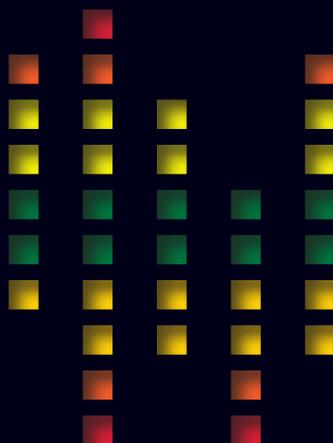


THE MEDIA FOR DEMOCRACY MONITOR 2021

*HOW LEADING NEWS MEDIA SURVIVE
DIGITAL TRANSFORMATION*

1



NORDICOM EDITED BY **JOSEF TRAPPEL & TALES TOMAZ**



The Media for Democracy
Monitor 2021

Vol. 1

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 **EMRG**
The Euromedia Research Group

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Josef Trappel & Tales Tomaz (Eds.)

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Preface

At the time when the Media for Democracy Monitor (MDM) set sail back in 2008, the financial market crisis had hit not only the world economy but reset the advertising-based media companies. Newsrooms were downsized or integrated. In retrospect, this crisis initiated the upcoming structural transformation of the entire news business, which is best characterised by the gradual erosion of the advertising-based business model of many leading news media.

Subsequent to the MDM's pilot phase with five countries (see Trappel & Meier 2011), the first edition of the monitor was researched in 2010 and published by Nordicom in 2011. Ten country teams delivered their analysis and observations along 26 indicators, which had been developed jointly by the team of participating scholars and researchers. Firmly grounded in normative media and journalism theories, indicators were grouped along the triad freedom/information, control/watchdog, and equality/forum (Trappel, 2011: 23). For each indicator, the country teams researched empirical evidence, based on the best available secondary sources as well as a series of interviews with journalists, editors-in-chief, representatives of journalists' unions, and other experts. Nine European countries and Australia were covered by this joint research, focusing exclusively on developed contemporary democracies. Excluding democracies in transition and states representing defect forms of democracy of any kind enabled this research to focus exclusively on the performance of leading news media under "free" circumstances (to borrow the terminology of *Freedom House*).

The results were widely positive. In the overall score, Sweden, Finland, and the UK reached more than 75 per cent of the maximum score, and no country reached less than 50 per cent. In qualitative terms, the leading news media showed a great deal of capacity to fulfil their basic democratic function.

A monitoring instrument lives up to its genuine assignment only if it is repeated. Ten years later, in 2019 and early 2020, country teams gathered again to scrutinise the performance of leading news media for democracy. The decade between has turned out to be the roll-out decade of digitalisation. Not only had leading news media transformed their operations into fully digital mode, but also powerful digital intermediaries emerged which revolutionised content distribution of news. Simultaneously, these platforms turned into highly effective and efficient competitors in the advertising market by providing personalised advertising services. Legacy media did not manage to master this erosion of income from their accounts to this small group of global giants, sometimes called GAFAM (Google, Apple, Facebook, Amazon, and Microsoft).

Furthermore, during this decade, media-use patterns and habits of primarily younger people converged from incumbent media towards digital platforms, as the results of the *Reuters Institute Digital News Report* demonstrate, annually delivered by the Reuters Institute for the Study of Journalism at the University of Oxford (Newman et al., 2020). Ironically, news content is still provided by legacy media, but used and received by the audience on social media platforms. What implications, then, did this structural digital transformation have on the performance of the leading news media for democracy?

Nine out of the ten countries that participated in 2011 and an additional nine countries constitute the 18-country sample of the 2021 edition of the MDM. From Europe, Belgium (Flanders), Denmark, Greece, Iceland, and Italy joined the group already composed by Austria, Germany, Finland, the Netherlands, Portugal, Sweden, Switzerland, and the United Kingdom. The sample was completed by countries beyond Europe: Australia (again), Canada, Chile, Hong Kong, and (South) Korea.

Before the field work started, the research team carefully revised the indicators. In order to allow for longitudinal, as well as cross-country comparative research, existing indicators were maintained (with updates and polishing to the extent necessary), and four new indicators were added. These new indicators refer to gender equality and representation on the one hand (Indicators F8 and F9) and to contemporary forms of nuisance for journalistic work on the other (F10 and F11). The following chapter introduces and summarises all 30 indicators, constituting the operational and empiric backbone of the MDM 2021. In a joint workshop in June 2020, between the first and the second wave of the Covid-19 pandemic, representatives of the 18 country teams assembled (partly virtually) to discuss and adjust the scores given to each indicator for each country. Similar to ten years ago, this collaborative exercise allowed not only for coherent scoring, but also for cross-cultural learning from one another.

The group of authors and researchers decided to publish the indicator reports country by country, both as printed book volumes, Open Access with Nordicom, and as searchable and dynamic online versions available from the website of the academic host of the MDM, the Euromedia Research Group.¹ Furthermore, cross-country and longitudinal findings inform an edited volume on key issues, which the research teams identified as most significant along the way of the research. The Dutch Journalism Fund [Stimuleringsfonds voor de Journalistiek] has supported the group's research work and contributed to the publication cost of the project.

Research and most of the field work for the 2021 edition of the MDM has been conducted shortly before the outbreak of the global Covid-19 pandemic. The findings reflect, therefore, flaws and achievements of leading news media during the recovery years after the 2008 financial market crash and before the Covid-19 crash hit them. This way, and completely unanticipated, the MDM

2021 covers the period framed by two paramount crises. As the pandemic had immediate and severe consequences on the performance of the media, we decided to complement each indicator report with a first critical assessment of its consequences on the media in each country. At the time of writing, neither the magnitude of the pandemic nor its implications on the media and society at large were visible.

We express our gratitude to all contributors in the 18 countries, all interview partners for their open words, in particular the competent and flexible team from our publisher Nordicom, and the Dutch Journalism Fund for its support.

Josef Trappel and Tales Tomaz
Salzburg, May 2021

Note

1. www.euromediagroup.org/mdm

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Democratic performance of news media

Dimensions and indicators for comparative studies

Josef Trappel & Tales Tomaz

Introduction

Throughout history, news media have made commitments that “give rise to persistent expectations” about public interest (Christians et al., 2009: 135; Nielsen, 2015). Indeed, there is vast literature about how the media can contribute to democracy by providing freedom of expression, promoting awareness of the demands of disenfranchised groups, and holding the powerful accountable.¹ However, there is also evidence of failure when the media do not live up to these expectations, reinforcing structures of the establishment and even leveraging its power. There are many reasons why they can – and more often than desired – fail. Hyper-commercialism, media concentration, and declining diversity of news, for example, have been pointed at – since long ago – as deadly threats to democracy (Baker, 2007; Curran, 2011; McChesney, 2008). Mass media understand themselves first and foremost as a business, where “accountability to shareholders and owners take precedence over professional accountability and public responsibility” (Christians et al., 2009: 226). The view that the media are primarily a business, and that the freedom of the media is the freedom to trade, is rarely challenged in the Western world. Not by chance they tend to reproduce the status quo, favouring established and powerful actors, especially economic elites.

Such failures mean that, although news media might contribute to fostering democracy’s quality, this is no self-fulfilling prophecy. If they do not comply with certain normative standards, they are unlikely to play such a favourable role. Out of this perception, journalists, activists, politicians, entrepreneurs, and civil society have developed several strategies over the years to create better conditions for the news media to meet the expectations of society, including professionalisation, regulation, and monitoring.

The Media for Democracy Monitor (MDM) aims to contribute to this last aspect. Scholars have repeatedly pointed out that media monitoring should become a regular exercise in order to hold the media accountable to society

Trappel, J., & Tomaz, T. (2021). Democratic performance of news media: Dimensions and indicators for comparative studies. In J. Trappel, & T. Tomaz (Eds.), *The Media for Democracy Monitor 2021: How leading news media survive digital transformation* (Vol. 1) (pp. 11–58). Nordicom, University of Gothenburg. <https://doi.org/10.48335/9789188855404-1>

(and not only to shareholders, owners, and ultimately advertisers) and to facilitate the public debate on the performance of the media (Bertrand, 2003; Galtung, 1999; Glasser, 2009). Developed by researchers from the Euromedia Research Group in partnership with colleagues from other institutions around the world, the MDM provides a monitoring instrument to empirically assess and compare the performance of leading news media in contemporary, stable democracies by surveying their structures of production and distribution, and ownership and governance. This instrument was applied for the first time in a pilot project (d’Haenens et al., 2009; Trappel & Meier, 2011) and then in a full 2011 edition comparing ten countries (Trappel et al., 2011). After a decade of strong digitalisation, the MDM research team decided to apply it again to most of those democracies and some more, amounting to 18 countries (see the results in the country reports of this book).

The MDM is not the first media monitoring initiative, but is distinct from already existing ones. Many of the ongoing monitors watch the output of the news media, focusing on mistakes and misleading information published in their object of study. This is the case of the liberal FAIR, Fairness & Accuracy in Reporting and the conservative Accuracy in Media in the US; the Media Lens in the UK; the television programme *Media Watch* in Australia; and the Bild Blog, monitoring the broadsheet *Bild Zeitung* in Germany. But media watchers are usually run by individuals or small groups, and their sustainability depends on the time and effort these activists are able and willing to invest. Most of them also lack a theoretical foundation and scientific methodology. Their focus on specific content analysis is not shared by the MDM – we are rather interested in the changing structures of the media, which set the framework for the content and media use (Nordenstreng, 1999: 11; Pickard, 2020: 9–10).

The second kind of monitoring comprises established institutions with a specific mission statement. Often such monitoring instruments observe the media in democracies in transition and report violations of journalism rights, such as Freedom House and the International Research and Exchange Board (IREX). The MDM, instead, offers a monitoring instrument appropriate for mature democracies. The Worlds of Journalism Study, a research project headed at the University of Munich, covers changes in journalistic practices in more than a hundred countries over the years. While this monitoring can be very helpful when reflecting on the contributions of news media to local democracies, this is not their focus. The Media Pluralism Monitor, sponsored by the European University Institute, is similar to our approach in terms of its concern with democracy and its methodology, but it solely addresses European countries and has a strong focus on pluralism only. Other two valuable initiatives with strong financial and scientific support are the Journalism & Media division in the Pew Research Center and the Columbia Journalism Review,

from the School of Journalism at Columbia University; however, both of them concentrate on the US.

In this sense, the MDM has a specific ambition not covered by other existing instruments, however important they are, namely to provide an instrument for monitoring the contribution of leading news media to mature democracies all over the world. It is time, then, to explain what this instrument consists of. For this, it is crucial to clarify the conceptual assumptions about democracy that lead to the normative expectations for the media.

Roles of news media in democracy

Democratic theory offers several models of democracy, as well as different forms of classifying these models, but it is fair to notice that most accounts end up with two major groups of models: the liberal and the republican (Cunningham, 2002; Glasser, 2009; Held, 2006). Despite some divergences and criticism, it is common to use this distinction also within media and communication studies (Dahlberg & Siapera, 2007; Dahlgren, 2013; Karppinen, 2013).

The liberal model is a minimalist concept of democracy, which tends to emphasise the dynamics of representation; the role of citizens is to select representatives through voting. Because of the importance of representation, this model is often referred to as elitist (Baker, 2004: 129ff). Liberal democracy, in this tradition, can be conceptualised as an “essentially procedural mechanism designed to facilitate the expression of individual preferences” (Glasser, 2009: 94).

The republican model, on the other hand, is a maximalist position, focusing on direct participation. According to this conception, democracy comprises “a system of decision-making about public affairs in which citizens are directly involved” (Held, 2006: 4). Republican models of democracy come in many different shades, and it is difficult to give a unified account. Probably the most relevant conceptualisation of this variant is the deliberative model, a normative orientation that strives to encourage discussion and reasoned debate. In this model, democratic decision-makers should “equally [possess] the information and other resources productively to enter into deliberative forums before voting, if voting is needed at all” (Cunningham, 2015: 92–93).

Media and communication studies tend to agree that, depending on the model one chooses, there are some roles for news media in democracy. In the liberal model, the main role of the media is to identify and make public the wrongdoings of elected representatives (Baker, 2006: 114). In other words, the essential role of the press in elitist liberal democracies is that of watchdogs who alert people if something is going wrong in order to hold the powerful accountable and help people make informed choices in the next election cycle. In the

deliberation-based models of democracy, news media have not only the obligation to inform about potentially crucial issues, but also to act as a forum for the debate; the media should inspire people to participate in the public discourse, and journalism should give voice to groups that need to express themselves in public to make their cause heard (Strömbäck, 2005).

If there are profoundly different approaches to democracy and, respectively, different normative expectations regarding the role of news media, how should media monitoring proceed? The differences between these theories and their contradictions should not be overlooked. At the same time, one can also argue that these frameworks have specific aspects not necessarily excluding one another and, instead, might explain distinct moments of the relation between media and democracy. Both in times of conflict and corruption, as well as in times when such events are temporarily absent, legitimate (and even illegitimate) claims of groups, pressure groups, and lobbies are articulated. Some of these claims may be urgent and justify the immediate attention of journalism, but others may require public debate and deliberation over some time in order to mature, to explain, or even to develop their justification in public dialogue. This seems to justify the inclusion of roles from both models in a monitoring instrument. In fact, scholars have pointed out that most monitoring initiatives rely only on one model and, by doing this, are not able to cope with the complexity of democracy, especially if the goal is to assess established democracies that might display more subtle differences (Bühlmann et al., 2012).

Following this reasoning, the MDM relies on a set of journalistic roles which encompasses as many features as possible from the concurrent models. Denis McQuail's (2009) four roles of journalism – monitorial, facilitative, radical, and collaborative – correspond, to a certain extent, to all characteristics observed by the different models of democracy. The monitorial role addresses information provision by journalism to the general public: people need and require orientation, and journalistic information should be able to provide points of reference. The monitorial role refers to “all aspects of the collection, processing, and dissemination of information of all kinds about current and recent events, plus warnings about future developments” (McQuail, 2009: 125).

The facilitative role covers all aspects of the provision of a deliberative public space: Journalism should promote active citizenship by way of debate and participation: “They [the media] promote inclusiveness, pluralism, and collective purpose. According to the concept of the facilitative role, they help to develop a shared moral framework for community and society, rather than just looking after individual rights and interests” (McQuail, 2009: 126). This role is rather focused on minorities and marginalised groups and cultures than on mainstream reporting. Nonetheless, the facilitative role is particularly important in deliberative models of democracy.

The radical role “focuses on exposing abuses of power and aims to raise popular consciousness of wrongdoing, inequality, and the potential for change” (McQuail, 2009: 126). It is radical in the sense that such journalism has the potential to mobilise resistance or protest – it remembers that social order could be different.

The collaborative role refers to the collaboration between the media and the state, for example, during times of crisis or states of emergency (McQuail, 2009: 127). This role may at first sight be contradictory to the notion of freedom of the press in democratic societies, but, for example, cases such as the Covid-19 outbreak in 2020 demonstrate the importance of the role of the media in communicating public health-related information.

The MDM then relates these roles to three core dimensions of mature democracies: freedom, equality, and control (Diamond & Morlino, 2004; Maniglio, 2010: 63–70). Freedom as an elementary notion in democracy refers to ensuring political, civil, and socioeconomic rights (Diamond & Morlino, 2004: 22–24), and can be understood as both negative and positive freedom. Negative freedom refers to the absence of legal or political prohibitions and – in the context of media – to the absence of censorship. In a more reductionist view, negative freedom means being free from the interference of the state. Positive freedom, in turn, refers to the freedom to act. In the context of the media, positive freedom is freedom of expression (to receive and, in particular, impart, information), freedom of opinion-building, and of the flow of diverse ideas and opinions. In other words, positive freedom is the effective capacity of individuals to have their opinions printed and circulated (Picard, 1985: 48).

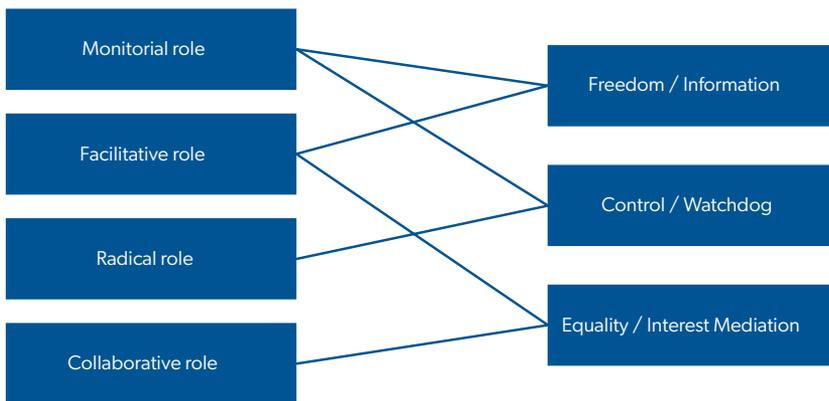
Equality is another elementary principle of democracy and refers, in the first place, to the fundamental notion that all citizens are equal in and before the law, ensuring that everyone has the same rights and legal protections (Diamond & Morlino, 2004: 24–26). Equality calls for an absence of discrimination or bias in the amount and kind of access available to channels, on equivalent terms, for all alternative voices, as far as is practicable (McQuail, 1992: 71). Equality, however, does not include any kind of obligation to provide balanced reporting. Not all claims need to be treated equally by journalists, as conflicts are an intrinsic element of democratic societies. James Curran (2007: 36f) holds that the media should not pretend that the underlying notion of society is harmony: “Democratic politics is about expressing and managing real conflicts in society. [...] The expression of conflict through the media is positive, and should be encouraged”.

Control, the third elementary principle of democracy, refers to the capacity and obligation of citizens to call powerholders of all sorts to account, ultimately consecrating popular sovereignty (Diamond & Morlino, 2004: 3). While at the institutional political level elections are a powerful instrument for holding political powerholders accountable, there are no set mechanisms to

call powerholders in other social realms to account. Curran (2007: 35) argues that control should not be limited to the state and institutionalised power, as this could lead to the “neglect of other forms of power – economic, social and cultural – that can also injure or restrict”. If we broaden his interpretation, this democratic principle calls for control of all institutions with power over individuals and groups. Media and journalism provide one prominent means to control powerholders by way of public deliberation. In the context of the MDM, however, there is a second meaning of democratic control: As power agents in democratic societies, the media must be called to account for their own actions as well.

Freedom, equality, and control can be translated into communication functions. The media’s communication function derived from freedom is the information function; from equality follows what might be called public opinion-making, or the interest mediation function; and from control follows the function to act as a watchdog against the abuse of all types of power. Thus, the root concept of democracy translates into a democratic media mandate to serve as 1) a guardian of the flow of information; 2) a forum for public discussion of diverse, often conflicting ideas; and 3) a public watchdog against the abuse of power in all its various forms. By connecting the journalistic roles and the democratic dimensions, the MDM finds a full-fledged theoretical framework that allows the assessment of the contribution of news media to democracy (see Figure 1).

Figure 1 Roles of news media and dimensions of democracy



Source: Elaboration of the MDM research team based on theories of democracy and McQuail’s (2009) roles of news media (for more details, see Trappel, 2011)

In the MDM, this root conceptual framework serves as a theoretical fundament for the development of empirical indicators. The original version comprised 26

indicators covering all three dimensions, *Freedom / Information (F)*, *Equality / Interest Mediation (E)*, and *Control / Watchdog (C)*. For the 2021 exercise, quite a few indicators have been carefully amended and adjusted to better suit the purpose and to describe more clearly their relevance for democracy. Generally, though, the MDM keeps most of the indicators largely unchanged, allowing for diachronic comparison over this decade of heavy digitalisation in the media and communications field.

However, in various iterations among members of the research team, they identified several vacancies in the research tool. These vacancies cluster around two topics: On the one hand, gender-based challenges for democracy have been identified as insufficiently incorporated ten years ago. Therefore, two indicators were adopted: Rules and practices on internal gender equality (F8), and gender equality in media content (F9). By adding these two indicators to the research instrument, gender-related challenges to democracy are better visible and well justified with regard to the ongoing contentions within the journalistic profession and media output. On the other hand, the research team decided to allocate more attention to developments that became prominent within the last ten years – and are potentially here to stay. This concerns the recently prominent, but pertinent, issue of misinformation on digital platforms (F10), and the digitally born phenomenon of online harassment of journalists (F11). Both issues qualify as challenges to contemporary democracies and have substantially increased in importance compared with 2011. All four new indicators fall into the *Freedom / Information (F)* dimension, and they take the overall number of indicators from 26 in 2011 to 30 in 2021.

Before adopting and applying these indicators to the national media and communication realities, the research teams discussed them in various face-to-face sessions. The meaning of each indicator was scrutinised in detail and theoretically applied to the context of the countries concerned. Following the adaption of the set of indicators, the national research teams graded the performance of their country's media by assigning 0 to 3 points. Point allocation is based on the following instructions:

- 3 points: all or almost all criteria are fulfilled
- 2 points: the clear majority of criteria or the most important criteria are met
- 1 point: indicates poor fulfilment, but at least some criteria are met
- 0 points: all major criteria are not met

At first glance, it might seem this grading scheme contains arbitrary choices, but in its application, the vast majority of grades are easy to apply, as was evidenced in both the 2011 and current 2021 editions. In order to create a common

understanding of how the grades should be awarded in the 2021 exercise, the group of researchers met after data collection (in June 2020) in a hybrid, half-virtual meeting, due to the Covid-19 pandemic. This way, all members of the national research teams had a chance to follow the deliberations from their remote computers. This grading meeting turned out to be highly useful for all participants in order to clarify interpretations and increase the validity of the instrument.

In the following, we present each indicator, explain the theoretical foundations, and discuss which data should be gathered to provide evidence on the topic. Explanation and justification of original indicators are mostly unchanged in comparison with the text of the previous edition (see Trappel et al., 2011), but developments presented by recent literature are indicated and properly discussed.

Indicators

Dimension: Freedom / Information (F)

In the first dimension, indicators refer to structural conditions for receiving and imparting information. The assumption is that news media play an important role in upholding the right of freedom of expression in democratic societies. Indicators cover the reach and consumption of leading news media, the autonomy of news producers both from political and commercial interference, access to the means of production by historically marginalised groups, and conditions against abuse in online communication, such as the spread of misinformation and hate speech.

(F1) Geographic distribution of news media availability

The first indicator concerns the geographic distribution of news media. According to this feature, freedom is better guaranteed if citizens have access to the relevant news media through the whole territory and rely on them to be informed and participate in public affairs. News media should, therefore, be widely available, and regional divides should not exist. This also implies a high degree of technical reach, such as coverage of radio and television signals and broadband access, guaranteeing full supply of all types of news media. Geographic distribution as an indicator of freedom should not be underrated. It has always been a key principle of media structure, closely connected with social structure. Regions not served by leading media outlets might struggle to properly participate in national politics, as “differences of geography may also coincide with ethnic, religious or language differences within the national soci-

ety” (McQuail, 1992: 115). In fact, geographic availability of news media is a factor of media pluralism (Valcke et al., 2015). It is true that the last decade has exhibited a steady growth in broadband access. On the other hand, in the wake of the erosion of their ad-based business model, news producers are struggling to survive, and scholars point out the increase of so-called news deserts, that is, cities or even entire regions completely excluded from journalistic coverage (Abernathy, 2018; Pickard, 2020). This indicator seeks to assess these general trends and provide a more nuanced account for each country.

Indicator F1 *Geographic distribution of news media availability*

Question	Are the relevant news media available to all citizens? Is there a regional divide?
Requirement	The higher the level of distribution and availability, the more democratic freedom and the higher the potential that democracy will be promoted.
Points	3: news media are widely available all over the country 2: some parts of the country are not served by local or regional news media 1: large and important parts of the country are not served by local or regional news media 0: news media are available to the urban population only
Criteria	<ul style="list-style-type: none"> • coverage of all areas, nationwide access • strong radio or television signals via cable, satellite, terrestrial networks • access to online media without restrictions (extended broadband coverage) • use of multiplatform delivery systems (e.g., making radio and television available online)
Data sources	statistics; reports; etc.

(F2) Patterns of news media use (consumption of news)

The traditional normative theory of news media has long held that well-informed citizens are a necessary condition for a healthy democracy (Berelson et al., 1954; Delli Carpini, 2000; Miller & Vaccari, 2020). This indicator relates to the reach of the primarily used news media and takes patterns of media use and consumption of news as proxies to estimate how successful news media are in the task of reaching and informing citizens. An important measure is the daily share of newspapers, television, radio, and online media use. It shows which news media reach the largest group of citizens and which media therefore have a potentially greater influence on public opinion. Comprehensive data, such as the *Reuters Institute Digital News Report* (Newman et al., 2020), indicate that interest in news continues to be very high in most stable democracies. But more granular data can help indicate whether this interest reflects similar patterns

of news consumption or there are relevant gaps, and what the implications are for each country.

Indicator F2 *Patterns of news media use (consumption of news)*

Question	How well do news media in general reach the population (different news outlets such as newspapers, television news, radio news, generic online-media, etc.)? What is the reach of the main news broadcasts?
Requirement	The more the news media are used, the more democratic freedom and the higher the potential that democracy is promoted. The whole population is distinguished from the younger population (approx. 12–25 years old)
Points	3: entire population, young and old, watches, reads, listens to, or uses news regularly 2: a considerable majority of the population is reached by news media; some gaps between young and old 1: news media reach elites, rather than the whole population; considerable gaps between young and old 0: news is of minor importance compared with entertainment, etc.
Criteria	<ul style="list-style-type: none"> • reach of main news broadcasts (evening news) • reach and circulation of quality newspapers • reach of radio news • reach of news-oriented online media • reach among different social segments of the population
Data sources	<i>Reuters Institute Digital News Report</i> (various years, when available); national statistics; audience research; public opinion surveys

(F3) Diversity of news sources

News media have been regarded as the main source of exposure to dissimilar political views, a crucial feature for democratic dialogue (Mutz & Martin, 2001: 97). In the 1990s and 2000s, the popularisation of the Internet unleashed claims that networked communication would provide a more diverse information diet. However, current research shows that, despite the actual contribution of networked communication, editorial media still play the central role in raising citizens' awareness of political difference in most liberal democracies (Benkler et al., 2018; Stier et al., 2020; Yang et al., 2020) – hence the importance of media outlets themselves accounting for diversity and pluralism. Accordingly, this indicator assumes that the selection and composition of news must be executed according to professional rules and through the use of a variety of sources (Kovach & Rosenstiel, 2007: 135–136). By using different news sources, media organisations should be better equipped to address plurality within democratic societies; this implies a large variety of news agencies and no dominance of just one national or international agency in the newsroom.

Furthermore, a diversity of news sources implies the use of non-elite sources (e.g., political blogs), sensitivity to gender, age, and ethnic representation, the rejection of public relations material, and the employment of national as well as foreign correspondents. The selection or omission of relevant news sources for political or ideological reasons is considered bad performance, as it reduces the degree of diversity. Furthermore, the indicator asks whether the media cooperate and build up a content syndication and supply each other with certain news sections, such as foreign news.

Indicator F3 *Diversity of news sources*

Question	How diverse are the sources used by the leading news media?
Requirement	The more diverse the sources used by the leading news media, the better democracy will be promoted.
Points	3: large variety of sources; no dominant sources; freedom to investigate 2: restricted variety of sources, some dominant; fair amount of investigation 1: sources are uniform, but some investigation is done by journalists 0: leading news media depend on one source (e.g., national news agency); little to no own journalistic investigation
Criteria	<ul style="list-style-type: none"> • dominance of the national news agency • presence and relevance of other news agencies • research findings on the use of public relations material by the media • number of own national and foreign correspondents • content syndication (do leading news media supply one another with relevant news sections, such as foreign news?) • relation between elite and non-elite sources • selection (or omission) of sources on political grounds • selection (or omission) of sources to news-making that reflect societal diversity in terms of gender, age, and ethnic origin • resources for journalistic investigation
Data sources	interviews with newsroom journalists; external research findings

(F4) Internal rules for practice of newsroom democracy

This performance indicator concerns the existence of checks and balances within a newsroom that allow internal democratic practices to flourish. It assumes that newsrooms in themselves must be democratic places, providing conditions of freedom for the editorial staff (Christians et al., 2009: 92, 96). This is achieved when rules regarding internal democratic practices are in place and followed. Though national and individual factors might be even more important, a democratic organisational environment helps increase the editorial staff's sense of autonomy (Reich & Hanitzsch, 2013), which increases the likelihood that democratic freedom will be promoted. Along these lines, this indicator looks for organisational structures that guarantee the independence

of individual members of the editorial staff and whether any formal procedures (or strict rules) have been established to ensure journalists' participation in decision-making. There can be different ways of ensuring the internal freedom of the press as well as the involvement of journalists in the management of information and in important decisions at the heart of a media organisation, such as the existence of a newsroom council and internal rules of electing or appointing editors-in-chief.

Indicator F4 *Internal rules for practice of newsroom democracy*

Question	To what extent do newsroom journalists practice internal democracy?
Requirement	If effective rules regarding internal democratic practices exist, it is more likely that democratic freedom will be guaranteed, and thus that democracy will be promoted.
Points	3: democratic practices in newsrooms are implemented and respected 2: journalists have a strong say on internal decisions (e.g., by veto rights) 1: journalists are heard and participate in decision-making, but cannot decide 0: decisions in the newsroom are taken top-down and do not involve journalists
Criteria	<ul style="list-style-type: none"> • newsroom journalists have a formal and equal say in how to portray and frame political issues • newsroom journalists must arrive at a consensus on how to frame political issues • newsrooms have clear editorial guidelines for impartiality, with sanctions attached • existence of a newsroom council • internal rules for electing or appointing editors-in-chief, other positions, etc. • journalists choose their editor-in-chief • existence of internal rules to support and promote women journalists' careers and their access to managerial positions • existence and implementation of a system of monitoring and evaluation of the presence and participation of women in decision-making at all levels
Data sources	interviews

(F5) Company rules against *internal* influence on newsroom/editorial staff

Extending the concept of freedom in the newsroom, this performance indicator aims to assess the degree of interference by the management and other internal supervisors in editorial decisions. According to McAllister and Proffitt (2009: 331), "Owners of media operations may exert influence over content and distribution in a variety of ways [...], although this may be rare in large

corporations”. Empirical evidence confirms that media outlets whose editors feel pressured by owners and management devote more positive coverage and apply less scrutiny to people and companies related to their parent organisations than their competitors, showing that boards, newsrooms, and news content are intertwined (Saffer et al., 2020). In the case of publicly owned media, newsrooms displayed a long history and different degrees of editorial independence around the world (Sussman, 2012). Most European public broadcasting systems set legal limits on freedom (McQuail, 1992: 117), but even in these cases, there is a range of practices varying from government capture to power-sharing (Hallin & Mancini, 2004; Reich & Hanitzsch, 2013). This indicator assumes that the newsroom must have freedom to decide independently on editorial matters. In order to secure the independence of newsrooms and journalists from the management or sales department, some internal rules are useful. A classic rule is that the newsroom and management must be clearly separated, preventing internal manipulation and influence. The sales department should also have no contact with reporting staff. But changing conditions, especially the growing employment of staff to produce paid content, defy this classical separation and put pressure on editorial freedom, which must be assessed as well (Conill, 2016).

Indicator F5 *Company rules against internal influence on newsroom/editorial staff*

Question	What is the degree of independence of the newsroom from the owners, management, and advertising sales department? Are there rules regarding this separation? Are these rules implemented?
Requirement	The more journalists decide independently on editorial matters, the more democratic freedom is exercised and the higher the potential that democracy will be promoted.
Points	3: newsroom journalists enjoy full independence on editorial decisions 2: management, sales departments, and newsrooms are separated most of the time 1: management and sales departments meet newsroom staff regularly 0: journalists must execute management decisions, including those from the advertising sales department
Criteria	<ul style="list-style-type: none"> • formal rules to separate newsrooms from management, including the board, in both private and public service media • Are such rules actually effective in daily practice? • representation of journalists in management • representation of journalists on the board • presence or absence of advertising sales department in newsroom meetings • Is the editor-in-chief or publisher the formal leader of newsroom work? <p>In the case of public service media:</p> <ul style="list-style-type: none"> • Does the public service remit provide for independence from the state or government? • Is the selection procedure for editors-in-chief independent from the government?
Data sources	interviews

(F6) Company rules against *external* influence on newsroom/editorial staff

Interference from external parties, such as advertisers, news sources, and organised pressure groups, are also unacceptable (Hardy, 2008: 92) – this is the topic of this indicator. Healthy financial conditions are crucial for ensuring independence from external influence; otherwise, news media are more susceptible to commercial pressure. This, in turn, reflects on content, as more commercialised media systems tend to offer less political information and more soft news, requiring citizens to put more effort towards following public affairs (Aalberg et al., 2010). Therefore, in the case of commercial media, this indicator demands investigation of large and small advertisers as well as the balance between them. The more sources of income a media company has, the more independence journalists should have to investigate. On the other hand, when financial resources originate mostly from a single third party (e.g., the government or a single large advertiser or sponsor), it is difficult to claim full independence (McQuail, 1992: 106). A similar reasoning concerns public service media: when well and independently funded, they do not need to serve the demands of the current government. Mixed funding – revenues flowing in from not only licence fees and public subsidies, but also from commercial activities, such as advertising – can also minimise dependence on political forces and foster reporting freedom. However, in this case, there is the risk that public service media might “conform to tuning-in quota” (Bardoel, 2015: 4).

Indicator F6 *Company rules against external influence on newsroom/editorial staff*

Question	What is the degree of interference by external parties (in particular advertisers and sponsors)? Do news media receive revenue from a multitude of sources?
Requirement	The higher the diversity of revenue streams, the more democratic freedom is exercised and the higher the potential that democracy will be promoted.
Points	3: no single large advertiser; no effective commercial influence 2: some large advertisers, but newsrooms are not affected by them 1: newsrooms depend on a few large advertisers or sponsors 0: strong dependence on large advertisers or sponsors
Criteria	In the case of mixed-financed media companies: <ul style="list-style-type: none"> • multitude of income streams (sales, advertising, licence fee, others) • multitude of advertisers, each having only a minor share of the total • sponsoring agreements with influence on content (such as “infomercials”, etc.) In the case of media companies with single-revenue financing (e.g., some public service media): <ul style="list-style-type: none"> • formal rules and practice of distance between revenue source (e.g., state or government, licence fees) and news media

- Are public service media financed over a short or long period?
 Can financial provision be changed from one year to the next?
- interventions by shareholders or politicians in newsrooms

Data sources interviews; data from leading news media

(F7) Procedures on news selection and news processing

This performance indicator asks about routines and guidelines for news production: Is a stylebook on news selection available and being used? Do new journalists receive training in news values or selection criteria? What procedures precede publication? Democracy in the newsroom is promoted if there is regular internal debate on the selection and processing of news, because this may ensure both control and impartiality (Kovach & Rosenstiel, 2007). Established procedures on news selection and processing can also be a safeguard against omission concerning structural inequalities. One example relates to gender: “The overall proportion of stories focusing on women has remained unchanged at 10% since 2000”, found the *Global Media Monitoring Project 2015 report* (GMMP, 2015: 71). Formal rules on news selection guarantee a high degree of professionalism and increase the chances of gender-fair headlines and balanced representation of social diversity.

Indicator F7 *Procedures on news selection and news processing*

Question	What rules are implemented and practiced in the leading news media regarding the selection and in-house processing of news items?
Requirement	The more internal debate about news values (selection criteria) and the choice of news that occurs, the more democratic freedom is exercised and the higher the potential that democracy will be promoted.
Points	3: formal rules on how to select and process news exist and are practised day to day 2: internal debate on the selection and processing of news is practised more than once every day and is part of journalistic routines 1: internal debate is limited to the daily news conference 0: news selection and processing are done by the individual journalist based on their own preference
Criteria	<ul style="list-style-type: none"> • stylebook available on news selection • in-house training for new journalists on the job • defined stages for any news item before it is published, aired, or put online • critical review of news originating in “social media” as a general routine procedure in newsrooms • newsroom discussions on how reporting of (in)equality and diversity issues should be made, including the use of diversity and gender-fair headlines, pictures, and language
Data sources	interviews

(F8) Rules and practices on internal gender equality

This performance indicator is the first of the new indicators for 2021, and it concerns the principle of equality within newsrooms and the entire media organisation. It describes, in particular, the equality of pay and career opportunities for female staff. Gender inequality in media organisations is considered one of the most prevalent risks to media pluralism for democratic societies (Brogi et al., 2018: 2). Despite some progress in the last decades, in 2015, women still occupied only 27 per cent of the top management jobs in media organisations around the world, according to the aforementioned report from the Global Media Monitoring Project (GMMP, 2015: 45). Research indicates persistent discrimination in the assignment of tasks to women journalists and a gender pay gap and sexism from both work colleagues and news sources, even in European liberal democracies (EIGE, 2013). When women play a decisive role in media organisations, freedom and democracy are better served. Research shows that increasing the presence of women in the newsroom has a positive impact on the content, providing more diverse news sources and including women and ethnic minorities, whereas male-dominated news organisations rely mostly on official sources (GMMP, 2015: 46). This indicator seeks to assess to what extent newsrooms actively take steps toward more gender balance in their operations and internal functioning. While it takes as a departure point the proportion of women and men in staff – especially in decision-making positions – it also considers conditions of employment, benefits such as child care, and internal guidelines and policies for women’s protection and career progression, in addition to existing legal frameworks.

Indicator F8 *Rules and practices on internal gender equality*

Question	To what extent do media outlets acknowledge and address challenges to gender equality in their own operations and internal functioning?
Requirement	Institutional commitment to gender-responsive practices in media organisations in relation to working conditions, career progress, and access to decision-making positions is a sign of media companies’ democratic orientation.
Points	3: employment conditions are equal between men and women 2: some inequalities remain, but the organisation has undertaken efforts to eliminate them and has already succeeded to some extent 1: inequalities exist and remain; the organisation slowly moves towards eliminating them 0: substantial differences exist with regard to payment, career and promotion, recruitment, etc., between men and women
Criteria	<ul style="list-style-type: none"> equal conditions of employment and benefits for women and men, including equal pay for equal work, and equal and transparent recruitment practices

- existence of internal rules, recommendations, codes, or guidelines in media organisations to support and promote women journalists in their careers and access to managerial positions (in particular general gender equality policies, maternal and paternal leaves, and policies to support women getting their job back after maternity)
- existence of mechanisms in place to remove obstacles to equal opportunities such as a gender equality advisor or department, devoted training activities, or the offer of childcare
- existence of female journalists' associations that monitor media's commitment to gender equality and promote good practices
- existence of national provisions or legal framework regarding gender equality in the media workplaces

Data sources interviews; gender-related reports and studies

(F9) Gender equality in media content

This performance indicator refers to the level of gender equality in media content and the promotion of free expression and inclusion of diverse voices in reporting. There is a relevant gender gap in news content, with only 16 per cent of the portrayed subjects in politics and government news being women. Furthermore, while men are more often portrayed as government officials, politicians, or experts, women appear mostly as simply residents, parents, home-makers, students, or victims (GMMP, 2015: 9). Such entrenched inequalities contribute to replicating and reinforcing gender stereotypes. Although there is a long-standing movement to hold media accountable for gender-related failures in coverage, recent developments such as the #metoo campaign – which turned global in 2017 – seem to have finally brought awareness within media organisations all over the world of the need to correctly portray underrepresented segments of societies (Krijnen, 2020). Accordingly, we assume that democracy is better served in cases where gender sensitivity in reporting is fully respected and journalists promote a balanced and non-stereotyped portrayal of women in the news. This indicator assesses the existence of rules and practices in media organisations to guarantee gender balance and diversity in news subjects. This way, the MDM corresponds with both objectives of the Beijing Declaration and Platform for Action regarding women and media, adopted at the UN's Fourth World Conference on Women in 1995 (United Nations, 1995), namely to increase the participation of women in news production (F8) and promote a non-stereotyped portrayal of women in the media (F9).

Indicator F9 *Gender equality in media content*

Question	To what extent do media outlets acknowledge and address challenges to gender equality in media content and promote free expression and inclusion of diverse voices?
Requirement	Gender parity and awareness across editorial content of the news and current affairs are crucial for the media to reflect the plurality of voices in society, thus fostering women's freedom to express their diverse knowledge and experiences and contributing to societal democratic development.
Points	<p>3: gender equality in reporting is codified and fully respected in daily routines</p> <p>2: such codified rules are in place, but little efforts is made to respect them</p> <p>1: no codified rules are in place, but there is informal consensus to report in gender-sensitive ways, and most journalists respect this</p> <p>0: there are no specific rules on gender equality in reporting in place, and each journalist decides whether or not gender equality is respected in reporting</p>
Criteria	<ul style="list-style-type: none"> • commitment to selection of sources to news-making that reflect societal diversity in terms of gender, age, and ethnic origin • explicit efforts are made, and mechanisms are in place, to monitor and guarantee gender balance in news subjects (balanced numbers of women and men in the news) (e.g., monitoring and sex disaggregated analysis of news and current affairs content) • existence of internal rules, recommendations, codes, or guidelines regarding the promotion of gender equality in media content • newsroom commitment to cover gender (in)equality and diversity issues • newsroom discussions on how reporting of such issues should be made, including the use of gender-fair headlines, pictures, and language • existence of internal rules, recommendations, codes, or guidelines to produce gender-sensitive coverage of gender-based violence • existence of women's alternative media, offline and online • existence of national legal frameworks concerning gender-fair and relevant media content (e.g., media policies including gender equality goals or gender equality strategies including reference to media responsibilities)
Data sources	interviews; gender-related reports and studies

(F10) Misinformation and digital platforms (alias social media)

As common wisdom suggests, misperceptions have negative effects on political debate and public policy (Flynn et al., 2017: 35). There is little doubt that the Internet triggered a flood not only of information, but also of misinformation. Although misinformation did not begin with digital platforms, they have allowed it to arrive faster and reach more people than in the age of mass communication;

however, the problem is more complex. Besides structural political-economic factors that make citizens more prone to produce, reproduce, consume, and believe in misinformation, news media play an even more crucial role in either spreading it or mitigating its effects (Benkler et al., 2018; Humprecht et al., 2020). This means that, if news media are to assume their responsibility in democracy, they must fight contemporary misinformation strategies. Well-equipped news media are likely to be the most important check a society can impose on false information. Newsrooms are therefore requested to exercise particular practices to identify misinformation and avoid spreading fake news. Democracy is well served if specially trained staff are available to check doubtful news and discuss them internally before distributing it. This can be done in-house or by professional fact-checkers, with or without algorithm-based tools. The more sophisticated misinformation becomes, the more important the fact-checking mission is for leading news media.

