the general population to only 9 items from the questionnaire, it can be concluded that media experts have the greatest impact on the overall results.

Given that a number of media experts and representatives of interest groups per country provided answers to the items, one measure for each item per country was obtained by calculating the share of positive answers among all the answers provided (for a particular item for each country). All negatively oriented items were reoriented in order to a positive direction, so that it is possible to make further mathematical operations between them. In order to obtain one measure per indicator, an average value was calculated for items belonging to one indicator.

Since there is one average value for each indicator (20 in total) for each country (6 countries), there are 120 scores altogether (20 indicators multiplied by 6 countries). These scores/indices are sorted from lowest to highest and categorised into five categories, from the worst evaluated to the best evaluated. The distribution used was 15%; 15%; 40%; 15%; 15%. Although it can be said that this distribution is arbitrary, it has its foundation in probability theory and normal (or Gaussian) distribution, where distribution of values is symmetrical, and most results are situated around the mean. Based on this distribution, cut values were determined, which enabled score categorisation in the following way:

- 15% (from 0 to 0.14) – Red, the worst evaluated in the region;
- 15% (from -0.36 to -0.06) – Orange, the second worst evaluated in the region;
- 40% (from -0.05 to 0.49) – Yellow, the middle of the regional ranking;
- 15% (from 0.50 to 0.81) – Light green, the second best evaluated in the region;
- 15% (from 0.82 to 1) – Green, the best evaluated in the region.

The same principle was applied to the objectives. In order to obtain one measure per objective (4 objectives), an average value was calculated for all indicators belonging to one objective. Since there is one average value for each objective (4 in total) for each country (6 countries), there are 24 scores altogether (4 objectives multiplied by 6 countries). These scores are sorted from lowest to highest and categorised into five categories, from the worst evaluated to the best evaluated (15%; 15%; 40%; 15%; 15%).



Note: Although objective number 3 is comprised only one indicator (3.1.) (as specified on pages 2 and 3), different categorisations of countries (i.e. their colours) is possible, given that the cut values for indicators and objectives are different. As already mentioned, there are 120 scores for indicators (20 indicators multiplied by 6 countries) and 24 scores for objectives (4 objectives multiplied by 6 countries), and this is the reason behind the differences.

3.1 The whole list of items included in the index system development

1. ENABLING ENVIRONMENT AND RESULTING RESPONSIBILITIES OF MAIN ACTORS

1.1. Legal guarantees and review of their implementation

1. Is the right to freedom of expression and information through the media guaranteed in the constitution?
2. Is the constitution in line with Article 10 of the European Convention on Human Rights?
3. Is the right to freedom of expression and information through the media guaranteed under national legislation?
4. Is this law in line with Article 10 of the European Convention on Human Rights?
5. Are cases in which these rights can be restricted clearly/unambiguously defined by the constitution/law?
6. Are these cases in line with those stipulated in Article 10 of the European Convention on Human Rights?
7. Are legal guarantees/safeguards regarding freedom of expression and information through the media implemented in a consistent, non-selective manner?
8. Is there a periodic assessment of the state of media freedom (including assessment of the existence and implementation of the legal framework affecting the media, or assessment of other factors influencing freedom of expression and media freedom) conducted by Parliament and/or the Government?
9. If yes, is this periodic assessment of the state of media freedom and of the legal framework done on the basis of indicators listed in the Council of Europe PA Resolution 1636 (2008)?
10. If not, is there an assessment of the state of media freedom (including assessment of the existence and implementation of the legal framework affecting the media, or assessment of other factors influencing freedom of expression and media freedom) conducted by any other state institution/body?
11. If yes, was the last assessment of the state of media freedom (including assessment of the existence and implementation of the legal framework affecting media, or assessment of other factors influencing freedom of expression and media freedom) - conducted by the Parliament/Government/other state institution/body - positive?
12. Are journalists' professional associations, and/or media representatives consulted about and involved in preparing the Parliament's/Government's assessments and follow-up proposals?
13. Is this done in a transparent manner?
14. Is this done in a fair/inclusive manner?
15. Was a report published about the consultation process?
16. Are the proposals by the media and journalists' professional associations taken into consideration by the Parliament/Government?
17. Are independent regulatory authorities* consulted about and involved in preparing the Parliament's/Government's assessments and follow-up proposals? *Independent regulatory authorities are in charge of supervising the implementation of regulations related to electronic media, which usually encompasses the power to license broadcasters, to monitor whether broadcasters are fulfilling their legal obligations, and to impose sanctions if they fail to carry out those obligations.

