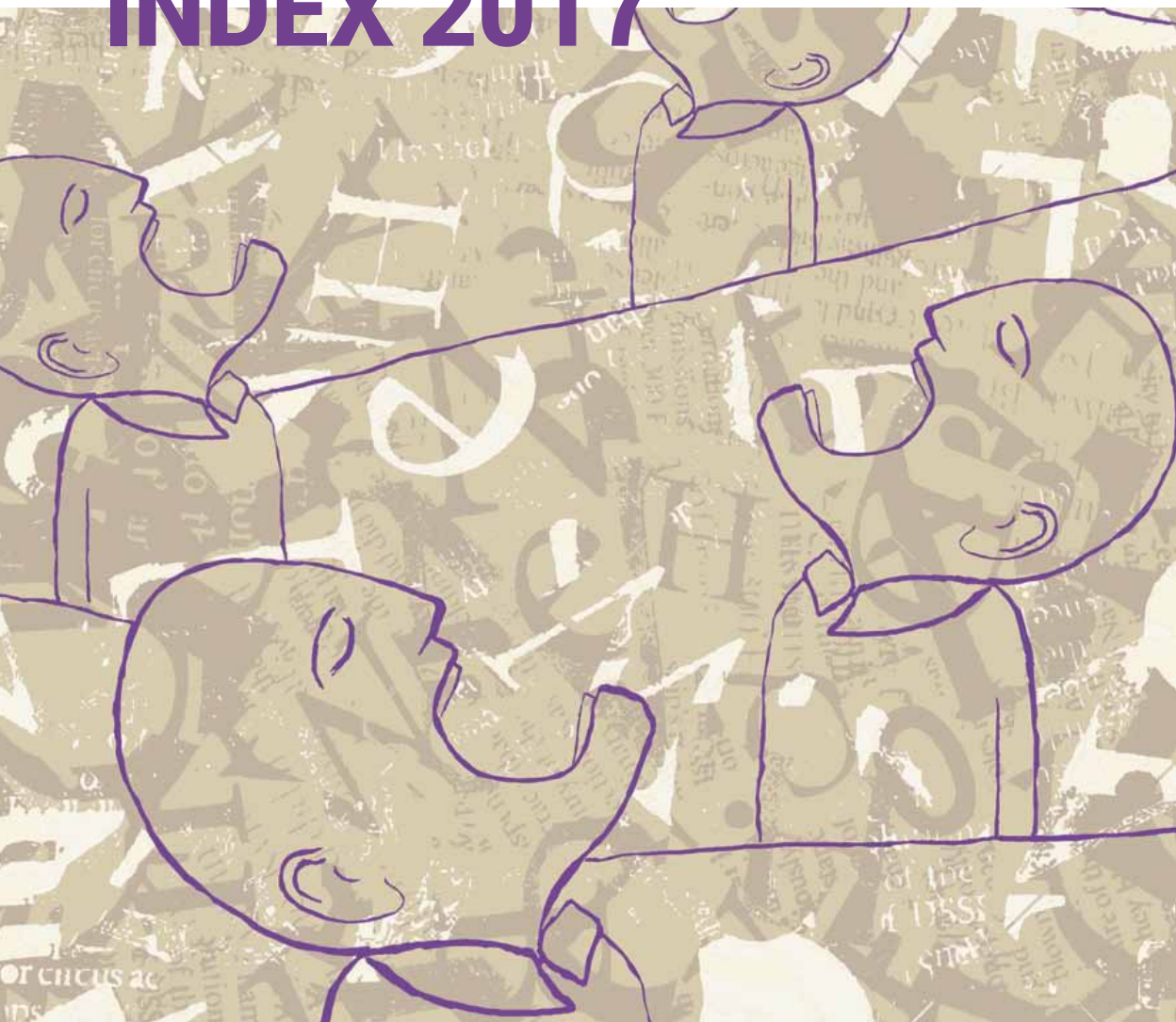


MEASURING MEDIA REALITIES: MEDIA CLIENTELISM INDEX 2017



ACKNOWLEDGMENTS

This publication has been published within the framework of the project Civil Response to Clientelism in Media – MEDIA CIRCLE, implemented by Partnership for Social Development (HR) and financed from the Instrument for Pre-accession Assistance by the European Union (IPA) Civil Society Facility (CSF). Partners from five countries of Southeastern Europe are: Expert Forum (RO), Vesta (BiH), Association of BH Journalists (BiH), Public Policy Institute (MNE), Association for research, communications and development “Public” (MK), YUCOM Lawyers’ Committee for Human Rights (SRB) and Independent Journalists’ of Vojvodina (SRB).

MEDIA CIRCLE project aims to create permanent values – a tool for monitoring Media Clientelism Index and news portal Fairpress.eu, dealing exclusively and systematically with media related issues. These unique instruments are creating data and insight into the media world that has never been available before while designing cross country emergency response system to journalists in need and continuous advocacy and awareness network of committed professionals and organizations.

Project acronym: MEDIA CIRCLE

Project full title: Civil Response to Clientelism in Media

Project duration: December 2013 – March 2018

EU funding: 548.341,37 EUR

Reference: EuropeAid/134613/C/ACT/MULTI

Grant agreement number: 2013/332-758

Project website: www.fairpress.eu

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Publisher: Partnership for Social Development, Zagreb (Croatia)

Cover page illustration: Goran Ristovski

Design: ACT Printlab d.o.o., Čakovec (Croatia)

Zagreb, 2017



This publication has been produced with the assistance of the European Union. The content of this publication is the sole responsibility of the authors and do not necessarily reflect the official opinion of the European Union.