Indicator F10 *Misinformation and digital platforms (alias social media)*

Question	How do leading news media protect and defend their content against misinformation delivered through digital platforms and social media?
Requirement	The more sophisticated the mechanisms and measures are in place to identify and prevent misinformation originating in digital platforms from being published, the better democracy is served.
Points	3: control by specially trained experts is in place, also using algorithm-based tools 2: information from doubtful platform sources must undergo specific checks 1: regular internal meetings to discuss potential misinformation 0: single journalists decide on their own when including content originating from digital platforms
Criteria	<ul style="list-style-type: none"> • specific rules apply and checks are implemented, additional care is taken in newsrooms if the source of news is a digital platform • algorithmic tools or other machine-based instruments are provided and in use • training on how to distinguish facts from misinformation is provided on a regular basis
Data sources	interviews with newsroom journalists

(F11) Protection of journalists against (online) harassment

Increasingly, journalists (often female) are targets of online harassment, “shitstorms”, cyberstalking, attacks, and even death threats aimed at preventing them from investigative reporting (Intergovernmental Council of the IPDC, 2020). Online communication evolved into an ecosystem providing fertile conditions

for these practices (Gillespie, 2018: 56). Harassment is a violation of the freedom of expression, which is an essential human right to voice and the cornerstone of a democratic society, and so affects the quality of democratic societies and “the right of society to access a plurality of information” (Chocarro et al., 2020). As democratic freedom is constrained when journalists, especially from minority groups, are under such threats, this requires strong and determined replies. While we assume that penal legislation is in place to protect all citizens (including journalists) from harassment, this indicator seeks evidence that media organisations support their staff in cases of intimidation and abuse. We look especially for the existence of contractual protections, codes of conduct, and guidelines to address harassment against reporters, but also to the availability of technical resources, such as encryption technologies, to provide safer online communication.

Indicator F11 *Protection of journalists against (online) harassment*

Question	How do leading news media support and protect their journalists in case of harassment, particularly online?
Requirement	Democracy is better served if journalists can work free from threats and harassment. Leading news media are therefore required to establish mechanisms to support and protect their news journalists from harassment and threats, for instance, by providing them shelter, hiring security personnel, and enabling them to use encryption technologies.
Points	<p>3: leading news media provide full and unlimited legal and other forms of support for their journalists in case of harassment, “shitstorms”, insults, etc.</p> <p>2: journalists can rely on their employers in such cases, but cost or other reasons sometimes compromise the assistance provided by news media organisations</p> <p>1: leading news media normally provide assistance, but there are repeated cases where support and protection did not work out or was strictly limited</p> <p>0: journalists work at their own risk in this respect, and news media do not provide any support</p>
Criteria	<ul style="list-style-type: none"> • relevant provisions in work contracts • (recent) cases that demonstrate the degree to which leading news media provide support • specialised legal services at hand provided by news organisations • possibilities for journalists to use encryption technologies to prevent them from being hacked • specific provisions (code of conduct, ethical code, or guidelines) addressing instances of gender-based harassment so as to protect and support particularly women professionals targeted online
Data sources	interviews with newsroom journalists and editors-in-chief; reports in trade press; cases in recent years

Dimension: Equality / Interest Mediation (E)

The structural feature *Equality / Interest Mediation* refers to the country and its entire media system. According to this feature, equality is better guaranteed if there are large numbers of different media outlets (quantitative external diversity). Ownership structure and diversity are accordingly regarded as important elements. Moreover, news should reach the citizen by means of different formats. Finally, there is a greater chance of achieving equality if the mass media are employed by minority groups (alternative media, third sector) and if the dominant mass media report on a regular basis about minority claims.

(E1) Media ownership concentration national level

As many other economic activities, media systems are also subject to market concentration. This happens when companies increase the relative or absolute number of units they control both by growing internally (creation of new products, innovation, and accumulation) and externally (purchasing other companies). This way, media systems might display horizontal integration (few companies dominate products within the same type of business), vertical integration (the whole supply chain is operated by the same or few companies), and diagonal growth (few media firms operate across several media sectors and even beyond media and communication industries) (Mastrini & Becerra, 2008).

Claims concerning the threats of ownership concentration for the fulfilment of media's democratic role have been discussed widely among scholars from liberal and critical perspectives. For example, Doyle (2002) affirms that media concentration narrows the range of voices and can lead to over-representation of certain political opinions. Along similar lines, Baker argued that ownership concentration must be seen as contrary to the fundamental ideas of democracy: "Concentrated media ownership creates the possibility of an individual decision maker exercising enormous, unequal and hence undemocratic, largely unchecked, potentially irresponsible power" (Baker, 2007: 16).

Drawing on this theoretical framework, the MDM assumes that ownership concentration in the media may compromise the plurality of the media landscape and undermine their democratic performance. Despite some belief that the abundance provided by the Internet would make pluralism concerns outdated, more careful analysis indicates that online communication is characterised by even more concentrated market shares, overwhelmingly favouring incumbents and large conglomerates (Hardy, 2014; Hindman, 2018). Technological development is raising fixed costs and lowering marginal costs of cultural production, turning economies of scale even more profitable, a classic predictor of market concentration (Noam, 2016; Picard, 2010). As news media have become more

intertwined with electronic and digital technologies in the last decade, a high and growing degree of ownership concentration should be observed by empirical research. Indeed, previous findings already point to increasing consolidation of news media all over the world, with additional strength in highly commercialised media systems and sectors (Abernathy, 2018; Saffer et al., 2020).

This indicator addresses the issue of concentration at the national level. A national market controlled by one operator (monopoly) or two (oligopoly) can be problematic in this regard. Ideally, more than two competing news media outlets should therefore be available in each news media sector, such as newspapers, news magazines, radio, television, and online media. Data about ownership, market share, and extent of public scrutiny allows for the assessment of concentration at this level.

Indicator E1 *Media ownership concentration national level*

Question	What is the degree of ownership concentration at the national level?
Requirement	The lower the national ownership concentration, the more democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	3: low concentration ratio (CR3 lower than 0.40) and more than two competitors for all news media sectors (television, radio, newspaper, generic online media) 2: moderate concentration ratio, with some market dominance by large companies; CR3 is between 0.40 and 0.70 1: competition is weak, and most media sectors are controlled by one company; CR3 is higher than 0.70 0: private monopoly at the national level
Criteria	<ul style="list-style-type: none"> • plurality of ownership at national level • transparency of ownership • If there is a monopoly: Is it publicly controlled? Is it state-owned? • Does one company control more than one medium (also across sectors)?
Data sources	statistics (data, calculate the market share CR3 of all media in the country; concentration ratio (CR n) is the combined market share of the n largest firms in the news media market divided by 100)

(E2) *Media ownership concentration regional (local) level*

The second indicator measures the degree of ownership concentration in the market of local or regional news media. Ideally, more than two competing news media outlets should be available in each news media sector. With lower media concentration, a larger number of players have access to the news markets, and more diverse opinions are likely to emerge. But the already alluded phenomenon of increasing numbers of news deserts, when entire regions become

under-served by news media due to closures (Abernathy, 2018), predicts an even higher degree of ownership concentration at the regional level. In fact, local and regional news media are more strongly hit by the news media crisis of the last decades than national groups (Napoli et al., 2018; Nielsen, 2015). At the same time, it is important to notice that most discourses of news media crisis are often based on the developments in the US alone. Scholars in other countries challenge the idea of crisis or point out other causes (historical and political) rather than present-day and technological ones (Brüggemann et al., 2016: 534). Anyway, strong media ownership concentration at the local level is particularly difficult for local politics, as politicians have no alternative means of communicating with their electorate other than through the local monopoly media company or their social media channels. These technologically enabled alternatives can indeed help, but research indicates that the decline of local news media often translates into citizens following national news instead (Darr et al., 2018). Therefore, networked communication is no ultimate solution. Local news media should still fulfil a specific democratic role, and they are likely to better perform under a lower degree of concentration.

Indicator E2 *Media ownership concentration regional (local) level*

Question	What is the degree of ownership concentration at the regional (local) level?
Requirement	The lower the regional (local) ownership concentration, the more democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	3: more than two competitors in all relevant regions for all news media sectors (newspapers, television, radio, etc.) 2: most relevant regions are addressed by more than two media companies 1: only few relevant regions are addressed by more than two media companies 0: full news control by just one private media company in all relevant regions (integrated media companies: newspaper, local television, radio, and online)
Criteria	<ul style="list-style-type: none"> • plurality of ownership in the regions • transparency of ownership • In the case of a monopoly: Is it publicly controlled? Is it state-owned?
Data sources	statistics (only for large regions in large countries: calculate the market share CR3 of main regions in the country, similar to indicator E1)

(E3) Diversity of news formats

A long list of news formats through multiple types of newspapers, television, radio, and online media indicates plurality of information. Each medium has its

own specificities for the presentation of news and potentially adds to the diversity of news and information on offer. Some media, such as newspapers, tend to increase political knowledge for already educated people, while audiovisual media benefit the least educated “almost as much as the most educated” (Van Aelst et al., 2017: 17). Especially younger generations long for news formats that harness affordances provided by mobile communication (Newman et al., 2020: 57). Thus, this indicator assumes that variety of formats is a positive feature of media systems. Moreover, ownership diversity is unlikely to automatically translate into news format diversity, hence the specific importance of this indicator.

Indicator E3 *Diversity of news formats*

Question	How diverse are the formats for news presentation?
Requirement	The higher the diversity of news formats, the more plurality of information and democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	3: abundance of news formats in all media sectors 2: good variety of formats; some news formats dominate but are challenged by others 1: few formats are available; public attention is focused on dominant news formats 0: minimum diversity of news formats; very few formats dominate
Criteria	<ul style="list-style-type: none"> • degree of news formats diversity (produce a list of different formats of news, including online outlets specialised in news, 24-hour news channels, etc.) • multiple types of news media • special forms of news presentation
Data sources	reports; audience research; format research

(E4) Minority/Alternative media

It is uncontested that media can contribute to diversity by reflecting differences in society: “Media are expected to represent the prevailing differences of culture, opinion, and social conditions of the population as a whole” (McQuail, 1992: 144). This feature belongs to democratic mediation, especially in societies marked by so many different interests and identities:

Adequate representation of different cultural values, lifestyles, languages, and heritages in mainstream media, development of minority media, and minorities’ access to media services have been repeatedly considered to contribute to a culture of tolerance, media pluralism and consequently, consolidation of democracy. (Klimkiewicz, 2015: 82)

Accordingly, all major minorities within a given society should be served by a variety of special minority or alternative media and be well represented and recognised by mainstream media based on rules or conventions. More democratic equality is likely to be established if minority groups have easy and even privileged access to the leading news media in order to argue their causes. Governance rules within media companies that entail legally binding obligations for the media in favour of positive discrimination of minorities are considered helpful tools in establishing more equality (both in public service media and in private commercial media).

Indicator E4 *Minority/Alternative media*

Question	Do minority and alternative media exist? Are all sorts of minorities served by media? Do minorities have their own media? (Qualifying as minorities are ethnic groups, disabled people, minority languages, etc.)
Requirement	The more minority and alternative media exist, the more democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	<p>3: a plenitude of minority media exist; largest minorities are served by them</p> <p>2: large and mid-size minority groups are recognised by existing media and operate their own media</p> <p>1: only large and powerful minorities operate their own media and are recognised by leading news media</p> <p>0: no such media exist</p>
Criteria	<ul style="list-style-type: none"> • quantity of minority and alternative media • Do the main or largest minorities have their own media or access to media on a regular basis? • use of languages that reflect the linguistic diversity of the media's target area • use of languages relied upon by marginalised groups • existence and relevance of weblogs of minorities or ethnic groups, etc.
Data sources	research reports; audience research

(E5) Affordable public and private news media

According to this structural indicator, the news media should be available at a reasonable price to the whole population. In order to provide people with equal opportunities for informing themselves on a regular basis, the price of the available media must be within the financial means of the entire population. Quality news should also be affordable to the population; thus, no relevant difference exists between the price for popular or quality news. In fact, a characteristic of current media economics is price deflation caused by rising information supply (Noam, 2016: 12). Thus, technological and economic conditions predict

lowering costs for access to news media, though simultaneous trends such as ownership concentration might push in another direction. It is also important to keep in mind the argument that consumers pay much of their consumption of digital information with their personal data (Stucke, 2018). But, as there is no consensus on the validity of this argument, and even less on how to measure this payment, this indicator limits itself to conventionally measuring the cost of access to newspapers (price of subscription or copy price for paper and online), television, and radio (licence fee, pay-TV), and online media (including the cost for broadband Internet).

Indicator E5 *Affordable public and private news media*

Question	What is the price of the media in relation to average household income?
Requirement	If the price for news media is affordable, it is more likely that democratic equality will be guaranteed and thus that democracy will be promoted.
Points	3: low price in relation to average household income 2: price excludes only few households from receiving news 1: price is an economic argument for households not to receive news 0: news media are only affordable for elites
Criteria	All in relation to average household income and to lower-income household groups (quantitative): <ul style="list-style-type: none"> • average price for an annual full subscription to newspapers (print and online) • annual tax or licence fees, television and radio • cover price relation of popular newspapers and quality newspapers • price of broadband access
Data sources	statistics; prices

(E6) Content monitoring instruments

The next structural indicator refers to content monitoring instruments in the specific country and its mass media landscape. According to this feature, equality is better guaranteed if there is a large number of politically independent outlets (internal diversity) or a balance of politically aligned media organisations at the aggregate level (external diversity). Along these lines, this indicator illustrates whether a country's media system has bodies or instruments to monitor news media content. Such instruments should be independent, operate on a regular basis, and the results should be publicly available. Such systematic and structured content monitoring might be institutionalised by the media themselves, supervising bodies, university institutes, or other organisations. The existence of a permanent content monitoring institution by itself is considered to have a positive impact on journalists' behaviour and to help foster the idea of media accountability (Bertrand, 2003).

Digital technologies offer additional possibilities for automated content analysis (Boumans & Trilling, 2016; Karlsson & Sjøvaag, 2019) and (commercial) services, such as LexisNexis and others, provide content monitoring. However, democratic benefits can only be expected if such tools are used to turn quantitative analyses into theory-informed qualitative results. Simple binary metrics do not deliver adequate results with regard to democratic values.

Indicator E6 *Content monitoring instruments*

Question	Is there a regular and publicly available content monitoring instrument for news media?
Requirement	If an effective monitoring instrument exists, it is more likely that democratic equality will be guaranteed and thus that democracy will be promoted.
Points	3: continuous and published content monitoring, provided by an independent organisation 2: news media provide content monitoring themselves on a regular basis 1: content monitoring is done irregularly or occasionally by various organisations 0: no public monitoring in place at all
Criteria	<ul style="list-style-type: none"> • organised, permanent content monitoring • published by relevant news media on a regular basis (publicly available) • independence of the monitoring body or private company • regulatory provisions (national or organisational) include a commitment to monitor the balance between men and women subjects in news content • ad hoc mechanisms are in place to monitor the balance between men and women subjects in news and media content (monitoring and sex disaggregated analysis of news and current affairs content)
Data sources	desk research

(E7) Code of ethics at the national level

This structural indicator seeks to determine the existence and use of an institutionalised and effective self-regulation system for the leading news media of a country. The core assumption here is that the mass media respect ethical standards when reflecting and representing the diversity of views and interests in society. Ethical norms are by no means eternal and ubiquitous. While professional skills and ethical standards are well established in democratic societies, the digital transformation calls for a profound revision of such standards and norms. Ward (2014, 2019) argues that the digital age undermines traditional principles of journalism as advocacy for contemporary democracies and calls for a redefinition of such norms and standards. Such ethical groundwork has become even more relevant at times when digital platforms increase their significance in news use and contribute to the erosion of ethical standards (Roberts,

2019). Digital intermediaries categorically reject editorial responsibility for ethical standards. In retrospect, however, Twitter's and Facebook's shutdowns of former American President Donald Trump's accounts in February 2021 might mark a turning point.

Scholars have pointed to a large variety of possible measures for implementing such standards both at the company level (internal guidelines, mission statements) and the national level (press councils, ombudspersons, etc.). Informed scholarly debates can be followed in Routledge's pertinent *Journal of Media Ethics*. Relevant for this indicator is the national level and whether codes of ethics exist and are implemented and respected by the leading news media. It checks whether the internal tools for editorial policies (such as mission statements, editorial guidelines, etc.) are implemented in line with formal rules.

Indicator E7 *Code of ethics at the national level*

Question	Does a code of ethics at the national level exist, requiring news media to provide fair, balanced, and impartial reporting? Is it known and used?
Requirement	If an effective code exists, it is more likely that democratic equality will be guaranteed and thus that democracy will be promoted.
Points	3: code is implemented and frequently used by all leading news media 2: code exists, but not all leading news media respect it 1: code exists on paper only, and is not part of newsroom practice 0: no code or not in use
Criteria	<ul style="list-style-type: none"> • existence of a press complaints commission, etc. • existence of independent journalist associations, which disseminate good practice, e.g., improving skills and raising ethical standards • Are there any provisions regarding the accountability of the media to civil society?
Data sources	desk research; interviews

(E8) Level of self-regulation

Along similar lines, this indicator is geared towards self-regulation instruments within leading news organisations in each country. Such self-regulation instruments are part of media governance in a broad sense, understood as the collective rules organising media systems. It is assumed that instruments such as clear internal rules that apply to all journalists in the newsrooms help to increase quality and provide journalists with guidelines on their day-to-day routines. Such guidelines work on the condition that rules do not only exist, but are used regularly. Self-regulation instruments can be formal or informal; however, formal self-regulation rules are more transparent and possibly more helpful for journalists than a set of informal rules applied at the discretion

of editors-in-chief. One example familiar to journalists is compliance rules regarding presents and invitations by individuals or institutions. While some news sections such as travel, lifestyle, and mobility are notorious temptations to transgress the line between editorial and sponsored content (Hanusch et al., 2020), new digital para-journalism exercised massively on digital platforms has fully blurred the boundaries.

Democratic best practice obviously requires clear and formal rules in newsrooms. News organisations with a sophisticated, highly developed, and continuously updated set of internal self-regulation rules are considered to better advance the cause of democratic equality.

Indicator E8 *Level of self-regulation*

Question	Does a media self-regulation system exist at leading news media, requiring the provision of fair, balanced, and impartial reporting? Is it effective?
Requirement	The better the media's self-regulation system is, the more democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	3: highly sophisticated self-regulation instruments in every relevant newsroom, and used regularly, e.g., during newsroom conferences 2: Leading news media have self-regulation instruments in place, but do not use them (only occasionally, e.g., in seminars for new staff) 1: self-regulation instruments exist, but are not notified; there is some "oral culture" in newsrooms 0: no such instruments at all
Criteria	<ul style="list-style-type: none"> • existence of a mission statement, code of ethics, or code of conduct referring to democratic values and containing journalistic obligations for politically balanced reporting • existence of internal rules for the right to reply • existence of formal systems for hearing complaints about alleged violations of ethical standards • Do ombudspersons have their own space in the media? Are they independent? • existence of sanctions against journalists who violate ethical standards or organised process of self-criticism • Are explicit efforts made to guarantee gender balance in the news subjects?
Data sources	interviews; document analysis

(E9) Participation

This performance indicator examines the extent to which news media give citizens the opportunity to voice their own views and reactions to news stories they see, read, or hear. This indicator analyses how well and successfully the media encourage citizens to participate in the production of news by commenting on

news and generating content themselves. Such an approach requires that the news media be open to forms of cooperation with citizens. It can be argued, generally speaking, that the higher the number of citizens who participate, the greater the chance of representing existing opinions and interests.

Over the years, some media (sometimes public service broadcasters) developed participation formats integrating the audience (for example “open mic” formats in radio). However, simply placing spectators into the television studio, for example, for game shows or sport reporting, does not qualify as participation in this indicator. Scholarly research shows that “mainstream news organisations do not really fulfil the promises they make of citizen participation”, and entirely new models may be required “rather than simply further opening of existing models” (Scott et al., 2015: 756).

While incumbent media often make use of the Internet to provide a forum for comments and criticisms on their websites, online media, as well as digital-born news formats, are well placed to organise such a forum by providing space online for user participation. In general, the Internet provides various modes of citizen participation in the public discourse with fewer gatekeepers and a redistribution of communicative power, away from established news outlets like television, radio, and newspapers. However, this form of online participation has a downside as well. Critics, such as Matthew Hindman (2009), claim that differences remain and that the computer skills necessary to participate are even more stratified than in the analogue world.

Indicator E9 *Participation*

Question	Is there an organised way for citizens to participate in the news process?
Requirement	The more citizens participate in the news process, the more democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	3: newsrooms sometimes open to public; online space for citizens’ voices and comments on each news item frequently used 2: newsrooms normally closed; selected news items are open for comments by citizens 1: newsrooms always closed; some space for comments online, but in online forums (e.g., Facebook), not underneath news items 0: no such possibilities
Criteria	<ul style="list-style-type: none"> • newsrooms open to the public (sometimes, always) • existence of rules for the right to reply or possibilities to give feedback • Can citizens actively participate by commenting on news online next to the news items, visible to all other readers? • Do leading online media offer public postings in online forums? • Do leading news media provide space for user-generated content?
Data sources	interviews; desk research

(E10) Rules and practices on internal pluralism

Along with the process of media ownership concentration (E1 & E2), the importance of internal pluralism increases. This performance indicator displays to what extent newsrooms are aware of the democratic value of internal pluralism and how leading news media operate internal pluralism. Different voices in society are well represented if the leading news media allow for a high degree of internal pluralism in the newsrooms. Denis McQuail (2010: 199) stipulates:

Media should reflect in their structure and content the various social, economic and cultural realities of the societies (and communities) in which they operate, in a more or less proportional way. [...] Media should serve as a platform for different interests and points of view in a society or community.

While in earlier stages of media development external pluralism was provided by a great number of independent news outlets (newspapers in those times) with a wide array of opinions, media concentration and the demise of the party press require higher levels of internal pluralism within leading newsrooms (Jakubowicz, 2015: 39–40). From the perspective of democratic equality, different views and opinions should be represented, irrespective of the requirement for each newsroom to follow an editorial line. Public policy intervention can help foster internal pluralism, but ideally, it should rather be part of the newsroom culture. Dire working conditions in emergent digital newsrooms such as overwork, long hours, high stress, burnout, job turnover, and low pay (Cohen, 2019: 571) create new challenges just to maintain the accomplished level and standard of internal pluralism.

Empirical evidence can be collected from close observation of the newsroom output (which is not done in this research) or by discussing with members of the newsrooms. Internal pluralism is realised when divergent voices are represented within the same newsroom, when different experts' opinions are being voiced, and when the feedback culture of the newsroom is open to all sides.

Indicator E10 *Rules and practices on internal pluralism*

Question	How do media organisations ensure different views and perspectives are being reported?
Requirement	The more different voices are reported by the media, the more democratic equality is guaranteed and the higher the potential that democracy will be promoted.
Points	3: newsrooms follow known and standardised procedures to ensure internal pluralism and give voice to various groups 2: no formal rules, but newsroom meetings regularly discuss and check for pluralism 1: it is the personal responsibility of the editor-in-chief or chief-producer to check for internal pluralism 0: no such procedures; no regular control for pluralism

Criteria	<ul style="list-style-type: none"> • How are different positions accommodated within the newsroom? • What rules apply for presenting divergent opinions of journalists within the same newsroom? • Are there regular internal debates on different positions? • existence of and respect for internal rules or guidelines specifying that all relevant information and socially significant views must be given their appropriate weight in the coverage • Are journalists free (and expected) to also use information and views favouring the other side when a medium is allied with a particular party or ideology? • Are politicians and experts from all sides given the chance to present their case? • Is the medium's feedback feature (e.g., readers' letters) open to all sides?
Data sources	interviews

Dimension: Control / Watchdog (C)

The structural feature *Control / Watchdog* refers to the specific country and its media system and focuses on control mechanisms that exercise a watchdog role with regard to the media themselves. The extent to which media manage to hold accountable those who exercise power in society varies according to the degree to which media companies are an integral part of power structures themselves, but also the degree of journalists' freedom and independence:

Yet, this inability to hold power to account shouldn't be seen as an unprecedented "failure" of the media to perform its democratic role when, in fact, this has long been the media's normal role under capitalism: to naturalise and legitimise existing and unequal social relations. (Fenton et al., 2020: 4)

(C1) Supervising the watchdog "control of the controllers"

The first indicator of this dimension examines the existence of instruments monitoring media performance and is based on the assumption that scrutiny from other media leads to overall better performance (Foreman, 2010: 34). However, unspecific and general media critique (such as "media are fake news") is not helpful in this respect. It is important to examine what tools different media have in order to adequately perform as watchdogs, as well as examining the extent to which the media actually deal with controversial matters, engage in public criticism, and risk antagonising either powerful interests or their own audience. Moreover, it is important to analyse the degree to which the media play an active role in their society or community.

Within a wider context, both the European Commission and the Council of Europe have recommended measures by member states to increase transparency

of media ownership as a minimum requirement in democratic societies. Ownership structures can influence editorial policies and should be brought to the awareness of the public and of regulatory bodies (see Council of Europe, 2018). In a research project following up on these recommendations on pluralism and ownership, Fengler and colleagues (2014) scrutinised self-regulation and media accountability in some 14 countries and concluded that professional observers of the media such as independent media councils are much better placed to control the controllers than self-regulatory bodies. This indicator, therefore, asks about the existence and functioning of any such bodies. Researchers are requested to report about the level of media critique within the media, and by external observers, such as bloggers and academics.

Indicator C1 *Supervising the watchdog “control of the controllers”*

Question	Are there any institutionalised mechanisms to control the performance and role of the news media?
Requirement	If effective institutionalised mechanisms for scrutinising the performance of the leading news media exist, it is more likely that democratic control will be guaranteed and thus that democracy will be promoted.
Points	3: permanent debate on the role of the media as watchdogs, which engages a wider public; media themselves are a topic for critical journalistic coverage 2: media performance is often publicly discussed in the media, in online forums, or both; some forms of journalistic coverage of the media 1: media performance is occasionally discussed, but mostly by representatives of unsatisfied vested interests 0: no public debate about media performance
Criteria	<ul style="list-style-type: none"> • independent observers: news monitor, media blogs, professional journalistic journals, etc. • openness to external evaluation • existence of relevant media bloggers • media journals reporting on media coverage • newspaper space, television, and radio programmes on news coverage and the media
Data sources	observation, desk research

(C2) Independence of the news media from powerholders

This structural indicator refers to independence of the news media from the government and big business. In *The Media Manifesto*, Fenton and colleagues (2020: 103) identify clientelism as a major threat to pluralism, and thus to democracy, “creating an ever more impoverished public sphere”. The more the media are independent of powerholders such as large businesses or the state, and the more this independence is guaranteed by formal rules or even

laws, the better the media can fulfil their function as watchdogs, and the better democracy is served. In this regard, media ownership matters, as material and structural factors “dramatically impact a media system’s openness and diversity” (Pickard, 2020: 105). The decade 2010–2020 has witnessed quite a few diagonal ownership concentration instances, originating in the booming Internet economy: Jeff Bezos (Amazon) took over the *Washington Post* in 2013; Marc Benioff (Salesforce) took over *Time Magazine* in 2018; Pierre Omidyar, founder of eBay, launched his own media company First Look Media, with its online flagship *The Intercept*, in 2014; and in China, Jack Ma’s Alibaba took control of Hong Kong’s *South China Morning Post* in 2015. Such media business conglomerates potentially limit the editorial independence of the news media if commercial or other business interests are affected by their coverage (Saffer et al., 2020).

Therefore, this structural indicator examines the influence of political parties, business interests, and other social groups on the news media. Are financial investors, representatives of the government, or churches present on the board of the leading news media? Do non-media companies own news media? The normative assumption is that media should first feel obliged to the citizens, and not to powerholders.

Indicator C2 *Independence of the news media from powerholders*

Question	How strong is the independence of the news media from various powerholders and how is it ensured?
Requirement	News media’s watchdog function requires a high degree of independence. More independence means more control of those in power, thus enhancing democracy.
Points	3: no formal or ownership-related influence from powerholders on leading news media 2: powerful organisations have no say in leading news media, but are present as owners in minor news media 1: powerful organisations or individuals own or control important shares of leading news media 0: strong formal or ownership-related influence of powerholders on leading news media
Criteria	<ul style="list-style-type: none"> • Are there shield laws in place to protect journalists, and are they effective? • How important is party affiliation among leading news media? • Are powerful business interests present on the boards of leading news media? • Are non-media companies such as financial investors, political parties, churches, etc. among news media owners? • Is such diagonal ownership concentration made transparent?
Data sources	legal provisions; public service remit; corporate information (investors’ relations); complementary interviews

(C3) Transparency of data on leading news media

Transparency is essential for democracy; thus, this indicator refers to citizens' possibilities to inform themselves about the ownership and (conflict of) interest of leading news media. Ownership transparency increased in relevance and public attention over the first two decades of the century. In 2018, the Committee of Ministers of the Council of Europe adopted Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership. In the preamble, they point out that "transparency of media ownership can help to make media pluralism effective by bringing ownership structures behind the media – which can influence editorial policies – to the awareness of the public and regulatory authorities" (Council of Europe, 2018). Indeed, ownership transparency must be considered an indispensable – but certainly not sufficient – prerequisite for media independence.

This indicator asks if information on ownership and vested interests is published frequently and easily accessible. Does an imprint, as a minimum requirement, exist, and is it obligatory to make the ownership of a news medium transparent? Who provides information on leading mass media: journalists' unions, government or regulatory authorities, universities, or research institutes? And to what extent is this information available? Potential sources for this information are company intelligences as well as public reports on the media for relevant information (ownership, key business figures, corporate social responsibility data, etc.).

Indicator C3 *Transparency of data on leading news media*

Question	How accessible is detailed information on leading news media for the citizens?
Requirement	Transparency is essential for democracy. The more easily citizens can inform themselves about the leading news media, the better the news media are placed to perform their watchdog function.
Points	<p>3: information on leading news media is published frequently and is easily accessible online or from other sources</p> <p>2: such information is published once every year, but available online</p> <p>1: such information is in principle available on request, but not available online</p> <p>0: information on leading news media is not available or only available to experts</p>
Criteria	<ul style="list-style-type: none"> • publication of ownership information in every edition or imprint (impressum) • information on ownership, key business figures, CSR information, etc. • information on leading news media is provided by outside sources such as government, universities, unions, etc. • easily accessible and comprehensive information on leading news media is available online

- annual reports by news media include detailed and relevant information
- data provided by regulatory authorities

Data sources own research; annual reports; company information; government reports

(C4) Journalism professionalism

This performance indicator addresses shared norms and standards of journalistic work and ethos. Professionalism (Anderson, 2012) can be regarded as one main form of journalistic accountability, and it is considered “useful to examine journalistic performance and change” (Waisbord, 2013: 4). Professionalism is different from occupation and reaches beyond mere descriptions of what journalism does; rather, it aspires to include the “ethical dimension of journalism in democracy” (Waisbord, 2013: 7).

In this respect, there are enormous challenges. Recent literature points out that the traditional understanding of journalistic professionalism is eroding because of changes in technology as well as organisational structures. Deuze and Witschge (2018: 170–171) identify reconfigurations toward post-industrial and entrepreneurial arrangements, encompassing trends like job-hopping and precarity instead of job certainty and economic sustainability, atelier-style offices instead of newsrooms, and “agile development sequences” with “fast-paced projects with short design cycles”. It is clear that these developments confront professional values of the media’s watchdog function, such as trustworthiness, fairness, and objectivity, hence the importance of empirically assessing how professionalism is established in leading news media and to what extent it still relates to the watchdog model.

On the one hand, this indicator covers questions of journalistic ethics: Do journalists and society discuss media rules and ethics on a frequent basis? Is there any journalistic training on these matters? On the other hand, watchdog professionalism requires freedom from pressure in terms of space, time, and format. Empirically, newsroom journalists, as well as journalists’ unions, should be asked for the status of journalistic professionalism in their day-to-day practice.

Indicator C4 *Journalism professionalism*

Question	How well developed is journalism professionalism?
Requirement	Strong professional ethos and sufficient journalistic resources are prerequisites for the exercise of the watchdog function. Strong professionalism is therefore beneficial for the watchdog function of the media.
Points	3: high professional ethos and sufficient resources across all leading news media

	2: while professional ethos prevails, professionalism is sometimes compromised by lack of resources
	1: limited journalistic resources do not allow for high professional ethos
	0: no or low professional ethos; very limited journalistic resources
Criteria	<ul style="list-style-type: none">• workload of journalists and time for investigative research• multimedia requirements of journalists; overload of journalistic capacities• self-organisation of journalists, discussing own rules and ethics; frequency of such meetings• solidarity in case of conflict• public debate provoked by journalists about ethical behaviour• statements of professional rules established by journalists• regular or irregular further education training for journalists on professional ethics• Are gender inequalities explicitly considered in professional development (gender-unequal life-work balance, horizontal segregation regarding assigned topics, leaky pipelines towards access to managerial positions)?
Data sources	own research; interviews with journalists' unions

(C5) Journalists' job security

This structural indicator is based on the assumption that the better journalists are protected against dismissal due to their reporting, the better they can exercise their watchdog role. Journalism research found that perceptions of job quality and job security are positive predictors for journalists' job satisfaction: "If employees are not satisfied in their jobs and fear being laid off, reduced work quantity and quality is inevitable" (Reinardy, 2012: 55). But this obvious and not surprising relation between job satisfaction and job security is more important than the individual welfare of journalists – job security is a prerequisite for investigative reporting. Journalists who fear their employer does not fully support their investigations may avoid unpredictable outcomes and personal risks. Job security for journalists is therefore more than just an incentive to work better, but it is an essential condition for bold watchdog journalism.

The decade of digitisation has decreased rather than increased journalists' job security. Online media tend to employ less journalistic staff than incumbent media companies, relying more on freelance contributors. Self-sustained digital-born media are still rare in many countries, and labour contracts are often weaker than in traditional press or television companies. On the juridical level, therefore, this indicator asks for legal provisions to save journalists from writing against their conviction (*clause de conscience*) as well as from being dismissed if their conviction is expressed in the commentary. On the level of the labour market, this indicator examines the share of freelancers and permanent staff in the newsrooms, as only long-term and secure contracts promote free and autonomous reporting.

Indicator C5 *Journalists' job security*

Question	What provisions are in place to provide maximum job security for journalists?
Requirement	The more securely journalists can do their research and reporting work, the better they can exercise their watchdog function, and the better for democracy.
Points	3: high degree of legal or professional security; journalists rarely lose their jobs 2: once employed, journalists normally remain employed for a long time, but such jobs are thinning out 1: news media change their journalistic staff frequently; employment for a longer period of time is not the rule 0: no or low job security; precarious journalistic jobs are the rule
Criteria	<ul style="list-style-type: none"> • legal provisions to save journalists from writing against their personal conviction (clause de conscience) • professional rules protecting journalists from dismissal because of personal convictions • labour contracts with long periods of notice (in case of dismissal) • employment duration of journalistic jobs • proportion of freelancers and permanent staff • systematic use of short-term contracting • efforts to support women and promote gender equality in relation to part-time and non-permanent contract positions • existence and implementation of prevention, complaints, and redress systems with regard to sexual harassment and bullying in the workplace
Data sources	own research; legislation; interviews with journalists' unions

(C6) Practice of access to information

This structural indicator refers to journalists' possibilities to gain access to public information. Actually, in many countries, this right to information does not privilege journalists over other citizens but is laid down in general legislation. Since 2011, the Canadian Centre for Law and Democracy (n.d.) is conducting an indicator-based survey on the right to information worldwide. Its 61 indicators include the recognition of a fundamental right of access to information by the legal framework (indicator 1), the right of everyone to file requests for information (indicator 4), that requests are free (indicator 24), and many more. Although the right to public information is considered universal, access for journalists is paramount. As stated earlier, taking the role of watchdog, journalists must be free from restrictions when they are researching government or state activities. Otherwise, the media cannot provide efficient and profound control and criticism. This indicator questions whether there is any media law providing unrestricted access to public information and how it is implemented.

Indicator C6 *Practice of access to information*

Question	How accessible is public information to journalists?
Requirement	In order to exercise the watchdog function, journalists need unrestricted access to public information.
Points	<p>3: no barriers for journalists; unrestricted access to public information</p> <p>2: public information is accessible by law, but not in reality; journalists must spend time and effort to gain access</p> <p>1: public information is not generally available, but single journalists manage to bypass restrictions and access public information</p> <p>0: high barriers for journalists; government information is generally not publicly available</p>
Criteria	<ul style="list-style-type: none"> • Does media law allow for access to public information? • Do journalists enjoy privileges in accessing public information? • Are there reports about problems for journalists seeking public information? • Are there relevant restrictions against journalists accessing public information? • differences between promises and practices
Data sources	own research; interviews with journalists and journalists' unions

(C7) The watchdog and the news media's mission statement

This performance indicator examines the extent to which the news media perform their mission as journalistic watchdogs. The view of the media as watchdogs against the abuse of power and corruption has long been a steady component of the journalistic self-image and of Western democratic political theory (Nielsen, 2015). This indicator intends to reveal the extent to which the watchdog function is perceived. The indicator assumes that a strong mission statement in favour of investigative journalism facilitates the day-to-day work of journalists to exercise control. Managerial meta-studies on mission statements concede, however, that the effectiveness of mission statements as a communication tool is underexplored and the results of mission statements on performance are inconclusive (Alegre et al., 2018). Although effects of mission statements in general should not be overrated, watchdog mission statements in particular help journalists' orientation in their routines and display the news media's investigative identity to external stakeholders.

Indicator C7 *The watchdog and the news media's mission statement*

Question	Does the mission statement of the media company or the newsroom contain provisions for playing an active role as watchdog, for investigative journalism, or for other forms of power control? Does the mission statement have any relevance in practice?
Requirement	If a mission statement concerning watchdog journalism exists, it is more likely that democratic control will be exercised and thus democracy will be promoted.
Points	3: all leading news media refer to the watchdog role and exercise it 2: investigative and watchdog journalism is part of the self-conception of leading news media, but journalists rarely have resources to exercise it 1: investigative and watchdog journalism is laid down in mission statements, but is lip-service rather than reality in day-to-day practice 0: investigative and watchdog journalism is neither required, nor exercised
Criteria	<ul style="list-style-type: none"> • existence of mission statement referring to active investigative journalism and containing duties to act as a trustee on behalf of the public • level of importance of watchdog journalism for the media organisation • examples for accountable journalistic watchdog role
Data sources	desk research (mission statements); interviews

(C8) Professional training

This next performance indicator provides information on whether journalists are given the chance and opportunity to take part in professional training courses: the news media can only perform their watchdog duty if they have qualified staff resources. Since the turn of the century, continuous training regarding (big) data analysis, digital research methods, and collaborative online tools for investigative journalism has become state of the art for committed journalists. However, as the need to update skills and crafts about digital journalistic opportunities is becoming pertinent, further education is inevitable. In parallel, journalism schools and other institutions offering further education for journalists are also called to improve and update their teaching methods and education models, “based on benefits digitalisation has to offer in an era of increased public awareness and interaction” (Maniou et al., 2020: 35). This indicator provides information about whether such contemporary trainings are available and used.

Indicator C8 *Professional training*

Question	What importance do leading news media attribute to journalism training?
Requirement	If effective professional training on watchdog and investigative journalism is provided, it is more likely that democratic control will be guaranteed and thus that democracy will be promoted.
Points	3: continuous knowledge training for journalists in news media available 2: training opportunities are provided, but are rarely used 1: training opportunities are not regularly provided, but those who wish to participate find ways and means to do so 0: continuous journalistic training is not provided and not exercised
Criteria	<ul style="list-style-type: none"> • continuous training; obligation for continuous training • not only skills but knowledge training • opportunities to learn and practice (big) data analysis for journalists • participation in training networks on digital research and investigation methods • enough resources (time and money) for each journalist • Are women professionals supported and encouraged to participate in training on digital and investigation methods? • availability, accessibility, and promotion of training on leadership for women
Data sources	interviews

(C9) Watchdog function and financial resources

A vital condition for exercising the watchdog role is that sufficient financial resources and time are available to journalists in the newsrooms. The more money there is at the disposal of newsrooms, the more reporters that can be employed, and the more funding there is to be invested in investigative journalism (Hamilton, 2016); thus, this indicator refers to the financial resources, regarding time and budgets, of newsrooms for performing their watchdog function. Limited resources have often been cited as a potential cause of constraint on the independence of journalism. Resources for their own investigations reduce the dependency on agency material. Additionally, news media perform better if they can make use of journalists who are trained specialists on given topics. Newsroom realities, however, suffer from budget cuts and less resources. This development is inherently linked to a much wider transformation of media economics and the frequent crises affecting the media. One element of Curran’s “triple crisis” of the media is the economic decline of journalism:

The migration of advertising to sites like Facebook, Google and Craigslist [...] has led to a total decrease in the size of the journalism workforce employed in many countries, and to smaller editorial budgets. This has resulted in less investigative reporting, more reliance on public relations, and more office-bound, derivative journalism. (Curran, 2019: 192)

In this indicator, the size of the loss in resources for investigative reporting, or their defence by leading news organisations, is estimated.