18. Is this done in a transparent manner?
19. Is this done in a fair/inclusive manner?
20. Are the proposals by the independent regulatory authorities taken into consideration by the Parliament/Government?
21. Are interested CSOs consulted about and involved in preparing the Parliament's/Government's assessments and follow-up proposals?
22. Is this done in a transparent manner?
23. Is this done in a fair/inclusive manner?
24. Was a report published about the consultation process?
25. Are proposals by the CSOs taken into consideration by the Parliament/Government?
26. Have any laws, strategies, policies and/or measures been adopted in order to improve the situation in the media sector, as a result of such periodic assessment?
27. Have there been any independent assessments of the state of media freedom carried out by non-state actors such as think tanks, international organisations etc. in the past year?
28. Did those assessments contain suggestions for improvement of the current situation in the media sector?
29. Did the Government/Parliament/other state institution/body take into consideration proposals provided in the independent assessments?
30. Did the Government/Parliament/other state institution/body implement any of these proposals?
31. If yes, were these changes based on the periodic assessments of the state of media freedom, including the assessment of the legal framework?
32. If changes in the national legislation were introduced in the past year, have these changes been for the better, for the worse, or has nothing changed?

1.2. The judiciary acts in conformity with Article 10 of the European Convention on Human Rights and applicable case law

1. *What is the number of judges in your country trained in applying ECtHR case law on freedom of expression? Training covers also application of legislation affecting media in line with fundamental rights (including to free expression). (not included in the index system development due to small number of answers)*
2. *What is the number of prosecutors in your country trained in applying ECtHR case law on freedom of expression? Training covers also application of legislation affecting media in line with fundamental rights (including to free expression). (not included due to small number of answers)*
3. *What is the number of the rulings in your country related to media freedom and freedom of expression (ECtHR case law) in the last year? (not included due to small number of answers)*
4. *What is the number of cases in your country in which journalists/media representatives were acquitted related to media and freedom of expression (ECtHR case law) in the last year? (not included due to small*

number of answers)

5. *What is the number of cases in your country in which journalists/ media representatives were convicted related to media and freedom of expression (ECtHR case law) in the last year? (not included due to small number of answers)*
6. *What is the number of cases in your country in which there were inadequate damages awarded (in comparison to other similar sanctions/cases) in the last year? (not included due to small number of answers)*
7. *What is the number of cases in your country where charges against journalists/media were pushed by public officials on the grounds of defamation law in the last year? (not included due to small number of answers)*
8. *Is there a data collection system in your country providing that data on prosecution of journalists/media representatives are systematically collected, updated and made available on a regular basis or otherwise accessible?*

1.3. State institutions ensure media pluralism and their independence; law enforcement in media outlets and access to information of public character

1. How often in the past year have public officials (President, Prime Minister, ministers, MPs, government at the local level, public officials, public authorities, directors of state companies, religious leaders, party officials, etc.) made statements that might possibly have a self-censorship effect on the media?
2. In your opinion, how often in the past year have journalists in your country practiced self-censorship for fear of civil lawsuits or criminal prosecution (fines, imprisonment)?
3. In your opinion, how often in the past year have journalists in your country practiced self-censorship for fear of professional reprisals or attacks on their reputation?
4. In your opinion, how often in the past year have journalists in your country practiced self-censorship for fear of threats to their physical safety or that of their family and friends, to their workplace or home?
5. How many physical attacks on journalists have taken place in the past year?
6. How many threats to journalists have been made in the past year?
7. How many other forms of intimidation of the media have taken place in the past year?
8. Has this number decreased in comparison to the previous year?
9. Are such cases dealt with by law enforcement and the judiciary in a timely manner?
10. *What is the number of complaints raised because law enforcement and judiciary did not deal with these cases in timely manner in the last year? (not included due to small number of answers)*
11. *What is the number of convictions in cases of attacks on journalists in the last year? (not included due to small number of answers)*
12. Is there a data collection system providing that data on attacks on journalists and on actions taken by the law enforcement bodies in these cases are systematically collected, updated and made available on a regular basis or otherwise accessible?