INTRODUCTION

In this report, we present the outcome of a work conducted across six South Eastern European countries for the purpose of measuring the Media Clientelism Index (MCI). The MCI looks at the media environment and relationships between politics, economic centers of power, the media and citizens. It is designed to identify practices that could lead to the subjugation of society, public interest and public goods by narrow circles of power, i.e. clientele. The experimental research, i.e. ground zero measuring of the MCI was conducted in first two years of the project and published in 2015. Last year, 2016, the second measurement of MCI was published. Within this report, the results of the third measurement, MCI 2017 are being presented, as well as some of the three years trends in specific areas of concern that MCI has covered.

In the first chapter the overview of the MCI measurements and findings are presented. In second chapter we provide a brief overview of country situations, while in the third chapter focus is on the specific statistical and econometric data comparison of targeted countries that provides in depth understanding of the media landscape in targeted countries. In final chapter we provide set of recommendations for the policy makers interested in the region and the policy areas related to or affected by media landscape. Methodology notes and explanations are provided in appendices of the document.

MEDIA CLIENTELISM INDEX, 2017

Media ownership and transparency followed by the media freedoms and fundamental rights are among key concerns in measurement of the MCI 2017.¹ The protests dubbed *Journalists Do Not Kneel* in Serbia, penetration of the organized crime in media ownership in Croatia, the elimination of public broadcast fee in Romania, attempts to shut down the PBS in Bosnia and Herzegovina, threats and physical attacks against journalists in Croatia, Serbia, Bosnia and Herzegovina and the former Yugoslav Republic of Macedonia are some of the main events that have marked the media landscape in South East European countries in 2016 and 2017.

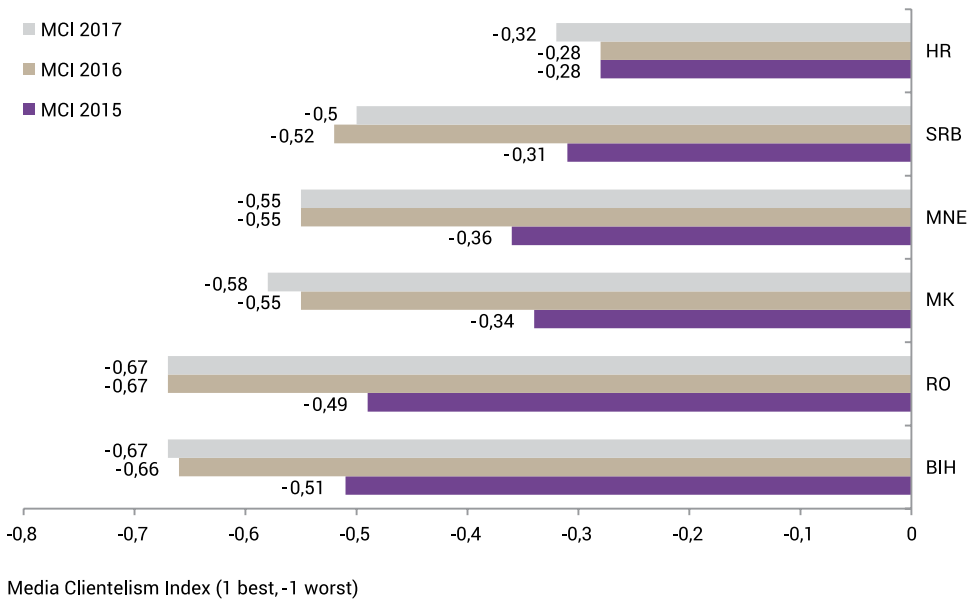
This is visible from both hard data collected by the MCI and in-depth reports and stories covered by the project's news portal Fairpress.eu. In fact, out of a few hundred stories on media related issues published on Fairpress.eu during 2016 and 2017, there are few positive stories to reflect on, such are the stories on two radio journalists from Novi Sad (Serbia) who, after being fired from RTV, have established their own independent online radio station and are funded directly by their listeners and supporters as well as Crowd funding campaigns in Croatia that managed to secure existence of the few non-profit news portals in Croatia (i.e. news portals Forum.tm and Lupiga.com).

The overall picture of media freedoms in South East European countries has deteriorated in 2016/2017 period. Six countries in South East Europe were included in the MCI 2017 measurement: Croatia, Bosnia and Herzegovina, Serbia, Montenegro, the Former Yugoslav Republic of Macedonia and Romania. Compared to the last year's measurement, a negative trend in MCI 2017 was observed in all countries, with the exception of Serbia. The most significant decline was observed in Croatia, the former Yugoslav Republic of Macedonia and Bosnia and Herzegovina. Although the overall picture in Croatian media landscape has deteriorated compared to the last year, it is still placed ahead of Serbia, which took the second place in the MCI 2017 ranking. Vertical measurements of the MCI² as well as horizontally measured areas of concern indicate that situation in all measured countries is severe, characterized by non-transparent political and financial influence and deviations in the public sphere as result of such practice.