Indicator C9 *Watchdog function and financial resources*

Question	Are there specific and sufficient financial resources for exercising investigative journalism or other forms of power control?
Requirement	If sufficient resources for the scrutiny of government and business are available, it is more likely that democratic control will be guaranteed and thus that democracy will be promoted.
Points	3: leading news media give highest priority to well-funded investigative journalism 2: journalistic investigation has priority, but the number of investigations is clearly limited by financial means 1: investigative journalism happens, but it is the exception rather than the rule 0: leading news media cannot afford their own investigations and rely on agency material or other sources instead
Criteria	<ul style="list-style-type: none"> • composition of news output (news agency material, own investigation) • funds, time, and money for investigative journalism • ad hoc provisions by the news media for in-depth investigation • foreign correspondents
Data sources	interviews; output observation

Final remarks

No monitoring instrument is perfect – the MDM also has its limitations. Concerning our theoretical framework, one can object that it relies mostly on the so-called high modern normativity of news media and journalism, and this narrative cannot stand anymore in face of current developments. Throughout the twentieth century, the foundations of values such as objectivity and impartiality, core elements of that narrative, have been strongly shaken. Moreover, technological change, globalisation of cultural industries, sluggish economic development, and increasing public distrust challenge the media’s distinctive position in society. Taken at face value, such tendencies cast doubt on the legitimacy of lofty expectations; however, they do not invalidate such a project. Rather, by empirically assessing news media’s actual fulfilment of that normativity, the MDM sheds light on its possibilities and limitations in the digital age. Whether or not one accepts the traditional narrative, our exercise gives journalists, activists, academicians, and policy-makers firmer ground to discuss what news media can really do for democracies, and under what circumstances.

Another limitation of this exercise is the lack of focus on digital platforms. Maybe Facebook, Twitter, or even Google News are leading players in the news

ecosystem, at least in the Western world, and a monitoring instrument born in 2021 could develop indicators to address their performance as well. But the MDM arose in 2009, when claims about the possible impact of networked communication in former American President Barack Obama's election were just starting to gain momentum. Radically changing the instrument to accommodate organisations with so many different characteristics would likely render any longitudinal comparison useless. Additionally, research confirms over and over again that, despite their amplifying role, platforms still play only a secondary role, even in digitally advanced media systems such as the American one (Benkler et al., 2018, 2020), whose core continues to be occupied by traditional, editorial mass media.

A methodological issue concerns the tension between qualitative findings and quantitative assessment. Scoring each indicator for each country as we do might give the impression that one can simply take the final numbers and find out which media systems are performing better; however, the MDM considers itself as a qualitative exercise. The richness of this project lies rather in the keen insights of experienced researchers combining data from very different sources. Furthermore, aspects represented by each indicator have different weight and implications depending on cultural, economic, and political conditions of each country. Our research team has made the best effort to come as close as possible to comparative scores, but at the end of the day, only a qualitative approach to these data can do justice to the conclusions.

Finally, it is important to highlight that the country reports in this book, which apply this instrument, present detailed findings for each individual democracy. They allow comparison when one reads the same performance indicator in several countries; however, explicit cross-country comparisons fall outside of the scope of this material. This purpose will be fulfilled by a forthcoming volume, *Success and Failure in News Media Performance: Comparative Analysis in The Media for Democracy Monitor 2021*, edited by Josef Trappel and Tales Tomaz, which engages in cross-country and longitudinal comparisons in selected topics brought out by this first research stage.

Therefore, despite some limitations, we firmly believe that the instrument developed by the MDM, with its dimensions and indicators, continues to deliver a robust and adequate framework for assessing the performance of leading news media in contemporary democracies.

Note

1. A more extensive discussion on contemporary literature on these issues is planned for a forthcoming volume as part of the Media for Democracy 2021 edition, *Success and Failure in News Media Performance: Comparative Analysis in The Media for Democracy Monitor 2021*, edited by Josef Trappel and Tales Tomaz. This volume will be published by Nordicom (Open Access and accessible from the publisher's website, www.nordicom.gu.se, and Euro-media Groups's MDM web page, www.euromediagroup.org/mdm).

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AUSTRALIA

Media concentration and deteriorating conditions for investigative journalism

Tim Dwyer, Derek Wilding, & Tim Koskie

Introduction

In the decade that has passed since the last Media for Democracy Monitor (MDM) country report for Australia, the conditions for media pluralism and media freedom have changed in some important ways. In the 2011 report, the general context of Australian media was framed in the title of the chapter in terms of being “committed to investigative journalism” (Josephi, 2011). Although that aspirational goal has not changed, the optimistic *conditions* of its attainment have altered in terms of key political, economic, cultural, and technological dimensions. Yet, despite these deteriorating conditions, Australia’s media remain moderately robust, and enjoy a relatively free press. However, the industry itself has become further deregulated and more concentrated. The same powerful voices have an unhealthy influence over the big picture agenda, shaping public opinion around key debates including topics such as climate change, education, and health (Dwyer & Koskie, 2019).

While Australia is a democratic country with a mostly independent news media, it has no explicit constitutional guarantee of free speech or freedom of the press, and no statutory bill of rights. Its journalists do not constitutionally enjoy any special rights beyond those of ordinary citizens. The High Court of Australia considered there to be implied freedom of political communication in the constitution, but it is narrow in scope. Some legal principles, including aspects of the common law, help to protect free speech, but there is nothing clearly similar to the First Amendment of the US Constitution (Wilding & Dwyer, 2019; see also Australian Law Reform Commission, 2016). Politically, Australia is considered a mature liberal democracy.

Freedom in the World 2021: status “free” (Score: 97/100, down from 98 in 2019).

One point was deducted in 2020 in the “Civil liberties: Freedom of expression and belief” category, “due to contempt of court charges being levied against journalists who reported on a major criminal case and police raids against media outlets as part of an investigation into government leaks”. (Freedom House, 2021)

Liberal Democracy Index 2020: Australia is placed high in the Top 10–20% bracket – rank 20 of measured countries, down from 7 in 2016 (Varieties of Democracy Institute, 2017, 2021).

Freedom of Expression Index 2018: rank 29 of measured countries, down from 13 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 26 of 180 countries, with a score of 20.21, alongside nations such as Singapore, Benin, and Djibouti. The organisation notes that “investigative journalism is in danger” with the score dropping five positions from the previous year (Reporters Without Borders, 2020).

The structural problem with media pluralism in Australia will require more strategic regulatory intervention to avoid further damage to democratic institutions. Following the removal in 2017 of the so-called two-out-of-three rule for maintaining pluralism, Nine Entertainment – a company known more for its tabloid style than for independent journalism – took over a major independent media company, Fairfax Media (Dwyer & Koskie, 2019; see also Carson, 2018). The take-over was widely anticipated when the federal government repealed these anti-concentration laws. The bulk of Australia’s newspaper and online news sector is now controlled by News Corp and Nine Entertainment Co.

Independent journalism received another hit in 2020 when the only news agency, Australian Associated Press, announced it would be closing mid-year. The two main shareholders – also the largest groups by market capitalisation – News Corp and Nine Entertainment Co, made this announcement citing Internet giants stealing their content, and thus rendering the wire business insufficiently profitable. However, a consortium led by a former News Corp executive has since announced that they will oversee a pared-back version of the company.

Sections of the media – including the Australian Broadcasting Corporation (ABC) and their flagship television public affairs programme, *Four Corners*, and parts of the “Radio National” network – and a fragmented independent press are still able to criticise and hold governments to account. But their voices are increasingly marginalised and muted in the mainstream media fray.

Reporters Without Borders (2020) notes the extraordinary situation of Australian Federal Police (AFP) raids on the home of a political journalist for News Corp and on journalists working for the national public service media organisation, the Australian Broadcasting Corporation (ABC). It observes that

these were “flagrant violations of the confidentiality of journalists’ sources and public interest journalism” (Reporters Without Borders, 2020).

The raids arose from the publication of two stories. The first was on the home of Annika Smethurst, a journalist with News Corp, related to an article from April 2018 on government plans to give the intelligence agency Australian Signals Directorate additional powers to spy on citizens. The second raid on the headquarters of the public service broadcaster ABC in Sydney was over articles written two years earlier by two ABC journalists in relation to allegations of unlawful killings by Australian special forces in Afghanistan between 2009 and 2013 (Wilding & Dwyer, 2019).

These incidents surprised many in Australia who saw them as important and legitimate instances of investigative journalism, not as a threat to national security, as they were described by police and other governmental authorities. In an article titled “Media freedom in Australia faces an increasingly gloomy future” for the Nieman Reports, the author suggested, “Australia offers the world a sobering example of how a liberal democracy can incrementally surrender media freedom and how hard it can be to fight back when the public is increasingly disengaged and distrusting of media” (Dickson, 2020).

A nationwide campaign by all major media groups broke new ground in efforts to defend media freedom in Australia. Major newspapers including *The Australian*, *The Sydney Morning Herald*, *The Daily Telegraph*, *The Age*, and the *Herald Sun* ran covers on 21 October 2019 featuring blacked-out text representing the obstacles faced by journalists in this country (Wilding & Dwyer, 2019).

Media freedom debates

Articles on government secrecy and harsh media laws featured in the print and online editions of Australia’s newspapers. In parallel, broadcasters ran advertisements with a similar theme. “When government keeps the truth from you, what are they covering up?” was the question with which they introduced their protest.

This campaign was orchestrated by Australia’s Right to Know (ARTK), an industry group that has been active for over a decade and regularly makes submissions to government reviews, arguing for law reform and changes to policy that might assist in newsgathering (ARTK, 2019). However, the AFP raids in June 2019 triggered a coordinated and unprecedented attack on the federal government (Wilding & Dwyer, 2019).

No evidence was found in either case of how these journalists’ actions might have endangered anyone or compromised national security. Indeed, the AFP was found to have acted illegally in one of the cases, but the High Court still allowed them to keep the evidence they obtained and did not restrict them from using it for other cases in the future (Karp, 2020).

Australia's defamation laws are regarded by many as no longer fit for purpose, and this has led to the drafting of new laws arising from a review by state and federal attorneys general. For decades, defamation laws in Australia have made it relatively easy to bring and win suits, leading Sydney to be called the "defamation capital of the world".

A patchwork of statutory and common law restrictions on speech operates against this relatively weak protection of speech. Defamation law (both statutory and common law) rivals national security legislation in limiting public interest journalism. Australia has no effective threshold test for "serious harm" such as exists in the UK, while the defences to defamation are notoriously difficult to apply – even in cases of important, public interest journalism. Defamation reform, improvement to freedom of information laws, and an overhaul of other restrictions, such as the use of court suppression orders, are part of ARTK's current campaign. But national security laws which criminalise journalism are undoubtedly at the forefront of the current action (Wilding & Dwyer, 2019).

So, many of these laws fail to provide adequate safeguards for journalists. And while it's important to understand that in the mid-2000s Australia really did need improved laws to protect its citizens against terrorism – and the AFP was subsequently able to prevent numerous large-scale terror plots – successive Australian governments have added to the pool of security legislation in wave after wave of legislative amendments. It's the cumulative effect of these waves of "reform" that the industry is now reacting against (Gelbner, 2007; see also Wilding & Dwyer, 2019).

After the AFP raids, the attorney general announced that any decision to prosecute journalists cannot be taken without his consent (Worthington, 2019). However, this has not addressed the concerns raised by many about government intrusion on media freedoms. Both commercial and publicly funded media organisations continue to lobby for the need to have a legal framework which allows them to do journalistic work unhindered. The various laws that allow access to journalists' confidential information, or which preclude access to information about government activities, have compromised a core requirement of Australian journalism: that confidences given in the course of journalistic work will be protected (CMT, 2019). In this regard, one prominent journalist recently noted, "A real reason why we do not have a charter or bill of rights are the ceaseless and frantic campaigns against them by News Corp" (Marr, 2019).

In a policy submission in 2019, researchers Johan Lidberg from Monash University and Denis Muller from the University of Melbourne contrasted the approach in Australia with that in the other members of the "Five Eyes" security community (the US, the UK, Canada, and New Zealand):

The key question that needs to be posed is why Australia is the only country among the Five Eyes intelligence-sharing community [with the US, UK, Canada, and New Zealand], and indeed among mature liberal democratic

countries, that see a need to equip its security and intelligence agencies with powers that extend to issuing and executing search warrants against individual journalists and media organisations justified by hunting down public interest whistleblowers in the name of national security? (Lidberg & Muller, 2019)

As many continue to ask questions such as these, the campaign in some form is likely to continue until the Australian Parliament takes action to address some of the most restrictive aspects of the laws that damage media freedom (Wilding & Dwyer, 2019).

In February 2020, ABC's appeal to the Federal court's decision that the search warrant was not legitimately issued was dismissed. Justice Wendy Abraham ruled that the protection of journalistic sources was not absolute, noting that "an informant cannot be promised or guaranteed anonymity (unless it covered an intention to potentially breach a court order)" (Wootton, 2020). The judge rejected ABC's argument that the AFP's warrant was a threat to the ability of journalists to provide protection for their sources and a potential breach of the implied constitutional right to free political communication. The ABC, for its part, argued, unsuccessfully, that the breadth of the warrant was "legally unreasonable" by allowing the seizure by the AFP of a broad array of material related to subjects such as the Australian Army, the Department of Defence, or even ABC (Wootton, 2020). On hearing the judgement, ABC's Director of News was quoted as saying that the decision "should send a chill down all our citizens' spines". He added:

Fundamentally the court ruled that the AFP have the right to enter a news-room and fossick around in confidential files, and to take information about the way it undertakes its journalism with its sources [...] this is not the way a free and fair democracy works. (Wootton, 2020)

Although there is a further avenue of appeal to Australia's High Court, ABC has announced that it would not pursue it, which many were no doubt disappointed to hear.

In April 2020, the journalist Annika Smethurst and her employer News Corp, who was subjected to the AFP raids in June 2019, won a High Court case. The case challenged the legality of the raid which was attempting to locate the source of leaked classified materials. However, in an ambiguous result, while the court quashed the raid warrant, it did not order the police to destroy the material seized, thus exposing the journalist to a future prosecution (Karp, 2020).

Recent developments in industry regulation

Since the 2011 MDM, some characteristics of Australian media remain largely unaltered. For example, the regulatory body ACMA (Australian Communications and Media Authority) deals with electronic media, and "its main briefs

are [to continue] to ensure that quality communication services are available, and that license conditions, codes and standards are complied with” (Josephi, 2011: 52). Self-regulation through the Australian Press Council and Australian Journalists Association still handles media complaints, with limited capacity to react to complaints.

However, the Australian Competition and Consumer Commission (ACCC), following the release of their ground-breaking *Digital Platforms Inquiry* report in July 2019, now figure far more prominently in the Australian media regulatory landscape.

The ACCC’s overarching finding from their *Digital Platforms Inquiry* was that “the dominance [and market power] of the leading digital platforms and their impact across Australia’s economy, media and society must be addressed with significant, holistic reform” (Sandberg, 2019: para. 1; see also ACCC, 2019a, 2019b). Other key recommendations, as summarised by Varghese (2019), included,

- requiring designated digital platforms to recognise the need for value sharing and monetisation of content and to each provide the Australian Communications and Media Authority (ACMA) and the ACCC with codes to address the imbalance in the bargaining relationship between these platforms and news media businesses and
- addressing the regulatory imbalance that exists between news media businesses and digital platforms, by harmonising the media regulatory framework.

More specifically, in terms of news media, the ACCC recommended,

- introducing measures to encourage philanthropic funding of public interest journalism in Australia;
- ACMA monitor the digital platforms’ efforts to identify reliable and trustworthy news;
- requiring the digital platforms to draft and implement an industry code for handling complaints about deliberately misleading and harmful news stories;
- and requiring the digital platforms to comply with a mandatory code to “share revenue” to fairly compensate news media business for their content.

The ACCC continues to investigate how the dynamic commercial ad tech aspects of platforms can be made more transparent to all stakeholders. They have undertaken an investigation into a potential revenue-sharing model between digital platforms and tradition news media business, as a basis for a mandatory bargaining code (ACCC, 2020).

~ AUSTRALIA ~
 MEDIA CONCENTRATION AND DETERIORATING CONDITIONS FOR
 INVESTIGATIVE JOURNALISM

Table 1 ACCC mandatory bargaining code proposal (concepts paper)

Focus	Affected services	Approaches
<p>The code is intended to cover content that is:</p> <ul style="list-style-type: none"> • produced by a professional journalist or published by a professional news media business; • mediated by a standard setting organisation, code of conduct, or established internal set of journalistic standards; • and conforming to a to-be-decided definition of relevant news content. 	<p>Initially, only two digital platform service providers will be targeted:</p> <ul style="list-style-type: none"> • the broad range of digital media services provided by Alphabet Inc, including Google News, Android TV, and Google’s ad tech intermediary services; • and the range of media and platforms provided by Facebook, including Instagram, WhatsApp, and Facebook News. <p>The code will be extended to other digital platform service providers if they are found to be leveraging an imbalance of power.</p>	<p>The proposal considers a range of approaches the code could employ:</p> <ul style="list-style-type: none"> • bargaining dispute resolution; • a collection of principles and methodologies to guide negotiations; • third party guidelines; • time-limited negotiations; • information disclosure requirements; • mediation; • third party arbitration; • collective bargaining for media organisations or collective boycotts; • collective licensing or fee setting; • establishing factors to determine the value of media content and the services provided by digital platforms; • data sharing; • and algorithmic selection or prioritisation.

Source: ACCC, 2020

After several last-minute changes to appease a hostile Google and Facebook (the latter platform having taken the unprecedented step of making news and other informational sites unavailable to Australian users for one week), laws establishing the code were passed by the Parliament in March 2021 (Federal Register of Legislation, 2021). Many commentators considered the monetary compensation to news publishers as a temporary fix that only further entrenched the existing concentrated media power in the country.

Covid-19

During the Covid-19 pandemic, there was a succession of business closures in 2020 as a result of falling advertising and revenue. This impacted quite heavily on media businesses in Australia and accelerated structural decline in the newspaper sector.

The advocacy group Public Interest Journalism Initiative has documented 200 news “contractions” in the sector (meaning title, masthead, or newsroom closures, the end of a print edition, a move to digital-only, or a merger) since January 2019 (Public Interest Journalism Initiative, 2020).

In May 2020, News Corp announced it would cease printing 112 community and regional newspapers, transitioning 76 titles to digital-only and closing 36 of their titles completely (Mason, 2020a). A number of commentators noted that Covid-19 had accelerated a plan initiated by News Corp in 2018 to transition its print publishing operations to digital-only. The company announced it would retain 375 jobs in its regional and community sector – a sector that was previously employing some 1,200–1,300 jobs.

In the context of these job loses, lobbying has intensified by regional media businesses to remove the few remaining anti-concentration ownership limits, including the one television licence and two radio licences, to market rules. Further deregulation of the “voices test” is being called for. This requires a minimum of four separate voices (or distinct media groups) in any regional market. New media such as online news sites, streaming services, or social media are not currently included in these limits (Mason, 2020a).

Recognising these extraordinary times for the sector, the government introduced a series of measures to assist the media sector. Firstly, commercial television and radio broadcasters received a 100 per cent rebate on their Commercial Broadcasting Tax for 12 months (2020–2021). This was expected to provide the commercial broadcasting sector with AUD 41 million in tax relief for the use of the broadcasting spectrum. The rebate was specifically intended to offset the sharp downturn in advertising revenue, which significantly impacted the operating revenues of commercial broadcasters.

Secondly, an existing fund – the Public Interest News Gathering Program (PING) of AUD 50 million received AUD 13.4 million of new money, as well as repurposed unallocated funds from the government’s Regional and Small Publishers Jobs and Innovation Package. This was intended to further support public interest journalism delivered by commercial television, newspaper, and radio businesses in regional Australia, which have been particularly hard hit by the downturn in advertising. In addition to the PING Fund, the government brought forward the release of AUD 5 million from its Regional and Small Publishers Innovation Fund. The Innovation Fund is independently administered by the Australian Communications and Media Authority.

Thirdly, in recognition of the disruption caused by the Covid-19 pandemic on production of Australian screen content, the government suspended Australian programming obligations for the remainder of 2020. These programming requirements relate specifically to Australian drama, Australian documentary, and Children’s and Preschool programme quota obligations on commercial television broadcasting licensees until the end of 2020. The government also announced the suspension of the licence condition requiring minimum levels of expenditure by subscription television broadcasting licensees on new eligible drama programmes until the end of 2020.

Leading news media sample

Data provided in this chapter is based on publicly available websites such as the Australian government’s, the Australian Competition and Consumer Commission’s, and the Australian Communications and Media Authority’s sites. These figures are supplemented by selected interviews with editorial managers and senior journalists from major Australian news organisations.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 2 POINTS

Due to Australia’s geography and population distribution, regional areas are less well-served than the metropolitan centres, where all media are available. Regional newspapers have significantly contracted, and this accelerated with Covid-19.

IN 2011
2 POINTS

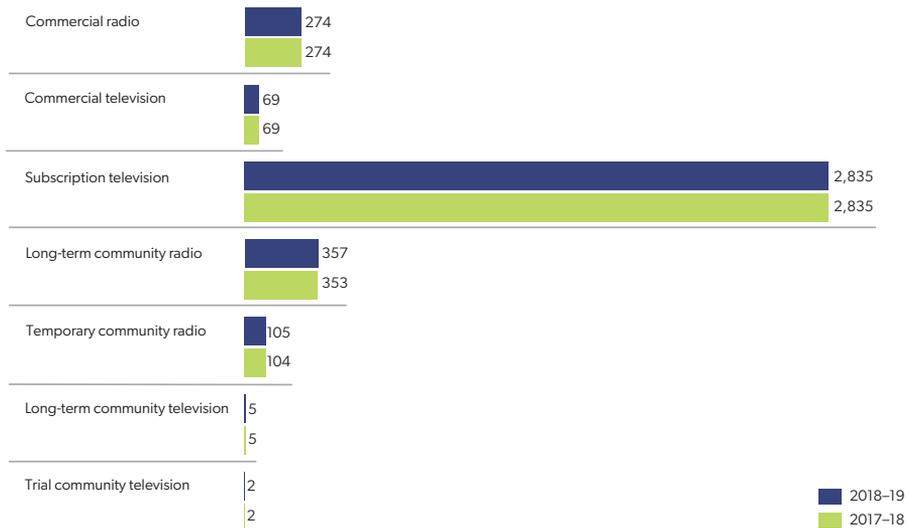
Geography and demographics are important factors affecting Australia’s media. As the world’s sixth-largest country, Australia compares in size to the contiguous United States. This large landmass only has a population of 25.4 million people (ABS, 2019), which is concentrated in its state and territory capitals, with approximately 90 per cent of Australians living in urban centres.

In a country the size of Australia – 21.5 times the size of Germany and 186 times the size of Switzerland – and with a population density of close to three persons per square kilometre, it is no surprise that there are regional divides. Actually, concerning geographical challenges for news media, the country is largely unchanged in comparison with its depiction in the 2011 MDM edition. Large parts of Australia are unpopulated or have so few people living in them that infrastructure – in particular broadband and mobile telephony coverage –

has always been a problem for regional areas and has been hotly fought over politically (Joseph, 2011). Broadband provision is problematic in regional and remote areas.

Access to radio is put at 99 per cent, and the availability map for 2007 shows that most of Australia is serviced by one to five stations, and up to twelve in the metropolitan centres (ACMA, 2009). As seen in Figure 1, there are 274 commercial radio broadcasting licences in Australia, including 150 FM licences and 106 AM licences, with the largest concentrations of commercial radio licences in the major capital cities. Most regional centres are served by two licensees, typically with one AM and one FM service. There are 69 commercial television broadcasting licences (ACMA, 2020).

Figure 1 Number of broadcasting licences in Australia



Source: Graph from ACMA, 2020: 29

Through the public broadcaster, Australian Broadcasting Corporation (ABC), 44 regional local radio services are available on AM or FM radio, with 43 available via streaming throughout Australia, and four national broadcast networks: the national talk network, Radio National; the national news network, News Radio; the national youth network, Triple J; and the national classic music network, ABC Classic. Other digital services include Double J, ABC Classic 2, ABC Jazz, ABC Country, ABC Grandstand, Triple J Unearthed, and ABC Kids Listen (ABC, 2019). Via shortwave, satellite, and online, Radio Australia broadcasts in the Asia-Pacific region.

The second public broadcaster, Special Broadcasting Service (SBS), whose brief it is to broadcast to Australia's various migrant ethnic groups (Ang, 2008), broadcasts in 68 languages to all capital cities and key regional centres on a mix of FM and AM frequencies (see also Josephi, 2011). SBS radio provides Australian and international news, homeland news, and a mixture of current affairs, interviews, community information, sport, and music (ACMA, 2008).

In terms of television, the public broadcasters ABC and SBS – as well as three major commercial networks Seven, Nine, and Ten – are the main providers of free-to-air television. All these broadcasters offer on-demand versions of their brands.

The country is divided into 28 distinct commercial television licence areas. According to the broadcast planning, Adelaide, Brisbane, Melbourne, Perth, and Sydney should have three commercial television licence operators, and the Seven, Nine, and Ten networks operate in each of these cities. There are also three licensees operating in Canberra and Hobart, and two in Darwin. In regional areas, the majority of broadcasting is provided variously by the NBN, Prime, Seven Queensland, Southern Cross Broadcasting, and WIN networks (ACMA, 2008).

As noted above, there have been closures of regional news bureaus, and the availability of local news in the regions of Australia “has sharply declined over the last five years and is likely to decline further”, according to a recent report on regional news (CMT, 2019). More recently, the Centre for Media Transition has reported: “Between 2008 and 2018, 106 local and regional newspaper titles closed across Australia. These closures have left 21 local government areas without coverage from a single local newspaper (either print or online), including 16 LGAs in regional Australia” (CMT, 2020). This has given rise to dozens of communities becoming news deserts.

(F2) Patterns of news media use (consumption of news) 2 POINTS

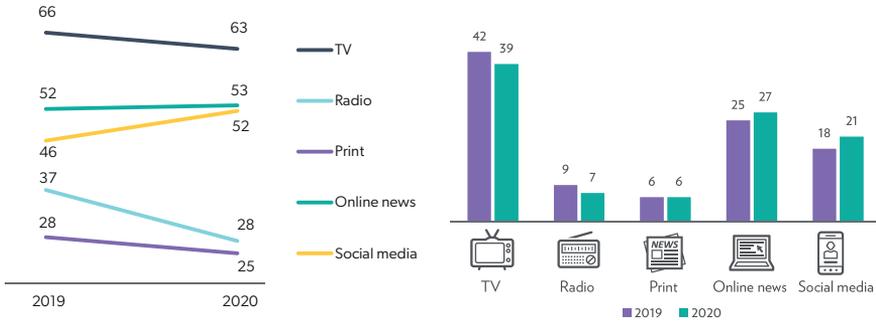
The Australian citizen is well supplied with news from different sources. However, the print media sector, already highly concentrated, is also in structural decline.

IN 2011
3 POINTS

News information is amply available in Australia from a wide variety of sources. As Figure 2 shows, instead of traditional news sources, consumers are turning to online and social media for news (Fisher et al., 2020). TV is the most-used general source of news by Australians (63%), but its popularity has declined. News consumption through traditional news media (e.g., newspapers, magazines, and radio) has fallen. Print is the least-mentioned main source of news

(6%). On the other hand, using social media for news has increased from 46 per cent in 2019 to 52 per cent in 2020. Online news has remained stable at 53 per cent.

Figure 2 Australian survey of media use (per cent)



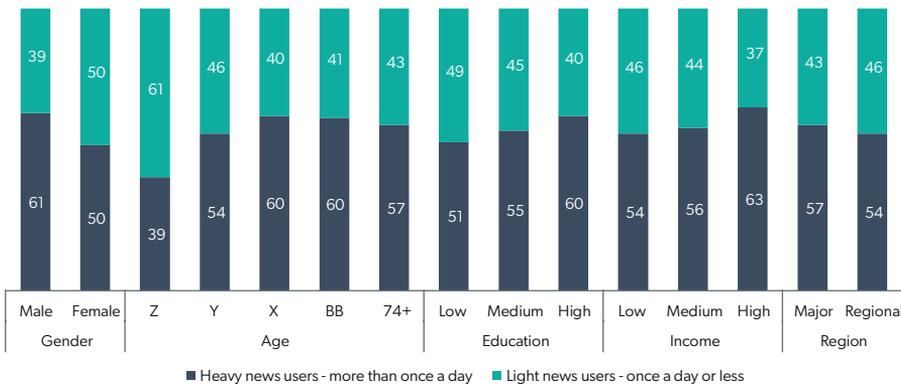
[Q3] Which, if any, of the following have you used in the last week as a source of news? Please select all that apply.

[Q4] You say you've used these sources of news in the last week, which would you say is your MAIN source of news?
*Social media: Blogs (0.2%) were included in 2019

Source: Graphs from Fisher et al., 2020: 50

The *Digital News Report: Australia 2020* indicates that men continue to be heavier consumers of news than women (for heavy users, 61% compared with 50%). Gen Z are the lightest news consumers (39%) (Fisher et al., 2020) (see Figure 3).

Figure 3 Demographics of media use (per cent)



Source: Graph from Fisher et al., 2020: 48

(F3) Diversity of news sources

1 POINT

The Australian newspaper industry (print and online) is highly concentrated, impacting the availability of diverse news voices.

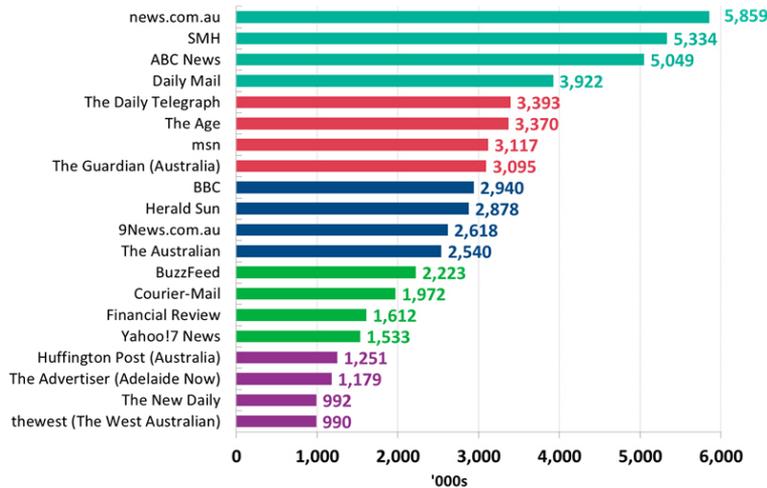
IN 2011
 2 POINTS

For Australians, as part of the English-speaking community, the Internet potentially offers a wide array of news sources, but this has not abated continuous declines in regional and local reporting.

As a result of deregulation, Australia’s media is dominated by two large commercial media corporations (Nine Entertainment Co Ltd and News Corp) and there are no longer any larger scale independent media voices. It might be asked – as the newspaper sector is in historic structural decline with fewer people reading newspapers and especially younger cohorts being less interested in these legacy mastheads – why does that matter?

There are at least three reasons to be concerned about this dominance regarding diversity in news sources (Media Pluralism Project, 2019). First, News Corp Australia and Nine Entertainment dominate not only legacy media, but also online news media, as they own many of the most visited online sites (see Figure 4). The exceptions (such as *The Guardian* and *Daily Mail*) only reinforce the point, as they are often established legacy media from other countries.

Figure 4 Most visited news websites among Australians



Comments: Visitation in an average four weeks over twelve months, April 2017–March 2018. n = 50,014 Australians aged 14+.

Source: Graph from Roy Morgan, 2018b

Second, the removal of cross-media laws, which prevented co-ownership of television, radio, and newspapers, will likely intensify this dominance. Contrary to earlier expectations of more diversity online, the convergence of digital media has resulted in news media being reused across platforms. The search engines and aggregators online and on mobile phones only exacerbate this dominance in their algorithms, which give preference to established media (Athey et al., 2017).

And third, the agenda for the rest of the media tends to be set by these major brands, as they control the bulk of the journalistic resources.

The Australian Broadcasting Corporation (ABC) is still an important part of the Australian media ecosystem. However, its ability to undertake the best quality investigative journalism is severely threatened because funding has been slashed year after year. In June 2020, a new round of staff cuts hit all areas, but particularly news and production. It was reported that the broadcaster needed to meet a shortfall of AUD 84 million, after having its funding reduced in real terms for several years (BBC, 2020).

If it is in a position where it is less likely to be critical of the government for fear of further budget cuts, the effect is that it is less likely to play a watchdog role, holding politicians to account for their actions. These cuts come in spite of ABC's status as the most trusted news source for Australians (Roy Morgan, 2018a) and after decades of sustained pressure from increasingly dominating news organisations like News Corp and the now further expanded Nine Entertainment Company.

Industry change is having a significant impact on magazines in Australia, who in recent years have fallen on tough times with the migration of audiences to the Internet. There have been large-scale job losses after the closure of titles in the sector, particularly as a result of a recent buyout of the Seven West Media-owned Pacific Magazines by its closest rival Bauer, which is the dominant player in the sector in Australia. The sale of Pacific Magazines for AUD 40 million to German company Bauer Media was accompanied by the announcement that Bauer had suspended a number of print editions of magazines, including *Harper's Bazaar*, *Elle*, *OK!*, and *NW*, as well as making 70 staff redundant and standing down as many more (Mason, 2020b).

Social media platforms could help provide diversity of news sources, but their actual performance does not seem promising. They rather distribute and amplify existing news stories amongst like-minded networked groups (Media Pluralism Project, 2019). Furthermore, these platforms are often regarded as responsible for amplifying the worst kinds of speech (Sunstein, 2018), while they also provide a means for algorithmic news manipulation, as witnessed in the Cambridge Analytica scandal and other incidents by extremist groups. So, while audiences are increasingly discovering their news on social media platforms, the contribution of those sources to news diversity is a more nuanced story (Andi et al., 2020).

(F4) Internal rules for practice of newsroom democracy 1 POINT

There are no written rules for newsroom democracy in the Australian media.

IN 2011
1 POINT

Australia did not see much change regarding newsroom democracy in the last ten years. As in the 2011 MDM survey, interviewees did not refer to any written newsroom rules regarding the rights of journalists, nor are there newsroom councils in the selected media outlets.

However, in the various media companies, the Australian journalists union does have “house committees” of journalists meeting regularly to discuss industrial matters and professional and ethical issues. Most interviewees pointed to the news conferences – usually held twice daily in the print media and once daily in the broadcast media – as a forum for discussion and consultation. While all agreed that Australian newsrooms follow a hierarchical structure in which the editor is the boss, several mentioned that some editors work in more collegiate ways than others, depending on the journalist’s seniority and how much direction they need (Josephi, 2011).

(F5) Company rules against *internal* influence on newsroom/editorial staff 1 POINT

Media proprietors have long been dominant figures, also in newsroom decisions.

IN 2011
1 POINT

This is a complex question. Much depends on the ownership structure of the media company, and several have statements on the independence of the editorial board. All the same, there was mention of a culture of upward referral, with journalistic training and investigation being done with permission from management: “Intervention is subtle – but it exists. Sometimes it is self-imposed”. Historically, Australia has been known for its hands-on media owners, notably Rupert Murdoch and the late Kerry Packer (see Josephi, 2011). While Murdoch publicly maintains that he does not interfere with the decisions of his editors (Chessell, 2010), there is a great deal of evidence that indicates intervention by the Murdoch family (Guthrie, 2010; Milovanovic, 2010). The allocation of only one point is to emphasise that, while some media companies have statements of editorial independence, others show evidence of owners exerting influence on their media companies.

(F6) Company rules against *external* influence on newsroom/editorial staff 3 POINTS

IN 2011
3 POINTS

The strong position of Australian media proprietors protects the newsroom from external influence.

While concerns persist about internal influence on the newsroom, the strong position of media proprietors conversely protects their media companies from external influence. Throughout Australia's history, rather than any influence of politics on the media, it is the influence of media owners and editors on politics which has been evidenced (Griffen-Foley, 2003; Josephi, 2011). "As the editor I make the final decision on editorial matters [...]. We have strict rules around editorial independence", said an editor in a university-sponsored news organisation.

However, advertisers also have shown a clear ability to exert influence over media outlets, including when an advertiser (brand) wishes to dissociate itself from a particular show or media celebrity (and controversial comments or opinions). According to a columnist, "Advertisers attempt to intervene from time to time. Occasionally there are boycotts". This has generally been viewed as a positive sanction against, for example, the harmful speech of radio shock jocks (Hayes, 2019).

(F7) Procedures of news selection and news processing 1 POINT

IN 2011
1 POINT

Although no formal rules on how to select and process news exist, informal rules are followed in the news selection and processing.

With the rise of online news platforms, there has been an observable trend to content sharing within major branded news networks.

Interviewees mentioned the importance of the daily news conferences. However, within the overall zeitgeist of newsroom closures and funding restrictions, there are considerable logistical challenges in putting together news bulletins for a country of the size of Australia, which covers several time-zones.

(F8) Rules and practices on internal gender equality 1 POINT

After decades of reforms and changed policies, women remain less paid, less promoted, and harassed.

While policies exist to promote gender equality in hiring and promotion, this has not resulted in substantial advancement across the board. As in other countries

(Zipkin, 2017), some online news outlets have managed more progress in this regard: “Our CEO is female as is the Chair of our Board and our director of Finance. And most of the senior editorial posts, apart from mine, are occupied by women”, explained a digital native editor. However, traditional media organisations have not seen such visible shifts in this regard. A recent report of senior roles in Australian television news and current affairs programmes has found “Under-representation in both gender and cultural diversity means that Australian television networks are not functioning at their optimal capacity” (Arvanitakis et al., 2020).

Looking over the Australian mediascape reveals more female faces, but crucial concerns in relation to pay, promotion, discrimination, and harassment remain. A survey by the Media Entertainment and Arts Alliance (MEAA) found a near-unanimous acknowledgment of gender-based pay discrepancy (MEAA, 2019), and women are substantially missing from higher levels of media management (MEAA, 2019; North, 2013). Further, nearly half of female respondents had experienced harassment or bullying in the office (48%) or online (41%). While there are government initiatives to address some of these concerns (NSW, 2018), significant work will be needed to improve the position of women in media.

(F9) Gender equality in media content

1 POINT

Women in sports has seen greater coverage than ever, but there is room to expand how and how much the media is covering women and their concerns.

According to the interviews, there is an explicit attempt to be inclusive of voices, but the challenges are complex. “It is company policy that we approach all people or institutions on stories that involve them. We are encouraged to quote widely if we can. Not all parties are willing to go on the record”, explained a senior columnist.

Representations of women have improved in recent times, though not across the board. In particular, women’s sports has expanded coverage and occupies a more prominent position than in the past (Toffoletti & Palmer, 2019), though it still receives far less attention than men’s sports. Conversely, women in positions of power continue to be viewed with an alternative lens, with a pervasive focus on their fashion choices in lieu of their decisions and work (Jansens, 2019), and women from minority communities often go unseen or misrepresented (Ryan, 2016). With women showing an increasing willingness to pay for their news (Fisher et al., 2020), increasing their representation in the news could prove valuable for struggling media organisations.

(F10) Misinformation and digital platforms
(alias social media)

1 POINT

Misinformation is spreading aggressively on social media, and its impacts are reverberating in current crises.

Australian media professionals see a specific and crucial role for journalists in combating misinformation: “Our whole business is built on fighting misinformation”, described an online editor. “There is training on how to detect misinformation. But logic and experience provide more effective screens. Internal fact checkers are too expensive for most media organisations. This must be done by the journalist”, illustrated a senior columnist.

Misinformation has long been associated with the digital platforms (Clark, 2009), but its prevalence and effect has been growing (Flintham et al., 2018). While misinformation online had the spotlight during the 2016 US election campaign (Guess et.al, 2018), the recent pandemic has revealed the extent to which this misinformation presents a recognisable danger to the public (Nyilasy, 2020). Calls are growing for a strategy and campaign to combat it, but progress has been elusive (Wenzel, 2019).

(F11) Protection of journalists against (online) harassment 1 POINT

Online harassment has become a mainstay of being a journalist online. Despite its implications for journalists, little has been done to stem the tide.

While women appear to be targeted disproportionately for harassment online (MEAA, 2019), journalists broadly report aggression appearing in their social media, news commenting, and even e-mail (Koskie, 2018; Wolfgang, 2018). While some journalists and editors have expressed a desire to engage with the audience, the hostility presents a difficult obstacle (Anderson et al., 2014). Nevertheless, news organisations’ initiatives to protect journalists – and their own reputations – have seen inconsistent results (Domingo, 2014; Løvlie et al., 2017). Meanwhile, journalists and news organisations are struggling to balance protections for their journalists, as well as their readers and sources, from hostility, while upholding their historic support for freedom of speech (Koskie, 2018).

Dimension: Equality / Interest mediation (E)

(E1) Media ownership concentration national level 1 POINT

Australia has a high media ownership concentration on a national level for offline media, which tends to be repeated online.

IN 2011
1 POINT

The removal of the cross-media rules in 2017 facilitated the take-over of Fairfax Media by Nine Entertainment in a AUD 4 billion deal, which subsumed the separate identities of the famous independent news mastheads, *The Sydney Morning Herald*, *The Age*, and *The Australian Financial Review*:

On 7 December 2018, the merger of Nine and Fairfax Media Limited was completed. At September 2019, Nine commenced purchasing the remainder of the shares (that it did not acquire via the Fairfax merger) to fully own Macquarie Media and increase its cross-media ownership by adding radio. (ACMA, 2020: 36)

Overall, the company has two radio licences and a newspaper in Melbourne, and two radio licences and a newspaper in Sydney, the two most populated cities of the country.

Concentration will very likely increase, as a tie-up between the Seven TV network and News Corp, for example, can already be anticipated. Because of the economics of digital media, the concentration in legacy media is duplicated offline. Legacy brands such as News Corp Australia and now Nine Entertainment run the most-popular online news sites (Media Pluralism Project, 2019).

Figure 5 Media interests snapshot, Australian Communications and Media Authority



Source: ACMA, 2021

Current at 9 December 2020

As Figure 5 shows in an infographic from the Australian Communications and Media Authority, a handful of corporations and interconnected family interests control much of Australia’s media.