13. Are rules on access to information of a public character in place?
14. Are these rules in accordance with the Council of Europe and other relevant European standards?
15. Are these rules related to access to information of public character for journalists and media followed by authorities without delay?
16. *What is the number of cases where authorities restricted access to information to media in the last year? (not included due to small number of answers)*
17. *What is the number of cases related to access to information of public character for journalists and media where Commissioner for information of public character/Information Commissioner intervened when the authorities restricted access to media? (not included due to small number of answers)*
18. *What is the number of cases related to access to information of public character for journalists and media where intervention of the Information Commissioner had positive outcome, and the authorities enabled access to information as a result of the intervention? (not included due to small number of answers)*
19. *What is the number of cases related to access to information of public character for journalists and media where intervention of the Information Commissioner didn't have positive outcome, and the authorities even after the appeal procedure didn't enable access to information, or enabled incomplete or delayed access to information? (not included due to small number of answers)*

1.4. Independent and professional regulators preserve media pluralism and prevent unfair competition in the media market

1. Are there Media regulatory authorities* present in your country? *Regulatory authorities are in charge of supervising the implementation of regulation related to electronic media, which usually encompasses the power to license broadcasters, to monitor whether broadcasters are fulfilling their legal obligations, and to impose sanctions if they fail to carry out those obligations.
2. Does legislation provide for independent and professional operation of the Media regulatory authorities in charge of the broadcasting sector?
3. Are Media regulatory authorities or any other professional and independent body (ies) required to contribute to the protection and promotion of freedom of expression and information through the media?
4. Are Media regulatory authorities or any other professional and independent body (ies) required to contribute to the protection and promotion of diversity of opinions and media pluralism - during elections?
5. Are Media regulatory authorities or any other professional and independent body (ies) required to contribute to the protection and promotion of diversity of opinions and media pluralism - outside election periods?
6. Are Media regulatory authorities or any other professional and independent body (ies) required to protect public interests and media users?
7. Are Media regulatory authorities or any other professional and independent body (ies) required to ensure media ownership transparency?

8. Are Media regulatory authorities or any other professional and independent body (ies) required to regulate/prevent concentration and abuse of dominant market positions by media?
9. Are there rules to ensure that Media regulatory authorities in charge of the broadcasting sector are independent and free from political or other interference when it comes to appointment and dismissal of members?
10. In practice, are Media regulatory authorities in charge of the broadcasting sector independent and free from political or other interference when it comes to appointment and dismissal of members?
11. In practice, are the Media regulatory authorities consulted if the Government initiates changes to the regulations related to their scope of work, competences, rights and obligations?
12. Is the media sector (media industry and journalists' associations) consulted if the Government initiates changes to the regulations related to the scope of work, competences, rights and obligations of the regulatory authorities?
13. Are the recommendations and suggestions from public consultations taken into account?
14. Are there rules to ensure that the government/ other state bodies or officials cannot take actions that might be qualified as interference with Media regulatory authorities' independence when it comes to the decision-making process?
15. In practice, are the Media regulatory authorities in charge of the broadcasting sector independent and free from political or other interference when it comes to the decision-making process?
16. Do the Media regulatory authorities publish or make available all decisions about the measures issued and imposed, with or without justification?
17. Is there an obligation for the Media regulatory authorities in charge of the broadcasting sector to submit an annual report to the parliament or other state institution on performance of its own mission and tasks?
18. Did the Media regulatory authorities in charge of the broadcasting sector submit an annual report on performance of its own mission and tasks in the past year?
19. Is this annual report on performance of its own mission and tasks available to the public?
20. Do the Media regulatory authorities in charge of the broadcasting sector have financial autonomy?
21. Did the Media regulatory authorities publish financial reports for the past year?
22. Does this annual report (annual reports if there are multiple regulatory authorities) include information on the fees paid by media outlets to the regulatory authority?
23. Please assess the efficiency of the Media regulatory authority/authorities.
24. Please assess the independence of the Media regulatory authority/authorities.
25. Do the Media regulatory authorities annually provide accessible records on media ownership?
26. Are these records transparent and credible (in terms of data on real beneficiaries/beneficial owners)?
27. Are economic performance/financial statements of outlets made available by the Media regulatory authorities or any other authority or institution?