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1 Please note that measurement of the MCI relies on hard data collected from the primary sources. In most of cases such data although collected in 2017 are referring to the 2016 fiscal year.

2 See methodology for explanations

Figure 1. Media Clientelism Index, 2015 - 2017



Stagnation of the media reforms (absence of the media strategy), dubious transfer of ownership in the case of the Novi List media publisher, political battles over PSB, and penetration of the organized crime in media ownership negatively affected the MCI rating for Croatia.

The situations in Serbia, Montenegro and the former Yugoslav Republic of Macedonia are very similar in observed cross-country comparison possibly due to similar dynamics of political activities in these countries in the previous year. Pre-election and electoral campaigns in these countries were preceded by significant media ownership and financing problems where political actors, with emphasis on the ruling parties at the time, were trying to buy their image across the local and national media by variety of tactics and methods used (from non-transparent marketing and distribution of public resources in the former Yugoslav Republic of Macedonia, to “returning” the privatized media in Serbia after elections and after privatized entities served just one simple purpose of supporting the ruling party in elections).

Romania after prospering from the liberal media market in the consolidation phase, is now suffering from the political ownership of private media and monopolies of the private owners that are directly or indirectly involved in national and local politics. In addition to this, Romania has decided to cut the obligatory fee in financing it’s PSB.

Finally, Bosnia and Herzegovina in addition to media struggling for survival and lack of proper institutional setting, was affected by hostile political actions against its PSB, which in turn resulted in further decline of the overall index as shown in the table above.

Horizontally weighted measurement – issues of concern

The table below shows expert measurements by country, that is, measurements and interpretations of the data gathered by expert groups in each of the respective countries. Due to obvious methodological limitations, it is not possible to compare numerical relations between countries, but these serve primarily to determine the level of risk in each category measured in each individual country. Table 1 shows the clientelism risk measurement in certain subgroups (areas covered by the index). For each country, the average grade awarded by the experts for each subgroup was taken, on a scale where the negative extreme (-1) represented the absolute absence of deterrents to clientelism, and the positive extreme (+1) the presence of fully effective deterrents, i.e. the establishment of media space in which clientelism cannot develop or pass unnoticed. For the horizontal measurement, the value of the grade on the scale was not as important in itself, so much as its divergence from the average value of all grades awarded by all the experts in all the subgroups in that country. Based on this divergence (positive or negative) from the mean values for that country, the risk level for that country can be established, and this is shown in a particular color. Risks shown in dark red represent a higher risk, while light green represents a lower risk of the occurrence of clientelism in that subgroup in that country.

The highest risk of the occurrence of clientelism for all countries is found in subgroup SG5 - Media freedoms and fundamental rights, closely followed by worsening trend in the area of Media ownership and transparency (SG3). Finally, particularly problematic institutional framework in Croatia, Bosnia and Hercegovina and Serbia was observed (SG2).³

3 Please note that measurement of the MCI relies on the hard data collected from primary sources. In most of cases such data although collected in 2017 are referring to 2016 fiscal year.

Table 1 Weighted horizontal measurement

	SG1	SG2	SG3	SG4	SG5	SG1-SG5 AVG
Croatia	-0,18	-0,60	-0,20	-0,42	-0,35	-0,35
Bosnia and Herzegovina	-0,33	-0,67	-1,00	-0,50	-1,00	-0,70
Serbia	-0,67	-1,00	-0,82	-1,00	-1,00	-0,90
Montenegro	0,57	0,52	0,03	-0,32	-0,07	0,15
the former Yugoslav Republic of Macedonia	-0,17	-0,27	-0,83	-0,57	-0,70	-0,51
Romania	0,00	-0,50	0,70	-0,70	-0,50	-0,20

According to country experts (see the table above), the key issue of concern in 2017 measurement of the Media Clientelism Index in all countries is in the area of the media freedoms and fundamental rights.

Vertically weighted measurement

The vertically weighted measurement, like the horizontal, serves to determine by subgroups the level of risk of the occurrence of clientelism in individual areas, and consequently indicates priority areas where special attention should be paid to the creation of public media policies. From the table, it is clear that in general, most risks are found in the area of social capacity to determine media reality, or rather to detect and oppose clientelism. When speaking of social capacity, we mean the sum of capacities of all sectors which comprise the media eco-system, from the political system, state and state institutions, the private sector, civil society, and the media themselves, i.e. media professionals. From the table, it is clear that the capacity of the societies observed to oppose clientelism is weak, or non-existent, and apart from Croatia, building this capacity in all countries must be a priority in creating new media policies.

Table 2 Weighted vertical measurement

	T1	T2	T3	T4	T1-T2 E AVG
Croatia	0,07	-0,20	-0,42	-0,12	-0,17
Bosnia and Herzegovina	-0,17	0,00	-1,00	0,00	-0,29
Serbia	-1,00	-0,50	-0,08	-0,83	-0,60
Montenegro	0,30	0,30	0,23	0,05	0,22
the former Yugoslav Republic of Macedonia	-0,57	-0,60	-0,43	-0,57	-0,54
Romania	0,00	0,50	0,50	0,70	0,43

REGIONAL OVERVIEW

Common issue observed in all of the countries were attacks on journalists and editors as well as on independent media outlets.