(E2) Media ownership concentration regional (local) level 1 POINT

Australia’s demographic distribution and resulting economy of scale have led to a high media ownership concentration on a regional level. IN 2011
1 POINT

It was announced in 2019 (not long after the merger between Fairfax Media and Nine Entertainment Co was completed) that Nine Entertainment Co sold their regional media arm, Australian Community Media (ACM), to a private equity group lead by Anthony Catalano, the former head of the Fairfax Media lifestyle division, which included the Domain real estate brand. ACM includes around 170 titles such as *The Newcastle Herald*, *The Illawarra Mercury*, *The Canberra Times*, and *The (Launceston) Examiner*.

On the face of this deal, with a new owner, some may have expected some welcome diversification in the newspaper sector. However, ACM is part of the highly commercialised news media sector in Australia. In April 2020, the group announced that it was “suspending the printing of newspapers at four of its printing sites, halting the production of most of its non-daily newspapers. ACM has about 160 titles” (Muller, 2020).

In an attempt to assist in their survival, this former regional arm of Fairfax Media has been cut right back in terms of journalistic resources in the last few years: “It’s reasonable to assume even more of this kind of cost-cutting at a time when local journalism is in a very precarious situation from the challenges of a reconfigured global media, including from social media platforms like Facebook and Twitter” (Media Pluralism Project, 2019). Since the beginning of the digital disruption, many companies have experimented with alternative revenue models, such as subscription. However, as with all media groups, Covid-19 has more suddenly impacted this group, and it is likely more titles will be paused, closed, or moved to digital only.

Media pluralism was tested when Seven West Media, a major national broadcaster, merged with regional broadcaster, Prime, in 2019. At the time, there were concerns expressed about media concentration and a reduction of media voices in Western Australia. Both the media regulator, the ACMA, and the competition regulator examined the transaction under broadcasting legislation, but cleared it to proceed in late 2019 (ACMA, 2019).

(E3) Diversity of news formats

2 POINTS

News and information formats are under pressure.

IN 2011
2 POINTS

When the Broadcasting Legislation Amendment (Broadcasting Reform) Act 2017 (Broadcasting Reform Act) commenced in October 2017, it “reformed the existing regulatory framework for the provision of ‘material of local significance’ (that is, local content) by commercial television broadcasting licensees in regional areas” (ACMA, 2020: 33):

The Broadcasting Reform Act introduced:

- additional local content obligations for commercial television broadcasting licences already covered by local content rules in the more populous regional licence areas in Queensland, New South Wales, Victoria, and Tasmania (collectively referred to as “aggregated” licence areas)
- new local content obligations for commercial television broadcasting licences in the remaining “non-aggregated” regional licence areas in South Australia, Western Australia, and western parts of New South Wales and Queensland.

(ACMA, 2020: 33)

These requirements were under strain prior to Covid-19, and now their long-term sustainability is in doubt.

Similar obligations apply to regional commercial radio licensees who are also required to broadcast prescribed amounts of material of local significance (local content) each year. In their annual Communications Report, the ACMA report that for the period 1 July 2018 to 30 June 2019, it did not receive any complaints about compliance with local content obligations (ACMA, 2020).

(E4) Minority/Alternative media

3 POINTS

Australia offers an abundance of broadcast and print media in languages other than English.

IN 2011
3 POINTS

Regarding the presence of minority and alternative media, there is no major change in the last decade, and the Australian media system performs fairly well, as noted by Josephi (2011) in the last MDM survey. Australia’s second public broadcaster, the Special Broadcasting Service (SBS), is unique in that its radio and television services are broadcast in more languages than on any other network in the world. The television programmes on its first channel in non-English languages – comprising over half their schedule – have SBS-produced English-

language subtitles. SBS's charter is "to provide multilingual and multicultural radio and television services that inform, educate and entertain all Australians and, in doing so, reflect Australia's multicultural society" (SBS, 2010).

SBS television broadcasts in 23 languages, and SBS radio broadcasts in 68 languages – both include news programmes. One of SBS's digital channels is almost entirely devoted to news programmes taken from stations around the world.

Australia's multiculturalism is equally reflected in the print sector. In New South Wales, papers are available in 30 different languages, including seven in Arabic, five in Chinese, four in Korean and Turkish, and three Afghan and Iranian papers. The other states do not offer quite the same spread. Victoria offers papers in 17 different languages, with six in Chinese, and four each in Greek and Indian. Queensland, Western Australia, and South Australia only have four, three, and two papers, respectively, in non-English languages. The frequency of publication varies from bi-weekly to weekly – (the most common form) to fortnightly, and in some cases, monthly (Joseph, 2011).

(E5) Affordable public and private news media

3 POINTS

Media are readily affordable in Australia but there is still a reluctance by some demographics to pay for news.

IN 2011
3 POINTS

According to the Australian Bureau of Statistics (ABS) mean equivalised disposable household income (EDHI) in 2017–2018 was AUD 1,062 per week. After adjusting to 2017–2018 dollars, this has not changed significantly from 2015–2016 (AUD 1,046 per week).

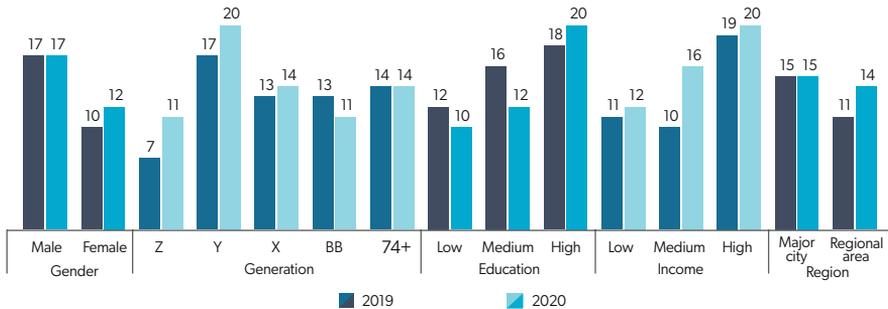
As a business model, the shift from advertising to subscription-based provision is a clear trend, and has arguably been accelerated by Covid-19.

The Reuters Institute's *Digital News Report: Australia 2020* notes the following headline trends in the Australian market for subscription news (Fisher et al., 2020):

- the number of ongoing news subscribers has doubled since 2016;
- consumers most interested in politics are most likely to pay for online news (28%);
- those valuing independence in journalism are more willing to pay (18%);
- those who prefer news that shares their viewpoint are more likely to pay for news (25%), compared with those who prefer impartial news (14%);
- and news consumers are not so concerned about paywalls.

However, overall, Australians remain relatively unwilling to pay for online news (14%), despite the trend to the steady emergence of subscription as the way to pay, if they choose to. The *Digital News Report: Australia 2020* found that willingness to pay for news appears to be closely related to interest in politics as well as interest in and access to news (see Figure 6).

Figure 6 Paying for news by demographics (per cent)



[Q7a] Have you paid for ONLINE news content, or accessed a paid for ONLINE news service in the last year? (This could be a digital subscription, combined digital/print subscription, a donation, or one off payment for an article or app or e-edition)

Source: Graph from Fisher et al., 2020: 86

(E6) Content monitoring instruments

2 POINTS

IN 2011

2 POINTS

Australia has a number of monitoring instruments, but largely of a self-regulatory or co-regulatory nature.

In the monitoring landscape of Australia, the same institutions continue to play a central role after one decade. The Australian Communications and Media Authority (ACMA) has the task of regulating the content of broadcasting, radio communications, online gambling, and telecommunications. It monitors transgressions regarding compliance with licence conditions, codes, and standards.

In 2015, the Enhancing Online Safety Act established the eSafety Commissioner, who is supported by the ACMA and has powers relating to cyberbullying, image-based abuse, and illegal and harmful online content.

The Australian Press Council is the self-regulatory body of the print media. It was established in 1976 with two main aims: to help preserve the traditional freedom of the press within Australia and to ensure that the free press acts responsibly and ethically and provides accurate and balanced reporting (Australian Press Council, 2020). While it only deals with complaints received, it does play an active role in promoting freedom of speech and access to information, and in ensuring high journalistic and editorial standards. Its adjudications are

available on its website (see Josephi, 2011), and publishers involved in complaints must publish adjudications which involve their own journalists.

(E7) Code of ethics at the national level 2 POINTS

The journalists' code of ethics is well-known in the print industry but needs to be updated to better suit new online environments.

IN 2011
2 POINTS

There is agreement at high and low levels as to the importance of the codes to the practices of journalism, but also agreement that further standards need to be applied: "90% of our editorial staff are MEAA members and we take the code very seriously, alongside our own internal rules and policies and procedures", explained an online editor. "It is an important code. But journalists must also apply their own ethical standards", added a senior columnist.

As explained by Josephi (2011) in the previous Australian MDM report, the country has a journalistic code of ethics which was first adopted in 1944 (Lloyd, 1985: 228) and has been revised since. It was drafted by the Australian Journalists' Union, and for many years, it was Australia's only journalistic code of ethics. Concise in nature and upheld by the union to which a high proportion of Australian journalists used to belong, it is well known to journalists and in newsrooms. Interviewees both in the previous edition and now confirm that the Australian journalists' code of ethics continue to have a deep professional penetration.

Over the past two decades, more and more media companies added their own in-house codes of conduct to the Australian Journalists' Union – now Media, Entertainment and Arts Alliance – code, but in recent years, the trend is to defer to the Australian Press Council's Statement of General Principles, Standards and Advisory Notes for providing ethical guidance for journalists and editors in traditional and new media contexts, specifically in relation to the adjudication of complaints (Australian Press Council, 2020).

(E8) Level of self-regulation 2 POINTS

While the self-regulatory system is far from perfect, a fair attempt is made to implement it.

IN 2011
2 POINTS

The main self-regulatory body concerned with the print media is the Australian Press Council. The regulatory body for the broadcast (and some aspects of online) media is the Australian Communications and Media Authority, which is described as a system of co-regulation due to a collaborative system between

the industry which prepares codes of practice, which are then formally registered with the regulator. There is no national ombudsperson for the media.

The Australian Press Council has a mediated settlement process that can consist of publishing an apology, correction, clarification, or follow-up material. Several papers now have a correction or “mea culpa” column (see Josephi, 2011).

Some of the print media houses have their own internal codes of conduct or editorial ethics policy available on their websites.

(E9) Participation

2 POINTS

Though there is an ongoing level of interaction between journalists and the public, there is no formal participation mechanism in the news process.

IN 2011
2 POINTS

This participation occurs both onsite and on social media platforms – and many Australian news organisations allow onsite commenting, including the public broadcaster ABC.

In the traditional print media, the “Letters to the editor” had been the customary feedback tool. Most Australian newspapers still devote a page to “Letters to the editor”, which also contains columns of brief emails from readers, under the page heading of “Commentary”. Now, however, there are much more direct forms of feedback available to the public, creating new challenges for news organisations. While some news organisations have managed to turn their onsite commenting features into a profitable and attractive addition to their offerings, others have had to turn them off completely due to the challenges presented by hostility and poor-quality comments as well as the cost of moderation (Huang, 2016). Nevertheless, the feedback from comments and social media has had an impact on journalists and news organisations (Bruns, 2012; Hanusch & Tandoc, 2019).

The degree of public participation is now as high as it has ever been. Some investigative stories are accompanied by an online forum where the public could send in comments and tips, and the response is overwhelming and often unmanageable. Many programmes now have a “Twitter backchannel” for the audience to send in their opinions or to ask questions. But it would be wrong to affirm that this greater interaction between journalists and the public leads to actual participation in the news process.

As it was already the case in 2011, the public broadcasters ABC and SBS have high-profile programmes, *Q&A* and *Insight*, which are built on audience participation. Audiences are not only in the studio, but can also e-mail questions and participate via Twitter, with a feed of tweets running at the bottom of the screen (see Josephi, 2011). However, these programmes are very formulaic and opinion is relatively closely controlled.

The ABC website offers a live blog with analysis and opinion, and a fact-check site, run in partnership with RMIT university, which monitors important claims including those suggested by the audiences (ABC, 2020).

The availability of a comments section at the end of online news sites varies considerably, as does the moderation style in terms of intervention.

(E10) Rules and practices on internal pluralism

1 POINT

There is evidence of internal diversity but little of internal pluralism.

IN 2011
1 POINT

Australian print media have a degree of internal diversity through their opinion pages. These opinion pieces are either written by regular columnists who may or may not be staff on the paper, or by invited columnists such as politicians or other public figures or academic experts.

Some papers permit their journalists to work within a broader framework than others, just as some papers will have not only the journalist's by-line but also their photo (see Josephi, 2011). With Australia's news landscape dominated by two dominant commercial media players, News Corporation and Nine Entertainment, there are clearly limitations on genuine internal pluralism. In Australia, News Corporation dominates commercial news journalism in a way that has few, if any, parallels among democratic countries. In response to this situation, the Australian Senate has instigated an inquiry into media diversity (Australian Senate, 2020).

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog "control of the controllers"

2 POINTS

IN 2011
3 POINTS

Australia has a number of independent observers of the news media.

Australia has several agencies with a brief to monitor and control the performance and role of the news media, including the ACMA, ACCC, and the Australian Press Council. These bodies adjudicate and produce reports of various kinds on a frequent basis under a variety of legal frameworks and self or co-regulatory codes of practice.

One continual source of "inside stories" on the media as well as politics, business, and environment is the web publication *crickey.com.au*. Most of its pages are available to subscribers only, with an annual subscription costing AUD 199.

Arguably, the best-known programme is *Media Watch* on ABC Television, which has been shown for around 30 years. It has a weekly 15–20-minute programme slot right after ABC’s major investigative television programme *Four Corners*, on Monday nights at 21:15 o’clock. *Media Watch* comments on inaccurate and sloppy journalism, bias, and unethical conduct such as plagiarism. The programme has had profile presenters, either famous journalists with years of experience or media lawyers. The programme has been responsible for consistently producing major stories on media corruption and malpractice. Often, these journalistic watchdogs seem more effective than the watchdogs themselves and are responsible for triggering more formal judicial investigations, including royal commissions.

Other more recent and smaller, independent publications undertake the watchdog role to varying degrees, including *The Monthly*, *The Saturday Paper*, *The New Daily*, and the local edition of *The Guardian*.

(C2) Independence of the news media from
powerholders

2 POINTS
IN 2011
2 POINTS

Legal instruments to guarantee greater independence from powerholders are relatively new. However, defamation law continues to be used as another pathway by the rich and powerful to silence critics.

The funding of the public broadcaster ABC has been savagely cut in recent years, and its previous position of independence has thus been undermined. As mentioned above, in June 2020 there were another round of savage funding cuts.

It is a similar scenario for the Special Broadcast Service, although it is able to derive 20 per cent of its revenue from advertising. However, with both public broadcasters, the selection procedure for their boards is not independent from government (see Josephi, 2011). The process of selection of board members has also been shown to be one of stacking these boards with political allies by successive governments.

Many see defamation law as another means used by the rich and powerful to deter criticisms. The law is indeed designed to protect people’s reputations from unfair attack, but it can also be used to protect powerful people from unwanted scrutiny (Josephi, 2011). A new nationally harmonised defamation law, including with a bolstered public interest defence, has recently been introduced.

(C3) Transparency of data on leading news media

1 POINT

Data on media are rarely a topic of debate.

IN 2011
1 POINT

There is little transparency of data on the country's leading news media, and little has changed in the last decade. Therefore, the scenario is pretty similar to the one Josephi (2011) pictured in the previous MDM edition. While information is available on the Internet, for example on the media companies' websites, it takes a dedicated citizen to piece together the full picture of the media in Australia. Although bodies such as the ACMA authority publish annual reports, these hardly ever come onto the radar of the general public. The government and their regulators, universities, or the main media union may offer information on specialised aspects of the media, but this rarely amounts to a coherent or comprehensive picture of the Australian media. Commercial media are themselves highly positional and therefore not a reliable source of information. It must be assumed that the average Australian citizen has little or no knowledge of the political economy of the Australian (news) media.

(C4) Journalism professionalism

2 POINTS

Most journalists receive professional training.

IN 2011
2 POINTS

Australian media professionals suggest that training and development are made available on a piecemeal basis.

Since the 1990s, Australia has offered journalism degrees at all but two of its 39 tertiary institutions (Koivisto & Thomas, 2008: 95). The educational level of Australian journalists has changed significantly over this period. Whereas in 1992 only 35 per cent of journalists held a degree, the figure was 80 percent in 2010 (Josephi, 2011), and Hanusch (2016) found similar results six years later. Interestingly, the percentage of those who held an undergraduate degree in journalism had hardly changed, from 33 to 35 per cent, which shows the industry is happy to employ people with degrees other than journalism (see Josephi, 2011). However, many journalists hold a post-graduate degree in journalism. Internships are still being offered by the major media companies, but their numbers had already decreased in 2011 as a casualty of expenditure cuts, and there is no sign of recovery in the last decade. Investigative journalism is a subject or topic in some university journalism courses (Josephi & Richards, 2011).

(C5) Journalists' job security

1 POINT

It is difficult to provide job security for journalists in this time of change.

IN 2011
1 POINT

Job security has arisen as an area of substantial concern even before the economic impacts of Covid-19 became apparent. The Senate Select Committee on the Future of Public Interest Journalism (2018) raised this as an area of growing risk for the nation. According to a columnist at a major commercial news organisation:

Journalism today is woefully under resourced. There is too little time and not enough people to deliver news in a comprehensive way and journalists are stretched. Too many errors are made [...] In pursuit of cost savings many middle layer journalists have been replaced by younger and cheaper workers. A few bigger brand name journalists have been retained to create the veneer of the product. I believe this has taken place across most media companies.

While there are redundancy clauses and long periods of notice in the case of dismissal based on the time served, the MEAA acknowledges this is a difficult period of structural decline for the industry. Josephi (2011) had already pointed out an increasing use of casuals and freelancers at the time of the previous MDM edition, and this has barely changed since then. The union attempts to enforce that, if a journalist has been a casual for more than six months and has worked a regular pattern of shifts, they have the right to become a regular member of staff. Yet in a time of structural decline, media organisations are reluctant to take on permanent staff.

With the broader downturn in the media, there has been an acceleration of job insecurity, especially during the Covid-19 pandemic. The MEAA has advised its members to be careful to not sign unlawful contracts during the Covid-19 period. They advise: "Any waiver that asks an employee to indemnify their employer for any damages that may arise from Covid should not be signed" (MEAA, 2020).

(C6) Practice of access to information

1 POINT

The law provides access to public information, but practical problems persist.

IN 2011
1 POINT

According to interviews, the freedom of information laws are important for Australian journalists and an area of focused training for new recruits. However, access to government and court documents is still inconsistent.

The Freedom of Information legislation in Australia was seen as such a hurdle to journalistic work that in 2007, nine major media companies, the two public broadcasters, and the MEAA formed the "Right to Know" coalition to

address concerns about free speech in Australia (Right to Know, 2010). This coalition set out to work with the Commonwealth and State governments to establish new policy and best practice to improve Australia's relatively poor world ranking for freedom of speech which, in 2010, led to sweeping changes in the Freedom of Information legislation, making it easier for Australians to get information about the federal government (see Josephi, 2011). Reform of Freedom of Information legislation has led to changes, but the results are inconsistent, with marked advancement in some areas and persistent challenges in others (Lidberg, 2016).

Interviews suggested that, while the freedom of information laws are easy to engage with, attempts are often "not particularly successful".

(C7) The watchdog and the news media's mission statement 3 POINTS

IN 2011
3 POINTS

Australia's media sees itself as a watchdog.

The watchdog role is widely seen as the media's most important task, and one survey of Australian journalists found investigating government claims to be very important by 90 per cent of the journalists (Josephi & Richards, 2011).

Some media companies whose editorial policy is available on the Internet, such as the *West Australian*, commit themselves expressly to their role as fourth estate (West Australian, 2009). However, in practice, this role has been somewhat muted in recent years, especially in mainstream commercial media. While journalists perceive this role as being of elevated importance in the face of increasing misinformation (Schapals, 2018), recent raids on ABC and News Corporation illustrate the extent to which this role is also under attack (Sarre, 2020). Further, Australia's increasingly consolidated and contracted news media is finding it more difficult to report on scandals (O'Shea, 2019).

(C8) Professional training 1 POINT

IN 2011
1 POINT

Some mid-career training is on offer.

Concerning professional training, Australia has seen no major change in the last decade and, as Josephi (2011) found in the previous report, is far from ideal. Some media companies offer training for mid-career journalists, for example, to equip print journalists for multitasking, such as how to add audio and video to their online reporting. Larger media organisations generally provide instruction in media law, narrative writing, hostile environment reporting, bushfire

training, and trauma training. But these courses are more poorly resourced than they have ever been.

The MEAA also provides continuous training, in particular directed towards facilitating the transition to online journalism, or on journalism ethics, which the union sees as the core to journalistic professionalism. Interviews suggest that younger staff are not as committed to, or do not receive the training for, investigative journalism – as was the case some years ago.

(C9) Watchdog function and financial resources

2 POINTS

Commitment to investigative journalism is the Australian media's way to brand themselves.

IN 2011
3 POINTS

Increasingly, the resources being invested into serious investigative journalism are under threat in Australia, and there are few locations in the media where the practice is undertaken.

Public service media remain committed to investigative journalism even with their resources being spread more thinly. As already noted by Josephi (2011) a decade ago, ABC always had a strong investigative brief, and has a dedicated investigative unit; however, it is now having serious limitations placed on its functioning due to funding cuts. ABC's *Four Corners* programme, a weekly 45-minute report on television, is Australia's best known investigative programme. Its investigations have caused royal commissions and state premiers to step down. But other segments on ABC television, such as its nationwide 7.30 programme, contain diminishing investigative elements, as do a number of ABC radio programmes.

SBS shows investigative programmes on international topics often bought from other providers, and the impact of funding restraints are evident. The commercial television stations, too, have current affairs programmes, such as Nine's *60 Minutes* (based on an American format) which contain investigative elements, though they are typically cast with an entertainment priority and by the programmes' emphasis on the human-interest angle.

Conclusions

The conditions for investigative journalism in Australia have deteriorated in recent years. This can be seen in the example of AFP raids on journalists in an attempt to discover their sources on so-called matters of "national security". This situation means that it is becoming more difficult – and often dangerous – for journalists to do their work. These developments have happened against

the backdrop of the removal of anti-concentration cross-media rules, which has facilitated a further reduction in media pluralism, most notably with the merger of Australia's main independent news organisation, Fairfax Media, with Nine Entertainment Co. This organisation, valued at around AUD 4 billion, together with News Corp, now own the bulk of the Australian media, dominating traditional and online news outlets.

The market failure of advertising-supported news media business models, and the rise of social media platforms as key sources of news for many people, are testament to the significant changes underway. At the same time, the place of the public broadcasters ABC and SBS has become more precarious with ongoing cuts to their budgets, forcing them to lay off employees and cut programmes. The Covid-19 pandemic in 2020 has been responsible for accelerating structural decline in the production of news media for traditional and new media platforms, which may well have ongoing, and as yet unforeseeable, impacts.

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AUSTRIA

Confirmed democratic performance while slowly digitalising

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Introduction

Located in the centre of Europe, Austria is a small country with about 8.8 million inhabitants. It is a part of the German-language area, with some linguistic minorities (mainly Hungarian, Slovenian, and Croatian) in the south and east of the country. Austria shares borders with Czechia, Germany, Hungary, Italy, Slovakia, Slovenia, Switzerland, and Liechtenstein. With the latter three countries, Austria also shares the German language. Therefore, for some media organisations, the competition is also in a larger language market. Austria's only metropolis is Vienna, comprising nearly two million people living in and around the capital. Politically, Austria is considered to be a mature liberal democracy.

Freedom in the World 2021: status “free” (Score: 93/100, down from 95 in 2017). One point has been deducted in the category of Freedom of expression and belief, justified by repeated verbal assaults of journalists by politicians, as well as by a high level of media concentration (Freedom House, 2021).

Liberal Democracy Index 2020: Austria is placed in the top 10–20% bracket – rank 24 of measured countries, considerably down since 2009, but up from 30 in 2019 (Varieties of Democracy Institute, 2021).

Freedom of Expression Index 2018: rank 38 of measured countries; the score decreased over 2008–2018 at a statistically significant level, and down from rank 9 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 18 of 180 countries, down from 11 in 2016–2018 (Reporters Without Borders, 2020).

In Austria, two parties have dominated parliament and government since its restoration of political independence after World War II in 1955: the social

democrats (SPÖ) and the conservative people's party (ÖVP). In the first two decades of the new century, smaller parties increased their political relevance, in particular the far-right freedom party (FPÖ, once under the leadership of the late Jörg Haider) and the environmentalist Green party. In 2017, following general elections, a coalition government was formed by ÖVP and FPÖ. However, they split less than two years later, following the publication of a video recorded during a sting operation showing the FPÖ party leader engaged in a private corruption talk in a luxury resort at Ibiza. Snap elections later in 2019 reconfirmed the leadership by ÖVP, which established another coalition government, this time partnering with the Green party. After a few weeks in office, in March 2020, Covid-19 threatened to hit Austria, bordering heavily affected Italy.

The Austrian media landscape is characterised by two dominating groups: the public service broadcaster Österreichischer Rundfunk (ORF) – the uncontested market leader in the electronic media (television, radio, and online) – on the one hand, and the largest newspaper *Kronenzeitung* – reaching 27 per cent of the Austrian population (2019; down from 40.4% in 2009) – on the other. Since autumn 2016, the online edition of this boulevard-style paid newspaper, *Krone.at*, ranks second in the Austrian online ranking. In addition, the wife of the publisher and the editor-in-chief of *Kronenzeitung* runs the daily free-sheet *Heute*.

Austria's private commercial television is in a relatively weak position. The first private channel started as late as 2003 (ATV). As the result of a lost lawsuit at the European Court of Human Rights, Austria released legislation to allow for private commercial broadcasting only in 2001.

Outside the capital Vienna, media ownership concentration has wiped out competition almost entirely in the daily newspaper business. While two provinces do not have any regional newspapers in addition to the regional edition of *Kronenzeitung*, only one publisher each dominates the remaining provinces (for details, see Indicator E1 – Media ownership concentration national level, and Indicator E2 – Media ownership concentration regional level).

There is little counter-balance to incumbent media companies by civil society initiatives. Third-sector media exist both in analogue (television, radio, press) and Internet-based digital formats (blogs, social media), but their influence on public opinion and deliberation is limited.

According to the Media Pluralism Monitor of the Centre for Media Pluralism and Media Freedom at the European University Institute in Florence, risks to media pluralism in Austria were considered high for five indicators, medium for eleven indicators, and low for only four indicators in 2019 (Seethaler & Beaufort, 2020: 8ff). This result compares unfavourably to the 2018 edition, when only two indicators showed high risks and nine medium risks (Seethaler et al., 2019: 3).

Covid-19

From mid-March to mid-May 2020, the then new government imposed severe restrictions on freedoms of mobility and interactions, such as closed borders to neighbouring countries, a ban on all public gatherings and events, curfew, and shutdown of all shops except food supply, pharmacies, and a few others. During this shutdown, linear television (both public and private-commercial) increased their audience, daily newspapers (both on paper and online) their readership, and radio their listeners. Despite this, because of the economic restrictions, advertising slumped, causing revenue losses in advertising-based media. Most affected were daily free-sheets, as well as fully advertising-based private-commercial television and radio channels.

In order to prevent media companies from collapsing, the government substantially increased its media subsidies, along with unprecedented financial support for various sectors of the Austrian economy. The government increased the regular press subsidy for newspaper distribution by the factor 1.5. In addition, subsidies based on the numbers of printed newspaper copies were allocated. This way, the highest-circulation newspapers (all of them yellow press) received the largest share; smaller quality-oriented papers received less. Furthermore, private-commercial television stations received about EUR15 million in addition to the previously foreseen EUR 20 million subsidies. In total, the government allocated EUR 32 million to support the media during the first phase of the Covid-19 crisis.

Leading news media sample

Our media sample for MDM 2020 consisted of seven leading news media representing different types and different ownership: editors-in-chief and leading journalists have been interviewed from one national quality daily newspaper (*Der Standard*), one regional daily newspaper (*Salzburger Nachrichten*), one political news magazine (*Falter*), and one popular news portal (*Krone.at*). Moreover, public television and public radio were also part of our sample. In this case too, editors-in-chief and journalists were interviewed (ORF 2, Ö1). Finally, one private-commercial television broadcaster (PULS 4) and one daily free-sheet (*Heute*) were part of our sample, but interviews were not possible. In addition to these, the chair of the journalists' union was interviewed.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

A wide and stable variety of news media is available to Austrian citizens.
There is a small regional bias between rural areas and the Vienna region.
The distribution of news media remains variable concerning media types.

IN 2011
3 POINTS

In 2020, thirteen paid-for dailies are available to Austrian citizens, which is three less than ten years ago (Grünangerl & Trappel, 2011). Two regional newspapers with a long tradition closed for economic reasons (*Salzburger Volkszeitung* and *Neue Kärntner Tageszeitung*, both in 2014) as well as the national newspaper *Wirtschaftsblatt* (in 2016). All of the remaining papers are morning dailies – six of them national and seven regional. The national dailies are all based in Vienna, but they all offer regional editions broadly available all over Austria (ÖAK, 2018). Furthermore, 231 non-daily papers are available (free-of-charge and paid for; see also ÖAK, 2018).

Free-of-charge dailies have become a cornerstone of Austria's newspaper market; however, their role continues to be significant only in the urban areas in eastern Austria (*Heute*, circulation: 568,769). In addition, Moser Holding runs a small-scale free-of-charge format in Western Austria (*Tiroler Tageszeitung Kompakt*, circulation: 12,388). Seven daily newspapers also offer Sunday editions. Some of the latter show a circulation higher than their weekday editions (for instance, *Kronenzeitung Sonntag* with 1,324,220, *Kurier am Sonntag* with 322,032 or *Die Presse am Sonntag* with 84,202). Newspaper sales in Austria are still mainly based on subscription (41–96% compared with 1–9% on single-copy sales; see also Table 1). Mediaprint continues to dominate newspaper distribution nationwide, and other national newspapers have started cooperations in order to compete with Mediaprint in the eastern regions of Austria (Horizont, 2000). With the entry in the market of the new daily newspaper *Österreich* in 2006, Verlagsgruppe News began to expand its own distribution network as well. All Austrian daily newspapers developed an e-paper solution within the last decade, although Austrian newspaper users remain loyal to print media: pure e-paper subscription reaches 1–17 per cent of the print circulation (lowest: *Österreich*, highest: *Die Presse*; see also Table 1). While at the time of the 2010 MDM report all Austrian newspapers had free online editions, many switched to paywall solutions since then (e.g., *Salzburger Nachrichten*, *Kleine Zeitung*, *Die Presse*).

Table 1 Comparison of single-copy sales to subscription sales, 2018

Newspaper	Type	Circ.	Issues per year	Price single copy ^a (EUR)	Price annual subsc. (EUR)	Single-copy sales ^b	Subsc. sales ^b	E-paper subsc.	% single-copy sales	% subsc. sales
Kronenzeitung	P	793,279	300	1.20	316	70,565	606,964	20,576	9	77
Österreich ^c	P	561,497	245	2.90	263	6,171	23,589	3,882	1	4
Kleine Zeitung	P	281,010	300	1.20	307	4,799	269,675	25,935	2	96
Kurier	P	145,560	300	1.75	410	12,742	95,764	5,863	9	66
OÖ Nachrichten	P	127,139	300	1.88	315	2,524	93,602	5,410	2	74
Tiroler Tageszeitung	P	91,045	300	1.77	378	1,402	74,206	1,381	2	82
Salzburger Nachrichten	P	75,936	300	2.27	378	2,086	65,124	9,043	3	86
Die Presse	P	70,884	299	2.30	461	2,816	58,077	12,266	4	82
Der Standard	P	70,234	300	2.60	498	2,470	50,858	7,067	4	72
Vorarlberger Nachrichten	P	56,914	300	2.00	395	610	54,285	6,553	1	95
Neue Vorarlberger TZ	P	11,032	250	1.50	337	125	4,512	203	1	41
Wiener Zeitung ^d	P	-	-	-	-	-	-	-	-	-
OÖ Volksblatt ^d	P	-	-	-	-	-	-	-	-	-
Heute	F	568,769	250							
Tiroler Tageszeitung Kompakt	F	12,388	248							

Comments: P = paid-for daily newspapers; F = free-of-charge daily newspapers

^a Calculated average price per copy

^b Including e-paper

^c Most copies, but not all, are distributed for free; no data for first semester 2018, data based on the year before (ÖAK, 2018)

^d These newspapers do not disclose their figures

Source: ÖAK, 2019: 14–35

In 2018, 98 per cent of all Austrian households were equipped with television, 37 per cent with an Internet-connected television device or smart-TV (ORF Medienforschung, 2020a). In all, 186 free television channels are currently licensed in Austria: five of them delivered by the public service provider ORF and three of them running under a non-commercial licence (RTR, 2020b; Mavise, 2020). The switch-over to digital terrestrial broadcasting was completed in 2010 (Grünangerl & Trappel, 2011). Until now, only 5 per cent of all television households exclusively use digital terrestrial programmes; 56 per cent are equipped with digital satellite devices and 39 per cent with digital cable devices (ORF Medienforschung, 2020d). In total, of 124 radio licences registered in the Austrian radio market, 12 are supplied by the public service provider ORF and 14 under a non-commercial licence (RTR, 2020a). The availability of radio channels differs significantly on a regional level.

In 2010, ORF was the only platform provider for on-demand television and radio content available online. Until 2020, all national private channels and

non-commercial television channels developed their own live-streaming and online archive services. In addition, some news providers from other media sectors, such as print or online, developed online video formats (e.g., krone.tv and oe24.tv) as part of their multimedia strategy.

Despite geographical barriers caused by Austria's topography, Internet availability is high and increasing: as of 2019, Internet connection was technically available to 90 per cent of the Austrian population, and 74 per cent used it almost daily, compared with only 2 per cent of non-Internet-users (ORF Medienforschung, 2020a; ORF Medienforschung, 2020b). Moreover, in 2019, about 72 per cent of Austrian households were equipped with fixed broadband connections (digital subscriber line, cable, optic fibre) and 68 per cent with mobile broadband connections (Statistik Austria, 2020). The distribution differs regionally, still on a high level, between the lowest share in Carinthia (84%) and the highest in Vienna (90%) and Vorarlberg (91%) (Eurostat Statistical Yearbook, 2019).

(F2) Patterns of news media use (consumption of news) 2 POINTS

Newspapers and public service television remain the prime sources of information concerning political issues. Among the younger population, the digital Internet platforms increase their news relevance. Overall, the interest in news is high, but gaps are widening between soft and hard news followers.

IN 2011
2 POINTS

News is generally attractive to Austrians. According to the *Reuters Digital News Report*, about 63.6 per cent of the Austrian population are extremely or very interested in news. News interest shows some degree of variation across genders, with 67.8 per cent of men and 59.5 per cent of women extremely or very interested. It shows an increase with age, but more than half of those aged 18–24 consider themselves as being highly interested in news (Gadringer et al., 2019: 30ff.).

As interested as they are in news, Austrians showed they value traditional legacies in communication modes. No less than 81.7 per cent of the population collectively considered television (31%), printed newspapers (18.8%), or radio (11.9%) as their main source of news. Only 10.5 per cent reported social media as their main news source. Compared to all the other countries in the *Reuters Digital News Report*, Austria stood out as being loyal to news traditions on the whole. A closer look, however, indicates some generational gaps. 18–24-year-olds show a reverse picture: for 36 per cent, the main news source is social media, with online newspaper apps ranking second (13%) and television only third (10.6%).

These news preferences are also reflected in national data for the various news outlets. Over the last decade, considerable shifts in media consumption have been observed (see Table 2).

Table 2 Average daily reach of different media types, 2009 and 2019 compared

	2009 total reach (mil.)	2019 total reach (mil.)	2009 daily reach (%)	2019 daily reach (%)	2009 avail- ability (%)	2019 avail- ability (%)	2009 avg. use (min. per day)	2019 avg. use (min. per day)
Newspapers	5.29	4.55	75.0	60.7	100	100	30	–
Television	4.53	4.99	62.6	66.4	98	98	156	196
Radio	6.40	6.06	81.7	77.3	98	98	199	201
Internet daily	3.33	6.22	64.0	83.0	74	88	50	–

Source: AGTT, 2020; RMS, 2020; AIM, 2020; Arbeitsgemeinschaft Media Analyse, 2020; Arbeitsgemeinschaft Media-Analysen, 2008, 2019a; RTR, 2009a: 123

Newspapers have lost reach in both absolute and relative terms. In 2009, some 75 per cent of the population were reading a daily newspaper. Ten years on, only 60.7 per cent appear to maintain that habit. This represents a reduction of about 750,000 readers. Interestingly, this decline in newspaper readership is not distributed evenly among various newspaper titles. While most of the quality newspapers have widened their reach, albeit marginally, the popular press has lost a considerable quantum of its readers. The market dominant *Kronenzeitung* reached 40.4 per cent of the population in 2009, close to its all-time high five years earlier (2005: 44.9%). Ten years later, *Kronenzeitung* is still the largest print newspaper in Austria, but 27.2 per cent was the lowest figure in its recent subscription history. The gap in numbers between the two years can partly be explained by the launch of the yellow-paper style daily free-sheet *Heute* in 2004 and its steady increase in reach. While stagnant in reach for its first decade, in 2019, *Heute* reached 12.2 per cent of the Austrian population. These trends unveil a polarisation among readers, with a strong element of boulevard press on the one hand, and a small but growing section of the population reaching out for quality newspapers, offline or online, on the other (Media Analyse, 2020).

Television has expanded its reach in the last decade, from 62.6 per cent to 66.4 per cent. This seems significant at first glance, but when taking all online streaming services into consideration, linear television has retained its audiences surprisingly well. Credit for this positive development goes to the market-dominating public service broadcaster ORF, which expanded its services from two channels in 2009 to four in 2019. These two main ORF channels are fundamental to its success with audiences and continued popularity in Austria,

with a combined daily reach of 49.8 per cent in 2009 and 48.1 per cent in 2019. Private-commercial television has slowly expanded its reach and market share, but remains insignificant compared to ORF. The most popular private channel, ATV, reached a market share of some 3.5 per cent in 2019, compared to 28.9 per cent for ORF's two main channels (AGTT, 2020).

Radio remains popular in Austria, with more than six million people listening on a regular basis in 2019. This represents a daily reach of about 77.3 per cent, dropping from 81.7 per cent over the last ten years. On average, people spent more than 200 minutes listening to radio every day, unchanged over this decade. Again, ORF radio channels lead the market (combined market share 2019: 74%; 2009: 77%), with private-commercial radio channels lagging behind (combined market share 2019: 25%, 2009: 21%) (RMS, 2020).

Finally, the Internet has significantly expanded over the past decade, reaching more people on a regular basis than any other media category. Approximately 6.2 million people use the Internet, nearly doubling from 3.3 million in 2009. Although statistically not clearly distinct from online newspapers, streaming television, and radio podcasts, nearly 83 per cent of the population use the Internet regularly. This is up from 64 per cent in 2009. Once again, Internet services provided by ORF are the most popular in Austria, followed by websites operated by most popular newspapers (AIM, 2020).

Overall, news media is widely used in Austria by all segments of society. However, a widening gap is appearing between those following serious news on quality channels, such as newspapers, television newscasts, and websites thereof, and those watching the news online, who prefer short-form news pieces or even just headlines, or soft news provided by free-sheets online and offline.

(F3) Diversity of news sources

3 POINTS

Editors-in-chief and journalists emphasised the predominant role of journalistic research over news agency and public relations material. National and international collaboration is increasing.

IN 2011
2 POINTS

The national news agency Austria Presse Agentur (APA) remains an important source in the day-to-day business of journalism. It is jointly owned by twelve Austrian newspaper publishers and the public service broadcaster ORF (APA, 2020). Ten years ago, ownership was slightly wider, with 15 newspapers and ORF. While all daily newspaper publishers are trustees of APA – with the notable exception of *Kronenzeitung* – its operations have diversified beyond news business in recent years.

Most interviewees in the journalistic sphere acknowledged the importance of news agencies in their working processes, where different news agencies (APA,

dpa, Reuters, etc.) are integral. Nevertheless, to some respondents, news agencies were seen as diminishing in importance in their personal work and used as secondary sources, rather than backbone or priority sources. Nonetheless, some smaller online media used news agencies as main sources, thereby increasing the agencies' visibility.

Concerning public relations material, respondents unanimously rejected any significant influence of it on their routine work. The amount of such material, they said, is increasing, but only a small proportion found its way into actual coverage. However, in rare cases, such materials have triggered further investigations by journalists.

Content exchange with partners and other forms of media was reported as an exception, rather than the rule, for leading Austrian news media. Although international journalism networks have been established over the past years (such as the International Consortium of Investigative Journalists), and some newspapers and ORF occasionally collaborated with other forms of media, such exchanges were of minor importance. It occasionally crystallised around larger investigative stories, such as that of the *Panama Papers*. The public broadcaster ORF typically participates in a network organised by the European Broadcasting Union, often with partner broadcasters from Scandinavia. Nonetheless, compared with 2009, reservations against cooperation with competing or neighbouring media appeared to be dissipated. While such cooperation has levelling effects for the audience when national media are involved, it may increase diversity of sources when international networks are established.

(F4) Internal rules for practice of newsroom democracy 1 POINT

Newsroom democracy is established by editorial statutes, which are common in Austrian newsrooms. But journalists have limited influence on decisions about hiring the editor-in-chief.

IN 2011
1 POINT

The Austrian Media Act allows media organisations to establish editorial statutes (Mediengesetz, 2021: para. 5); stricter rules apply to the public service broadcaster. The law (ORF-Gesetz, 2021: para. 33) requires editorial statutes, which are in place and required to be published online (ORF, 2002).

In 2008, about 61 per cent of Austrian journalists worked in media organisations that provide statutes (Kaltenbrunner et al., 2008: 64). A decade later, in 2019, this percentage increased to 65 per cent (Kaltenbrunner et al., 2020: 200). Several leading news media in our sample did not have such statutes.

According to our respondents, democratic practices in newsrooms are less common at the local level, where owners appoint editors-in-chief without the participation of the journalistic staff council, as it was a decade ago (Grünangerl & Trappel, 2011). At the national level, this important staff decision is also

taken by the owners, but only after intensive internal hearings including newsroom staff.