28. Is legislation against media concentration and misuse of dominant market position in place?
29. Is legislation against media concentration and misuse of dominant market position properly enforced?
30. Are sanctions regarding media concentration and misuse of dominant market position proportionate?
31. Are enforcement records (data/files on all investigated or processed cases) regarding media concentration and misuse of dominant market position made public?
32. Is State advertising and any other direct or indirect use of public money in the media regulated by legislation in accordance with good governance to guarantee fairness, neutrality, equal treatment and transparency?
33. Are the rules regarding State advertising and any other direct or indirect use of public money in the media enforced by the competition authority or other body(ies)?
34. Is there transparency in State advertising including public campaigns/advertisements by state bodies and local authorities?
35. Are the volume and share of State advertising and, other use of public money per media outlet being published (including public campaigns/advertisements)?
36. Is there transparency in dispatching advertisements by state-owned companies?
37. Is the volume and share of advertising per outlet by state-owned companies made public?
38. Are verified audience measurements implemented regularly?
39. Are publicity campaigns by governments or other state or local authorities developed on the basis of verified audience measurements?
40. Is media sector market analysis conducted regularly?
41. Are regulatory proposals being developed on the basis of media sector market analysis?
42. Is there legal protection in place against informal economic pressure (e.g. cancelation of advertising contracts because of critical reporting) on independent reporting?
43. Do responsible authorities provide periodic sector analysis to disclose any informal economic pressure on independent reporting (e.g. by ad agencies, media owners participating in public procurement, cross ownerships, etc.)?
44. Has the state-owned media been privatised?
45. Has this privatisation been carried out in a transparent way?
46. Has privatisation been carried out with due respect to fair competition?
47. Are there sanctions for the cases that jeopardise the media privatisation process?
48. Are state budget funds foreseen for project co-financing for media outlets?
49. Is the process of funding allocation conducted in a transparent manner?
50. Is the report on funding allocation published annually?
51. Are there measures in place to sanction cases that jeopardise the process of project co-financing for media outlets?

52. Are there any other sources of public funding/money that might be allocated to the media through various funds and mechanisms (subscription fee, taxes payable directly to a designated fund etc.)?
53. Is the process of funding allocation in case of these other financial mechanisms conducted in a transparent manner?
54. Is the report on funding allocation published annually?

1.5. State institutions and public authorities stimulate public demand for quality journalism

1. In the past year, have there been public/state programs to promote media literacy?
2. Has regulation been drafted or adopted to block or filter internet content?
3. In the past year, have there been cases where dissemination of information was prevented by blocking/filtering internet content?
4. In the past year, were there cases where dissemination of information was prevented through blocking/filtering internet content by the state bodies (including prosecutors or courts)?
5. Have the public authorities recently developed strategies or measures for supporting of “new”/online, local and/or alternative media?

1.6. Public Service Media – ensure content pluralism in the media environment in an independent and accountable manner

1. Is the Public Service Media remit defined by legislation?
2. Were there broad public consultations regarding the Public Service Media remit?
3. Does the law provide for editorial independence and against politicisation of Public Service Media?
4. In practice, is editorial independence of Public Service Media efficiently/de facto protected when it comes to political interference?
5. Is there a governing body of Public Service Media composed to represent diverse social groups and actors (e.g. minorities, CSOs, academia and similar)?
6. Please assess the level of independence of PSM considering mechanisms for appointment and dismissal of key personnel (e.g. director general, directors, editors-in-chief etc.).
7. Do the Public Service Media have sufficient funds to perform Public Service obligations (funds sufficient to comply with the PS remit)?
8. Are sources of and mechanisms for funding the Public Service Media provided to allow stable operations and avoid dependence on decisions by the Government/the Parliament over the PSM budget?
9. Is there a legal obligation for Public Service Media to publish annual reports (including financial)?
10. Did the Public Service Media publish an annual report (including financial) in the past year?
11. Is there a Code of ethics for the Public Service Media?
12. Have the Public Service Media developed an in-house mechanism to deal with viewer/listener/user complaints (e.g. an ombudsman, a readers’ editor)?
13. Are these mechanisms effective in dealing with viewer/listener/user complaints?

14. Is there an investigative journalism* unit present in the PSM in your country? *Investigative journalism in this survey is considered systematic work on investigation of and reporting on societal issues related to abuse of power, corruption, organised crime and serious violation of fundamental rights that otherwise would not have been brought to the public's attention.
15. Does the PSM have an annual or multi-annual program and financial plans dedicated to the operation of an investigative journalism unit?
16. Does the PSM (its special unit or without such unit) engage regularly in independent and critical investigative journalism?
17. On a scale from 1 to 4, how much trust do you have in Public Service Media (please insert the specific media provider), when it comes to reporting the news fully, accurately and fairly? (*General population survey*)

1.7. Initiative and creativity by state institutions in using tools at their disposal to promote free speech and media diversity

1. Have there been any actions (e.g. awareness campaigns, public hearings or debates) undertaken by state institutions aimed at promoting media freedom and media pluralism/diversity?
2. If yes, please assess the efficiency of any actions undertaken by state institutions (e.g. awareness campaigns, public hearings or debates) aimed at promoting media freedom and media pluralism/diversity.