In Bosnia and Herzegovina in preceding year, according to the data delivered from the Association of Journalists in Bosnia and Herzegovina, these attacks included physical assaults (9 cases), death threats (8), verbal threats (11) and 14 cases of political pressure. In addition, 2017 process of adoption of the Freedom of Access to Information Act indicated political aim to derogate acquired rights of media in this sphere with aim to limit the overall access to information to citizens of Bosnia and Herzegovina. These trends were accompanied by the hostile political actions toward the public service broadcasters.

The former Yugoslav Republic of Macedonia had similar trend, as observed by relevant journalist association (Association of Journalists of Macedonia). The incidents comprise, among others, violations of journalists' social rights, dismissal of journalists, verbal and physical assault, intimidation, preventing journalists from reporting on events, destruction of their professional equipment and personal property.

In Serbia attacks on media freedoms were conducted mostly through the media outlets. Attacks and pressures on the media have marked 2016 in Serbia. The practice of sensationalist reporting and tabloidization of socio-political events has continued, the attacks of pro-government tabloids (the leading tabloid in this is Informer) are particularly problematic for journalists and the media who critically write about the work of representatives of government and state authorities. Journalists' of a small number of non-progovernment media (for example, Danas, research networks BIRN, CINS, KRIK, VOICE, Portal Autonomy) or representatives of journalists' associations (IJAS, IJAV) were labeled as traitors, state enemies, foreign mercenaries, spies. According to the report of the Press Council Serbia for 2016, the results of the monitoring of violations of the Code of Journalists of Serbia conducted from March 1st to December 31st show that eight daily newspapers with national coverage violated the Code 5477 times, an increase of 49 percent in relation to the same period in 2015. The most violations (1320) were made by the tabloid Srpski telegraf, Informer (1208), Kurir (1100), Alo (810), and Blic (604).

In all of the covered countries, experts as well as other independent reports indicate that economic pressure adds to the already endangered socio-economic status of journalists leading to more bias reporting and radicalization of public sphere.

In Romania, during February 2017, Carmen Dan, the Ministry of Internal Affairs publicly blacklisted a few journalists and named them instigators during the pro-

tests in January-February 2017 against the Government (OUG 13). At the beginning of the year the president of the parliamentary Commission of the Control of the Secret Service declared that it is legal for the secret service to infiltrate under covered agents in the press and confirmed that there are such cases. Active-Watch, Centrul pentru Jurnalism Independent, Centrul Român pentru Jurnalism de Investigație and Miliția Spirituală criticized the declaration and asked for the specific introduction of such incompatibility in the legislation and practice. In addition, several journalists quit their jobs/were fired and accused political pressures. On the other side, journalists were candidates in the elections. Moreover, some of them continuously published defaming articles about civil society and the opposition parties and therefore showing a strong ideological and submissive behavior.

In Croatia, threats against journalists continue to be selectively dealt by all relevant stakeholders. The media environment has been divided between two major political forces, with interference of the organized crime, as well. In the case of attack and attempted murder on Dušan Miljuš, journalist of the Jutarnji list, absence of the significant reaction of the relevant criminal justice authorities (police and state prosecutor) was observed in previous year. Continuous investigation by the investigative reporters tied to this project in this case showed that police and other relevant criminal justice system had knowledge of the perpetrators in this case, and yet their reaction did not follow the evidence collected. As Miljuš's articles that preceded the attack covered the connection between the organized crime members, local politicians in City of Zagreb (Mayor of Zagreb) and few businessman, and as preliminary investigation showed evidence of attackers being connected to the above, we pushed for additional investigation in the case. However, the reactions of the police as well as Journalist Association in Croatia (HND) was absent.

Further investigations conducted by the Fairpress.eu team showed that, despite Mayor of Zagreb being arrested and prosecuted for several criminal charges together with Petar Pripuz, brother of assumed member of the largest organized crime syndicate in Zagreb – police department of Ministry of Interior in Croatia engaged in business with the accused Petar Pripuz in several procurement contracts. In addition, the lack of the response of the Croatian Journalist Association – HND (only journalist professional association in Croatia), was as well explained by our investigation. The wife of the general secretary of the HND, Vladimir Lulić, is employee and one of the closest associates of the Mayor of city of Zagreb. In addition to this, the City of Zagreb is one of the largest funders of the private and independent media, while Pripuz family entered the ownership of radio and TV stations in Croatia. As soon as we reported on this case, the Fairpress.eu portal was hacked and severely damaged by the attack. In addition to the attack the treats to the editorial staff of the Fairpress portal were posed. As in hours that

followed the attack, Fairpress.eu staff determined the identity of the attacker and his business relationship with Petar Pripuz, all relevant information was sent to the police department. All relevant actors including the police department and Croatian Journalist Association, remain silent. This case, in-depth elaborated in series of articles on fairpress.eu portal serve as explanation of the status and stage of media development in Croatia in the area of fundamental rights and freedoms, and the damage that has been posed to it by the absence of any substantial action in this area in the last decade.

In the area of media ownership and transparency of media economic operators (SG3), type of concerns varies from country to country with similar outcome – non-transparent ownership with presence of undue political and financial influence over distributed information.

In Bosnia and Herzegovina, there is no legislation on obligatory declaration of the owners of media which consequently hinders any attempt to analyze the connections between the media ownership, political actors and/or other players in media field and content published. Existence of such obligation and possibilities of determination through court registers on the other hand did not help Croatia and Romania, as beneficial ownership registers have not been properly established and as there is no barrier for direct political influence over the private and public media. This led to specific issue of *criminalization of media*, where media outlets have been observed as criminal actors involved in blackmail, tax evasion, corruption etc. In both countries Romania and Croatia, off shore ownership over media as well as non-transparent investment fund (intermediate economic operators) ownership was observed.