There are a few exceptions to such a rule. Some newspapers have established rules on democratic participation of the newsroom council, especially regarding appointment of the editor-in-chief. The newsroom assemblies of *Die Presse* and *Profil*, for example, can reject the editor's proposal for a new editor-in-chief with a two-thirds majority (Kurier, 2011; *Die Presse*, 1974: para. 7). In fact, such rejections have already occurred in both newspapers. Nevertheless, opportunities to make autonomous proposals are few, and participation in other management or staff decisions, or in framing future formal rights, are also relatively rare. This also has remained the same over the past decade (Grünangerl & Trappel, 2011).

As far as ORF is concerned, by law, all leading positions have to be publicly announced, and staff-appointment decisions are largely transparent. Nevertheless, influence of the newsroom council and its representatives is still limited to an advisory function (Grünangerl & Trappel, 2011; ORF-Gesetz, 2021: para. 33; ORF, 2002: para. 5). Participation rights concerning changes in programme schemes and journalistic content exist; however, there is no participation in management or supervisory boards. According to our respondents, journalists appeared to be quite aware of their participation rights and practiced them seriously, as they did a decade ago (Grünangerl & Trappel, 2011). Before being appointed by the ORF Council, candidates for the position of editor-in-chief are required to present themselves in hearings to newsroom journalists.

(F5) Company rules against *internal* influence on newsroom/editorial staff

3 POINTS

IN 2011
2 POINTS

The separation of newsrooms from management is formally practised by all media organisations in this media sample and can be interpreted as common in the Austrian media system.

Leading Austrian news media houses strictly separate the newsroom from both the ownership and the advertising and commercial departments.

With regard to ownership, newspapers separate their newsrooms from owners, although, in most cases, there are no legally binding rules in place. Editors-in-chief confirmed that owners rarely visit the newsroom and never intervene in editorial matters. This also applies to public service radio and television, where newsroom journalists strictly reject interventions by the board of trustees. The few cases of interventions in newscasts by board members that are retained in collective memory were immediately made public and did not continue.

With regard to the separation of newsrooms from advertising departments, one newspaper (*Salzburger Nachrichten*) pointed to the fact that both departments are even physically separated, operating in different wings of the (same) building. All our respondents confirmed this strict separation with no contact, let alone interventions.

Nonetheless, some news sections are prone to influence and collaboration between journalists and advertising departments, such as travel, leisure or holiday, and mobility (cars) sections. Some newspapers have drawn a demarcation line by employing staff just for these sections, not working in the newsrooms but exclusively for the commercial section. Other newspapers occasionally mix staff, working for both sides. However, this, too, is rare and not general practice.

(F6) Company rules against *external* influence on newsroom/editorial staff

1 POINT
IN 2011
2 POINTS

Editors-in-chief strictly denied the direct influence of external parties on newsroom work and content, although such attempts were occasionally reported. The amount of public advertising compromises editorial freedom for some leading news media.

All leading news media in Austria are financed through a combination of sales or licence fee income on the one hand, and advertising and sponsorship on the other. The only exception is ORF's radio channel, Ö1, dedicated to culture, information, and classical music, which is free of advertising. ORF's other radio channels, all television channels, and its online media are partly financed by advertising.

Advertising in Austria is a black box to media economists. Media companies do not disclose their advertising income, and there is no database with how much money companies invest in advertising. No information is disclosed by global platforms such as Google and Facebook on their advertising business in Austria. Therefore, statistical evidence that can help to cross-verify the answers of our respondents is lacking.

All editors-in-chief and all journalists categorically rejected any influence of advertisers and other external agents on their editorial content. Their advertising clients are diverse, with no undue influence by any of them. Some respondents recall singular cases of advertisers blackmailing media with the withdrawal of advertising, or even boycotts; however, these incidents were rare and occurred several years ago.

Although no data has been disclosed for commercial advertisers, some evidence regarding advertising by public institutions is available. In 2011, the Austrian parliament passed a law on media transparency, obliging all public

institutions and companies governed by the state to disclose quarterly all advertisements, including beneficiaries. This dataset is publicly available online at the website of the telecommunication and broadcasting authority Kommunikationsbehörde Austria (KommAustria) and Rundfunk und Telekom Regulierungs-GmbH (RTR).¹ In 2019, public companies, municipalities, ministries, labour and employers' associations, public transport, energy supply companies, tourism marketers, universities, and so forth, spent a total of EUR 178 million for media advertising purposes. Table 3 shows the main beneficiary media.

Table 3 Beneficiary media from advertising spending by public institutions, 2019

Media	EUR
Kronzeitung (incl. Kronehit, Krone.at)	20,362,311
ORF (TV, radio, ORF.at)	19,853,376
Heute (incl. Heute.at)	12,024,529
Österreich (incl. oe24.at)	10,528,713
Kurier (incl. Kurier.at)	7,623,999
Google (.com and .at)	5,903,216
Standard (incl. derStandard.at)	5,824,121
Kleine Zeitung (incl. Kleinezeitung.at)	5,742,767
District newspapers	5,461,162
Presse (incl. diePresse.at)	5,203,473
Vorarlberger Nachrichten (incl. VOL.at)	3,321,596
OÖN (incl. nachrichten.at)	3,255,378
Tiroler Tageszeitung (incl. tt.com)	3,081,223
Facebook (.com and .at)	2,488,305
Salzburger Nachrichten (incl. sn.at)	2,373,180
Total (all media)	178,027,676

Source: RTR, 2019b

Table 3 shows that advertising money is far from being spent equally across news media. There is a strong bias favouring popular media that has high reach among Austrians. *Kronzeitung*, *Heute*, and *Österreich* are boulevard-style titles with sympathies for populist movements. The public service broadcaster ORF is by far the largest medium in Austria, with its operations being determined by law (ORF Gesetz). Regional newspapers profit much less from public advertising. The regional newspaper in our research sample, *Salzburger Nachrichten*, received a sixth of the amount that *Kronzeitung* did. Public institutions also spent almost EUR 6 million for advertising in Google, and another EUR 2.3 million in Facebook.

For Austrian media, such advertising bookings are essential and economically important. This is exemplified by how the public service broadcaster ORF is obligated to disclose its annual accounts. In 2018, 63.8 per cent of ORF's income was generated by licence fees and 23 per cent by advertising (the rest included miscellaneous revenues from programme sales and other income) (ORF, 2019). The 23 per cent advertising income was equivalent to EUR 229.6 million. Thus, public advertising represents 8.6 per cent of the entire advertising income. It can safely be assumed that public advertising is relatively more important for the revenue stream of considerably smaller private media.

Seen from a management perspective, in such media houses, public advertising constitutes a main economic pillar and should not be jeopardised. Positive and less critical coverage is conducive to this end. A closer look at the public institutions and the amount spent for beneficiary media might further illustrate this delicate relationship (see Table 4).

Table 4 *Public advertising by beneficiary media, 2019 (thousand EUR, selected institutions)*

	Kronen- zeitung	Österreich	Heute	ORF	Standard	Salzburger Nachrichten
Prime Minister	410	208	41	0	80	47
Ministry of Digitalisation and Economics	335	278	625	40	78	35
Ministry of Finance	1,329	854	141	0	96	193
Ministry of Interior	364	364	529	0	6	29
Ministry of Environment, Energy, Technology	412	462	772	0	0	32
Municipality of Vienna	2,879	2,007	3,418	433	1,559	–
Province Lower Austria	457	406	160	210	41	–
Province of Salzburg	–	–	–	–	–	84
Employers' Association	1,397	474	511	2,559	217	304
Labour Association	1,063	370	296	1,009	37	145
Public service broadcaster ORF	1,093	1,526	527	–	465	0
Austrian Railways ÖBB	394	616	293	1,029	51	150
Verbund (national energy provider)	167	117	556	508	277	33
Salzburg AG (regional energy provider)	–	–	–	–	–	281
Total (all public institutions)	20,362	10,529	12,025	19,853	5,824	2,373

Comments: Kronenzeitung (incl. Kronehit, Krone.at), Österreich (incl. Oe.24), ORF (incl. TV, radio, orf.at), Heute (incl. Heute.at), Standard (incl. derstandard.at), Salzburger Nachrichten (incl. Salzburger Fenster, sn.at)

Source: RTR, 2019b

The Ministry of Finance, for example, spent more than EUR 1.3 million for advertisements in *Kronenzeitung*, but just EUR 69,000 for the quality daily newspaper *Der Standard*. Still more remarkable is the overall amount spent by the municipality of Vienna for the three boulevard dailies *Kronenzeitung*, *Österreich*, and *Heute*. Together, they received advertising orders of EUR 8.3 million, and *Der Standard* received another EUR 1.5 million. Overall, advertisers of this scale and order can – and, in all probability do – expect positive coverage in return.

Overall, the implications of this advertising-based media support compromise the beneficiaries' editorial independence. This might well be relational to the proportion of this support in their entire revenue.

(F7) Procedures on news selection and news processing 1 POINT

Institutionalised means of criticising journalistic working habits only exist in a few newsrooms and are not regularly practised.

IN 2011
1 POINT

Stylebooks were rare in Austrian newsrooms a decade ago (Grünangerl & Trappel, 2011) – and this has not changed. Editors-in-chief still rely more on the individual professionalism of their journalistic staff than on formalised rules. They emphasised the implicitness of such criteria in the journalistic working process. Discussions on news values and news selection are occasion-driven and part of the journalistic routines (Grünangerl & Trappel, 2011). Such routines typically foresee that up to five persons read and edit stories before they are published. All editors-in-chief emphasised that news items would not be published without being checked by at least two people, although they admitted that this was not always ensured rigorously under time pressure. ORF has more institutionalised and complex forms of news selection, as a check and re-check system has been implemented. By law, but also enshrined in the journalists' statute, ORF journalists are free and independent in what they report, and their work enjoys integrity safeguard mechanisms (journalists do not have to accept editing by others) (ORF, 2002).

(F8) Rules and practices on internal gender equality 2 POINTS

Employment conditions among male and female journalists are formally equal in terms of conditions and pay.

Much in line with the findings of the study by the International Women's Media Foundation (IWMF, 2011) for Western Europe, Austria's journalism staff is almost balanced in terms of gender: 53 per cent are men and 47 per cent are

women. However, again in line with the International Women’s Media Foundation report, there is a glass ceiling regarding leading positions among journalists: 14 per cent of male journalists work in leading positions, compared with 8 per cent of female journalists. Furthermore, on average, female journalists earn less than their male counterparts do. 43 per cent of women earn less than EUR 3,000 per month, but only 27 per cent of men do. Such disparities are even more pronounced within the bracket of high-earning journalists (more than EUR 5,000 per month). Only 16 per cent of women belong to this group, but double that proportion (32%) of men do (Kaltenbrunner et al., 2020: 239).

All respondents in the leading news media sample observed a clear and lasting trend of ironing out gender inequalities and reported progress for their own media company. Gender equality applied both to the current numbers of employment in newsrooms and to newly hired journalists (with one exception, in which two-thirds of journalistic staff was male). Even in leading positions, many more women have been appointed in recent years. In some news media, informal or implicit rules positively discriminate against women when leading positions are filled, up to the time when equal status is achieved. To this end, there is even a binding legal provision in place for ORF (ORF-Gesetz, 2021: para. 30d).

Equal pay is strictly applied for all journalistic labour contracts, according to respondents. However, the difference in the above reported earning statistics might be explained by the fact that many more women (45%) are working part-time (thus earning less) than men (20% part-timers) (Kaltenbrunner et al., 2020: 247).

Within ORF, the largest employer of journalists in Austria, specific rules apply with regard to gender equality, based on legal provisions (ORF-Gesetz, 2021: para. 30a–p). Since 2012, a gender balance plan is in force and revised every two years. It secures equal employment conditions and aims to eradicate existing imbalances at all employment levels. In 2013, the European Institute for Gender Equality has distinguished this plan as “good practice” (EIGE, 2013). The plan’s implementation has enabled ORF to take significant steps towards equality (Kirchhoff & Prandner, 2017).

(F9) Gender equality in media content

1 POINT

There is growing sensitivity among journalists for gender equality in media content, but no formal rules apply. Stereotypes prevail in visual gender representation.

Gender equality is much more a private and personal concern among journalists, rather than being codified or recognised explicitly. Respondents acknowledged the importance of the issue, but admitted that the respect for gender equality in media content is limited. In daily practice, timeliness often trumped gender equality when searching for experts.

Women are acutely underrepresented as subjects in Austrian news coverage. Empirical research has confirmed such an inequality repeatedly, over the decades and across various media genres (Thiele, 2019). In their country-level study on news and gender within the framework of the Global Media Monitoring Project, Kirchhoff and Prandner (2015) identified women's representation in the news as weak. Only 21 per cent of news subjects, reporters, and presenters in the traditional media were female, and even less in Internet-based media. The presence of women as news subjects was high in sections about celebrities, art, and media, and low in economics, politics, and government. The authors of this snapshot content analysis on a single day in March 2015 concluded:

There are significant gender gaps in both the traditional media outlets and the internet. The representation of women in economy (14%) and politics or government stories (18%) is very low compared to the news stories that deal with lifestyle (44%), crime and violence (25%) and social or legal issues (20%). (Kirchhoff & Prandner, 2015: 17)

Another content analysis (Pernegger, 2020) confirms these findings. While women's representation in politics is stronger than ever (first female prime minister in 2019; first government with equal gender participation among ministers 2019; 39% female members of the Austrian parliament in 2020), popular print media (*Kronenzeitung*, *Österreich*, *Heute*) in particular continued to neglect women's policy issues even as late as 2019. Regarding gender representation in published pictures, the gender gap is striking (only 31% are women); moreover, such pictures reinforce traditional gender stereotypes.

(F10) Misinformation and digital platforms (alias social media)

1 POINT

Misinformation on digital platforms is of minor relevance and importance so far, and defence mechanisms are not yet developed.

Respondents of leading news media in Austria, among them public service broadcaster ORF, recognised the potential harm caused by misinformation on digital platforms, but trusted their journalistic skills to identify fake news. They all applied the basic journalistic principle of “check, re-check, double-check” to all stories and believed that fake news could be identified this way. When in doubt, leading news media houses trusted credible sources, such as news agencies, and hoped that these business-to-business services applied strict verification procedures. None of the news media in our sample, including even ORF, collaborated with external fact-checking institutions or ran an in-house verification department. Overall, respondents confirmed that fake news and

deep fakes were not an urgent and pressing problem in Austria at the present time, making investments in verification unjustified as yet.

(F11) Protection of journalists against (online) harassment 3 POINTS

Journalists generally rely on support and protection by their employers in case of harassment.

Harassment rarely happens in Austria, online or offline. Over the last decade, few cases of harassment or online shitstorms have occurred, according to our respondents of leading news media. Thus, media companies generally had no special legal division in place to protect their journalists. However, if such insults did happen, media companies employed specialised lawyers to defend the rights of journalists and prevent harm to journalists on those occasions. This applied to both online and offline media, and no specific safeguards or provisions were observed to be in place for online cases. In the case of ORF, the management has the obligation to defend its journalists in the case of any assault (ORF, 2002: para. 4).

The general level of support was considered fair and sufficient by our journalist respondents.

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 1 POINT

Ownership concentration on a national level remains remarkably high, as a few big media companies divide the market among them. IN 2011
1 POINT

The Austrian Cartel Act provides special regulation for media mergers being notifiable to the Federal Competition Authority if companies exceeded revenue limits (Kartellgesetz, 2021: para. 8).² Nevertheless, especially the Austrian market has continually seen extremely high press concentration, accumulated by several waves of concentration until the mid-1990s (Steinmaurer, 2009: 505; Trappel, 2007: 64).

Even after the implementation of stricter competition rules with the establishment of competition authority in 2002, rejections of media mergers by Austrian authorities have been rare. Economic struggles and crises within the overall media sector have gradually contributed to this problem over the past ten years.

Table 5 Audience reach and circulation of Austrian dailies (paid-for and free-of-charge), 2018

	Type	Associated media company	Audience reach	Audience reach (%)*	Circ.	Market share (%)
Kronenzeitung	national	Mediaprint	2,035,000	27.2	793,279	27.7
Heute	regional/free	AHVV-Verlags GmbH	868,000	11.6	568,769	19.8
Österreich	national/partly free	Verlagsgruppe News	518,000	6.9	561,497	19.6
Kleine Zeitung	regional	Styria Media Group	735,000	9.8	281,010	9.8
Kurier	national	Mediaprint	556,000	7.4	145,560	5.1
OÖ Nachrichten	regional	Wimmer Verlag	375,000	5.0	127,139	4.4
Tiroler Tageszeitung	regional	Moser Holding	276,000	3.7	91,045	3.2
Salzburger Nachrichten	regional	Salzburger Nachrichten	252,000	3.4	75,936	2.6
Die Presse	national	Styria Media Group	346,000	4.6	70,884	2.5
Der Standard	national	Standard	583,000	7.8	70,234	2.5
Vorarlberger Nachrichten	regional	Vorarlberger Medienhaus	160,000	2.1	56,914	2.0
Tiroler Tageszeitung Kompakt	regional/free	Moser Holding	11,000	0.1	12,388	0.4
Neue Vorarlberger Tageszeitung	regional	Vorarlberger Medienhaus	37,000	0.5	11,032	0.4
Total (national)			4,654,000	–	2,865,687	–
Total (population 14+)			7,473,000	–	–	–
Three top media companies (CR 3) (titles)			–	–	–	67.1
CR 3 (companies)			–	–	–	76.6

*readers per edition in per cent of population

Source: Arbeitsgemeinschaft Media-Analysen, 2019a; ÖAK, 2019: 14–35

Circulation of all Austrian newspapers decreased significantly over the past ten years (e.g., the market leader *Kronenzeitung* from 948,615 in 2008 to 793,279 in 2018). *Kronenzeitung* is still dominant on the Austrian print market; however, reaching only 27.2 per cent of the population (compared to 41.9% in 2008) and with a market share of 27.7 per cent (2008: 37.4%), total circulation has been largely set back even for this hugely successful newspaper (Arbeitsgemeinschaft Media-Analysen, 2019a; Arbeitsgemeinschaft Media-Analysen, 2008: 67). The three largest newspapers – all boulevard titles – reach a combined market share of 67.1 per cent (2008: 62.3%), demonstrating a highly concentrated national newspaper market. The nationwide quality newspaper with the highest circulation, *Der Standard*, reaches 7.8 per cent (2008: 5.5%) of the Austrian population with a circulation of 70,234 (2008: 117,131). In fact, four big private media companies (Styria Media Group, Mediaprint, Verlagsgruppe News, and AHVV Verlags-GmbH) dominate the Austrian press market. The calculated circulation market share for the three top media companies (CR3) on

the national newspaper market is 76.6 per cent (2008: 77.5%) and, therefore, remains reasonably high and secure.

In terms of ownership, over the past ten years, the Austrian media market has widely sustained its highly concentrated and non-transparent nature, due to complex ownership structures including private foundations and holding companies with few changes. Hence, the big national boulevard-style newspapers *Kronenzeitung* and *Kurier* are still associated with Mediaprint, sharing technical production, distribution, and advertising. Major changes occurred in 2018, when the German Funke Gruppe sold 49.5 per cent of their shares to the Signa Holding conglomerate, based in the Austrian real estate market (derstandard.at, 2018).

Styria Media Group, which used to be the second largest Austrian media company in terms of turnover after the public broadcaster for a long time (Melischek et al., 2005: 247–251) underwent consolidation over the past ten years. This included restructuring the newsrooms of *Die Presse*, as well as closing the daily newspaper on economic affairs *Wirtschaftsblatt* in 2016. Still, Styria, whose owner (Katholischer Pressverein) is associated with the Catholic Church, is an active market player in Austrian newspapers (*Kleine Zeitung*, *Die Presse*), regional print media (*Radio Marketing Service*, *Bezirksblätter*), radio (*Antenne Kärnten*, *Antenne Steiermark*), magazines, as well as online media.

The magazine market in particular saw changes over the past ten years. With Red Bull, a new financially powerful player entering the market (also the television market), the leading player on the magazine market so far, Verlagsgruppe News, saw restructuring in terms of ownership. In 2000, this media company was part of a very controversial decision on media mergers in Austria, allowing an exchange of corporate shares between the magazine section of *Kurier Verlag* and Verlagsgruppe News. This led to a quasi-monopoly situation for Verlagsgruppe News in the magazine market, as the competing political weekly magazines *Profil*³ and *Format* were also edited by Verlagsgruppe News at the time. Moreover, Verlagsgruppe News was also cooperating with Mediaprint. Several times, criticisms were raised about how stricter rules on media mergers and media concentration in Austria were established too late to effectively prevent a concentrated media market (Melischek et al., 2005: 248; Steinmaurer, 2009: 508). As of 2020, the Austrian bank Raiffeisen Zentralbank is a minority owner of Verlagsgruppe News (together with *Kurier* and Mediengruppe *Österreich*, which belongs to the Fellner family). The German publisher Gruner + Jahr (Bertelsmann) sold its majority to the Austrian media manager Horst Pirker in 2016 (Fidler, 2016). On the whole, then, the Austrian print media landscape continues to remain highly concentrated: on the one hand, restructuring processes led to closures of media titles; on the other, certain German publishers who were active in the Austrian media market sold their shares. Furthermore, new financially strong players entered the (television, magazine, print) market from non-media related sectors.

The legal framework for the implementation of private broadcasting in Austria was only established after a decision of the European Court of Human Rights asserted that the broadcasting monopoly would infringe freedom of speech (Steinmaurer, 2009: 512). As a consequence, the first two local private radio broadcasters were founded in 1995. The first national terrestrial television licence was granted to the former Vienna-based cable television broadcaster ATV in 2003 (Steinmaurer, 2009: 512). ORF always had private competitors (particularly in the television sector) since the mid-1980s, due to the availability of cable and satellite programmes from Germany. German media companies also played a significant role in the private Austrian television market from the start. In 2020, PULS 4, owned by German ProSiebenSat1 Media AG, has content arrangements with other German channels affiliated with its owner. ATV (channels ATV and ATV II) was partly owned by the German media company Tele München Gruppe, which sold its shares to ProSiebenSat1 Media AG in 2017, leaving only two competitors of Austria-based private television channels on the market. The second of these is the energy drink producer Red Bull, which entered the Austrian television market via its media holding Red Bull Media House GmbH in 2009. It launched the latest private national television channel: *ServusTV*. The media holding is also active in the Austrian print sector with several monthly magazines (*Red Bulletin*, *Servus in Stadt und Land*, *Terra Mater*, etc.).

As a consequence of such late liberalisation, the television market is still dominated by the public service broadcaster ORF, even though its market share is gradually but steadily declining. In 2019, ORF 2 had a market share of 19.8 per cent (2008: 25.1%), and the rather entertainment-orientated public service channel ORF 1 had a market share of 9.1 per cent (2008: 16.8%). Together, they reached 3.619 million Austrians on a daily basis (48.1%, compared to 51.8% in 2008) (ORF Medienforschung, 2020c). The largest German private television channels (RTL, VOX, Pro7) present in the television sector in Austria held market shares that varied from 3.4 to 4 per cent; the Austrian private channels also varied between 3.5 per cent (ATV), 3.4 per cent (PULS 4), and 3 per cent (ServusTV). The top three television channels accumulated a market share of only 33.1 per cent (2008: 49.2%) and represent two public broadcasters (two channels by Austrian ORF and German ZDF). The CR3 for the top three television companies on the national television market remains higher – ORF, RTL Group, and ProSiebenSat1Media hold a market share of 64.5 per cent (2008: 69.7%) (see Table 6).

The radio market too, has been dominated by public service channels. Besides the three nationwide available radio channels operated by ORF (Ö1, Ö3, and FM4), only *Kronehit* (owned by *Kronenzeitung* and *Kurier*) operated the nationwide private licence for a long time; Radio Austria started as the second nationwide private channel in October 2019. In 2019, *Kronehit*

Table 6 Market share of national television channels, 2019

	Type	Associated media company	Market share (%)
ORF 2	Public service broadcaster (AUT)	ORF	19.8
ORF 1	Public service broadcaster (AUT)	ORF	9.1
ZDF	Public service broadcaster (GER)	ZDF	4.2
RTL	Private (GER)	RTL Group	4.0
VOX	Private (GER)	RTL Group	3.6
ATV	Private (AUT)	ProSiebenSat1 Media SE	3.5
Pro 7	Private (GER)	ProSiebenSat1 Media SE	3.4
PULS 4	Private (GER)	ProSiebenSat1 Media AG	3.4
SAT 1	Private (GER)	ProSiebenSat1 Media SE	3.3
ARD	Public service broadcaster (GER)	ARD	3.0
ServusTV	Private (AUT)	Red Bull Media	3.0
Kabel 1	Private (GER)	ProSiebenSat1 Media SE	2.3
RTL II	Private (GER)	RTL Group	1.9
Sat.1 Gold	Private (GER)	ProSiebenSat1 Media SE	1.8
3sat	PSB (GER)	ARD, ZDF, ORF, SRG	1.5
RTL NITRO	Private (GER)	RTL Group	1.3
ATV II	Private (AUT)	ProSiebenSat1 Media AG	1.1
Super RTL	Private (GER)	RTL Group	1.1
SIXX	Private (GER)	ProSiebenSat1 Media SE	1.0
RTL Plus	Private (GER)	RTL Group	1.0
7MAXX	Private (GER)	ProSiebenSat1 Media SE	0.7
ntv	Private (GER)	RTL Group	0.7
Dmax	Private (USA)	Discovery Inc.	0.7
TLC	Private (USA)	Discovery Inc.	0.6
Comedy Central	Private (USA)	Viacom	0.3
n24 doku	Private (GER)	Welt N24 GmbH	0.3
sport1	Private (GER)	Sport1 Medien AG	0.3
Nickelodeon	Private (USA)	Viacom	0.2
Others			22.9
Total			100.0
CR 3 (channels)			33.1
CR 3 (companies)			64.5

Comments: Country of origin in parentheses: AUT = Austria, GER = Germany, USA = United States

Source: AGTT, 2020

reached 10.7 per cent (2008: 5.9%) of the population and had a market share of 7 per cent (2008: 4%). Nevertheless, the Austrian radio landscape is mainly characterised by a variety of regional and local channels, as it was ten years ago (Grünangerl & Trappel, 2011; see also Indicator E2 – Media ownership concentration regional level; and Table 7). The public service mainstream programme Ö3 leads the market with a share of 33 per cent (same as in 2008); this reached 33.7 per cent of the population. The regional public service radio programmes, locally produced by nine regional studios (Ö2) occupied 35 per cent of the market (2008: 37.0%), followed by the cultural program Ö1 with 7 per cent (2008: 6%). The top three radio channels have an aggregated market share of 75 per cent (2008: 76%), and the top three radio companies have 86 per cent (2008: 81%).

The Austrian online media market has been growing remarkably over the past ten years in terms of reach. Yet, it remains subservient to traditional media companies that are also active in other media sectors – mainly newspaper, magazine, and television markets (see Table 8). The online network of the public service broadcaster ORF reaches 3.9 million people per month, which represents 52.1 per cent of the Austrian population (2008: 1.9 million). Many media companies are extant only in the online outlets of their print products (e.g., Mediaprint) and associated media offers. Others have broadened their repertoire: Styria Media Group reaches many Austrians with the online outlets of the newspapers *Kleine Zeitung* and *Die Presse* as well as their regional offers (*Regionalmedien Austria*, *meinbezirk.at*) and the online market platform *willhaben.at*. Both *heute.at* (reach 2019: 2.7 million) and the medical information platform *netdokter.at* (reach 2019: 861,000) belong to Heute Gruppe. Mediengruppe Österreich not only offers the online newspaper platform *oe24-Netzwerk* (reach 2019: 2.6 million) but also the weather info website *wetter.at*. What is particularly remarkable is how the circulation of the online pioneer *derstandard.at* reached 2.5 million Austrians per month, with a quality information policy.

Table 7 Daily reach and market share of leading national radio channels, 2019

	Type	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	Public service broadcaster	ORF	2,640,000	33.7	33
Ö2 (regional)	Public service broadcaster	ORF	2,319,000	29.6	35
Kronehit	Private	Mediaprint	838,000	10.7	7
Ö1	Public service broadcaster	ORF	729,000	9.3	7
FM4	Public service broadcaster	ORF	251,000	3.2	2
Antenne Steiermark	Private	Antenne Stmk./Knt.	243,000	3.1	3
88.6 - so rockt das Leben	Private	Radio Eins Privatradio	235,000	3.0	2
Life Radio OÖ	Private	Life Radio	180,000	2.3	2
Radio Arabella	Private	Radio Arabella GmbH	165,000	2.1	2
Radio Austria / Antenne Salzburg / Antenne Tirol	Private	Radio Austria GmbH	141,000	1.8	2
Radio Energy	Private	NRJ Group	133,000	1.7	1
Antenne Kärnten.	Private	Antenne Stmk./Knt.	125,000	1.6	2
Antenne Vorarlberg	Private	Russmedia Verlag GmbH	94,000	1.2	1
Life Radio Tirol	Private	Life Radio	71,000	0.9	1
98,3 Superfly	Private	Superfly Radio GmbH	39,000	0.5	0
Total public			4,951,000	63.2	74
Total private (AUT)			2,217,000	28.3	25
Total private (foreign)			329,000	4.2	4
CR 3 (channels)					75
CR 3 (companies)					86

Comments: Population 10+ (national: 7,834,000; n = 22,141).

* daily listeners in per cent of population, sorted by daily reach

Source: RMS, 2019

Table 8 National concentration of websites with news content, 2019
(Unique users, top 25)

	Associated media company	Reach	% population 14 +	% total Internet users
ORF.at Network	ORF	3,957,000	52.1	60.1
willhaben (roof offer)	Styria Media Group	3,640,000	48.0	55.3
krone.at	Mediaprint	2,773,000	36.5	42.1
oe24-Netzwerk	Mediengruppe Österreich	2,632,000	34.7	40.0
derstandard.at Netzwerk	Standard	2,489,000	33.0	38.0
gmx.at	GMX	2,468,000	32.7	37.7
Kurier Online Medien	Mediaprint	2,326,000	30.6	35.3
heute.at (roof offer)	AHVV-Verlags GmbH / Heute Gruppe	2,279,000	30.0	34.6
Regionalmedien Austria Digital	Styria Media Group / Moser Holding	2,093,000	27.6	31.8
SevenOne Interactive Network	ProSiebenSat1 Media SE	2,079,000	27.4	31.5
meinbezirk.at	Styria Media Group / Moser Holding	1,997,000	26.3	30.3
kleinezeitung.at	Styria Media Group	1,919,000	25.3	29.1
VGN Digital roof offer	Verlagsgruppe News	1,810,000	23.8	27.5
Russmedia Portale	Vorarlberger Medienhaus	1,461,000	19.2	22.2
OÖ Nachrichten Online Netzwerk	Wimmer Verlag	1,367,000	18.0	20.7
nachrichten.at	Wimmer Verlag	1,357,000	17.9	20.6
wetter.at	Mediengruppe Österreich	1,337,000	17.6	20.3
shpock.com	finderly GmbH	1,151,000	15.2	17.5
Moserholding Tirol Netzwerk	Moser Holding	1,119,000	14.7	17.0
diepresse.com	Styria Media Group	1,082,000	14.3	16.4
tt.com	Moser Holding	1,077,000	14.2	16.3
Salzburger Nachrichten Online Netzwerk	Salzburger Nachrichten	1,045,000	13.8	15.9
wetter.com	Mediengruppe Österreich	1,029,000	13.6	15.6
NÖN-Netzwerk	NÖ Pressehaus	945,000	12.4	14.3
netdoktor.at	AHVV-Verlags GmbH / Heute Gruppe	861,000	11.3	13.1
Total		6,588,000	-	-

Source: ÖWA, 2019

(E2) Media ownership concentration regional (local) level 1 POINT

IN 2011
1 POINT

On a regional level, ownership concentration is remaining remarkably high. In most Austrian regions, one newspaper is dominant; the public service broadcaster still dominates the local radio market.

With regards to television, local or regional broadcasters have been insignificant for a long time in Austria. All national broadcasters are Vienna-based except for ServusTV (based in Salzburg). Non-commercial broadcasting projects have become a stable part of the spectrum over the past years; however, they tend to telecast niche programmes bound to specific local (mainly urban) areas (e.g., *FS1*, *Okto TV*).

On the contrary, the Austrian radio market has traditionally been dominated by regional channels (see Tables A1–A9 in the Appendix). Besides the national channels of the public service broadcaster ORF, only *Kronehit* (since 2003) and *Radio Austria* (since 2019) hold national licences. In all nine provinces, the national public service mainstream programme Ö3 leads with a market share, ranging between 29 per cent (Vienna) and 39 per cent (Lower Austria). The regional public service programmes (Ö2) surpass private competitors, with market shares ranging from 15 per cent (Vienna) to 48 per cent (Carinthia). Several small private channels are part of trans-regional chains (*Antenne*, *Arabella*). Therefore, media concentration in the regional radio market varies across regions, from 56 per cent (Vienna) to 92 per cent (Carinthia) at the level of specific channels. At the company level, concentration is more severe: while the CR3 (companies) dominate 88 per cent of the market in Vienna and 86 per cent in Tyrol, they exceed 90 per cent in all other Austrian regions, peaking at 99 per cent in Carinthia and Burgenland.

High concentration has always been common for the regional structures of the Austrian newspaper market (Seethaler & Melischek, 2006: 254). With a general decline in audience reach for most newspapers in the past ten years, the problem persists. Nevertheless, daily newspapers are an important source of information to the Austrian population at a regional level: as of 2018, it varied between 57.7 per cent (in Vorarlberg) and 71.1 per cent (in Carinthia) of the local population being reached by a newspaper regularly (see Table 9). In Vienna, Styria, Carinthia, Upper Austria, and Salzburg, two comparably powerful newspapers have split the local market (one of them being the national boulevard daily *Kronenzeitung*). In Vienna and Lower Austria, the free-of-charge daily *Heute* has become the main competitor to *Kronenzeitung*. Compared to 2008, *Kurier* lost its strong position in Vienna and Tyrol, supposedly due to competition from free-of-charge papers in urban areas of these regions. Some regions such as Carinthia faced more drastic changes due to the closure of titles (*Neue Kärntner Tageszeitung*, ceased 2014). Other regions have one dominant daily newspaper (see also Table 9). *Kronenzeitung* is still market leader in two

of the nine provinces (compared to four in 2008), being second only to regional newspapers in six further provinces (compared to four in 2008), and reaching up to 46.7 per cent of the local population. Compared to data from the 2010 MDM, all major newspaper titles faced declines in audience reach. This was moderate in some regions (e.g., Burgenland, Salzburg, and Vorarlberg) and more acute in others (such as Vienna, Lower Austria, and Tyrol), even the big player *Kronenzeitung* witnessed a fall in its reach, for instance, from 520,000 in 2008 to 329,000 in 2019 in Upper Austria (Arbeitsgemeinschaft Media-Analysen, 2019b–j; Arbeitsgemeinschaft Media-Analysen, 2008:146–193).

Only in the most western region of Austria, Vorarlberg, is *Kronenzeitung* not the most significant newspaper in the local market. However, in Vorarlberg itself, the two dominant daily newspapers (*Vorarlberger Nachrichten*, *Neue Vorarlberger Tageszeitung*) are published by the same media company, which leads to an extremely concentrated local market. This company, Vorarlberger Medienhaus, not only reaches more than half of the regional population with its print products, but also dominates radio and online media at a regional level. In Tyrol, Moser Holding AG plays an important role as a regional market power. Here, *Tiroler Tageszeitung* is the leading daily newspaper, reaching 43.3 per cent of the local population. Additionally, Moser Holding AG owns the leading private radio channel (*Life Radio*) and several monthly and weekly magazines in the region.

(E3) Diversity of news formats

3 POINTS

Austrian news media provide for a large variety of different news formats, from headline news online to long-reads in newspapers and background features on radio and television. All different categories are covered, including local, national, and international news as well as politics, economy, current affairs, culture, and sport sections.

IN 2011
3 POINTS

Austria's news media provide for a large variety of news formats. This variety has increased over the last decade since 2009, notably online and in the private broadcasting sector. In particular, boulevard-style formats have increased, with online television channels being launched by daily newspapers *Kurier* (Schau TV) and *Österreich* (oe24.tv). Furthermore, the two private television channels ATV and PULS 4 (owned by the same company) have also extended their news programmes. Although this news content is popular in style, it has also added to format variations.

These programmes come in addition to quality boulevard newspapers and ORF's main television news formats, which are broadcast on ORF 2. Information formats on ORF 1 are usually shorter. ORF 2, meanwhile, provides seven different news formats throughout the day, four of them exceeding a time slot

Table 9 Audience share of top 3 Austrian paid-for and free dailies with highest reach on regional level, 2018

	Associated media company	Audience reach	% ^a
VIENNA			
Heute (free)	AHV-Verlags GmbH	447,000	28.2
Kronzeitung	Mediaprint	351,000	22.2
Österreich / oe24-Kombi (free)	Verlagsgruppe News	289,000	18.3
Population (1,584,000)		1,009,000	63.7
LOWER AUSTRIA			
Kronzeitung	Mediaprint	435,000	30.6
Heute (free)	AHV-Verlags GmbH	256,000	18.0
Kurier	Mediaprint	200,000	14.1
Population (1,421,000)		841,000	59.2
BURGENLAND			
Kronzeitung	Mediaprint	102,000	40.4
Kurier	Mediaprint	41,000	16.1
Heute (free)	AHV-Verlags GmbH	21,000	8.4
Population (253,000)		161,000	63.7
STYRIA			
Kleine Zeitung (Graz)	Styria	442,000	41.5
Kronzeitung	Mediaprint	332,000	31.1
Der Standard	Standard	66,000	6.2
Population (1,065,000)		712,000	66.9
CARINTHIA			
Kleine Zeitung (Klagenfurt)	Styria	229,000	55.7
Kronzeitung	Mediaprint	186,000	46.7
Der Standard	Standard	22,000	10.3
Population (483,000)		344,000	71.1
UPPER AUSTRIA			
OÖN-OÖ Nachrichten	Wimmer Verlag	40,000	27.5
Kronzeitung	Mediaprint	329,000	26.5
Heute (free)	AHV-Verlags GmbH	117,000	9.4
Population (1,239,000)		738,000	59.5
SALZBURG			
Salzburger Nachrichten	Salzburger Nachrichten	160,000	34.5
Kronzeitung	Mediaprint	135,000	29.0
Der Standard	Standard	20,000	4.2
Population (466,000)		273,000	58.7
TYROL			
Kombi Tiroler Tageszeitung / Tiroler Tageszeitung Kompakt (paid / free)	Moser Holding	275,000	43.3
Kronzeitung	Mediaprint	149,000	23.4
Der Standard	Standard	43,000	6.8
Population (635,000)		386,000	60.8
VORARLBERG			
Vorarlberger Nachrichten	Vorarlberger Medienhaus	153,000	46.9
Neue Vorarlberger Tageszeitung	Vorarlberger Medienhaus	35,000	10.6
Der Standard	Standard	23,000	7.1
Population (327,000)		188,000	57.7

^a readers per edition in per cent of local population

Source: Arbeitsgemeinschaft Media-Analysen, 2019b–j

of 15 minutes. A regional news format is broadcast on ORF 2 before the main evening news, delivered by the regional ORF studios. In addition, ORF 1 delivers shorter news formats five times a day, from “flash news” to “late night news”. Apart from these news formats, there are also special interest magazines on political and economic topics (*Thema, Report*), political discussion formats (*Im Zentrum, Runder Tisch*), international magazines (*Welt Journal*), as well as a weekly discussion format on current affairs, inviting journalists from other media organisations to be co-interviewers (*Pressestunde, Hohes Haus*).

Private television channels have shorter and more sensationalist forms of news presentation. The private channel ATV delivers its daily news format (*ATV Aktuell*) three times a day, in addition to news magazines (*ATV Die Reportage*) with lower frequency. PULS 4 produces two news formats, *Café Puls at breakfast time* and *Puls 24 News in the evening*, followed by an infotainment magazine.

On most radio programmes, short news flashes every full hour are common. ORF’s programme Ö1 offers longer news formats: two morning news broadcasts – including one in English and French – a one-hour news broadcast at lunch time (*Mittagsjournal*), and four news formats in the evening. In addition, radio magazines are quite common. All public service radio channels and many local private channels provide podcasts or are also available as web radio.

Albeit this rich variety of news, there is still no Austrian 24-hour-news television or radio channel, even though some foreign news channels (*ntv, n24, CNN*) are available via cable or satellite. Furthermore, there is no Internet-only news channel online, as all sizeable Austrian news websites are subsidiaries of mass media corporations.

(E4) Minority/Alternative media

2 POINTS

IN 2011
2 POINTS

The availability and institutionalisation of minority media depends on whether the minority is legally recognised. Overall, a wide range of minority media are available; however, their reach is limited.

Austria has six ethnic minority groups, recognised by law, whose languages have official status: Croatian, Romani, Slovak, Slovene, Czech, and Hungarian. Furthermore, Austrian sign language is recognised as a minority language. Particularly in the 1960s, and again in the 1990s, the number of Turkish speakers and of the languages of the former Republic of Yugoslavia surged. However, their languages do not have official status as minority languages in Austria. For this reason, media initiatives in these languages are either private or non-commercial projects.

ORF is obliged by law to provide programmes in the official minority languages (ORF-Gesetz, 2021: para. 5). Some regional ORF studios have special

newsrooms that exclusively produce content in minority languages. On television, one weekly nationwide broadcast format (*Heimat, fremde Heimat*) is dedicated to minority issues such as integration, cultural diversity, and so forth. Furthermore, weekly television magazines in the main minority languages are broadcasted in the eastern (Burgenland) and southern provinces (Styria, Carinthia). ORF also organises offline events for minority groups in Austria and has extended its services during the decade since 2009.

In addition, the Slovenian minority in southern Austria is addressed by a 24-hour radio programme, jointly operated by the community-operated radio station *Radio Agora* and the regional ORF studios. Broadcast time is shared among the two broadcasters since 2011 (ORF 2020: 158).