2. ADVANCING MEDIA TO A MODERN LEVEL OF INTERNAL GOVERNANCE

2.1. Media outlets voluntarily adhere to principles of transparency

1. Is any state institution obliged to collect data about corporate governance and finances from one or more different types of media (Radio, TV, Print, Online)?
2. If yes, are these state institutions able to efficiently collect these data from the media? (Radio, TV, Print, Online)
3. Is the ownership structure made publicly available? (Radio, TV, Print, Online)
4. Are financing sources made publicly available? (Radio, TV, Print, Online)
5. Is income received from the state made publicly available? (Radio, TV, Print, Online)
6. Are balance sheets made publicly available? (Radio, TV, Print, Online)
7. Does any state institution keep track of and provide data (available to the public) about the market share of one or more different types of media (Radio, TV, Print, Online)?
8. Are media outlets obliged to submit a report on their corporate governance and finances to some state institution?
9. What share of media outlets voluntarily provide open access to data about their ownership structure?
10. What share of media outlets voluntarily provide open access to data about their financing sources?
11. What share of media outlets voluntarily provide open access to data about income received from the state?

12. What share of media outlets voluntarily provide open access to data about their balance sheets?

2.2. Media outlets voluntarily subscribe to and implement adequate labour standards

1. What percentage of journalists in your country have long-term employment contracts?
2. What percentage of journalists in your country have fixed-term employment contracts?
3. What percentage of journalists in your country have contracts, but are not in an employment relationship (honorarium-based/piecework contract or service contract, etc.)?
4. What percentage of journalists in your country are freelancers (self-employed, working for different media)?
5. What percentage of journalists have no or insufficient social protection (contributions for social security not paid or paid only on part of the salary)?
6. Are the terms of working contracts a factor in self-censorship? (The terms of working contracts refer to job insecurity, uncertainty of working time, irregular earnings, insecurity of working conditions, legal insecurity and violation of labour rights: non-payment of overtime, work on weekends and public holidays and unpaid sick leave; failure to comply with labour rights in the company where the respondent works, violation of their rights to union organising.)
7. What percentage of media outlets have adopted an internal code of ethics (a document defining ethical conduct)?
8. What percentage of media outlets have adopted statutes (internal acts defining the relations, rights and obligations between owner/publisher, management and editorial office/journalists etc.)?
9. Is freedom of association (i.e. the right of media workers to establish associations and/or unions) clearly spelled out in the labour regulations, or in internal statutes?

2.3. Self-enforcement of ethical norms and professional standards

1. What share of media outlets have developed in-house mechanisms to deal with reader/viewer/listener/user complaints (e.g. an ombudsman, a readers' editor)?
2. Are these mechanisms effective in dealing with reader/viewer/listener/user complaints?
3. Are public data available about cases of journalists suspended or dismissed on the grounds of critical reporting (despite having complied with the code of ethics)?
4. *What is the number of suspended or dismissed journalists on the grounds of critical reporting (despite being consistent with code of ethics) in the last year? (not included due to small number of answers)*

2.4. Structures strengthened for basic and continuous training and education of journalists and journalism students on professional standards, freedom of expression and media integrity

1. What is the total number of colleges/faculties/schools teaching journalism?
2. What is the number of journalism colleges/faculties/schools that incorporate courses on ethical codes and standards in their curriculum?
3. In the past year, how many media providers have offered/organised training courses and/or internship programs* which include learning about professional standards, freedom of expression, media freedom

and media integrity? *These courses/programs are offered to any journalist, not only to those employed/working in that media.

4. In the past year, how many training programs/courses for professional journalists have been organised by Media training centers* that include learning about professional standards, freedom of expression and media integrity? *Media training centers refer to civil society organisations operating separately from any media.

2.5. Media outlets promote professional training (including in professional ethics)

1. What percentage of media have a staff development policy? (Staff development refers to all policies, practices and procedures used to develop the knowledge, skills and competencies of staff.)
2. What percentage of media providers have a human resources department?
3. In the past year, what percentage of media providers have implemented their own professional development programs (for journalists employed/working in that media) that include learning about professional ethics?
4. In the past year, what percentage of media sent their journalists to professional development programs (provided outside their own institution) that included learning about professional ethics?

2.6. Investment in professional management of companies

1. What percentage of media outlets have business plans?
2. What percentage of media outlets implement the business goals defined by their business plan?