In addition, in Croatia, engagement of the organized crime members and associates was established by the MCI research. One of the strongest organized crime groups in Croatia (the Knezija gang) was detected in ownership of variety of media outlets in Croatia, especially radio broadcasters. At the same time, their close associates engaged in ownership over local and national private TV stations. Most worrying part of the research of primary source data indicated the existence of the so called non-disclosed contracts, where formally in the commercial registers nominal owners are listed, while contracts that are not deposited in the courts, between the nominal owners and the actual owners, suggest that the owners are convicted criminals (PSD is in possession of several of such contracts).

Montenegro, according to experts, suffers from similar situation as the one observed in Croatia. The regulation on media ownership appears to be in place, and registers updated, however, the expert suspicion was expressed that such registers do not represent the publicly known facts in most of the cases.

In Serbia, on the other hand, indirect engagement of political actors in media ownership that has emerged from privatization, deviated the improvements that Ser-

bia had two years ago. Experts raised their suspicion that engagement of political actors has happen in variety of privatized media outlets; for example: one of the new owners acquired 8 media outlets, without having any previous experience in the media business and with clear ties to the ruling party.

In the former Yugoslav Republic of Macedonia however, while ownership is rather transparent, the indirect hostile political actions caused several media to shut down their operations (i.e. the biggest printing media company, Media Print Macedonia) which hinders country's media pluralism.

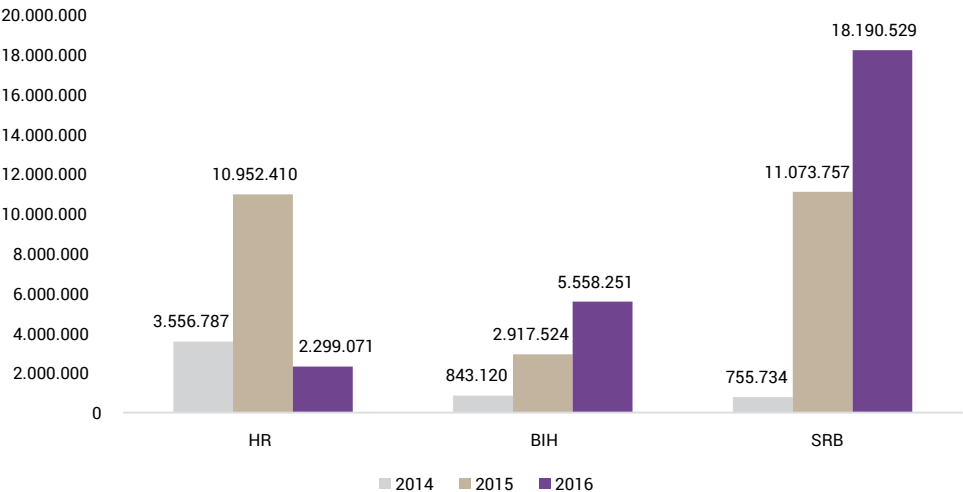
All of the above, experts agree by consensus, have significantly affected the public sphere and the quality of the distributed information. In all of the countries, division among social groups have been observed, affecting democratic processes and deviating the outcome of democracy. Direct involvement of the organized crime in media business and criminalization of media is an issue that no policy actor at this moment (whether the international or national) is willing to tackle, which will leave significant consequences on observed societies in near future.

STATISTICAL DATA COMPARISON AND 2014-2016 TRENDS IN OBSERVED COUNTRIES

It should be emphasized that unified financial indicators of non-profit media are still publicly inaccessible in all the countries covered by our research, and only sporadically accessible for private media. In fact, our attempts to access the business results of privately-owned media publishers proved fruitless in most countries apart from Croatia, and to some extent in Macedonia, in which indicators for television and radio stations were available.

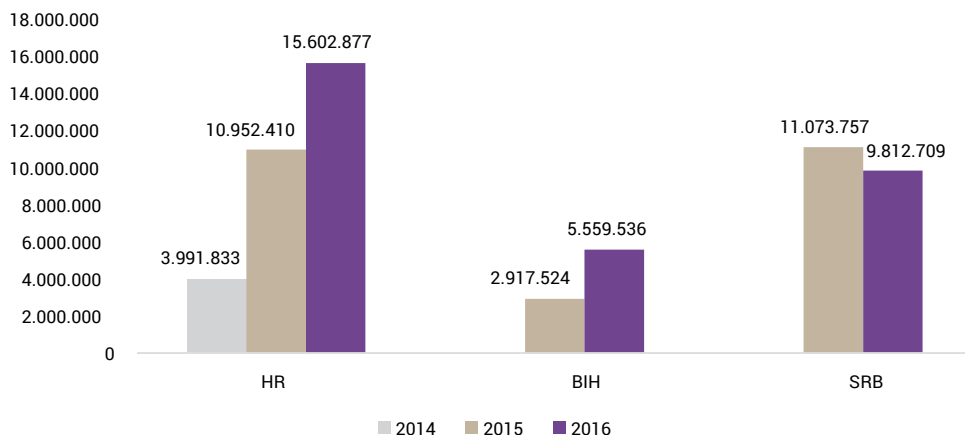
A significant drop was observed in the amount of state media subvention in Croatia during 2016. This is a consequence of developments in culture/ media sector in Croatia in 2016 when the new Minister of Culture, Zlatko Hasanbegović (HDZ) was appointed. Namely, right after assuming office, Hasanbegović dissolved the Commission for Non-profit Media, a body in charge of the Ministry’s grant-making and oversight of grantees in the non-profit media sector. While explaining his decision to dissolve the Commission, Hasanbegović stated: “My position is that there is no need to continue giving grants to any non-profit media outlet within the Culture Ministry policy.”