As a service for hearing-impaired persons, some 70.1 per cent of all television broadcasts are complemented by subtitles, including all main news programmes, and ORF's online platform TVthek contains specific programme sections for these persons. Furthermore, selected programmes are transmitted in Austrian sign language, among them news broadcasts, live-broadcasts from parliament, and service-oriented programmes (ORF, 2020: 173f.). The overall number of features for people with disabilities has significantly increased since 2009.

Content analysis of representation of disabled persons in Austrian newspapers, ORF television, and selected Facebook pages identified considerable deficits. Disabled persons are strongly misrepresented in the media, stereotyped, and marginalised, and coverage is mostly focused on disabled celebrities from sports and politics (Pernegger, 2017).

As in 2009, Austria had 14 non-commercial radio projects in 2019, all of them limited to specific regions, with the largest in Vienna (*Orange 94.0*), Klagenfurt (*Radio Agora*), and Graz (*Radio Helsinki*) (VFRÖ, 2018: 19). These community-based radios put their focus not only on minorities, but also on disadvantaged people, such as migrants. Furthermore, a non-commercial television channel with significant amounts of foreign-language content is located in Vienna (*Okto TV*).

Since 2009, community radios and television providers are eligible for public funding under the non-commercial media fund. In 2019, some EUR 2.9 million were distributed among community broadcasters, of which EUR 1.96 million went to radio and EUR 0.91 million to television (KommAustria/RTR, 2019).

Finally, a wide variety of alternative and minority magazines and online media complement the Austrian media landscape. However, their finances are often in critical condition, and many depend on (limited) public subsidies. Again, KommAustria and RTR is in charge of the public funds established by law (KommAustria-Gesetz, 2021: para. 9i; Publizistikförderungsgesetz, 2021: para. 7). In 2019, some 73 journals and magazines were subsidised by a total of EUR 340,000 (2008: 93; EUR 361,000). Not all of these publications represent alternative or minority media.

Compared to 2009, progress has been made to institutionalise and fund alternative and minority media in Austria. There is a vibrant scene of small and medium-sized media, both online and offline, representing the cultural diversity in Austria. Nonetheless, deficits remain with regard to representation of disadvantaged people.

(E5) Affordable public and private news media

3 POINTS

All news media have moderate sales prices compared to the average income of Austrian households. Prices for cultural expenditures have remained stable, or have even been decreasing, over the past ten years.

In 2011
3 POINTS

The average disposable income of an Austrian household in 2018 was about EUR 36,322; the lowest 10 per cent had less than EUR 15,120, and the highest 10 per cent had EUR 78,580, which shows a heterogeneous income level (Statistik Austria, 2018). The latest consumer statistics about cultural aspects from 2014 and 2015 show that an average household spent about EUR 2,990 per month in total. The average amount for culture-related expenditures was EUR 104.7, radio and television licence fees were about EUR 15.7 per month, those for newspapers and news magazines were EUR 14.9 per month, and another EUR 37.8 were spent on communication devices (Statistik Austria, 2015). All expenditures in total have decreased by a quarter since 2009–2010, when EUR 140 per month were spent (Statistik Austria, 2015). This means that the average cost of mass media (print, radio, television, telecommunication) in Austria ranges between 0.7 and 2.6 per cent of total household expenditures.

The average copy price for a newspaper lies between EUR 1.20 and EUR 2.90 (single-copy sale) and has been increasing slightly compared to the past ten years (ÖAK, 2019: 14–35). Concerning broadcasting, every Austrian household with a reception device is subject to a compulsory licence fee established by the law. Only a part of the total amount of the licence fee is given to the public service broadcaster ORF, as some additional regional and national fees are deducted; therefore, its amount varies regionally. The monthly fee has been slightly increasing since 2010 and ranges from EUR 20.93 (Vorarlberg, Upper Austria) to EUR 26.73 (Styria); the average annual fee is about EUR 295.03 (compared to EUR 261.12 in 2010) (GIS, 2017). The broadcasting fee is lower if a household is only equipped with radio receivers. In addition, disabled people or low-income households can apply for reduction or remission of the licence fee.

Broadband availability has been increasing in Austria over the past 10 years, even in rural areas, where connecting households does not promise any profit for the company. Prices, however, remained stable or were even slightly decreasing: overall, Austrian households spent between EUR 26.60 (Internet only, up to 30

Mbits per second) and EUR 53.20 (Internet and television, over 100 Mbits per second) per month on Internet connections in 2018 (RTR, 2019a: 35).

Table 10 Average annual costs of different media, 2018 (compared with 2008)

	Average annual price (EUR)	% of household income (lower 10%)	% of household income (upper 10%)	% of average household income	% of average household income (2008)
Newspaper (subscription)	369.01	2.44	0.47	1.02	0.81
Newspaper (direct sale)	607.27	4.02	0.77	1.67	1.10
Radio (licence fee)	82.71	0.55	0.11	0.23	0.22
Television (licence fee, including radio)	295.03	1.95	0.38	0.81	0.77
Internet (broadband only, ≤ 30 Mbits per second)	319.20	2.11	0.41	0.88	1.00
Internet (broadband incl. TV, ≤ 30 Mbits per second)	420.00	2.78	0.53	1.16	1.13
Internet (broadband only, > 100 Mbits per second)	496.80	3.29	0.63	1.37	–
Internet (broadband incl. TV, > 100 Mbits per second)	638.40	4.20	0.81	1.76	–

Source: ÖAK, 2019; GIS, 2017; RTRa, 2019: 35; Statistik Austria, 201

(E6) Content monitoring instruments

1 POINT

Publicly available institutionalised and independent media monitoring instruments are rare in Austria.

IN 2011
1 POINT

Austria does not self-inspect its media content by default, and it never did. No publicly accessible media content monitoring is in place. The APA runs a commercial company, APA DeFacto, which collects all sorts of media content in their database, but access is restricted and analyses are sold to commercial customers. This database is highly useful for research purposes, but the company does not itself publish any research findings, apart from occasional rankings such as the representation of politicians in Austrian media (Who has been mentioned most often? Politikerranking).

The public service broadcaster ORF is obliged by law to publish an annual analysis of its programme (ORF-Gesetz, 2021: para. 7). These annual reports are produced internally by ORF and must be published on its website (latest report: ORF, 2019). It is very detailed with regard to legal programme and content obligations. It reports about the amount and share of European programmes

within the entire programming, according to EU legislation. Nonetheless, these reports focus on numbers, counting minutes and genres, and not on content and quality itself. This could only be done by external research.

Such content-related research on Austrian television has been commissioned and financed by the regulator KommAustria and RTR for several years (2007, 2008, 2010, 2012; the latest: Woelke, 2012), but were discontinued thereafter. These programme analyses included ORF channels, as well as private-commercial television channels (ATV, PULS 4, ServusTV).

In 2015, research efforts were undertaken to measure the quality of the Austrian media (Seethaler, 2015), but this research was limited to a single study. From 2019 to 2021, a tri-national comparative news content analysis in Austria, Germany, and Switzerland has been done by several university institutes in these countries, but results are not yet published (expected 2021).

Compared to 2009, there is even less media monitoring in Austria exercised by independent supervising bodies. The only systematic monitoring instrument is ORF's internal annual report.

(E7) Code of ethics at the national level

2 POINTS

The self-governed code of ethics for print media is well respected. For audiovisual and Internet-based media no national code exists (only company rules).

IN 2011
1 POINT

The Pressrat [Press Council], a self-governed organisation composed of journalists' associations, press companies, and trade associations released the most prominent code of media ethics. Almost all print media in Austria subject themselves to the council's code of ethics (with the notable exception of the two largest daily newspapers *Kronenzeitung* and *Heute*). Founded in 1961, the council was suspended between 2002 and 2010 due to unsettled internal disputes. Since its restoration, the Press Council examines complaints in three senates. In 2019, some 297 complaints were filed, of which 37 were considered to breach the code. Most cases concerned the boulevard daily newspapers *Österreich* (14 cases) and *Kronenzeitung* (9 cases) (Österreichischer Presserat, 2019). According to the council's rules, such violations of the code must be published in the respective media. 93 per cent of all journalists confirmed in 2019 that their employer medium respects this code (Kaltenbrunner et al., 2020: 198). This is remarkable, because the Press Council's code of ethics does not apply to audiovisual media or the Internet. For the latter media, no national code of ethics exists.

Most of our interviewees accepted the guidelines of the code of ethics and affirmed compliance with high ethical standards in their newsrooms, as they did in 2011 as well (Grünangerl & Trappel, 2011). Most of them even confirmed

that the norms of the code are often and regularly quoted in newsroom meetings, but not necessarily the code itself. This applies in particular to journalists and editors-in-chief of newspapers in our sample.

At the level of communication research, media ethics is a prominent field of activities in Austria. Since 2015, the Interdisciplinary Media Ethics Centre unites communication scholars and practitioners to discuss and consult on media ethics. The centre is based at the University of Klagenfurt (or Celovec).

Another association dedicated to the improvement of journalistic (ethical) standards is the Initiative für Qualität im Journalismus [Initiative for Quality in Journalism], which organises public discussions about ethical standards and quality in journalistic work.

Compared with 2009, codes of ethics are better networked into journalism practices, and after ten years, almost all print media today honour the work of the Austrian Press Council. However, there is not a national code of ethics for audiovisual and Internet-based media, let alone legally binding instruments.

(E8) Level of self-regulation

2 POINTS

Self-regulation occurs rather informally; institutionalised or codified rules and procedures are rare.

IN 2011
1 POINT

All Austrian news media provide a mission statement declaring their fundamental orientation, as required by the Media Act (Mediengesetz, 2021: para. 25). However, as the law does not contain any further instructions about the length and content of these mission statements, some news media keep them short and non-specific (e.g., *Kronenzeitung*, *Standard*, *Falter*). Many of them refer to the independence of the medium and its responsibility for democracy and human rights.

Interviewees confirmed that internal rules on reporting exist (one newspaper's editor-in-chief addressed them as "golden rules"), but most of them referred to some sort of informal and internal culture for self-criticism and newsroom standards. One respondent put the rule very simply: "The story must be true". Written compliance rules exist only in exceptional cases in private media, but undue behaviour by journalists is sanctioned by management according to house rules.

In contrast to these rather relaxed applications of self-regulation rules in the private sector, ORF journalists work under strict and codified internal rules, required by law. The internal code of conduct⁴ and the very detailed journalists' statute⁵ regulate rights, obligations, and standards of journalistic work. This includes strict compliance rules concerning the activities of leading journalists outside their ORF employment, refusal of presents and other benefits offered by

third parties, and so forth. Journalists are held to refraining from any activity that might create doubt about ORF's independence. An internal ethics council, comprising representatives of the management and journalists, settles disputes on the application of these rules.

Compared to 2009, the level of self-regulation has substantially improved for the public sector's ORF, but remained weak for all other media.

(E9) Participation

2 POINTS

IN 2011
1 POINT

Audience participation happens by posting comments online in some web-editions of newspapers and by analogue letters to the editor. Austrian newsrooms are not open to citizens' participation.

In the decade since 2009, appraisal and importance of user contact and participation have significantly increased. While ten years ago, letters to the editor and in some cases online postings were the only ways to contact newsroom members; in 2019, all respondents considered audience and user interaction as crucial success factors. One editor-in-chief (*Salzburger Nachrichten*), for example, travels to different locations within the footprint of his paper every second month, inviting citizens for a readers' evening. In another case, a newspaper entertains readers' panels of some 30 persons, giving feedback to the newspaper's content three times a year. It has become the normal procedure to run a social media team of up to ten members, exclusively looking after the various interactive online channels on digital platforms. One national newspaper (*Der Standard*) organised two waves of curated public dialogue sessions among readers in 2018 and 2019 ("Österreich spricht", "Europa spricht"). On a regular basis, newspapers also invite readers to critically discuss one of the editions of the previous week.

ORF television also invites about 200 viewers every second month in one of Austria's provinces to discuss programme matters. At the institutional level, ORF has created a "public value team" to establish sustainable relations with a wide variety of stakeholders in Austria. This team not only publishes annual "public value" reports and runs a website,⁶ but also organises events at the ORF premises, welcomes group visitors (such as schools), and pays visits to external events upon request. However, newsrooms remain closed for the public, and no standardised interaction takes place in the television studios. This latter attitude is also reflected in ORF radio, with very little interaction with listeners.

(E10) Rules and practices on internal pluralism

2 POINTS

Most Austrian newsrooms do not have codified rules on internal pluralism – public service television being the exception. Leading newsrooms are undertaking efforts to extend the range of voices represented by the media.

IN 2011
1 POINT

Compared with 2009, sensitivity for internal pluralism has increased. While ORF is legally obligated to represent all significant voices in society, private media follow their own preferences. Newsroom journalists in our sample confirm that the choice of experts and voices is repeatedly discussed, and in one case, a pool of experts is systematically set up together with a national university. Similarly, ORF television scouts for experts in various fields and provides them with specific training for how to perform in front of a camera. In addition, each journalist uses their personal contacts for gathering information.

However, most respondents admit that looking for new faces and voices regularly falls prey to constraints of time and tight editorial deadlines. Experienced experts know how to fulfil the expectations of journalists and make their life easier with quick responses.

Overall, diverse opinions remain welcome in Austrian newsrooms and are promoted by the editors-in-chief. Journalists are generally free to publish their work, with no internal interference, as long as their work falls largely within the mission statement of the media organisation.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog “control of the controllers”

2 POINTS

Self-observation by journalists in the media and public debates about journalism have increased. But apart from some independent initiatives, no systematic media observation is done in Austria.

IN 2011
2 POINTS

Controlling the (media) controllers is not particularly pertinent in Austria and has no tradition. Nonetheless, a few initiatives can be listed. Online-only initiatives on the issue of media content surveillance and control had been active in the past (e.g., *Krone-Blog* and *Medienschelte*) but have disappeared again. Currently, *Kobuk* is run by students of Communication Studies in the University of Vienna. This blog observes media coverage, most frequently by *Kronenzeitung* and *Österreich*.

A more professional media watch is exercised by the daily newspaper *Der Standard* in its online edition. There, the “*Etat*” section is dedicated to media and media business affairs and is a rich information source about media. A

subsection of that website is dedicated to authors from the field of communication studies reporting and commenting on communication affairs (“Ein Fall für die Wissenschaft”). Other newspapers also employ specialised journalists to report about media and communication, dedicating sections of the paper to these matters (e.g., *Salzburger Nachrichten*, *Kleine Zeitung*). Some magazines specialise in media issues, aiming at journalists as readers and discussing media economics, the functions and roles of media for society, or debates on journalistic ethics and standards (e.g., *Der Österreichische Journalist*, *Horizont*).

Furthermore, the crowd-funded hybrid-magazine *Dossier* specialises on investigative journalism and addressed the history, coverage, and governance of *Kronenzeitung* at the occasion of its 60th anniversary in 2019.⁷ In May 2017, ORF launched a monthly radio feature on media affairs and media politics, “#doublecheck”. This magazine-style radio broadcast addresses media and communication matters with a critical view.⁸ There is no corresponding format in television.

Regarding the code of ethics for print media, the Austrian Press Council continuously scrutinises violations based on complaints. In 2019, some 297 complaints were filed, of which 37 were considered to breach the code. Most of these cases concerned the boulevard daily newspapers *Österreich* (14 cases) and *Kronenzeitung* (9 cases) (Österreichischer Presserat, 2019) (see also Indicator E7 – Code of ethics at the national level).

Apart from such self-observing and self-regulatory initiatives by journalists and the media, there is no systematic media-performance monitoring institution in Austria.

(C2) Independence of the news media from powerholders 1 POINT

By law, journalists’ independence is protected, but ownership structures limit this freedom in practice.

IN 2011
1 POINT

Powerholders are present in Austrian news media primarily in two ways: on the one hand, the public service broadcaster ORF is institutionally bound with politics, and on the other, ownership of quite a number of news media is firmly tied to business interests. Although political parties no longer play a significant role as media owners (the conservative peoples’ party ÖVP owns one rather small regional newspaper, *Oberösterreichisches Volksblatt*), the largest parties recently started their own online media (*zur-sache.at*, *kontrast.at*).

The ORF-Act grants fundamental independence from powerholders to ORF (ORF-Gesetz, 2021: para. 32). Nevertheless, the close relationship to political parties and authorities becomes obvious in staff decisions taken by the board (*Stiftungsrat*), which is also in charge of appointing the director general (ORF-

Gesetz, 2021: para. 20; ORF-Gesetz: para. 22). Once in office, management and journalists are entitled to operate with full independence from political interests. The ORF television editor-in-chief confirmed the strict distance between politics and news reporting in day-to-day routines. Politicians sometimes try to intervene, but with no success. ORF news journalists are further protected by the journalists' statute, which clearly stipulates that journalists are fully independent in their editorial work (ORF, 2002: para. 2). Furthermore, ORF management must defend and protect journalists from any external intervention (ORF, 2002: para. 4).

In 2011, there were two important non-media institutions present in the Austrian media sectors: the Catholic Church (Katholischer Medien-Verein, Styria Media Group) and the financial service provider Raiffeisen Holding (*Kurier*, Verlagsgruppe News, *Profil*, Mediaprint, Kronehit, Sat1 Austria, etc.) (Grünangerl & Trappel, 2011). Since then, the soft-drink giant Red Bull (Red Bull Media House, ServusTV, *Servus in Stadt & Land*, *Red Bulletin*) has joined them. All three are active in various media sectors (book publishing, print, radio, television, online).

The high level of media ownership concentration (see Indicator E1 – Media ownership concentration national level and Indicator E2 – Media ownership concentration regional level) and the many interrelations between different media companies have some negative effects on journalists' employment (Kaltenbrunner, 2013: 109). It is more difficult for journalists to change from one media company to another if the same owners also control alternatives for journalists and management staff.

Our respondents, however, denied any direct impact of owners on journalistic daily routines. Concerning the daily journalistic practice, the chairman of the journalists' union admitted that attempts to directly influence journalists or newsrooms are sometimes made by politicians, but with little or no effect.

(C3) Transparency of data on leading news media

2 POINTS

Ownership structures are transparent online, but some important information on media and advertising markets is lacking.

IN 2011
1 POINT

Basic data on the Austrian media system, in particular on media legislation, are easily accessible online and provided by the Federal Chancellery. Furthermore, the administrative media authority KommAustria and RTR provides regular reports on developments in the Austrian media and telecommunications markets (see also Indicator E6 – Content monitoring instruments).

ORF is required by law to annually publish business reports containing information on its financial performance (ORF, 2019). Furthermore, since

2008, ORF publishes annually a report on the fulfilment of the public service mission (latest edition: ORF, 2019).

Private media companies are not obliged to publish their business results and refrain from doing so. Therefore, data on the advertising revenues of private media companies are not accessible to Austrian citizens. According to law (Mediengesetz, 2021: para. 24–25), all media companies must provide information on ownership as well as their fundamental orientation in their imprint. Most of them publish this information online, but ownership is often complicated and complex, with several subsidiary companies and shareholders. Although not widely and actively provided, media ownership information is transparent – with very few exceptions.

(C4) Journalism professionalism

2 POINTS

The share of higher education among journalists is increasing, but time and resources for professional journalism, as well as job satisfaction, are on the retreat.

IN 2011
2 POINTS

Journalism in Austria is a profession that requires no formal skills. Nonetheless, some 48.5 per cent of Austrian journalists were graduates of higher education in 2019. This is a considerably higher share than ten years ago (34%). Women outnumber men, with 58 per cent of female journalists being graduates and only 42 per cent of male journalists. Among graduates, almost one third (32%) has studied communication science or journalism, followed by political science (13%) (Kaltenbrunner et al., 2020: 250).

The chair of the journalists' union emphasised the fact that journalistic ethos and resources do not always match in Austria. He pointed out that resources for investigative journalism have been reduced over the years, and journalists complain about the lack of financial support. Furthermore, journalists report back to the union that the work load has continuously increased, and journalists are too exhausted to engage in further education to enhance professionalism. In a representative survey, nearly 49 per cent of all journalists indicated that they were only partly or not satisfied with their daily workload, and 51 per cent said they were only partly or little satisfied with the time available for investigative reporting (Kaltenbrunner et al., 2020: 253). Compared with 2008, job satisfaction decreased significantly: By then, 75 per cent were very satisfied with working times; 51 per cent could not complain about their daily workload; and 44 per cent were very satisfied with the amount of time they spent on investigation and research (Kaltenbrunner et al., 2008: 82).

(C5) Journalists' job security

2 POINTS

Journalists stay for a long time with their employers and are formally well protected by several laws. Economic pressures affect experienced journalists.

IN 2011
2 POINTS

Measured against the number of years journalists work for their employers, Austrian journalists enjoy high and growing job security. 41 per cent of all journalists work for more than 15 years at the same media company. In 2008, this share was substantially lower at 21 per cent (Kaltenbrunner et al. 2008: 145; Kaltenbrunner et al., 2020: 251). Another 36 per cent were employed by the same media company for five to ten years. Freelance journalism in the news field is not a widely common practice.

Journalistic jobs are safe also with respect to their professional convictions. The Media Act contains a clause of conscience protecting journalists from writing against their convictions (Mediengesetz, 2021: para. 2). Furthermore, the Journalists' Act includes special privileges and financial compensation for journalists in case of dismissal or termination of contract related to changes in ownership or the political orientation of the medium (Journalistengesetz, 2021: para. 8 & 11). In addition, there are several collective agreements for journalists.

However, the chair of the journalists' union pointed to the fact that more and more journalists of advanced age were retiring early, some on request (or "invitation") by their employers. The obvious reason is the considerably higher cost of experienced journalists compared with beginners. The union's chair argues that cost increasingly becomes more important than experience.

(C6) Practice of access to information

1 POINT

Although the Constitution guarantees freedom of information, the absence of a freedom of information act impedes access to public information and exacerbates journalistic work.

IN 2011
2 POINTS

In Austria, the European Convention on Human Rights has constitutional status. Therefore, freedom of information is granted to all citizens. Nevertheless, the Austrian Constitution, in article 20(3 & 4), also requires the discretion of all official institutions and federal or state-related authorities, unless law declares special rights and conditions of access. As a result, some information is subject to official secrecy. However, specific federal and regional laws regulate that requests to official institutions and authorities must be answered, to provide transparency in state administration (Auskunftspflichtgesetze). Albeit, observers consider the Austrian legal status with regard to public information unsatisfactory. In their study on media freedom, Berka and Trappel (2019: 92) draw the conclusion that rules for access to public information are outdated, and a new

law on information freedom is overdue. The Global Right to Information ranking, where Austria scored the lowest of all 128 countries in 2020, reinforces the relevance of this conclusion (RTI, 2020).

In practice, journalists expressed concern about access to public information, but admitted finding ways around the strict Austrian legal provisions. The chair of the journalists' union pointed out that the absence of a freedom of information act impedes the work of younger journalists more often than the work of more experienced colleagues with a well-knit network of informants, also within the administration. Journalist respondents unanimously demand the release of such a freedom of information act. Some complain that the European directive on data protection has made access to public information even more difficult, as this directive provides administrations with another strong argument to keep documents secret when in doubt.

(C7) The watchdog and the news media's mission statement

3 POINTS

IN 2011
2 POINTS

Significant value is attributed to the watchdog function of media in Austria.

There was unanimous agreement among respondents that investigative and watchdog journalism is essential for Austria's leading news media. Both public and private media companies agree that investigation is the first and noble duty of all journalists. Most of the respondents explained that in their media company and newsroom, investigative reporting is welcome and supported. Several media have established task forces for investigative journalism with members committed to investigate, and they receive financial resources and extra time, if necessary.

Indeed, over the last few years, a good deal of investigative reports have likewise attracted the attention of citizens and politicians. For example, before and after the publication of the infamous Ibiza-video in 2019 – compromising the moral integrity of the former vice-prime minister – journalists launched a series of fact-based accusations against FPÖ. Investigative reporting even managed to unite competing newsrooms in cooperation, publishing findings in a coordinated way.

So far, Austrian news media only occasionally participate in international networks, such as the International Consortium of Investigative Journalists,¹² which collaborate globally in operations such as *Offshore Leaks* and *Panama Papers*.

As much as investigative reporting is part of the self-definition of journalists and editors-in-chief, this end is almost inexistent in the mission statements of the media. But journalists confirm that investigation does not need to be codified

in Austria – it is self-evident. In a representative survey, journalists described the professional self-perception of their job in the first place to inform (93%), explain (91%), and reflect (88%), but in the second place to criticise (78%; share of respondents who agree totally or predominately; Kaltenbrunner et al., 2020: 253).

(C8) Professional training

2 POINTS

Supply of further education is abundant in Austrian newsrooms, but course attendance is not.

IN 2011
2 POINTS

As digital means are transforming the entire profession of journalism – from text creation to big data analysis – requirements for further professional training are obvious. The chair of the journalists' union confirmed the growing need for training, but observed that journalists attend less trainings than ten years ago.

The reason for this neglect is certainly not the supply side: Austria has two institutions providing further training for journalism, the Kuratorium für Journalistenausbildung [board of trustees for journalism training], and forum journalismus und medien [forum for journalism and media]. Both offer numerous courses of all sorts for skill and qualification development, including digital skills, and in the case of the board of trustees for journalism education, also a journalistic diploma. In addition, some provinces in Austria offer journalism training (e.g., Upper Austria), and ORF runs its own training centre for employees. Universities and other higher education institutions complement this already long list by offering further education courses in the field. As a result, more than half (51%) of all journalists are rather or very satisfied with their options for further education (Kaltenbrunner et al., 2020: 253).

However, participation in trainings requires time and money, and both are scarce in newsrooms, respondents confirmed. Most editors-in-chief, who must approve such trainings, are willing to second journalists, but demand is limited. In exceptional cases, young talents are even sent to prestigious journalism universities such as Columbia University. By law, there are no requirements for journalists to attend further education, and all educational measures are voluntary; in turn, there is no right to continuous training either. If journalists ask for it, financial support is not guaranteed, but it is quite prevalent in Austrian newsrooms.

(C9) Watchdog function and financial resources 2 POINTS

Austrian newsrooms are positive and try to provide resources for investigative reporting to the extent possible, but funds are strictly limited.

IN 2011
2 POINTS

According to our respondents, and compared to the research results from 2009, more staff and financial resources were invested in investigations in 2019, although figures are not disclosed by the media (and probably do not exist).

All journalists and editors-in-chief confirmed that resources are made available for investigations. In some media, this happens once a month on average; other media have one person permanently positioned to follow investigative research. Overall, however, funds are strictly limited, and teams are established and financed on an ad hoc basis. One journalist pointed out that investigative journalism at the regional level can take place anyway, and does not necessarily require substantially more funding.

Conclusions

The 2019 research on the three dimensions for this Media for Democracy Monitor shows some progress of the Austrian media compared with 2009. At that time, the aftermath of the economic crisis had affected the media and their economic performance. The following period of high-density digitalisation of all journalistic and editorial processes has transformed the media internally and exposed them to giant competitors such as digital platforms, in the form of search engines (Google) and interactive personalised services like Facebook and YouTube.

Surprisingly, this potentially devastating transformation has not caused much deterioration to the performance of the Austrian media. Apparently, the fierce economic battle for advertising money has been compensated for by lowering costs and unlocking alternative revenues. Austria's media moved towards more ownership concentration, but also towards more investigative reporting and even more gender balance among journalists. Nonetheless, this report again draws a mixed picture of the democratic implications of the Austrian media system. The grading has modestly improved compared with 2010. One reason is the distinct progress by ORF, with its ethics council, journalists' statute, and reporting system.

Freedom of information is formally secured by law in Austria. News are available at moderate cost, leading news media have effective measures in place to defend themselves against internal and external influence, and journalists are well protected against offline and online harassment. The gender gap still exists in the form of glass ceilings; however, equal pay and almost gender-balanced

numbers of journalists constitute major progress. The absence of a freedom of information act sets Austria back amongst democratic countries.

Equality and interest mediation are overshadowed by the ongoing and high-level media ownership concentration. However, below the group of dominating media conglomerates, a vibrant and active alternative media scene has grown, interestingly not primarily online, but rather as community media, radio, and television. Actually, legacy media successfully captured the online media field, thereby increasing ownership concentration even further. Nonetheless, internal pluralism is alive and actively defended by concerned journalists. The public broadcaster ORF is an important cornerstone in this respect.

The control function and investigative reporting by the media remains highly valued by Austrian journalists. The high professional ethos of Austrian journalists concerning independence from and control of powerholders is, however, contradictory to the historically developed close relationship between media and economic or political powerholders. Nonetheless, journalists are committed to investigative reporting, and recent contemporary history shows they are quite successful.

Overall, Austria's leading news media managed to keep their standards during this turbulent decade of unleashed digitalisation. Measured by our indicators, Austria's news media serve democracy fairly well.

Notes

1. <https://www.rtr.at/de/inf/RTROpenData>
2. The general limits are: worldwide revenue higher than EUR 300 million, national revenue more than EUR 30 million, or at least two companies with worldwide revenue higher than EUR 5 million. The revenues of media companies are multiplied by 200; those of media related companies by 20 (para. 9 (1) and (3) Kartellgesetz 2019/2005). Media diversity must be addressed in the acknowledgement of the merger (para. 10 (1) 2.) and mergers must be refused if media diversity loss is to be expected (para. 13). So far, no media merger was refused by *Bundeswettbewerbsbehörde*.
3. *Verlagsgruppe News* was obliged by the competition authority to guarantee the continued existence of *Profil* until 2006. This limit was exceeded and *Profil* and *Format* were both still produced in separated newsrooms until 2015. In 2016, *Format* merged with another title of *Verlagsgruppe News*, *trend*, and therefore ceased its existence by then.
4. Verhaltenskodex (<https://der.orf.at/unternehmen/leitbild-werte/verhaltenskodex/index.html>)
5. Redakteursstatut (<https://der.orf.at/unternehmen/leitbild-werte/redakteursstatut/index.pdf>)
6. <https://zukunft.orf.at/>
7. <https://www.dossier.at/dossiers/kronen-zeitung/>
8. <https://oe1.orf.at/doublecheck>

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Appendix

Table A1 Daily reach and market share of radio in Vienna, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	ORF	371,000	22.3	29
Ö1	ORF	198,000	11.9	12
Ö2 Radio Vienna	ORF	188,000	11.3	15
Kronehit	Mediaprint	170,000	10.2	10
Radio Arabella	Radio Arabella GmbH	110,000	6.6	8
Ö2 Radio NÖ	ORF	98,000	5.9	8
Radio Energy	NRJ Group	95,000	5.7	5
88.6 - so rockt das Leben	Radio Eins Privatradio	77,000	4.6	6
FM4	ORF	75,000	4.5	4
98,3 Superfly	Superfly Radio GmbH	28,000	1.7	1
Radio Austria / Antenne Salzburg / Antenne Tirol	Radio Austria GmbH	23,000	1.4	1
Ö2 Radio Burgenland	ORF	22,000	1.3	2
Total public (ORF)		796,000	47.8	67
Total private (AUT)		420,000	25.2	30
Total		1,064,000	63.9	–
Population 10+		1,665,000	–	–
CR 3 (channels)				56
CR 3 (companies)				88

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach, table only shows channels with reach > 1%

Source: RMS, 2019

Table A2 Daily reach and market share of radio in Lower Austria, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	ORF	613,000	41.1	39
Ö2 Radio NÖ	ORF	361,000	24.2	28
Kronehit	Mediaprint	212,000	14.2	10
88.6 - so rockt das Leben	Radio Eins Privatradio	118,000	7.9	6
Ö1	ORF	113,000	7.6	6
Ö2 Radio Vienna	ORF	90,000	6	5
Radio Arabella	Radio Arabella GmbH	72,000	4.8	3
Arabella NÖ (local)		46,000	8	–
Arabella Mostviertel (local)		41,000	10	–
FM4	ORF	37,000	2.5	2
Radio Energy	NRJ Group	31,000	2.1	1
Ö2 Radio Burgenland	ORF	19,000	1.3	1
Radio Austria / Antenne Salzburg / Antenne Tirol	Radio Austria GmbH	18,000	1.2	1
Ö2 Radio OÖ	ORF	15,000	1	1
Total public (ORF)		1,035,000	69.4	81
Total private (AUT)		407,000	27.3	21
Total		1,192,000	79.9	–
Population		1,492,000	–	–
CR 3 (channels)				77
CR 3 (companies)				97

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach,
table only shows channels with reach > 1%

Source: RMS, 2019

Table A3 Daily reach and market share of radio in Upper Austria, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	ORF	487,000	37.4	36
Ö2 Radio OÖ	ORF	339,000	26.0	29
Life Radio OÖ	Moser Holding	168,000	12.9	10
Kronehit	Mediaprint	160,000	12.3	7
Ö1	ORF	113,000	8.7	7
Radio Arabella OÖ	Radio Arabella GmbH	78,000	6.0	5
FM4	ORF	43,000	3.3	2
Ö2 Radio Salzburg	ORF	38,000	2.9	3
Welle 1 OÖ	Welle Salzburg GmbH & Co. KG	27,000	2.1	1
Ö2 Radio NÖ	ORF	26,000	2.0	1
Radio Austria / Antenne Salzburg / Antenne Tirol	Radio Austria GmbH	16,000	1.2	1
Total public (ORF)		867,000	66.6	75
Total private (AUT)		388,000	29.8	24
Total		1,048,000	80.5	–
Population 10+		1,302,000	–	–
CR 3 (channels)				75
CR 3 (companies)				92

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach,
 table only shows channels with reach > 1%

Source: RMS, 2019

Table A4 Daily reach and market share of radio in Salzburg, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	ORF	198,000	40.4	37
Ö2 Radio Salzburg	ORF	165,000	33.8	35
Radio Austria / Antenne Salzburg / Antenne Tirol	Radio Austria GmbH	56,000	11.5	11
Ö1	ORF	47,000	9.6	8
Kronehit	Mediaprint	26,000	5.4	3
FM4	ORF	16,000	3.2	2
Welle 1 Salzburg	Welle Salzburg GmbH & Co. KG	16,000	3.3	3
Klassik Radio Salzburg	Klassik Radio AG (DE)	11,000	2.2	1
Radio Energy Salzburg	NRJ Group	9,000	1.8	1
Ö2 Radio OÖ	ORF	7,000	1.5	2
Total public (ORF)		351,000	71.8	81
Total private (AUT)		99,000	20.3	18
Total		394,000	80.5	–
Population 10+		489,000	–	–
CR 3 (channels)				83
CR 3 (companies)				95

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach,
table only shows channels with reach > 1%

Source: RMS, 2019

Table A5 Daily reach and market share of radio in Burgenland, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	ORF	106,000	40	36
Ö2 Radio Burgenland	ORF	84,000	31.7	33
Kronehit	Mediaprint	35,000	13.4	9
88.6 - so rockt das Leben	Radio Eins Privatrado	23,000	8.7	7
Ö1	ORF	21,000	7.9	5
Antenne Steiermark	Antennte	12,000	4.5	3
Ö2 Radio Steiermark	ORF	11,000	4.2	4
Ö2 Radio Vienna	ORF	10,000	3.8	4
Ö2 Radio NÖ	ORF	9,000	3.3	3
FM4	ORF	7,000	2.6	1
Radio Arabella	Radio Arabella GmbH	4,000	1.6	1
Total public (ORF)		190,000	72	83
Total private (AUT)		67,000	25.5	18
Total		216,000	81.8	–
Population 10+		264,000	–	–
CR 3 (channels)				78
CR 3 (companies)				99

Comments: Population 10+ (national: 7,834,000, n = 22,141)

* daily listeners in per cent of local population, sorted by daily reach, table only shows channels with reach > 1%

Source: RMS, 2019

Table A6 Daily reach and market share of radio in Styria, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö2 Radio Stmk.	ORF	379,000	34.2	36
Ö3	ORF	372,000	33.5	30
Antenne Steiermark	Styria	224,000	20.2	19
Ö1	ORF	115,000	10.4	7
Kronehit	Mediaprint	96,000	8.7	5
Soundportal	Soundportal Graz GmbH.	42,000	3.8	3
FM4	ORF	31,000	2.8	2
Radio Grün-Weiß	Radio Grün Weiß GmbH.	23,000	2.1	2
Ö2 Radio Burgenland.	ORF	13,000	1.2	1
Total public (ORF)		731,000	65.9	73
Total private (AUT)		352,000	31.7	29
Total		901,000	81.2	–
Population 10+		1,109,000	–	–
CR 3 (channels)				85
CR 3 (companies)				97

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach, table only shows channels with reach > 1%

Source: RMS, 2019

Table A7 Daily reach and market share of radio in Carinthia, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö2 Radio Kärnten	ORF	218,000	43.4	48
Ö3	ORF	166,000	33.1	25
Antenne Kärnten	Styria	120,000	23.8	19
Ö1	ORF	42,000	8.3	4
Kronehit	Mediaprint	34,000	6.8	3
FM4	ORF	11,000	2.2	1
Welle 1 Kärnten	Welle Salzburg GmbH & Co. KG	10,000	1.9	1
Ö2 Radio Steiermark	ORF	8,000	1.5	1
Total public (ORF)		359,000	71.3	77
Total private (AUT)		153,000	30.5	24
Total		431,000	85.7	–
Population 10+		503,000	–	–
CR 3 (channels)				92
CR 3 (companies)				99

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach,
 table only shows channels with reach > 1%

Source: RMS, 2019

Table A8 Daily reach and market share of radio in Tyrol, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö3	ORF	235,000	35.4	32
Ö2 Radio Tirol	ORF	177,000	26.6	26
Radio U1 Tirol	U1 Tirol Medien GmbH	84,000	12.7	13
Kronehit	Mediaprint	74,000	11.2	8
Life Radio Tirol	Moser Holding	68,000	10.2	8
Ö1	ORF	55,000	8.3	6
FM4	ORF	21,000	3.2	2
Radio Austria / Antenne Salzburg / Antenne Tirol	Radio Austria GmbH	15,000	2.3	1
Radio Osttirol (local)	Radio Osttirol GmbH	10,000	23.4	-
Klassik Radio Tirol	Klassik Radio AG (DE)	8,000	1.2	1
Total public (ORF)		416,000	62.5	65
Total private (AUT)		225,000	33.9	32
Total		665,000	80.4	-
CR 3 (channels)				71
CR 3 (companies)				86

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach,
table only shows channels with reach > 1%

Source: RMS, 2019

Table A9 Daily reach and market share of radio in Vorarlberg, 2019

	Associated media company	Daily reach (projection to total population)	%*	Market share (%)
Ö2 Radio VBG	ORF	115,000	33.2	36
Ö3	ORF	93,000	27	24
Antenne Vorarlberg	Russmedia	86,000	24.9	23
Kronehit	Mediaprint	28,000	8	5
Ö1	ORF	24,000	7.1	4
FM4	ORF	12,000	3.6	2
Total public (ORF)		206,000	59.7	66
Total private (AUT)		108,000	31.2	28
Total		272,000	78.8	–
Population 10+		345,000	–	–
CR 3 (channels)				83
CR 3 (companies)				94

Comments: Population 10+ (national: 7,834,000, $n = 22,141$)

* daily listeners in per cent of local population, sorted by daily reach, table only shows channels with reach > 1%

Source: RMS, 2019

FINLAND

Sustaining professional norms with fewer journalists and declining resources

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Kari Karppinen, & Hannu Nieminen

Introduction

Finland is a small, affluent country with a population of 5.5 million people, characterised by political, socioeconomic, and media structures typical of the Nordic welfare model (Syvertsen et al., 2014). The small size of its media market, together with a distinct language area, contributes to a relatively concentrated media system in the country with well-integrated professional norms and a high reach of the main national news media organisation.

As per Hallin and Mancini's (2004) categorisation, the Finnish media system is considered to represent the democratic corporatist model. Historically, characteristics of the model include strong state intervention, reconciled with well-developed media autonomy and professionalisation. Alongside other Nordic countries, the system has also been characterised with the label media welfare state, whose distinct features involve communication services as universal public goods, institutionalised editorial freedom, cultural policy extending to the media, and a tendency to choose policy solutions that are consensual, durable, and involve cooperation between both public and private stakeholders (Syvertsen et al., 2014: 17; see also Karppinen & Ala-Fossi, 2017). In international assessments, Finland has repeatedly ranked as one of the top countries for media freedom and democracy. Politically, Finland is considered a parliamentary republic with "free and fair elections and robust multiparty competition" (Freedom House, 2020).

Freedom in the World 2021: status "free" (Score: 100/100, stable since 2017) (Freedom House, 2021). Finland is one of the only three countries to receive a perfect score of 100 (Repucci, 2020).

Liberal Democracy Index 2020: Finland is placed in the Top 10% bracket – rank 7 of measured countries, up from 20 in 2016. Finland has reached close to top scores in the liberal, egalitarian, and deliberative aspects of democracy, although with a somewhat lower rank (25) in the dimension of participatory democracy (Varieties of Democracy Institute, 2017, 2021).

Freedom of Expression Index 2018: rank 8 of measured countries, considerably up from 26 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 2 of 180 countries, up from 4 in 2018 (though ranked 1 from 2013–2016). Finland has a strong legal, institutional, and structural basis for free media and journalism (Reporters Without Borders, 2020).

The Finnish news media landscape is diverse in relation to the size of the market, including a high number of regional and local newspaper titles, a strong public broadcaster (Yle, with 45% share of television viewing and 52% of radio listening), domestic private broadcasters, and some emerging digital news outlets. Despite the high number of newspapers and magazines published in Finland, the market is concentrated, with a few major companies (e.g., Sanoma and Keski-suomalainen as the largest publishers) controlling the majority of the market. Additionally, most regional and local markets are dominated by one leading newspaper, with little direct competition. Media ownership concentration, as a result, has been noted as one of the main risks to media pluralism in Finland in the EU Media Pluralism Monitor reports (Manninen, 2018).

Legacy news media also dominate the list of most visited online news sites, led by two competing tabloid newspapers (*Iltalehti* and *Ilta-Sanomat*), public broadcaster Yleisradio Oy (Yle), and the national daily newspaper *Helsingin Sanomat* (*HS*), each with a monthly reach of over three million visitors.