2.7. Regaining audience confidence

1. In general, how much trust do you have in the media -- such as newspapers, TV, radio or online news sources - when it comes to reporting the news fully, accurately and fairly in your country? (*General population survey*)

3. QUALITATIVE AND TRUSTWORTHY INVESTIGATIVE JOURNALISM AVAILABLE TO CITIZENS

3.1. Improved conditions for quality investigative journalism including modern/innovative approaches to increase the quality and credibility of investigative journalism

1. How many joint journalist/CSO projects have been created in your country dedicated to investigative journalism in the past year?
2. Are there any awards for investigative journalism in the country?
3. How many cross-border, regional or international joint investigative journalism projects have there been in which journalists from your country took part in the past year?
4. How often are there policy/personnel changes in the investigated institutions/organisations as a consequence of the findings from investigative journalism?
5. How many media outlets have been carrying out investigative journalism* within their outlet over the past year? *Investigative journalism in this survey is considered as systematic work on investigations and reporting on societal issues related to abuse of power, corruption, organised crime and serious violations of fundamental rights that otherwise would not have been brought to the public's attention.

6. How many TV media outlets have published investigative journalism content in the past year?
7. How many Radio media outlets have published investigative journalism content in the past year?
8. How many Print media outlets have published investigative journalism content in the past year?
9. How many Online media outlets have published investigative journalism content in the past year?
10. Could you please name up to three Media outlets that published investigative journalism stories in the past year? *(General population survey)*

4. INCREASING CAPACITY AND REPRESENTATIVENESS OF JOURNALISTS' PROFESSIONAL ORGANISATIONS

4.1. Media organisations/journalists' associations act on the basis of long-term vision and strategies to achieve impact. Productive dialogue with authorities established

1. Are media industry associations present in your country?
2. Do media industry associations engage in informed dialogue with the authorities in a coordinated manner?
3. Do media industry associations have sufficient funds for continuous and efficient operation?
4. Are sources of funding for media industry associations diverse (membership fees, donations, sponsorships, projects)?
5. Are membership fees the dominant source of funding for media industry associations?
6. Are media industry associations financially self-sustainable?
7. How many advocacy actions or joint policy initiatives (e.g. dialogue meetings with public authorities to suggest or influence upcoming policy or legislation) have been organised and implemented by media industry associations in the past year?
8. Please assess the impact of these actions on policies or legislation regarding the media.
9. Are journalists' professional associations present in your country?
10. Do journalists' professional associations engage in informed dialogue with the authorities in a coordinated manner?
11. Do journalists' professional associations have sufficient funds for continuous and efficient operation?
12. Are the sources of funding for journalists' professional associations diverse (membership fees, donations, sponsorships, projects)?
13. Are membership fees the dominant source of funding for journalists' professional associations?
14. Are journalists' professional associations financially self-sustainable?
15. How many advocacy actions or joint policy initiatives (e.g. dialogue meetings with public authorities to suggest or influence upcoming policy or legislation) have been organised and implemented by journalists' professional associations in the past year?
16. Please assess the impact of these actions on policies or legislation regarding the media.
17. How many journalists are members of journalists' professional associations?
18. Of the total number of journalists in your country, what percentage are members of journalists'

professional associations?

19. What is the number of members having benefited from free legal aid in the last year? (not included due to small number of answers)
20. Were media industry associations and journalists' professional associations engaged in issue-based coalitions in the past year?
21. In your opinion, does the work of journalists' professional associations contribute to improving the situation of media and journalists in your country? (*General population survey*)

4.2. Regular dialogue within the media community established on press freedom and integrity issues

1. Were there meetings of broad platforms (consisting of, for example, journalists' professional organisations, media industry associations, CSOs/media centers and institutes, think-tanks, journalism schools, investigative journalism centers, editors etc.) organised within the media community on media freedom and integrity issues in the past year?
2. How many meetings of broad platforms were organised?
3. Were there joint conclusions adopted and actions taken at the local, national and/or regional level as a result of meetings of broad platforms?
4. In your opinion, to what extent are journalists and media outlets in your country free to express their views and report critically about relevant news? (*General population survey*)
5. How would you describe the current state of media freedom (newspapers, TV, radio or online news sources) in your country? Chose the statement that best matches/represents your opinion. (*General population survey*)
6. In your opinion, how often have public officials (President, Prime Minister, ministers, MPs, government at the local level, public authorities, directors of state companies, religious leaders, party officials, etc.) made statements that might possibly influence journalists and/or media not to publish their information? (*General population survey*)
7. In your opinion, to what extent is information about relevant issues, events and developments made accessible through the media to citizens in the country? (*General population survey*)
8. In your opinion, how frequently do journalists/media in your country fail to publish information they have out of fear of provoking negative reactions from public officials and other important figures? (*General population survey*)

4.3. Media organisations monitor and evaluate the results and impact of their own work

1. Are media industry associations obliged (following internal rules or legal obligations) to make annual reports?
2. What percentage of media industry associations publish their annual reports?
3. Do media industry associations evaluate their projects and programs?
4. What percentage of media industry associations monitored and evaluated their projects and programs using baselines and quality indicators in the past year?