Figure 2 Amounts of state media subvention, in EUR, 2014-2016



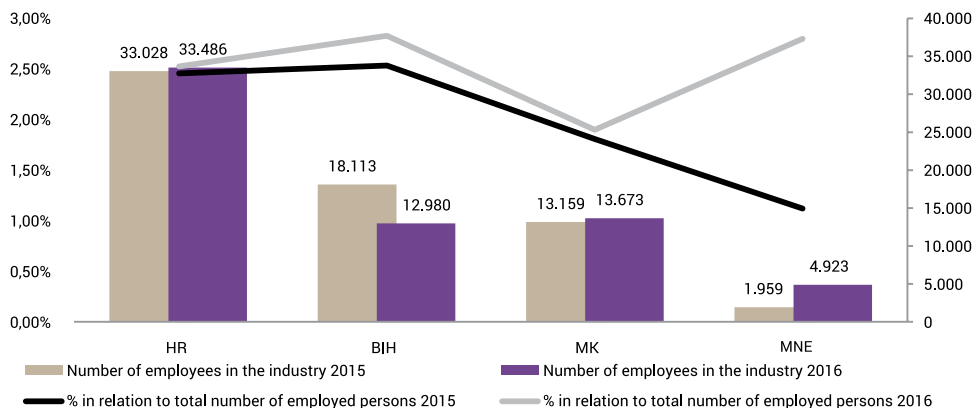
Other funds were allocated from state budgets relating to promotional and publicity services:

Figure 3 Amounts of financing from state budgets (promotion and publicity), in EUR, 2014-2016



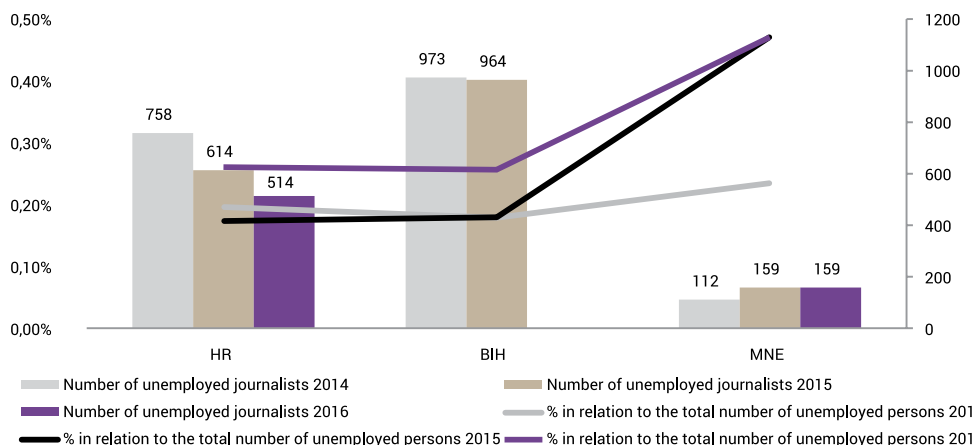
The number of those employed in the media cannot be established accurately in any of these countries. The closest statistical category relates to legal persons engaged in 'Information and Communications', which refers to a great extent to media activities, and is accessible in all countries except Romania and Serbia, where there is a different methodology for systematizing data on activities, which was not considered relevant. However, these data should be taken with reserve, since they do not refer to the number of journalists employed, but the total number of all employees in the 'Information and Communications' industry.

Figure 4 Number of those employed in the 'Information and Communications' industry and percentage in relation to the total number of employed persons in the country, 2015-2016



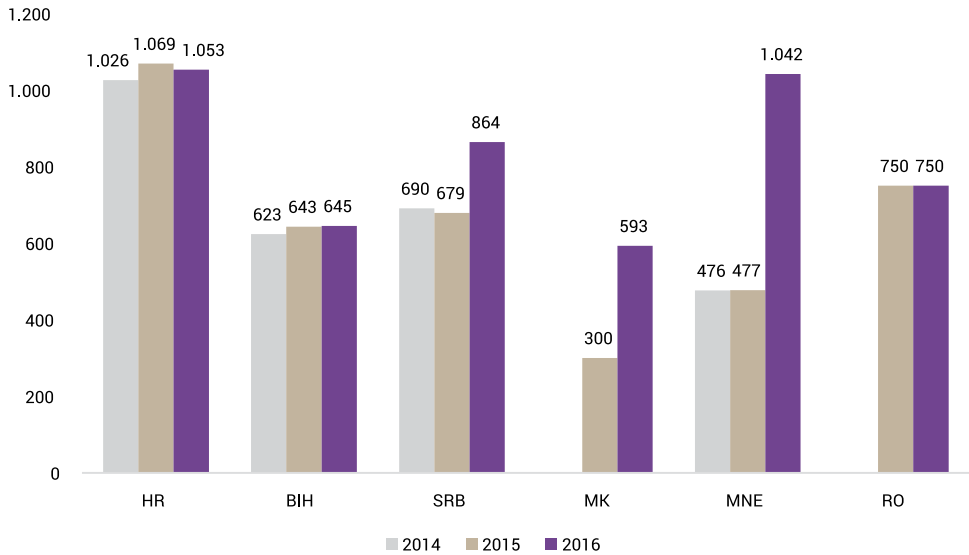
In 2016, the industry employed 33,486 people in Croatia, 12,980 in Bosnia and Herzegovina, 13,673 in the Former Yugoslav Republic of Macedonia, and 4,923 in Montenegro. When comparing 2015 and 2016, the number of persons employed significantly has declined in Bosnia and Herzegovina and employment growth was observed in Montenegro. In 2016, there were 514 unemployed journalists in Croatia, and 159 in Montenegro.