Despite stability in the main institutions, in the last ten years, digital disruption in the media market has significantly impacted the Finnish media landscape. In particular, circulation of newspapers and magazines has continued to decline throughout the 2010s. A few major outlets, such as *HS*, have found success in increasing their total readership and gaining new digital subscribers, but overall, less than one-fifth of the adult population paid for online news in 2019 (Newman et al., 2019). The total amount of media advertising revenue has remained at the same level since 2010, but the publishing sector's share (newspapers and magazines) has declined from over half to only a third. The share of online advertising has increased from 16 per cent to 35 per cent, with global giants Google and Facebook now controlling over half of all digital advertising (Ala-Fossi et al., 2020: 18).

As a result of declining circulation and advertising revenues, the total number of employees working for the media industry has been reduced by about a fifth in the last decade, with reduction focused on publishing, television, and radio in particular (Ala-Fossi et al., 2020: 14). According to some estimates,

the number of active journalists in Finland has been reduced by as much as a third since 2010.

The journalistic culture in Finland is characterised by a strong professional ethos and an established self-regulatory system, organised around the Council for Mass Media (CMM), which represents all main interest groups and oversees the commonly agreed upon ethical codes. The overwhelming majority of journalists are also members of the Finnish Union of Journalists (UJF), and according to studies, journalists continue to share a rather uniform commitment to core professional norms (Pöyhtäri et al., 2016). In the *Reuters Institute Digital News Report 2019* (Newman et al., 2019), Finnish news media remain the most trusted among all countries included.

Covid-19

At the onset of the Covid-19 pandemic in the spring of 2020, interest in news and journalism significantly increased. In the early stages of the crisis, the number of visitors to websites of main national news outlets was as high as double the normal traffic, and even after that, the demand for news has remained higher than in the normal times. Many outlets have also reported an increase in digital subscriptions by up to 20 per cent.

According to a survey of citizens' trust in various information sources during the pandemic, mainstream news media – and public service media in particular – remained the most preferred and trusted news source for most citizens (Matikainen et al., 2020).

On the other hand, advertising revenue dramatically declined during the crisis. According to a Finnish UJF and Finnish Media Federation (Finnmedia) survey, commercial media organisations have seen a decline of at least one-third and possibly up to 50 per cent in advertising, with print and local newspapers and local radio suffering the most. Over half of all newspapers laid off employees, and a handful of local papers also suspended publication altogether during the crisis (Grundström, 2020).

In response, the Ministry of Transport and Communication sought to support journalism during and after the crisis, and commissioned a report towards this end. It was authored by a former chair of CMM, including proposals for both short-term and long-term support (Grundström, 2020). In a supplementary budget proposal in June 2020, the government endowed EUR 5 million and EUR 2.5 million, respectively, to support journalism and news agencies. While the need for short-term support is less contested, the idea of more permanent support to journalism has been a more divisive issue within the industry. Unlike other Nordic countries, Finland practically abandoned all direct press subsidies since the 1990s, apart from minor support to minority and cultural

outlets. While industry actors have generally preferred indirect subsidies, such as reduced value-added tax, issues pertaining to direct subsidies and other support mechanisms are now back on the media policy agenda.

Leading news media sample

In addition to general observations based on statistical data and existing research, six Finnish news media organisations, representing different sectors and ownership, were selected for closer analysis and interviews. For each news organisation, the editor-in-chief and one other member of the newsroom were interviewed. The sample media included one national, one regional, one local, and one tabloid newspaper, as well as the leading public and private broadcasting companies. The selected news media organisations remained the same as in the 2011 Media for Democracy (MDM) report (Karppinen et al., 2011), except the local newspaper *Borgåbladet* has since then merged with another local paper into a new brand, *Östnyland*, and the Nordic telecom company Telia now owns the commercial broadcaster MTV3. In addition to editors and journalists, we interviewed the directors of the Finnish Union of Journalists (UJF) and the Finnish Media Federation (Finnmedia). In total, 14 interviews were conducted, with four women and ten men among the interviewees.

Table 1 News media sample and interviewees

	Interviewees	Media type	Ownership
HS	Editor-in-chief; one newsroom journalist and editor	Daily newspaper	Sanoma Group
Turun Sanomat	Editor-in-chief; one newsroom journalist	Daily regional newspaper	TS Group
Iltalehti	Editor-in-chief; one newsroom journalist	Tabloid newspaper	Alma Media
Östnyland	Editor-in-chief; one newsroom journalist	Local newspaper (Swedish language)	Konstsamfundet (foundation)
YLE	Editor-in-chief, news and current affairs; one journalist	National Public Service Broadcaster	Public Service Broadcaster
MTV3	Editor-in-chief, news and current affairs; one journalist	Commercial broadcasting	Telia
UJF	President		
Finnmedia	CEO		

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

Despite significant changes in the delivery of news, the mainstream news media is accessible throughout the country without any major regional divides.

IN 2011
3 POINTS

Newspapers, broadcast, and online services are still widely available nationwide. Although the reach of printed newspapers has been declining, the combined weekly reach of both printed and online papers continues to remain very high, at 92 per cent (Reunanen, 2019). Most newspaper sales are still based on subscription and home delivery, but early-morning delivery is now available only for 8 per cent of total volume of newspapers, which is about 10 percentage points less than in the 2011 MDM study. The total number of newspapers (176) has declined by almost 15 per cent since 2008, while the number of dailies (40) has declined by more than 20 per cent. Now, there are at least two regional centres without their own newspapers.

Besides printed dailies and their online editions, there are also two remarkable digital daily papers with no print edition, *Taloussanomat* (economic news section of *Ilta-Sanomat*) and *Uusi Suomi*. Most of the other newspapers – mainly local publications – are also present online. However, the amount of free online content has declined, as most publications sell their content with digital subscriptions and paywalls; for example, at the moment, two-thirds of *HS* subscribers pay for their digital content. Only afternoon papers *Ilta-Sanomat* and *Iltalehti* offer their content online for free. Consequently, their online versions now have more readers than print.

The original plan was that the first generation of digital terrestrial network television (DVB-T), with 99.96 per cent technical reach, would be shut down and replaced with the second generation of DVB-T in March 2020; however, that was delayed due to a legal dispute. The new nationwide network was completed by June 2020, but the date of the switchover has not yet been set. Over 80 per cent of television-owning households already have DVB-T2 compatible receivers. The number of free nationwide television channels (18) has almost doubled in ten years since 2008. The growth of pay television has stalled to one quarter of households, while satellite television has declined to only 3 per cent. The share of cable and Internet Protocol Television (IPTV) households has also increased over 10 percentage points to 60 per cent (Ala-Fossi et al., 2020).

In 2020, there are altogether 18 nationwide or at least semi-national private radio channels and 53 regional or local private stations. However, the total

number of private licence-holders has decreased to 29, mostly because of changes in frequency allocation as well as ownership concentration. Meanwhile, Yle, Finland's national public broadcasting company – with a legal obligation to provide equal services on a nationwide basis – has six radio channels with at least 50 per cent population coverage, meaning that in most areas, people can choose between 15 to 20 analogue FM radio stations (Ala-Fossi et al., 2020).

Online television viewing now has about 3 per cent share of the weekly reach among the total population, and it is about 7 per cent of the total viewing time. At the same time, both the daily and weekly reach of television is declining (Ala-Fossi et al., 2020). The online audio and video service of national public media, *Yle Areena*, is still the most extensive and increasingly popular online television and radio service, with a growing amount of online-only content. The main commercial broadcasters provide both free and premium content online.

Interestingly, only 5 per cent of households in Finland are still completely without Internet connection. Within less than ten years, mobile broadband has become so popular that 92 per cent of households are using it, and for 41 per cent, it is their only Internet connection. In addition, the monthly use of mobile data per subscription is the highest in the world (19.39 gigabyte). The minimum speed of universal service broadband available for all households nationwide was doubled to two megabits per second in 2015, and it will be raised to five megabits per second by a government decree in 2021 (Ministry of Transport and Communications, 2021). Fast, 30 megabits per second fixed broadband is already available in 73 per cent of households, but only 29 per cent use it (Ala-Fossi et al., 2020).

(F2) Patterns of news media use (consumption of news) 3 POINTS

IN 2011
2 POINTS

Consumption of traditional media and supply of news content are slowly declining, but in cross-national comparison, the mainstream news media still reach a very high proportion of the population in Finland. News is more highly valued in times of crisis.

The Finnish public has traditionally been quite well informed. Most Finns still consume news media at least on a weekly basis, but the overall reach of news has slightly declined during recent years – especially, the reach of printed newspapers and traditional television has declined. However, in Finland, the online services and applications of traditional media are still followed by 76 per cent of the respondents, which is more than in Sweden (72%) or Norway (71%) (Reunanen, 2019: 7–8). In addition, the Covid-19 pandemic in the beginning of 2020 has increased people's interest in news and current affairs programming, especially television (Matikainen et al., 2020; Koppinen, 2020).

Table 2 Daily reach of different media, 2018 (per cent)

Media	All	Male	Female	10–24	25–44	45–59	60–69
Newspapers (printed)	40	41	39	23	28	47	63
Newspapers (online)	56	57	55	40	58	61	58
Television	77	77	77	61	75	84	83
Radio	58	61	54	37	54	65	70
Internet	90	89	92	88	91	92	89

Source: Statistics Finland, 2020a

Similar to a decade ago, the main evening news broadcasts of public service broadcaster Yle and commercial MTV3 continue to be among the most-watched programmes on television. The average total reach of *Yle News* is nearly 2.5 million viewers (Finnpanel, 2020a). However, unlike before, only the three Yle channels and MTV3 now provide broadcast television news – all the other television channels have either abandoned news production or they have never been obligated to provide any news. Despite a small decline, *Yle Radio Suomi* continues to be the most popular radio channel, with 31 per cent share of total listening. It still broadcasts regular hourly news bulletins, which, however, are a bit shorter than those it broadcasted earlier (Finnpanel, 2020b; Yle, 2016).

Perhaps the most dramatic change in media use since the 2011 MDM report has been the collapse of print newspaper readership. In 2008, the leading newspaper *HS* still had a circulation of 400,000 copies and about 950,000 daily readers. Ten years later, the print circulation was only 221,000 copies with 562,000 daily readers. This shows a 40 per cent decline within ten years (Statistics Finland 2020b). However, *HS* is an exception, because since 2017, it has been able to increase its total readership 26 per cent with all-digital subscriptions. Other newspapers are also gaining digital subscribers, but this is lower in proportion to the loss they suffer from readers of print editions (Hartikainen, 2020). The combined weekly reach of newspaper content on all platforms is still quite high (92%), while the weekly reach of printed newspapers is just 12 per cent (Reunanen, 2019).

The five most-popular websites in Finland are still exactly those that were popular in 2011, although their respective order, as well as the methodology of measurement, has changed. Tabloid newspapers with free online content are still the two most-popular news websites, with over 3.8 million monthly visitors. In December 2019, public service *Yle news* and current affairs were seen to be slightly more popular than *MTV3 News* and the *HS* website (FIAM, 2019). At present, the Internet is the main source of news for everyone between the ages 45–54 years and younger. Among people over 55 years of age, television is

still the main source of news, while printed newspapers are important to many people over 65 years old (Reunanen, 2019).

Table 3 Top twelve Finnish news websites, December 2019

Website	Visitors per month	Rank among all websites
Ilta-Sanomat	3,835,746	1
Iltalehti	3,833,883	2
Yle News and current affairs	3,554,120	3
MTV News	3,406,656	4
HS	3,312,955	5
Kauppalehti	1,896,957	10
Aamulehti	1,569,301	11
Talouselämä	1,088,945	21
Kaleva	1,080,538	22
Maaseudun Tulevaisuus	827,248	25
Uusi Suomi	797,507	26
Satakunnan Kansa	786,717	28

Source: FIAM, 2019

(F3) Diversity of news sources

2 POINTS

IN 2011
2 POINTS

The role of syndicated content from the national news agency is diminishing, while the influence of public relations material and recycled content from other media outlets is increasing.

The position and role of the Finnish News Agency (STT) as a national news provider has fundamentally changed since the 2011 MDM report was published. At least 31 media companies still jointly own the agency; however, now the Sanoma Group owns a majority of the shares at 74.42 per cent. Although public broadcaster Yle has returned to be an STT subscriber after a parliamentary decision, it still runs an in-house news service for its own purposes. The two smaller news services – UP News Service, with social democratic roots, as well as Startel, owned by the Sanoma Group – still exist. The leading news media also follow the main international news agencies, like earlier.

In our interviews, several editors-in-chief of leading national news media organisations shared that they were now using less STT content or were using it mainly for more limited purposes than earlier. Meanwhile, the tabloid newspaper *Iltalehti* stopped using STT completely, arguing that the quality of journalistic work has since improved due to more engaging reporters:

Iltalehti does not use STT anymore. They realised the telegram-like information provided was generally on a very basic level. *Iltalehti* performs better on its own, and leaving STT has not been detrimental in any way. Now, the reporters have to work more hands-on and find their own information, thereby improving the standards of reporting on the whole. (IL journalist, 2020)

The reduced interest in using STT is a tendency that already existed even a decade back, and perhaps reached a visible peak by 2015, when *HS* also quit its subscription to STT text services. After Sanoma Group acquired the majority of STT shares in 2018, *HS* returned to subscribe to the service; however, it is now using it as an alarm system rather than a content provider:

Yes, we have several international news providers and STT is used within Finland. *HS* also works on the serving end of syndication, providing material for others. Sanoma owns a large part of STT, which needs to exist, so Sanoma keeps it alive, not so much for profit but for the importance of having it around (HS editor-in-chief, 2020).

The use of STT content has decreased also because of growing newspaper ownership concentration and increasing content interchange between newspapers of the same owner (Pernu, 2020). This tendency, as well as the increasing influence of public relations material, was well recognised already at the time of the 2011 MDM report. However, resources for in-house newsgathering have since been continuously decreasing. The problem is now becoming more serious, as Finnish online journalists are no longer able to use reliable sourcing practices and meet the expectations of young adults, who expect their online news to be always verified (Manninen, 2019).

In recent years, the network of national and foreign correspondents of leading news media organisations has been shrinking. For example, *HS* had six domestic offices in 2009, and now has only four. STT had two regional domestic offices in 2015, but now it relies just on a network of freelance correspondents. STT has also withdrawn its foreign correspondents from everywhere except Brussels. MTV3 has cut down on both the number of regional offices as well as foreign correspondents – currently, it has four foreign correspondents. Meanwhile, *HS* has a total of eight foreign correspondents, and one of those positions is rotated from one country to another on an annual basis (Hoikkala, 2014). However, Yle's network of 25 domestic offices and nine permanent foreign correspondents remains the same despite the cuts in its annual budget (Yle, 2014).

In 2020, *HS* started to publish selected stories translated from *The Wall Street Journal*. The purpose of this was to complement the reporting on American presidential elections. The longstanding trend of increasing editorial cooperation and syndication within Finnish newspaper chains has become even more visible after Sanoma Group bought all *Alma Media* regional newspapers in February 2020. *HS* has been publishing a growing number of *Aamulehti* content, and

vice versa. This reorganisation also meant that *Aamulehti* and *Satakunnan Kansa* were going to end their cooperation with Lännen Media, a joint content production company of eleven regional newspapers.

The latest phenomenon is probably content cooperation between independent local and national news outlets. *HS* has been publishing local content from *Kauhajoki-lehti*, while *Ylä-Satakunta* will start publishing Yle content on its website. A recent study on the diversity of media content provision described the Finnish development to be quite alarming, as the number of media outlets is decreasing at the same time media concentration of outlets is increasing (Ala-Fossi et al., 2020).

(F4) Internal rules for practice of newsroom democracy 2 POINTS

Finnish journalists seem to have a relatively high level of autonomy in their daily work, but any formal structures or practices supporting internal democracy are not common.

IN 2011
2 POINTS

The journalistic culture, as well as the organisational structures and practices in leading news media organisations in Finland has remained the same as in the early 2010s, when the previous report was published. The editors-in-chief and experts emphasised the individual autonomy of journalists in choosing and framing news topics.

The ethical rules of journalism in Finland have been collected into Guidelines for Journalists published by the CMM, which is a self-regulatory organisation of the Finnish publishers and journalists. Most respondents also referred to these guidelines, stating, “The journalist is entitled to refuse assignments that conflict with the law, his/her personal convictions or good journalistic practice” (CMM, 2014).

As in the 2011 report (Karppinen et al., 2011), impartiality and autonomy are on a general level documented in codes of ethics and editorial guidelines. In practice, they are ensured more effectively through journalistic culture and professional norms, rather than written guidelines. A newsroom council does not have a formal status in any of the selected media outlets, and the board of directors or the management normally appoints editors-in-chief and other leading positions, without any requirement to incorporate journalists’ input. However, if there is serious lack of confidence between the editor-in-chief and the journalists, it is possible that the journalists may march out and make their opinion heard in that way:

Reporters cannot affect the selection of an editor-in-chief. Should there be a really incompetent editor-in-chief, if necessary, they can march out to demand having him relegated from his position. (IL journalist, 2020)

(F5) Company rules against *internal* influence
on newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

The autonomy and independence of the newsroom remains a central value in Finnish journalistic culture.

The principle of journalistic autonomy is a cornerstone of the ethical guidelines for journalists by CMM. Following that, rule 2 requires that “decisions concerning the content of media must be made in accordance with journalistic principles. The power to make such decisions must not, under any circumstances, be surrendered to any party outside the editorial office” (CMM, 2014). The current wording of this rule, from 2014, is even stricter than the previous one from 2005. As it was a decade ago (Karppinen et al., 2011), all the leading news media organisations are committed to these guidelines, and according to the interviews with the UJF as well as editors-in-chief, the principle of journalistic autonomy continues to enjoy high esteem not only among journalists, but even among the publishers and owners of media companies.

In the previous MDM report, there was some evidence of a growing tendency to combine the posts of the editors-in-chief and publishers. However, it seems that the experiment did not turn out to be successful, as all the papers in the sample that tried this kind of arrangement have abandoned it by now. Already in 2013, the board of Sanoma Corporation nominated a new editor-in-chief for *HS*, who was allowed to concentrate on journalistic decisions. Meanwhile, *Borgåbladet* was merged with *Östra Nyland* in 2015, and the editor-in-chief of the new paper *Östnyland* was also the head of news, but no longer the publisher. Since 2018, *Iltalehti* has had a separate publisher and two editors-in-chief: one for news and another for feature content.

The practical organisation of the separation of the newsroom from the ownership largely depends on the type of media organisation in question. In some cases, such as the commercial broadcaster MTV3, the separation is explicitly mentioned in the company values or other formal documents. In many cases, however, there are no formal rules on the separation of the newsroom from the management, outside of the general professional code of ethics (as was the case in 2011; see Karppinen et al., 2011).

There is usually no formal representation of journalists on the board of media companies – of the sample media corporations, none except Yle had journalists on the board. Although the board nominates the editor-in-chief without any formal input from journalists, in practice, the editor-in-chief must have the confidence of the journalists to be successful. Advertising departments are generally strictly separated from the newsroom and do not interfere with journalistic work. However, in case of the local newspaper examined, the small number of interviewees made it evident that there was contact and some cooperation between the newsroom and the advertising department:

The advertising sales staff sits in the same room, so there are communications going on. The advertisers might say, “There is a new car sale store opening soon” (... hoping we would cover it). There is a small collaboration going across the borders but no pressure, it’s informal. I have no memory of advertisers influencing the newsroom. (ÖN editor-in-chief, 2020)

The independence of the state-owned public service media Yle has been a permanently contested question in terms of both organisational structure and individual news items. This has been happening since at least 1948, when a new law, “Lex Jahveti”, was introduced that transferred the company from de-facto government control to parliamentary control. The independence from the government and political parties was emphasised on all levels of the legal definitions, company values, and internal editorial guidelines of Yle. This system was put to the test in 2015, when a newly elected right-wing government wanted to reconsider the funding and remit of Yle, which had been agreed in the parliament only two years earlier (Karppinen & Ala-Fossi, 2017). After a new parliamentary working group (Satonen group) was able to reach a new consensus in 2016, most of the political pressure on Yle was relieved. However, later in the same year, Prime Minister Juha Sipilä ended up in a dispute with *Yle News* over a single news story, which was then scaled back (see Indicator F6 – Company rules against *external* influence on newsroom/editorial staff). As a result, CMM gave Yle a reprimand for breaking the code of conduct for journalists in Finland (Yle, 2017).

(F6) Company rules against external influence
on newsroom/editorial staff

2 POINTS

IN 2011
2 POINTS

Direct influence by external parties on newsroom decisions is still not seen as a major problem.

Similar to the previous study in 2011, all editors-in-chief interviewed insisted that journalistic work was not interfered with by individual advertisers or any other external parties. However, this was by no means because there would not be any attempts to influence journalistic decisions, but because the firewalls were in place and external influence was determinedly rejected. The editors-in-chief may feel pressure, but they gave assurances that it stopped there. According to representatives of leading commercial news media houses, in general, both advertisers and politicians know the extent to which they can influence a newsroom. There have been some difficult cases in the past, but both the times and people are not the same as before.

The funding system of public service broadcaster Yle was reformed in 2013 by replacing the licence-fee system with a special public broadcasting tax. In

addition to creating a system with lower fees and a larger pool of payers, the designers of the reform attempted to further insulate Yle from the state, financially speaking. Introducing an automatic annual index raise to keep the level of income steady, instead of annual government proposals for parliament decisions, was expected to achieve this. In 2014, the tax model turned out to be at least as vulnerable to budget pressures as the licence fee, as the index raise was granted only once in the first year (Karppinen & Ala-Fossi, 2017).

This ongoing struggle over the fair level of Yle financing was the context of the so-called *Sipilagate* in late 2016, when Yle published a news story about how a contract was awarded by a state-owned mining company to one owned by relatives of Prime Minister Juha Sipilä. This bothered him so much that he sent a series of oppressive emails to both the journalist who had written the story as well as to the editor-in-chief of *Yle News*, Atte Jääskeläinen. Very soon, three journalists resigned from Yle because they felt their editor-in-chief had let them down under pressure from the prime minister (Koivunen, 2017).

Jääskeläinen retained his position through this crisis, but he was forced to resign about five months later, after another public row over a relationship of Yle journalism and CMM. Even the CEO of Yle, Lauri Kivinen, renounced his position prematurely in 2018. *Sipilagate* compelled Yle to create more clear internal rules and processes to improve integrity of journalistic work. Additional protection against external pressure was considered necessary, as something like this could potentially occur again. According to the new editor-in-chief of *Yle News*, it also seems to have taught Finnish politicians a lesson about how to not interfere in Yle journalism.

The Administrative Council are a colourful group and they try to influence the news production at times but the firewalls hold strong [...] there was a long time of silence after Sipilagate, when it seemed nobody [of the politicians] had dared to comment [on their work] with a risk of feeling that they were leaning on the editor. Of course, while the editor-in-chief should be given feedback where necessary, it should be directed to him, *not* directly to the reporters. Nowadays the situation has normalised. (Yle editor-in-chief, 2020)

(F7) Procedures on news selection and news processing 2 POINTS

Despite radical reforms of strategy for news production and distribution, the ways of processing and selecting the news have not yet been revolutionised.

IN 2011
2 POINTS

Over the past decade, the leading Finnish news media organisations have radically reformed their strategic thinking about news production and distribution. Most newspapers, including *HS*, have abandoned broadsheet format for tab-

loid format; traditional broadcasters like Yle and MTV3 have invested more in online services instead of television and radio; and after experiments with specialised production groups, practically everybody has adopted an overall strategy to put digital first – or mobile first. The printed edition of the newspaper or the main evening news broadcast on television or radio are no longer the main platforms for news, but rather by-products of continuous daily news production for online and mobile audiences.

In this context, however, it seems that actual processes of news selection and news processing in leading news media organisations in Finland has changed much less than one would expect. Most respondents emphasised the importance of the traditional “morning meeting” for news selection (or in some cases, two morning meetings, with the first held among the heads of all departments and the second in each department separately). Longer, more demanding or labour-intensive stories must be more carefully planned beforehand, but shorter stories are usually produced and published as quickly as possible. There is also no longer only one daily deadline. Although the plans for the day are made in the morning, the actual outcome is usually a result of continuous negotiations between journalists in the newsroom.

The 2011 MDM study pointed out that Finnish media organisations had already adopted some sort of stylebook, or they were preparing one. However, it seems that most of them have remained for internal use only. Evidently, the STT and public broadcasting company Yle are the only ones with comprehensive stylebooks and editorial guidelines; they are also publicly available online. Yle has also updated its own ethical guidelines for news and content production twice after *Sipilägate* (2017 and 2019) and has additionally created a special “concept bible” to help the introduction of audience segmentation into Yle online news journalism (Hokka, 2019) – but this document has not yet been published.

(F8) Rules and practices on internal gender equality 2 POINTS

Gender equality is protected by law and women have equal opportunities to proceed and develop their careers as journalists. However, the division of work tends to be very stereotypical in practice.

In 1906, the Grand Duchy of Finland was the first country in Europe to grant women the right to vote in national elections. Nearly 80 years later, a special legislation on equality between women and men (609/1986) came into force. Despite that, there is still a lot of work to be done towards perfect gender equality in Finland.

Journalism has been a profession dominated by males for a long time. Even the UJF was called the Union of Finnish Newspapermen until 1993; however,

five years later in 1998, the majority of the union members were female. Female participation in the trade is increasing, as over 70 per cent of student members are women (Journalists Union, 2020). The theme of gender equality among journalists became increasingly stronger in the 1980s and 1990s. However, gender-specific practices of the trade were not properly challenged at the time, and that is why the discussion continues even today (Kurvinen, 2019).

The editors-in-chief of leading news media organisations – two of them female– noticed and highlighted the significant increase of the number of female journalists in the country, especially among newcomers. From a management perspective, gender equality in Finnish newsrooms had been taken care of. Salaries and working conditions in the same field were similar for everybody, and opportunities to build one’s career were described as equal. However, trade union representative pointed out that on an average, female journalists make less money than male journalists. This may be partly because young journalists tend to have lower salaries than older ones, but also because of stereotypical divisions of work:

On a larger scope, things are quite equal, the situation is comparable to the Finnish society in general. Then again, whereas for normal women 1 euro is 82 cents, for female journalists it’s 96 cents. But still, when there is an interesting story about how the older generation of leaders tended to send male reporters to do the job because the men were considered better reporters. Other stereotypical divisions also exist, for example, women do stories on interior design while men cover sports, typically. There is still a lot of work to be done in this area, even though the challenges are connected to different age groups among the leaders, [especially] the older aren’t equally equal in their leadership. (UJF president, 2020)

(F9) Gender equality in media content

2 POINTS

The leading Finnish news media organisations strive towards increased gender equality in media content online by using a tracking system. However, challenges remain, as the surrounding society is truly not equal.

The leading newspaper in Finland, *HS*, has monitored the gender balance of its website content since late 2017 (Yläjärvi & Ubaud, 2018). Public service media company Yle followed its example in January 2018, as part of their internal gender equality programme. In 2020, 17 newspapers as well as *Yle News* in Finnish and Swedish are using the same gender equality tracker developed by the Swedish company, Prognosis.

For the past 150 years, the share of female interviewees in Finnish media has been close to one-third (Pettersson, 2018). *HS* has promised twice (in 2014

and 2018) to increase the number of female voices in their publication, but without lasting results. In 2018, Yle was able to increase the share of female interviewees from 30 per cent to 43 per cent, but challenges remain for reasons like the Finnish political elite being predominantly male (Erho, 2019).

In 2007, the Institute of Languages of Finland recommended the use of gender-neutral expressions in the media. Ten years later, in September 2017, *Aamulehti* announced that it would replace traditional gender-specific job titles, such as chairman or fireman, with gender-neutral titles. The reception to all this has been mixed. *Aamulehti* received an award from the Council for Gender Equality and the National Council of Women of Finland; however, no other newspaper has publicly followed their example. It has, additionally, been criticised for using newly coined gender-neutral job titles instead of official titles, some of which have a specific legal basis.

(F10) Misinformation and digital platforms (alias social media)

2 POINTS

The leading Finnish news media rely primarily on internal processes and traditional practices of good journalism as defensive weapons against misinformation. They have also invested in improving the media literacy of their audiences.

Finnish news media experienced an exceptional period of hybrid information warfare in the aftermath of the annexation of Crimea by the Russian Federation. Fake social media accounts had been spreading misinformation supporting Vladimir Putin's government and the state of Russia already for a while. Following that, in 2014, right-wing activist Ilja Janitskin established a new platform, *MV-lehti*, an online newspaper that published hate speech and propaganda in Finnish, which gained some popularity among people supporting Russia, as well as among right-wing extremists. In 2018, Ilja Janitskin was finally arrested and sentenced to jail on 16 different criminal counts, including harassment and aggravated defamation of Yle journalist Jessika Aro (Nousiainen, 2019).

At the same time in 2014, a small group of Finnish journalists and a Finnish transparency NGO called Avoin yhteiskunta [Open society] created the Faktabaari [FactBar] fact-checking service to meet the increasing need of preventing distribution of misinformation. Faktabaari started by checking claims made in the European election debate and ran a fact-checking campaign during the general elections in 2015. However, among the leading Finnish news media organisations, only *HS* identified it as an important partner for collaboration and as an instrument for producing high-quality journalism.

Since 2015, public service media Yle has been offering a special series of online stories in Finnish, aimed at revealing different cases of misinformation

under a common title *Valheenpaljastaja* [Lie detector] (Yle, n.d.). In addition, Yle has also invested in new ways of increasing audience awareness and understanding of troll tactics by developing an online game that lets you play the role of a hateful troll. *Trollitehdas* [Troll factory] was first released in Finnish in May 2019, and it turned out to be so popular that an international version in English was released only a few months later (Yle, n.d.).

Practically all other editors-in-chief and journalists interviewed for this study stressed the importance of internal processes, guidelines, and rules as well as traditional practices and conventions of good journalism in fact-checking. As mentioned earlier, CMM has a central role in creating, maintaining, and controlling the obedience of the ethical rules for producing good journalism as a self-regulatory organisation of the media. A media outlet in Finland not committed to the ethical rules of CMM is still a rare exception, but in 2018, the members of the council started to use a special emblem of membership as a sign of “responsible journalism”.

(F11) Protection of journalists against (online) harassment 3 POINTS

All the largest news media organisations in Finland have their own internal protocols and guidelines for protecting their journalists against external interference and harassment. Meanwhile, freelancers may get help from a special fund. Online harassment is also going to be criminalised.

Despite top rankings in the World Press Freedom Index by Reporters Without Borders, ever since it was established in 2002, external interference of journalists is by no means a new phenomenon in Finland. However, online harassment and intimidation of journalists covering the aftermath of the so-called refugee crisis and immigration became a public concern in 2016, after several cases had been reported in the media. One exceptional case was the knife assault on Turku Market Square in March 2018, as described by the editor-in-chief of *Turun Sanomat*:

Moderation is necessary [online]. A few years ago when the Turku knife assault happened, it was a huge effort as there were 500–1000 daily posts that needed to be handled. Two people did it on the side of their main task. For the past two years, the commentators have been bound to first register themselves. That helped the situation. Now, the amount of comments can be handled well [...] After the knife attack, there were 200 hate mails in one month, mostly from the “racists” but also from the “suvakit” [anti-racists]. If our reporter is harassed, he does not hesitate to mention it. But there is a serious risk for self-censorship, where a reporter does not have the strength to write a story because of the expected shit-storm that will follow. (TS editor-in-chief, 2020)

Later in the same year, there was also a very exceptional conflict between the prime minister of Finland and public broadcaster Yle (see Indicators F5 & F6 – Company rules against *internal* and *external* influence on newsroom/editorial staff) (Hiltunen, 2018).

A study conducted in 2017 revealed that although severe interference was rare, low-level external interference of journalists was more common than expected. For example, 60 per cent of respondents had experienced verbal abuse in their work, and 15 per cent faced it regularly (Hiltunen, 2018). According to the editors-in-chief of a leading news media organisation, both male and female journalists have been targeted online; however, female reporters have been harassed more often and more seriously.

By now, the largest news media houses in Finland have created their own internal protocols and guidelines for protecting their journalists against external interference and harassment. All of them are also ready to take legal action and transfer the most serious cases to the police. Small and local media do not necessarily have their own guidelines yet, but they can utilise the public version of Yle guidelines for safer interaction released in early 2020 (Harvia & Naskali, 2020).

At the moment, online shaming, harassment, or illegal threats are not crimes as such, but the Finnish government is going to change the situation by reforming the existing legislation. This would provide better protection not only for the police, prosecutors, and judges, but also nurses, paramedics, and professional journalists (see Indicator C2 – Independence of the news media from powerholders).

Besides company-specific policies and practices for protecting permanently employed journalists from harassment, a special Support Fund of Journalists was established in 2019 to help Finnish freelancers, in particular. During its first year of operation, the fund altogether disbursed EUR 41,000 as four support grants covering, for example, loss of income, moving expenses, and crisis therapy (Jokes, 2020).

Dimension: Equality / Interest mediation (E)

(E1) Media ownership concentration national level 2 POINTS

The national media market is relatively concentrated, with only a handful of companies dividing the market in each sector. Since 2011, mergers and acquisitions within the industry have continued, but the overall concentration ratios have remained stable.

IN 2011
2 POINTS

As it was a decade ago (Karppinen et al., 2011), Finland does not have any specific regulation of media ownership concentration, aside from general

competition rules. The overall media market is relatively concentrated, with a handful of mostly domestic groups controlling several outlets across media sectors, although no single actor controls any sector.

The Sanoma Group continues to be by far the biggest media company in Finland, with a presence in all major media sectors. Since 2018, Sanoma is also the majority stake owner of the Finnish News Agency STT. The public broadcasting company Yle is the second-biggest media company, with notable market shares in television (46%), radio (50%), and online news (third popular online news site).

The position of *HS* as the only (de facto) national, quality newspaper is dominant in practice with no real rivals. The evening tabloid market is shared between two competing national tabloids – *Ilta-Sanomat* and *Iltalehti*. All three are also among the most popular online news sites in Finland (see Table 4 and Indicator F2 – Patterns of news media use). The consolidation of regional and local newspaper ownership into chains has also continued.

In television, the number of commercial channels has significantly increased throughout the 2010s, but the viewing share of the channels controlled by the three biggest companies has remained above 80 per cent. In radio, the market has further concentrated with two major commercial companies (Bauer Media and Sanoma), together with Yle controlling 89 per cent of the market share.

The basic data on media ownership are transparent for the most part. Most of the large media companies are publicly traded, and major changes in ownership are also reported in the media. According to a recent review of Finnish media policy, however, ownership information is not always readily accessible to audiences, and it may be difficult for citizens to gain a full picture of the cross-interests and ownership structures within the industry (Ala-Fossi et al., 2018: 180). The EU Media Pluralism Monitor has also identified media ownership transparency as a medium or high risk for media pluralism in Finland (Manninen, 2018), mainly because Finnish legislation does not set specific transparency requirements for media companies.

The market shares of the top three companies (CR3) have been calculated on the basis of net sales (newspapers) or share of total viewing and listening (television and radio). As indicated in Table 4, the market share of the top three companies is relatively high in almost all sectors of the media, indicating a moderately concentrated, but not monopolistic, market structure.

Table 4 Market share of top three companies in different media sectors (CR3)

Sector	Top 3 companies 2020	Market share (%) 2020	CR3 (%) 2010
Television	Yle, MTV3, Nelonen/Sanoma	82	90
Newspapers	Keskisuomalainen, Sanoma, Alma Media	65	50
Radio	Yle, Bauer Media, Sanoma	89	71

Source: Statistics Finland, 2020c, 2020e, 2020f

In 2020, Sanoma bought the regional newspapers of Alma Media, further strengthening the position of Sanoma and Keskisuomalainen, which owns around 80 regional and local newspapers, as the two largest newspaper publishers.

(E2) Media ownership concentration regional (local) level 1 POINT

Apart from newspapers, the leading news media houses in Finland are more nationally oriented. There are no significant regional or local television channels. Dominant regional newspapers generally face no direct competition in their own market area.

IN 2011
1 POINT

The number of regional and local newspaper titles in Finland is high in proportion to its population, with over 200 titles in total. However, as a result of mergers and closures, the number of titles has decreased by around 13 per cent in the last decade (Ala-Fossi et al., 2020: 24). Ownership has further consolidated with a large proportion of the titles now owned by national publishing chains, specifically Sanoma and Keskisuomalainen. In 2020, Sanoma acquired the regional newspapers of the third-largest publisher, Alma Media, further consolidating the market position of these two companies.

Almost all regions are served by one dominant regional newspaper, with no direct competition in their own market area. Despite the high number of regional and local newspapers published per capita, the market for regional media is relatively concentrated. The competition these regional newspapers face is against the nationwide newspaper *HS* and other national news outlets, including online services such as the regional news service of public broadcaster Yle, which has been criticised by the commercial media industry for their impact on commercial regional news media.

Television channels in Finland are almost exclusively national, and although small-scale commercial or community-regional and local channels exist, they

have a marginal market share. Yle publishes regional news online for 19 regions, broadcasts daily regional news broadcasts on national television for ten areas, and regional programming in Finnish, Swedish, and Sámi language on the frequencies of Radio Suomi.

There are 53 regional or local commercial radio stations in Finland (see Indicator F1 – Geographic distribution of news media availability). In larger markets, such as the Helsinki region, there is competition between a wide range of radio channels, whereas more remote areas have less options. The field of local radio stations has also seen continued consolidation into national chains (Bauer Media, Sanoma) in the last decade, reducing the provision of genuinely local programming. In addition, a few non-profit, public access radio channels also operate in Finland with very limited resources.

(E3) Diversity of news formats

3 POINTS

Most major news formats are widely available in Finland, with new formats being generated online by both legacy and online-only outlets.

IN 2011
3 POINTS

A variety of news formats are widely available across the media market, ranging from legacy newspapers and broadcast media to various online and mobile news applications.

There are no Finnish 24-hour news channels, but Yle and MTV3 broadcast news bulletins on their main channels throughout the day. In the last decade, one of the major commercial channels, Nelonen, as well as other commercial channels, have ceased broadcasting their own news, leaving MTV3 as the only commercial broadcaster with major news provision. This can be seen as decreasing the diversity of broadcast news provision. Other traditional news formats, such as party-affiliated newspapers, have also notably declined in importance, with resources being directed to online and social media.

On the other hand, the largest news media organisations with most resources, such as *HS*, have heavily invested in their digital services, which increasingly make use of new formats such as data journalism, video, podcasts, visualisations, and other forms of news presentation. The public broadcaster Yle has also been considered ahead of most European public service broadcasters in terms of adapting its provision to the digital environment and their use of mobile and social media platforms to deliver public service content (Sehl et al., 2016; see also Karppinen & Ala-Fossi, 2017).

In addition to the traditional news providers, a handful of new online-only outlets, such as *Uusi Suomi*, *Mustread*, *Long Play*, and *Rapport*, have also attempted to develop new formats of news delivery, although their resources and reach remain much lower than major legacy news companies.

(E4) Minority/Alternative media

2 POINTS

IN 2011
2 POINTS

The supply of media content in Swedish and Sámi languages is extensive in relation to the size of the population in Finland, but other minority and alternative media organisations are limited.

Compared with most other European countries, Finland remains ethnically homogenous. Although immigration to Finland has increased in the last ten years, the proportion of foreign-born population (7%) remains below the EU average. In addition to the official languages Finnish (native language for 87% of the population) and Swedish (5%), the constitution of Finland specifically mentions Sámi, Romani, and users of Finnish sign language (alongside a reference to “other groups”) as minorities with a right to “maintain and develop their own language and culture”.

With its own established media institutions, it can be stated that the Swedish-language media in Finland constitutes an institutionally complete media system (Moring & Husband, 2007), including several daily regional and local newspapers, periodicals, and significant public service programming in Swedish on television and radio. In 2017, however, the public broadcaster Yle’s dedicated channel for Swedish-language programming was merged with another channel.

Yle is obliged to provide services also in Sámi, Romani, sign language, and, when applicable, other languages used in Finland. The supply of products in the Sámi language includes television news broadcasts (*Oddasat*), a regional radio channel (*Yle Sámi Radio*), and an online news portal. Yle also has a multilingual radio channel and provides news portals in English and Russian (Ministry of Transport and Communications, 2019).

The Ministry of Education allocates public subsidies to minority-language media. Some EUR 500,000 is annually allocated to minority-language newspapers, magazines, and online services in Swedish, Sámi, Romani, or Karelian languages. Overall, while media services for recognised “old minorities” in Finland are relatively extensive, only a few media services are available for immigrants in Finland. The representation of ethnic minorities also remains marginal in the workforce of mainstream media houses (as was the case a decade ago; see Karppinen et al., 2011).

Arts Promotion Centre Finland (Taike) also allocates subsidies (around EUR 1 million annually) to cultural and opinion journals to “maintain diverse public discussion about culture, science, art or religious life”. Non-profit actors have a presence in print media and magazines, but in television and radio, alternative media outlets remain few and they receive little public support. Only two genuine public access and community radio stations exist locally, as non-profit broadcast media houses have increasingly moved online. Alternative media outlets of civil society organisations and other non-profit actors are thus increasingly confined to the Internet.

(E5) Affordable public and private news media

3 POINTS

The prices for media services in relation to household income remain affordable.

IN 2011
3 POINTS

Finland is a comparatively rich country characterised by a generally high cost of living. In relation to the average household income, the prices of mass media are generally not exceptionally high. On average, Finnish households spent EUR 946 (2.5% of total consumption expenditure) on mass media in 2016 (down from 4.1% one decade earlier). However, this excluded telecommunication, which accounted for an additional 2.3 per cent of total consumption (Statistics Finland, 2020d). Statistics Finland also published information on media consumption by household income and education level. It showed that the percentage of income used on media services is more or less the same in all income and education groups.