5. Are journalists' professional associations required to make annual reports?
6. What percentage of journalists' professional associations publish their annual reports?
7. Do journalists' professional associations evaluate their projects and programs?
8. What is percentage of journalists' professional associations monitored and evaluated their projects and programs using baselines and quality indicators in the past year?

4.4. Platforms (journalists' professional organisations, CSOs, media owners and editors) set up and actively promote professional standards and ethics

1. Have self-regulatory bodies been established in your country?
2. Do these self-regulatory bodies have relevant representation from the media community regarding the number of media outlets that have joined the self-regulatory body and submitted to its rules and procedures?
3. Do these self-regulatory bodies have relevant representation from the media community regarding the impact or influence of media outlets that have joined the self-regulatory body and submitted to its rules and procedures?
4. Do these self-regulatory bodies have relevant representation from the media community regarding the market share of media outlets that have joined the self-regulatory body and submitted to its rules and procedures?
5. Do you consider the rules agreed and implemented by these self-regulatory bodies to be effective?
6. Were there any decisions taken against their members?
7. *How many decisions were taken against their members? (not included due to small number of answers)*
8. Has the number of decisions made by self-regulatory bodies regarding violations of the agreed rules decreased in the past year?
9. Are the funding sources (membership fees, donations, sponsorships, projects) of self-regulatory bodies diverse?
10. Have financial contributions (membership fees or similar contributions) from the media community, outlets and media owners to self-regulatory bodies increased, decreased or remained the same over the past year in comparison to the year before?

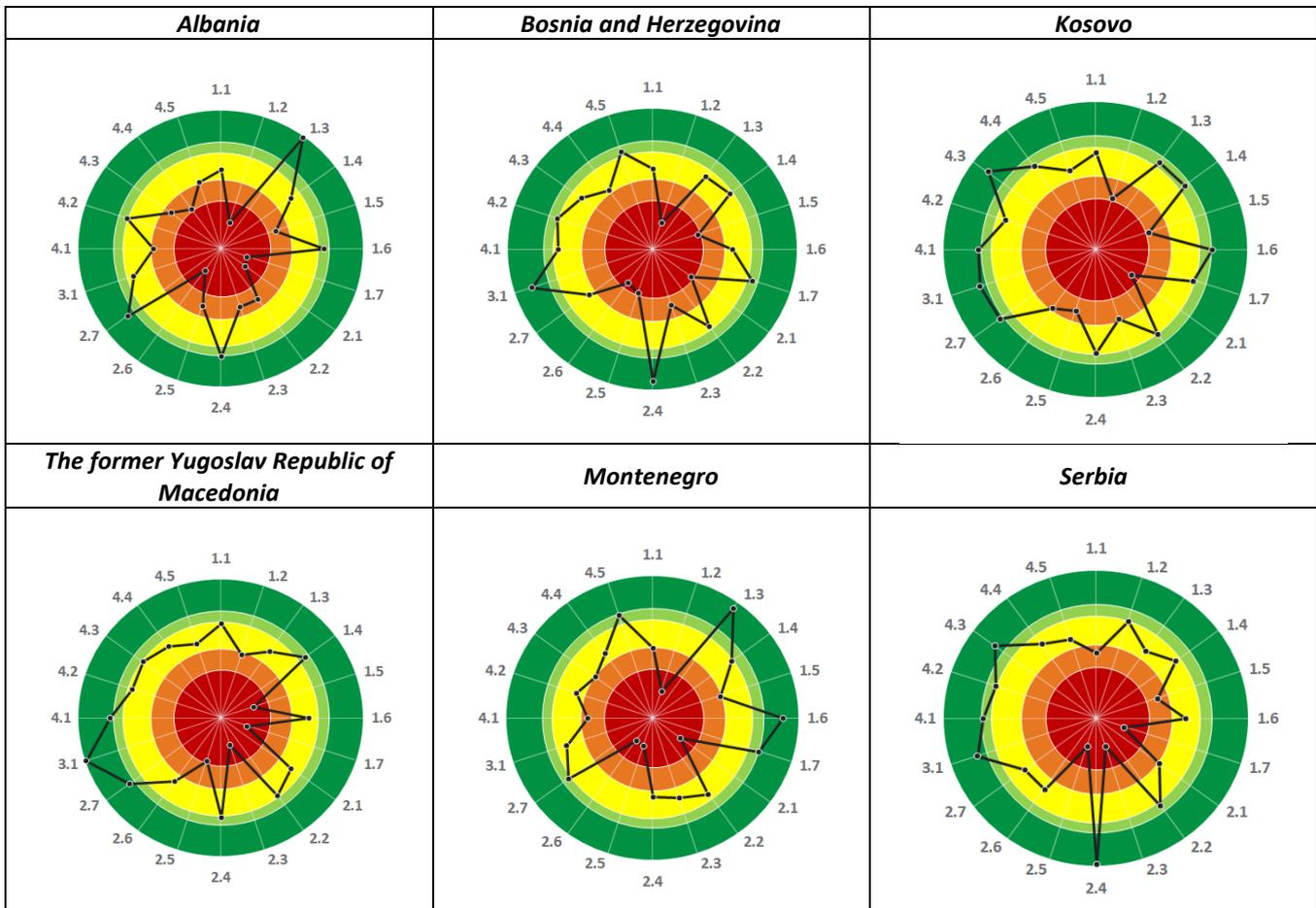
4.5. Labour standards developed and upheld