Figure 5 Number of unemployed journalists in relation to total numbers of unemployed persons nationally, 2014-2016



In Croatia, Bosnia and Herzegovina and Romania average salaries in the industry remained more or less the same. The increase is recorded in Serbia and the former Yugoslav Republic of Macedonia; the most significant increase, however, was observed in Montenegro.

Figure 6 Average net wage in the 'Information and Communications' industry, in EUR, 2014-2016



ADDITIONAL RISKS OBSERVED AND RECOMMENDATIONS

Additional risks observed include insufficiently transparent or inclusive process of media policies design. In Bosnia and Herzegovina, for example, there is no even a declarative obligation to hold consultations with interested public parties on procedures for adopting laws, or other regulations and acts. Further, media policies do not follow the development of the media and change in its structure. Online media are not adequately covered by media policies; their number, ownership and financing are not known to the public, or to the public authorities.

Publicly accessible, unified financial indicators of non-profit media are still unknown in all the countries covered by these measurements. The situation is not much different regarding private media. In fact, all attempts to access the business results of privately-owned media proved fruitless in most countries apart from Croatia, and to some extent in Macedonia, in which indicators for television and radio stations were available.

Finally, political influence over the media through ownership has been observed (Bosnia and Herzegovina, Croatia, and Romania). Other forms of influence over the media through ownership that have been observed include influence of persons who were associated with intelligence services during the communist era (Romania) and the ones associated with organized crime (Croatia).

It is time for comprehensive strategic action in the media sphere by all relevant actors including European Commission. Actions shall rest on universal principles with careful selection of actors, as organized crime and corrupt politics have heavily influenced media landscape including media outlets, media regulators, and even the professional media organizations and civil society engaged in sphere of media freedoms.

Comprehensive registers of beneficial media ownership, financial and material support allocated to them, grants, and declared interests of those involved in decision-making on media policies, must be available in real time to all interested citizens.

**APPENDIX:
METHODOLOGICAL
NOTES**

OUR APPROACH

The aim of the MCI is to help decision makers, when they create and implement public policies in the area of governance of the media environment, to ensure that the universal values important to the quality of democracy are upheld – pluralism of ideas and opinions, and the participative role which citizens have in a democracy.

Therefore, the focal point in this analysis of the media environment in the index is not just clientelist practice, although we refer to it particularly in the narrative parts, but the barriers, i.e. the formal and technical restraints which each society has set for itself in relation to clientelist practice. As a rule, a lower level or quality of restraining clientelist practice and the mechanisms which ensure it means a higher risk of clientelism occurring, with a negative effect on the functioning of the media. An increased risk of media clientelism (weak, ineffective deterrents to clientelist practice) consequently leads to a high risk of deviation in democratic processes, which may have extremely harmful, sometimes radical effects on society, the quality of democracy, and life in general.

Finally, the MCI should be seen as a control mechanism which monitors the media environment and relations between politics, economic centers of power, the media and citizens, warning of the risks or identifying practices which may lead to the subjugation of society, public interest and public goods by narrow circles of power, that is, clienteles.

DATA COLLECTION

The data for the purposes of measurement of the MCI were gathered by the desk method, focusing on primary data, i.e. data held by state and formal institutions. After carrying out a normative analysis of media laws, with a special focus on those which had undergone amendments in the previous year, requests were sent to the competent institutions, bodies and agencies in each country, asking them to provide information pursuant to their laws on the right to access information, and consisting of sets of questions aimed at investigating the efficacy of the legislative, regulatory and institutional frameworks regarding the occurrence of media clientelism.

The index relies on primary information sources (gathered by formal institutions), but it should be noted that in order to contextualize data, or compare them, in some cases, selected secondary sources of information were also consulted, which had been gathered for the purpose of other research.

In the process of gathering and analyzing data, certain limitations were obvious. In fact, many statistical data which were important for the measuring process (e.g. budget reports, reports by state statistical institutions, and those on the work of the relevant institutions) were not available in real time, but only by the middle of the current year for the previous year. So, this year's MCI 2017, although published at the end of the year, in fact covers, or was measured statistically on the basis of data relating to 2016. On the other hand, in order to keep the relevance of the index in real time, data from 2017 were used for certain areas such as the occurrence of clientelism in the media, or certain forms of it.