1. *What is the number of journalists who reported obstacles to freedom of association in the last year? (not included due to small number of answers)*
2. *What is the number of journalists reporting inadequate working contracts with insufficient social protection? (not included due to small number of answers)*
3. In your country, are there collective agreements on the level of single media outlets, on the level of certain types of media, or a collective agreement covering all the media in the country?
4. Are trade unions recognised as partners in negotiating collective agreements?
5. *What is the number of media outlets where collective bargaining between trade unions and employers*

took place in the past three years? (not included due to small number of answers)

6. *What is the number of media outlets where collective bargaining between trade unions and employers took place with a positive result in the past three years? (not included due to small number of answers)*
7. Please assess the quality of agreements reached (against the backdrop of labour standards).
8. How many advocacy and lobbying activities by unions and other organisations regarding labour standards have taken place in the past year?
9. Please evaluate the implementation of national labour laws (in media outlets) and how they are reflected in the collective agreements.
10. Do the media industry/media employers' associations play a role in negotiations on a collective contract with journalists' trade unions?
11. Do the media industry/media employers' associations contribute to achieving satisfactory labour standards?
12. *What is the number of journalists associated in journalist unions? (not included due to small number of answers)*
13. *Out of the total number of journalists in your country which percentage is a member of journalist unions? (not included due to small number of answers)*
14. *What is the number of journalists with irregular/temporary employment status such as fixed-term contract basis, honorarium-based or freelance that are members of journalist unions? (not included due to small number of answers)*
15. Out of the total number of journalists in your country which percentage are journalists with irregular/temporary/precarious employment status such as fixed-term contract basis, honorarium-based or freelance that are members of journalist unions?
16. Were there any attempts at unionisation (new initiatives to establish unions) at media outlets or on the local/regional/national level in your country in the past year?
17. Were there any attempts at de-unionisation (closing down or collapsing of unions) at media outlets or on the local/regional/national level in the past year?

Annex 2 – Traffic lights for all countries



- 1.1. Legal guarantees and review of their implementation
- 1.2. The judiciary acts in conformity with Article 10 of the European Convention on Human Rights and applicable case law
- 3. State institutions ensure media pluralism and their independence; law enforcement in media outlets and access to information of public character
- 1.4. Independent and professional regulators preserve media pluralism and prevent unfair competition in the media market
- 1.5. State institutions and public authorities stimulate public demand for quality journalism
- 1.6. Public Service Media – ensure content pluralism in the media environment in an independent and accountable manner
- 1.7. Initiative and creativity by state institutions in using tools at their disposal to promote free speech and media diversity
- 2.1. Media outlets voluntarily adhere to principles of transparency
- 2.2. Media outlets voluntarily subscribe to and implement adequate labour standards
- 2.3. Self-enforcement of ethical norms and professional standards
- 2.4. Structures strengthened for basic and continuous training and education of journalists and journalist students on professional standards, freedom of expression and media integrity
- 2.5. Media outlets promote professional training (including in professional ethics)
- 2.6. Investment in professional management of companies
- 2.7. Regaining audience confidence
- 3.1. Improved conditions for quality investigative journalism including modern/innovative approaches to increase the quality and credibility of investigative journalism
- 4.1. Media organisations/journalists’ associations act on the basis of long-term vision and strategies to achieve impact. Productive dialogue with authorities established
- 4.2. Regular dialogue within the media community established on press freedom and integrity issues
- 4.3. Media organisations monitor and evaluate the results and impact of their own work
- 4.4. Platforms (journalists’ professional organisations, CSOs, media owners and editors) set up and actively promote professional standards and ethics
- 4.5. Labour standards developed and upheld