DATA STRUCTURE

The structure of data is based on five sub-groups, SG1 – SG5, and four hierarchical models, T1 – T4.

The sub-groups cover five categories: the legislative framework, the institutional framework, media ownership and transparency, the media market, and media freedoms. Apart from these five categories, there are additional four categories (T1 – T4), i.e. levels of indicators gathered for the needs of this measurement: (T1) the regulatory and institutional capacity of the state to detect and eliminate clientelist practice in the process of adopting media policies and in the operative activities of the media industry; (T2) practice in adopting media policies, deterrents to clientelist practices and the occurrence of clientelism; (T3) the ability of the state, or society, to understand the situation in the media compared to the declared existence of data, and finally, (T4) social capacity to measure media realities, in which all previous declared attitudes and data gathered by formal institutions are tested, and their credibility and quality assessed.

Legislative framework

In analyzing the legislative framework, the environment or system was analyzed in which legal acts governing the media market have been adopted, while the key question concerned the extent to which the entire process of adopting such acts was adequate, effective, and efficient in the sense of detecting, regulating and preventing clientelist influences on the final drafts of such acts. To be more precise, an analysis was conducted of the procedure through which acts were adopted which regulates the media in one way or another. Primarily, these were media laws, electronic media laws, laws regulating the functioning of public services, and laws relating to the media or affect the functioning of the media and potential clientelist practices, but specific to only one of the countries covered in the research. So, for example, in the case of Croatia, the Penal Code was analyzed, since slander is still a criminal offence only in the Republic of Croatia. The questions which guided us in this part of the analysis, i.e. the data we gathered in relation to the legislative framework, included for example whether it was compulsory to hold public debates on draft laws, and if so, what the minimum number of days was allotted for public debate. Next, we asked if there was any standard operating procedure (prescribed by law, author's note) on the appointment of members of working groups charged with producing draft laws. Was the open access principle respected when appointing members of working groups, or was there any obligation (prescribed by law) to conduct open calls for which all interested experts could apply? Was there any requirement to publish exhaustive re-

ports on how public debate was conducted (including comments received during the debate period, and highlighting those accepted)? Questions were also posed about the existence of a body engaged in assessing draft laws and their compatibility with the existing legal system, and for 'corruption proofing' proposed draft laws.

Institutional framework

In the institutional framework, the efficiency and efficacy of bodies, agencies and institutions competent for the implementation of media policies, acts and sub-legal acts were analyzed. The analysis covered ministries of culture, electronic media agencies, parliamentary committees, and agencies for market competition protection, etc. Data were gathered on the total number and type of decisions rendered by these institutions in the preceding year, the number of newly-appointed or excused persons in their governing structures in the same year, and information regarding the body competent to make appointments in their governing structures. Next, two-level decision-making was addressed, analyzing whether or not the right of appeal existed against decisions made by an institution, and how it was regulated, along with the presence or absence of accountability mechanisms in the institution. Finally, in the part of the analysis dealing with the institutional framework, there was the question of whether the institution allocated financial support, i.e. grants, and under what conditions, with what level of deterrence in terms of clientelism; and information was requested about the recipients of such funds and the amounts provided in the observation period.

Media ownership and transparency

Indicators relating to media ownership and business transparency were primarily covered by general questions which aimed to determine the level of transparency and publicly available data on media ownership, but also data on the business operations of economic subjects with registered media activities, i.e. their revenues and profits/losses for the previous year. In the subcategory of media ownership, an analysis was conducted as to whether comprehensive registers of private, public and non-profit media existed and were accessible to the public. We also considered the existence or lack of any sanctions prescribed by law for undeclared media ownership, whether ownership information was publicly accessible, and how it could be accessed. Were there any legal prescriptions regarding publishing information on paid advertising by political parties in public media, was the public service provider obliged to carry out an annual audit and publish the auditor's report, and were there any obligations to publicise contracts

between the public media and the public sector? These were some of the questions relating to the environment in which public service providers operated. In relation to private media, the existence of lack or the obligation to publicize contracts concluded between these media and the public sector, including political parties, was analyzed.

Media market

Indicators relating to the media market included, firstly, questions on the presence or absence of a comprehensive register on grants allocated for each institution included in media financing. In addition, competitions conducted in the previous year were analyzed, along with the frequency of allocating funds per particular media. It was essential to include an analysis of the advertising market in this category. Some of the questions were: is there a public register which contains information on transactions conducted by the public sector towards the media for any publication services, and is there a register of advertising agencies which are active on the market? Is there any public information about the frequency and amounts of funds paid by the private sector to the media for advertising services? In the same way, data were gathered on the economic status of each individual media body or broadcaster, their revenues and expenditure, number of employees, losses/profits in the preceding business year, and other indicators which pointed to the economic risks associated with clientelism, such as poor business results, the risk of political influence through financing from public funds, and the media's exposure to the influence of significant advertisers.

Media freedoms

The last category in the MCI covers media freedoms, ethics and the fundamental rights of journalists. The support system for journalists in situations where they find themselves under threat, or when their rights are threatened, including the right to work freely, was analyzed. Next, the capacity of the state to keep records relating to the labor market, i.e. the number of employed and unemployed journalists, was analyzed, along with keeping records of procedures being conducted against them before certain courts. Of course, indicators measuring the efficacy of journalists' associations, unions and self-regulating bodies were also included.