The annual subscriptions to daily newspapers are generally between EUR 300–400 (up from the average of EUR 225 in 2010), while an annual subscription to the largest newspaper *HS* (print and digital, without discount) is currently EUR 469. Newspapers also offer various discounts for students, weekend-only subscriptions, and other combinations of print and online services. Most newspapers have introduced a paywall in the last ten years, decreasing the amount of free content online; however, less than one-fifth of the adult population paid for online news in 2019 (Newman et al., 2019). The availability of free newspapers distributed in public transportation has also declined in the last ten years. The free daily *Metro* that was distributed in the Helsinki region public transportation since 1999, for example, ceased publication in 2020, partly due to the Covid-19 disruptions.

A special public broadcasting tax, which replaced the television licence fee in 2013, funds the public service broadcasting in Finland. In contrast to the old licence fee, the tax is income-adjusted. As a result, individuals pay an earmarked tax up to a maximum of EUR 163 per year (in 2020), with those earning less than EUR 14,000 exempt from the tax. In comparison, the annual television fee in 2010 was EUR 231 per household. Meanwhile, all Yle services are free of charge, available to all, and funded entirely by the tax, with no advertising or sponsoring allowed.

Access to broadband is designated as a universal service in Finland, which means that all households across Finland have the legal right to a reasonably priced connection at a minimum speed to be periodically reviewed (will be raised to five megabits per second in 2021; Ministry of Transport and Communications, 2021). According to the ICT industry association Federation for Communications and Teleinformatics, the price of broadband access has slightly decreased in recent years, with 10 megabits per second fixed connections costing EUR 25, and 100 megabits per second around EUR 50, on average (Ficom, 2020). In

the European Commission's (2019a, 2019b) comparison of broadband prices in Europe, prices for both fixed and mobile broadband bundles in Finland are below the European average.

(E6) Content monitoring instruments

1 POINT

IN 2011
1 POINT

There have been some content monitoring initiatives by the media houses themselves, universities, and public bodies. However, they are mostly irregular and non-systematic. In some regards, the data basis for systematic monitoring has eroded in recent years.

A range of actors – including Statistics Finland, regulatory authorities, media industry associations, and commercial monitoring agencies – offer mostly structural data on media structures, supply, and use. Instruments to monitor news media content, and issues such as neutrality and diversity, however, are more fragmented and ad hoc.

The 2011 MDM report on Finland noted several attempts to develop more systematic instruments for media content monitoring in Finland. Since then, however, many of these initiatives have been discontinued. The Annual Monitoring of News Media, developed by The Journalism Research and Development Centre of the University of Tampere to survey news media output between 2006 and 2012, for example, was discontinued. Various research projects have developed tools for monitoring reporting on individual issues, such as ethnicity and racism in the media, but they have not developed into organised, permanent monitoring instruments.

The Ministry of Transport and Communications published an annual report on Finnish television programming focused on quantitative analysis of the television output and diversity, based on different programme types until 2015, which has also been discontinued. In 2018, the Ministry commissioned a report on the state of Finnish media and communication policy, which proposed a range of metrics to improve the knowledge base of media policy-making (Ala-Fossi et al., 2018); most of these metrics, however, have not been systematically implemented.

Apart from independent bodies, media organisations themselves do some monitoring. For example, a number of media organisations are using a gender equality tracker to monitor and publicise the balance between men and women as subjects and sources in their news (see also Indicator F9 – Gender equality in media content). The public broadcaster Yle also employs various instruments of content monitoring regarding its mandated obligations.

In addition, discussions on the content of journalism take place in academic studies, professional journals, and of course social media, but for the most part,

these do not constitute continuous monitoring instruments. A number of commercial media monitoring services also keep track of reporting on specific issues for subscribing clients, but their results are generally not publicly available.

(E7) Code of ethics at the national level

3 POINTS

All leading news media organisations in Finland have committed to the common code of ethics, overseen by CMM.

IN 2011
3 POINTS

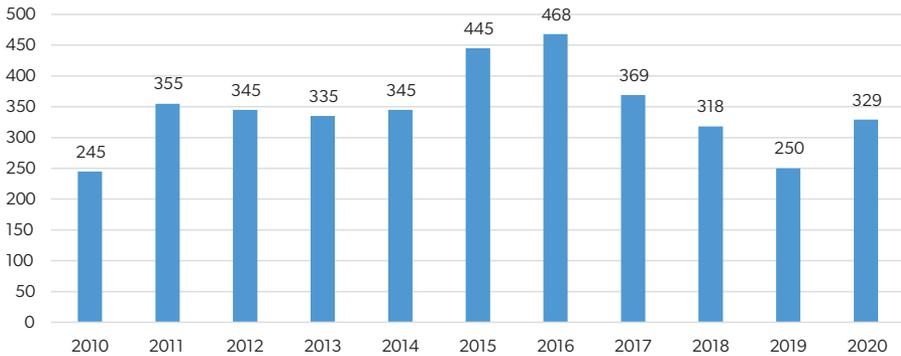
CMM is a national self-regulating committee established in 1968 by the publishers' and journalists' unions whose mandate is to interpret good professional practice and defend freedom of speech and publication. Anyone may file a complaint about a breach of good professional practice in the media, and if CMM establishes a violation, it issues a notice. All organisations signed under CMM's charter are obliged to immediately publish this notice – practically speaking, all Finnish news media organisations are a part of that charter. CMM can also issue general policy statements.

Despite periodic criticism directed at the effectiveness of the existing self-regulatory practices, the system is strongly established and remains well-known among journalists. According to the interviews, the status of CMM's Guidelines for Journalists continues to be strong. Editors-in-chief, journalists, as well as both publishers' and journalists' associations uniformly attested that the code of ethics is well known and followed within the profession. According to the director of Finnmedia, the significance of the national guidelines has been further strengthened in recent years, and the model is often seen as exemplary in other countries.

On the whole, the CMM journalistic rules are followed closely and their importance has grown. The rules are the most important factor when deciding which media producers are to be considered “real news media”. The Finnish rules are exemplary and are being followed as a model also by other countries. (Finnmedia CEO, 2020)

In addition to CMM, UJF also stated that it has a special responsibility to defend journalism and its ethical rules. Alongside its member associations, UJF organises courses and other activities to disseminate good journalistic practices. It also publishes the monthly professional journal *Journalisti*, which sustains debate on journalistic practices and ethics.

Figure 1 Number of annual complaints made to the Finnish Council of Mass Media, 2010–2020



Source: CMM, 2020

(E8) Level of self-regulation

3 POINTS

The common code of ethics overseen by CMM is the backbone for self-regulation in all leading news media organisations in Finland. Beyond these national guidelines, the existence of additional internal guidelines and self-regulation instruments varies from one organisation to another.

In 2011
2 POINTS

As noted above, all media organisations are committed to following the guidelines published by CMM. Most news media also have their own internal guidelines in one form or another, usually used to complement the guidelines of journalists and to give more detailed instructions on the practices of the media organisation in question. A number of interviewees noted that they have internal journalistic rules, handbooks, or stylebooks that complement and specify the general national rules (see Indicator F4 – Internal rules for practice of newsroom democracy). The right to reply and the publication of corrections are guaranteed at the level of both national code of ethics and media law, as confirmed by the UJF president:

Inhouse rules exist widely. Usually, they are more pragmatic rules on how to interpret the CMM rules, or maybe even more rigid. [...] It's a good thing that there are house specific rules because different topics bring different kinds of issues and needs. (UJF president, 2020)

Most media organisations also have more general mission statements, which almost invariably refer to democratic values, independence, balance, pluralism, and so forth. Some individual media organisations in Finland have experimented with the use of an independent Ombudsperson in the past, but the practice has

not become adopted by other leading news organisations. Instead, the public broadcaster Yle has a position called the head of journalistic standards and ethics, whose task is to support journalists and oversee the implementation of ethical standards.

In 2018, the leading news media houses launched a campaign where those who follow the CMM guidelines would display a “responsible journalism” logo to distinguish them from blogs and other non-journalistic information sources (see Indicator F4 – Internal rules for practice of newsroom democracy).

Most media houses in the sample also claimed to exercise some organised form or process of self-criticism. CMM resolutions are typically discussed together with the journalists involved, and sometimes with the whole newsroom. Professional journals published by the publishers’ and journalists’ associations also include debate on media ethics.

(E9) Participation

3 POINTS

News media has generally shifted from anonymous and open commenting to moderated comments sections. Social media, too, has increased dialogue between journalists and audiences.

IN 2011
2 POINTS

The right to reply and the publication of corrections are guaranteed at levels of both the national code of ethics and that of media law. Most news media also provide spaces for commenting on news pieces online and in social media, although many outlets have recently begun to move away from unmoderated and anonymous comments sections in order to avoid harassment and other objectionable content. User-generated content, such as photographs, video, and social media content, is also used, but this shows a lot of variance between different types of news media. The Internet sites of news media typically also contain surveys, feedback features, and other interactive content for viewers. According to the interviewees, the early enthusiasm for user-generated content has dissipated and been replaced by the use of social media. This has been both as a news source and as a platform for audience feedback.

Most of the interviewees expressed ambivalence towards online commenting. Comments are generally encouraged, but it was noted by multiple interviewees that open online commenting spaces can potentially become dominated by trolls as well as extremist views:

UGC today consists mostly of commentaries on social media. The feedback comes from a small group. Those who have the time to comment do it often. During the last five years the True Finns policy seems to have increasingly taken a trolling role. Often the third comment on any news already relates to immigration. This leads to many refraining from commenting. (*IL* journalist, 2020)

At Yle, for example, almost all online news items were previously open for comments, which resulted in chaotic discussions and an overabundance of improper behaviour. In 2019, an automatic moderating algorithm was adopted, which was still unsatisfactory. Since 2020, human editors in cooperation moderate discussions with a service provided by the STT. Other new media reports similar experiments. According to the interviews, and compared with a decade ago, a better balance now seems to have been found between completely open forums and moderated discussions.

According to one editor-in-chief, it is obvious that “the citizens affect the contents of the paper more than they did ten years ago”. The significance of social media as a forum of dialogue between journalists and audiences has also increased in this time. According to one interviewee, “What the paying customer wants is openness in social media, answers to questions and dialogue, and not so much that they might produce content actively”.

The local newspaper *Östnyland* stood out from the larger media organisations in our sample. According to the interviews, their newsroom was easy to approach, as people can just walk through the door or suggest ideas in random meetings around town. Larger media organisations, and the public broadcaster Yle in particular, tended to organise special events and Q&A sessions to interact with audiences. Yle has also founded a new “Head of Audience Dialogue” position to promote participation and audience relations.

(E10) Rules and practices on internal pluralism

2 POINTS

Internal pluralism is generally encouraged and valued, but aside from general professional guidelines and values, there are few formal rules.

IN 2011
2 POINTS

None of the media organisations in the sample were officially associated with a particular party or an ideology, but like almost all other leading news media, they subscribe to the ideals of independence, balance, and pluralism. Practically all interviewees recognised the importance of internal pluralism, but generally, they emphasised general journalistic culture over formal rules or procedures. As one interviewee put it, “the best way to ensure plurality is to have proficient reporters and good journalistic standards”.

Individual journalists tended to have a lot of responsibility and autonomy in Finnish newsrooms, although discussions between editors and the newsroom staff also took place to discuss appropriate weight given to different positions, especially when it came to political news.

The choice of expert sources was recognised as a significant issue by many interviewees. According to multiple interviewees, the fact that Finland is a small country often meant that the same handful of experts would be called

upon to comment on a particular topic, despite attempts to find people who could provide different angles. Some media organisations also reported that analytics were deployed to keep track of the balance (for example gender) of sources interviewed:

There have been times when Yle has been criticised for often having the same expert on-screen. The argument is that if the expert is well known, it's easier to trust. There have been statistics to follow up on the gender distribution of the experts, so the situation has improved [with more female experts included].
(Yle editor-in-chief, 2020)

One interviewee also raised a more general issue of whether journalism was collectively able to cover all layers of society, when journalists themselves are generally middle-class professionals living in the metropolitan area.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog "control of the controllers"

2 POINTS
IN 2011
1 POINT

Independent media criticism in Finland is weakly institutionalised.

As a result of widespread adoption of different social media platforms, performance of the media has been under public scrutiny and critique more than perhaps ever before. However, this has not resulted in creation of new more formalised fora for media criticism. Individual activists in the mid-2010s established a few blog-based platforms – *Faktabaari* and *Vastavalkea* are perhaps the best known – but they have not gained much significance (see also Indicator F10 – Misinformation and digital platforms). More influence has, instead, been gained perhaps by a couple of politically motivated web-services that drive a xenophobic and racist agenda, such as *Magneettimedia* and *Vastarinta*. The latter appeal especially to the supporters of the right-wing populist party *Perussuomalaiset* [the Finns Party].

Traditionally, the Finnish media has enjoyed a great degree of self-regulatory autonomy. This is especially due to long-standing collaborative relations between the media owners, the editors, and the journalists' union. This rather unique collaboration is internationally institutionalised in CMM, where not only all the parties are equally represented, but also whose 13 members include 5 representatives of the public (see also Indicators E4 – Minority/Alternative media & F7 – Procedures on news selection and news processing). Additionally, all CMM members oblige themselves to follow the Guidelines for Journalists (the code of ethics), and CMM represents around 90–95 per cent of the Finnish news media.

CMM's role in controlling the performance of the media is based on two functions: public complaints from members of audience and a system of sanctions against the misconduct of its member media organisations, and further acting on its own initiative regarding issues that it finds important for the public good and relevant for popular trust in the media. As a self-regulatory body covering most of the news media, CMM is the main media watchdog in Finland. Despite going through some turbulent years in the early 2010s, CMM has been able to progressively consolidate its public trust and reputation.

The other main platforms for media criticism include the *Journalisti*, a professional monthly journal published by the UJE, and *Suomen Lehdistö*, a bi-monthly magazine published by the Finnish Newspapers Association. In addition, media criticism is exercised by occasional op-eds in newspapers and journals by renowned journalists and academics, television talk-shows (Yle's *Pressiklubi* until 2018, *Viiimeinen sana* [Final word] from 2021), radio debating programmes, and so forth. A number of books related to the "control of the controllers" have recently been published (see Herkman, 2011; Horowitz et al., 2019; Karppinen et al., 2015; Nordenstreng & Nieminen, 2017; Seppänen & Väliverronen, 2015).

(C2) Independence of the news media from powerholders

2 POINTS

IN 2011
2 POINTS

Independence of the Finnish news media from powerholders is generally strong, but it is increasingly tested.

In general, journalists are not granted special status under Finnish law, except for legislation specifying the responsibilities of editors-in-chief. The confidentiality of sources is guaranteed in the Freedom of Speech Act (Ministry of Justice, 2003) and the professional code of ethics (CMM, 2014). Furthermore, new legislation is planned to protect people in vulnerable professions – teachers, health workers, and journalists, among others – from increasing threats and from being targeted through social media platforms (see Indicator F11 – Protection of journalists against (online) harassment). From the perspective of news media, new legislation would prevent the gagging of critical journalism from reporting on non-democratic and racist actions and opinions (Heijari, 2020).

The political parallelism that permeated much of the press and public broadcasting in the second half of the twentieth century has all but vanished. Almost all leading news media organisations now place emphasis on political independence. Despite this, however, it is quite possible and perhaps even obvious that both open and public as well as non-open and non-public relations between the powerholders and the media co-exist.

A permanent topic of discussion is the standing of the national public service broadcaster Yle. Its official status is based on a special Act of Parliament (Ministry of Transport and Communications, 2019), its Administrative Council is nominated by parliament, and its functions are financed by a special tax (Finnish Government, 2012), paid by all citizens. In principle, this potentially makes Yle vulnerable to all kinds of political pressures. This was tested in the 2010s a couple of times, ultimately leading to changes in the Yle’s journalistic leadership (see Indicator F6 – Company rules against *external* influence on newsroom/ editorial staff). In general, due to a wide-based parliamentary consensus, Yle has, however, been able to enjoy relative independence from political powerholders. On the other hand, the commercial media – whose one-time spokesperson coined the term “an eternal Christmas” to describe Yle’s privileges – has continuously challenged this status because of its tax-based funding (HS, 2011).

In the private media sector, a few non-media companies count among the owners of the leading news media organisations. Most national and regional media outlets are owned by one of the major media conglomerates, mostly Finnish but some also by Swedish media houses, such as Bonnier (a major Nordic private media company) and Telia (a telecom company, majority-owned by the Swedish government). Most local newspapers in Finland are still owned either by a relatively small company, families, or other private individuals with historical roots in publishing (see also Indicator E1 – Media ownership concentration national level).

Rather than ownership or other direct economic ties, with regard to independence in relation to powerful economic actors, respondents suggested that problems arose from the strict information management and lack of openness of large corporations, which are not bound by statute with the same transparency requirements as public authorities.

In line with the 2011 report (Karppinen et al., 2011), many of the respondents also noted that journalists themselves should be more critical and that more resources were needed to fulfil the watchdog role as well against private companies and economic powerholders.

(C3) Transparency of data on leading news media

2 POINTS

Relevant information about the media system is publicly available, but it is difficult to find.

IN 2011
2 POINTS

No general information services related to the media system exist, although such information is mostly freely available. Statistics Finland (a governmental statistical office) best provides general information,¹ but also Finnmedia (an advocacy organisation for private media companies) offers some information

services. A highly relevant overall review of the Finnish media system emerged from the round table discussions between 2016–2019, invited by the Ministry of Transport and Communication. In the discussions, all major stakeholders of media and communication industries participated, including academic researchers. A concrete output of these developments was a thorough report, *The state of media- and communications policy and how to measure it* (Ala-Fossi et al., 2018), that included basic data on Finnish media ownership and business. A follow-up report was published in 2020 (Ala-Fossi et al., 2020).

Yle is supervised both by the government and by the parliament. According to the law on regulating public service broadcasting, Yle’s board is required to provide an annual report of its activities to the Finnish Transport and Communications Agency, which represents the government. In addition to this more technical report, the Administrative Council of Yle must submit a more substantial annual report to the parliament. In turn, on the basis of the report, the parliament issues a statement on Yle’s annual performance. Both reports are publicly available to citizens (Yle, 2019a, 2019b).

Information on media ownership remains freely available for the most part openly, especially since many media companies are now publicly traded (Ala-Fossi et al., 2018). The problem is that these reports and statements are not easily accessible to citizens. This is especially true in the case of foreign-owned media companies. The mainstream news media, as well as financial news, continue to regularly report major changes in the media markets. Some news outlets, including *HS* (owned by the Sanoma Group), have adopted a policy of publishing a standard acknowledgement of ownership connection whenever it publishes reports related to companies owned by the same parent company. Universities, research institutes, and professional organisations like UJF are other entities that provide various forms of information about the news media occasionally.

(C4) Journalism professionalism

3 POINTS

Strong professional ethos and a high level of unionisation characterise the news media.

In 2011
3 POINTS

Recent studies have confirmed the findings of the 2011 MDM report: journalists and media professionals are largely well educated, and further, share a basic commitment to common quality standards (Rantanen et al., 2020; see also Karppinen et al., 2011). Together with local unions and member associations, UJF is reasonably active in organising further and continuing education for practising journalists (Journalists Union, 2018). According to the respondents, the professionalism among journalists in Finland remains high, and profes-

sional and ethical rules are generally well established. Time pressure, however, remains a chronic problem that threatens to decrease the daily time and space available to in-depth journalism and professional deliberation (Haapalainen, 2018; Association of Freelance Journalists in Finland, 2019; see also Karppinen et al., 2011).

The number of staff in relation to the amount of content produced has also decreased, which means less time is available for planning and writing single news items. While an overload of journalistic capacities was widely acknowledged as a real problem in the interviews, many respondents also noted, however, that the resources and tools available for providing quality journalism are still better than before (Rantanen et al., 2020). A tension between increasing demands of output and limited resources thus seems to have become a lasting situation in journalism. One interpretation of these developments is that there is an increasing divide between quality media, which strive to uphold and develop high professional standards, and a largely routinised bulk journalism that is gaining ground, especially online (Kivioja, 2018; Manninen, 2019; Pöyhtäri et al., 2016; see also Karppinen et al., 2011).

(C5) Journalists' job security

2 POINTS

There are few specific legal provisions that apply only to journalists: but general legal provisions and labour contracts that cover the field provide journalists relatively strong occupational protection.

IN 2011
2 POINTS

General legal provisions on employment and labour contracts (Ministry of Economic Affairs and Employment, 2019) provide journalists with permanent contracts. Like any other occupational group, they enjoy a strong degree of protection against dismissal because of personal convictions or any other arbitrary reason. In the case of the termination of an individual's contract, their employer is obliged to demonstrate a financial or production-related reason for it. Dismissal must be preceded by a period of notice, preventing arbitrary firing. The Finnish collective employment contracts between the employer's unions and trade unions are extensive, and the terms of employment are generally complied with. The most recent collective contract representing journalists has been negotiated between the Finnish Media Federation (the employers' union) and UJF for the period 2020–2022.

UJF aims to improve the financial and professional positions of its members and their work conditions, and to supervise their interests at the levels of both collective bargaining and individual organisations.² Over the years, the union has taken several dismissal cases to court, which have generally been ruled in favour of the journalists, awarding compensations or damages for undue dismissal.

According to the interviews, a professional practice of allowing journalists to decline to write against their personal convictions has a solid foundation in Finnish journalistic culture – this is strictly followed in the news media. This principle is also stipulated in the journalists’ collective contract (Federation of Finnish Media Industry & Journalists Union, 2020: 15, para. 2.7).

In the 2010s, about 200 journalists’ jobs have been lost on a yearly basis from just newspapers because of both digitalisation and the economic downturn (Grundström, 2020). In addition, the proportion of freelancers has declined, currently comprising around 10 per cent of UJF’s members. The use of short-term contracting varies between media sectors, but in general, short-term contracts, internships, or freelance contracts are still the primary way of gaining entry into the profession. As one respondent remarked, because of relatively high unemployment among journalists, there is no particular shortage of a temporary workforce, which has allowed employers to downgrade their earnings:

Yle is in a class of its own when it comes to [the amount of] part time jobs. The organisation is too large. The organisation should let the managers in the “lower- tiers” have more freedom to make arrangements. In the commercial media organisations, the situation is different, often when someone is on maternity leave there are older professionals hired to take their place, at a much lower salary; this is the nasty outcome. It is perfectly legal but a mockery of people’s professionalism. (anonymous, 2020)

According to UJF, the unemployment rate among journalists is currently about 7.5 per cent, although many who have lost their jobs and later become freelancers and do not show up in this statistic (Honkonen, 2017).

(C6) Practice of access to information

2 POINTS

There is an existing law that, in principle, provides open access to public information, but problems remain in practice.

IN 2011
2 POINTS

Finland has a long tradition of open access to government files. This can be traced to the world’s oldest freedom of information law enacted in 1766, when Finland was part of Sweden. The current law is known as The Act on the Openness of Government Activities (1999) and is considered to provide citizens extensive access to public information. The Act states a principle that all documents are public by default unless there is a specific reason for withholding them, enacted within another law.

There are still no privileges specifically for journalists to access public information; rather, all citizens may access any official public document held by public authorities and private bodies that exercise public authority. Those requesting information are not required to provide reasons or even verify their

identity, unless they are requesting personal or otherwise-classified information. There are 32 legally specified categories of secret documents exempt from public release, according to a variety of potential harm tests, depending on the type of information.

In a couple of recent studies, journalists' experiences of the freedom of information legislation and their perusal of official documents were examined (Hiltunen & Suuronen, 2019; Media Industry Research Foundation of Finland, 2020). As per an "accessibility test" designed to evaluate the behaviour of individual officials towards information requests, it was found that officials were often slow to reply and reluctant to provide the information requested.³ Problems arose often from inconsistent legal interpretations of what comprised public or non-public issues, from negative attitudes among the authorities providing requested information, and partly from the journalistic practices themselves (see also Indicator E1 – Media ownership concentration national level).

A further problem stems from the fact that journalists do not always seem to be aware of their rights to access information. From the interviews with editors-in-chief and experts, it was also suggested that rather than the legislation alone, the more critical issues have to do with the skills and resources of journalists to find and access relevant information. Additionally, journalists often face problems in gaining information about actions that are still in preparation, which hinders public evaluation of the authorities' forthcoming plans. However, most respondents acknowledged that the existing law does give journalists and the general public relatively broad access to public information:

We get the information from the political system, it is open – the politicians have an open mind and are reasonably easy to approach and to acquire information from. On the other hand, documents are not always accessible. Sometimes you are denied access to documents that should be openly available. There might be a fee in order to get access. There are of course cases where clerks actually need to make an effort to find the information. It is not clear-cut, things are not working optimally in Finland. There are authorities who seek to keep some documents secret and not follow the "general spirit of the laws" or, even, restrict the reporters to some extent. (*HS* journalist, 2020)

(C7) The watchdog and the news media's mission statement

3 POINTS

IN 2011
2 POINTS

The significance of the watchdog role is widely recognised by Finnish media organisations.

News media's and journalists' allegiance to the Guidelines for Journalists was strongly underlined in almost all interviews. In the Guidelines, the watchdog

function is emphasised: “a journalist is primarily responsible to the readers, listeners and viewers, who have the right to know what is happening in society” (CMM, 2014) (see also Indicator F4 – Internal rules for practice of newsroom democracy). This was evidenced in a recent study on the basic professional values of Finnish journalists. Here, it was found that the “role of an impartial watchdog” was clearly emphasised in their professional profile (Pöyhtäri et al., 2016: 12). Additionally, most news media outlets have a mission statement or in-house rules of some kind – both typically making references to the freedom of speech, political independence, pluralism, and other democratic values (see also Indicators F7 – Procedures on news selection and news processing & E8 – Level of self-regulation).

Although most of the interviewed editors-in-chief acknowledged that mission statements have little practical meaning, the watchdog function remains strongly entrenched in the dominant professional ideology. However, when asked about investigative journalism, only the biggest news media houses could confirm that they had regular activities and investments in this area of work (*HS*, *Yle*); other respondents either stated that their mission does not include investigative journalism (*MTV3*, *Iltalehti*) or that although they recognised its importance, they did not have the necessary resources to conduct it regularly:

There aren't many resources available for investigative journalism. The tempo is high and the news is produced very quickly, which means there is a limited time resource to use for investigative journalism [...] Investigative reporting is mainly used when there are crimes that need to be covered. If and when there is an option to do investigative reporting it helps if the reporter shows initiative. But often it is not possible [practically] to do investigative journalism. (*MTV3 reporter*, 2020)

(C8) Professional training

2 POINTS

The importance of continuous professional training is broadly acknowledged, but journalists do not have opportunities enough to participate in it.

IN 2011
2 POINTS

All respondents considered journalism training to be increasingly important, but resources allocated to and practices of it seemed to vary across media organisations. As in 2011, the problem in most newsrooms is that individual journalists did not have the opportunities or time to leave their daily duties to take part in training.

Recent research reaffirms the contention among journalists that possibilities for professional training should be improved. UJF and The Federation of the Finnish Media Industry have an agreement that promotes advanced professional training. The unions agreed that education should be diverse, attended

regularly, and that part of it should consist of training outside the journalist's own workplace. There is also a chapter on the education programmes included in the collective labour agreement (Federation of Finnish Media Industry & Journalists Union, 2020).

In many instances, journalists can take paid leave to further their education, and in the selected media organisations, various forms of training are in use. The largest media organisations, like Yle and *HS*, have their own internal resources for professional training, but most news organisations also use outside consultants or experts for internal training. Much of regular professional training focuses on technical skills, creative writing, and other professional skills. For more extensive knowledge training, media organisations tended to rely on universities and other places of journalistic higher education. Opinions differed on the recent developments.

(C9) Watchdog function and financial resources

2 POINTS

While the watchdog function is seen as being crucially important, resources for investigative critical journalism are scarce.

IN 2011
2 POINTS

Most respondents claimed that resources for investigative journalism were too scarce, although all respondents stressed its importance. Some of them underlined how – rather than viewing investigative journalism as a specific function separated from other forms of news journalism – it should form a part of everyday journalistic culture. Many respondents also noted that journalists themselves could be more active in pursuing their own ideas and investigative stories.

The editors-in-chief interviewed maintained that ad hoc provisions for in-depth investigations were available when necessary. Public service broadcaster Yle, which also possesses a specific investigative group, has exceptional resources for investigative journalism in the form of documentaries and other current affairs programming. Some newspapers, such as *HS*, have also experimented with independent units dedicated to investigative journalism. However, since it was found that the unit had become too disconnected from the daily process of news-gathering, investigative journalism is now integrated with daily news journalism.

The Finnish Association of Investigative Journalism (Tutkiva) was founded in 1992 to promote critical and thorough reporting within Finnish media.⁴ The association tries to facilitate investigative journalism by spreading information on good practices and about research methods, principles of transparency, sources, and source criticism by organising discussions and training, and also by awarding an annual prize for investigative journalism: “Lumilapio” [the Snow Shovel] prize.⁵ Based on the interviews, however, it seemed there were, in fact, less resources for investigative journalism today than ten or fifteen years ago.

Conclusions

Based on the above criteria, the overall assessment of the performance and structure of the Finnish mainstream media is fairly positive, although it was found that in some areas there is reason for concern. In an international comparison, the equal availability and reach of the main news outlets remain at a high level. The problems that were there already in the early 2010s, such as increasing market pressures, declining news consumption among young people, and mounting workload – usually emerging from haste in journalistic work – are similar to those of most other countries. A new trend that a growing number of journalists face today, and which is causing much concern, is the increase in harassment, hate speech, and targeting.

Despite these trends, many respondents were also quite optimistic, noting that the preconditions for providing quality journalism in Finland have also continued to improve, to some extent. In the last few years, the financial situation of the major media houses has strengthened, although on the flipside, redundancy for a great number of journalists and other media workers has also occurred. The legal preconditions for freedom of expression and access to public information are generally considered adequate, although some problems were observed regarding a reluctance of certain public officials to serve journalists with their information requests in a timely manner.

The professional ethos among journalists in Finland has remained strong, reflected in the established ethical guidelines and professional norms, as well as in UJF's recognised position. However, due to diminishing resources, there is growing concern about the state of journalists' advanced professional training. Other issues discussed more critically included the lack of organised media criticism, the resources for more daring and critical journalism, and somewhat inward-looking professional circles.

The independence of the news media from political powerholders was generally considered strong, but many respondents – as was the case in 2011 – called for a more critical attitude toward private companies and economic powerholders. However, certain novel ways of engaging with public issues – for example, by deploying social media platforms and other digital affordances – fall outside the scope of traditional journalism, and are, hence, largely beyond the scope of this report. Their potential influence on the relationship between the media and democracy in Finland remains to be discussed.

Notes

1. https://pxhopea2.stat.fi/sahkoiset_julkaisut/joukkoviestintatilasto/html/suom0004.htm
2. <https://journalistiliitto.fi/fi/>
3. <https://tietopyyntoongelmat.net/>
4. <https://www.tutkiva.fi/kategoria/yleinen/>
5. <https://www.tutkiva.fi/kategoria/lumilapio/>

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GERMANY

Solid journalistic professionalism and strong public service media

Christine Horz-Ishak & Barbara Thomass

Introduction

Germany is the biggest country in Europe, with 83 million people, and is also the largest part of a bigger German-speaking media market of about 100 million people. It has four small linguistic minorities (Sorbs in the east, Danes in the north, Frisians in the northwest, and German Sinti and Roma) and large migrant communities, of which the Turkish is the biggest one. The country has a long tradition of mass media and is one of the most dynamic media markets in the world. This is reflected in the consumption patterns of media users, who have an average media use of 10.16 hours per day. Politically, Germany is considered a mature liberal democracy.

Freedom in the World 2021: status “free” (Score: 94/100, down from 95 in 2016). The 2017 federal elections saw a decrease in the representation of women in the Bundestag, down to 30.9 per cent, the lowest since 1998, which resulted in a one-point deduction in the category of Political Pluralism and Participation (Freedom House, 2021).

Liberal Democracy Index 2020: Germany is placed first in the Top 10% bracket – rank 8 of measured countries, well up from 20 in 2020 (Varieties of Democracy Institute, 2019, 2021).

Freedom of Expression Index 2018: rank 23 of measured countries, down from 10 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 11 of 180 countries, up from 16 in 2017 (Reporters Without Borders, 2020).

Today’s media landscape is moulded by history. While mass media was a tool of the dictatorship during the Nazi era, the post-war media system started anew under democracy. Until 1990, the country was divided into Western and Eastern

Germany. After reunification, it became a federal state with sixteen different Länder [federal states], with the broadcasting system organised accordingly, although patterns of media usage still differ between the east and west. Today, the major print production centres are located in the “old” west and newspapers of the former GDR do not exist anymore or are usually controlled by Western companies. Broadcasting is integrated into the Western dual system with few newly founded regional public service media outlets within the Eastern federal states.

The media landscape is characterised by a long and deeply-rooted tradition of the press. Despite a changing landscape due to other competitive players in the advertising market, like broadcasting and digital media, the periodical press still plays a major role today. High levels of press circulation are ensured by regional and local subscription papers, which are complemented by nationwide quality newspapers and two influential weeklies (*Die Zeit* and *Der Spiegel*). Due to market concentration, five large companies have a highly diversified range of print and other products that dominate the newspaper market: Axel Springer SE, Südwestdeutsche Medienholding, Funke Mediengruppe, Ippen, and Madsack. These “big five” acquired a market share of over 42 per cent in 2018 (Röper, 2018).

The broadcasting sector is characterised by a dual system of public service media and commercial broadcasters. The federal system is reflected in the decentralised broadcasting system, with eleven public service media networks in the Länder broadcasting with a nationwide range and nine broadcasting stations under the aegis of the Arbeitsgemeinschaft der öffentlich-rechtlichen Rundfunkanstalten der Bundesrepublik Deutschland [Consortium of public broadcasters in Germany – ARD]. Furthermore, one television-only station, Zweites Deutsches Fernsehen (ZDF), broadcasts with a nationwide range, as does one radio-only broadcaster, Deutschlandradio.

Commercial radio and television were only established with the liberalisation of the broadcasting market in 1984 in (Western) Germany. This market comprises a large number of well-established commercial television and radio stations mainly consumed by younger audiences. German media users seem to prefer rather traditional linear media (press, radio, and television) over Internet-based media. However, the growth rates of Internet usage are enormous, specifically among the youth. Producers of quality journalism in the press, however, have difficulties benefiting from this development. New challenges and changes in the German media system will, hence, be inevitable in the near future (see also Thomaß & Horz, 2021).

Third-sector media exist both in analogue (television, radio, press) and Internet-based digital formats (blogs, social media), but their influence on public deliberation is limited. However, high-interest topics such as racism or sexual harassment (#metoo) certainly manage to find a broad audience from time to

time. For example, there was an outcry when no Black experts were invited to political talk shows to talk about racism. A Black expert was finally invited only when an intensive debate started on Twitter.

The Media Pluralism Monitor by the Centre for Media Pluralism and Media Freedom at the European University Institute in Florence indicates that, overall, basic protection, market plurality, and political independence are at rather low risk with respect to media pluralism. However, the main risk to media pluralism in Germany is lack of social inclusiveness, especially access to media for minorities, people with disabilities, and women (Hanitzsch & Steindl, 2017: 13).

Covid-19

From mid-March to mid-May 2020, the Coalition Government of Christian Democrats (CDU) and Social Democrats (SPD) imposed severe restrictions on liberal freedoms, such as closing borders with neighbouring countries, banning all public gatherings and events, curfews, and the shutdown of all shops except food supply, pharmacies, and a few others. During this shutdown, linear television (both public and private-commercial), daily newspapers (both print and online), and radio increased their audiences. Nonetheless, because of the economic restrictions, advertising slumped, causing revenue losses in advertising-based media. Most affected were fully advertising-based private-commercial television and radio channels.

In order to prevent media companies from collapsing, the Government introduced some media subsidies, along with unprecedented financial support for various sectors of the German economy. The well-established instrument of temporary unemployment, according to which part of the reduced salary is supplanted by funds of the Federal Employment Office, helped many media houses whose advertising income had gone down. However, many freelance journalists could not benefit from these subsidies. Other subsidies are extremely scattered due to the federal structure of Germany. The government of Berlin, for example, where many media houses are located, offered up to EUR 25,000 to help cultural and media companies – hit particularly hard by the Covid-19 crisis and usually employ more than ten people – to overcome an economic situation threatening their existence. In justified exceptional cases, up to EUR 500,000 can be applied for (IBB, 2020). The Federal Government announced a stimulus to promote the digital transformation of the publishing industry and to boost the sales and distribution of subscription newspapers, magazines, and advertising journals. This consists of a maximum of EUR 220 million, of which EUR 20 million would be available in 2020 and the remaining EUR 200 million in future financial years.

One of the first studies about the quality of covering the Covid-19 pandemic, conducted during the first three months of 2020, concluded that no comprehen-

sive tendencies towards uncritical or hysterical reporting were found – except for the tabloid *Bild* (RND, 2020). The accusations voiced by critics that there had been predominantly negative reporting or one-sided panic-mongering could not be confirmed by the analysis (epd medien, 2020). The pandemic had consequences on the news consumption side: Television news saw a considerable uplift between January and April 2020, with a 12-point decline in reach for television news since 2013 partially reversed as many people turned to trusted sources of news, including public service media (Newman et al., 2020).

Leading news media sample

Our media sample for the Media for Democracy Monitor (MDM) 2021 consists of eight leading news media representing different types and different ownership: two national quality daily newspapers (*Süddeutsche Zeitung*, *Welt*), three weeklies (*Die Zeit*, *Der Spiegel*, *Stern*), one tabloid (*Bild*), and one public service broadcaster (ZDF). All editors-in-chief were interviewed, and in some cases, this was supplemented by news journalists (*Zeit*, *Spiegel*, ZDF). Leading representatives of the two journalists' unions (DJV, dju) were also interviewed. The following quotes stem from these interviews.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS
 There is a multiplicity of news sources widely available all over the country. IN 2011
3 POINTS

Germany is one of the largest newspaper markets in Europe. Access to news media is available nationwide and in all areas. In 2020, 327 paid-for dailies were available to German readers with 1,452 local editions and a printed total of 13.52 million copies. Furthermore, 17 printed weeklies with an average of 1.61 editions and 6 Sunday papers with an average of 1.74 editions were distributed. The number of daily papers per 1,000 residents is 231 printed papers – one of the highest figures in Europe (BDZV, 2020). Germany has the densest distribution network in the world, with 1.4 single-sale unit per 1,000 residents and about 116,000 retailers.

During the first quarter of 2020, 14.57 million newspaper copies (dailies, weeklies, Sunday papers) were sold on average every day, of which 1.65 million were e-papers (IVW, 2020). Compared to 2019, print-copy sales decreased by 4.75 per cent, whereas e-paper sales increased by 13.84 per cent.

However, a closer look at the newspaper variety per district reveals the high and rising media concentration in Germany (see Indicators E1 – Media ownership concentration national level & E2 – Media ownership concentration regional (local) level). Newspaper sales in Germany are still mainly based on subscription, particularly at the local and regional level, with 88.6 per cent subscription of local and regional newspapers compared with 11.3 per cent of single-copy sales.

Every newspaper serves its readers with online editions. Subscription, Sunday, and weekly papers reach a market share of roughly 50 per cent for local or regional papers, and up to 73 per cent for national papers with their online editions (BDZV, 2020).

There are five national dailies (*Frankfurter Allgemeine Zeitung*, *Frankfurter Rundschau*, *Süddeutsche Zeitung*, *Tageszeitung*, *Die Welt*), a daily economic paper (*Handelsblatt*), and a large number of regional or local dailies. Table 1 shows the top seven sold papers in 2018 and 2019.

Table 1 Top seven sold newspapers, 2018 & 2019

Position	Title	Subs+scs (2019-IV)	2019-IV vs. 2018-IV (absolute)	2019-IV vs. 2018-IV (%)
1	Bild	1,182,699	-134,113	-10.2
2	Süddeutsche Zeitung	279,079	-12,858	-4.4
3	Frankfurter Allgemeine	192,770	-6,909	-3.5
4	Handelsblatt	87,560	-1,018	-1.1
5	Welt Print weekdays (Welt + Welt Kompakt)	66,957	-9,498	-12.4
6	taz.die tageszeitung	42,113	-413	-1.0
7	Neues Deutschland	19,010	-3,449	-15.4

Source: IVW, 2020

During the last decade, differentiation took place at the local level, with so-called hyperlocal journalism enterprises. Highly committed small initiatives established news media voluntarily with some small revenues from advertising to serve their urban quarter.

Taking a look at broadcasting, the federal political structure of Germany is mirrored in the media system. National law stipulates that every citizen shall have access to public television and radio. For this reason, almost every Bundesland [Federal State] or major communication area, respectively, has its own publicly run radio and television regional stations, which are available nationwide via DVB-T2. The biggest public service broadcaster ARD runs

nine regional television stations, plus one nationwide television programme. ZDF runs a nationwide television-only programme. Both established a variety of special interest channels, like the online-only channel funk, distributed via YouTube. Deutschlandfunk is a nationwide public service radio network with three different programmes. In addition, commercial broadcasters like RTL are available nationwide. A complete supply of radio programmes is hence ensured. In 2018, a total of 688 broadcasters served the public, of which 273 were commercial radio and 294 were television programmes. Public service media offers comprise 57 radio stations and 20 television channels (Goldmedia AG, 2019: 12).

The technical reach of the five biggest television stations is nearly 100 per cent: 98 per cent (both ARD and ZDF) for public broadcasting services, and 96.4 per cent (RTL), 95.8 per cent (Sat1), and 95.6 per cent (Pro7) for commercial stations (ARD-Werbung, 2019: 4–5). There are 38.8 million television-owning households (ARD-Werbung, 2019: 4–5). How do they access television? About half receive television via cable (15.5 million), some more via satellite (17.14 million), and only 1.3 million via terrestrial networks. To sum up the different figures, television is fully accessible all over Germany.

90 per cent of all German households have a personal computer and 77.9 per cent own a smartphone (DeStatis, 2020b), which are both technical prerequisites for access to the Internet. At the end of 2018, about 88 per cent of German households had broadband access of at least 50 MBs (BMVI, 2018). A lower density of Internet penetration is still observed for parts of Mecklenburg-Vorpommern and Sachsen-Anhalt, but this region also has a low population density (BMVI, 2018: 21, 24).

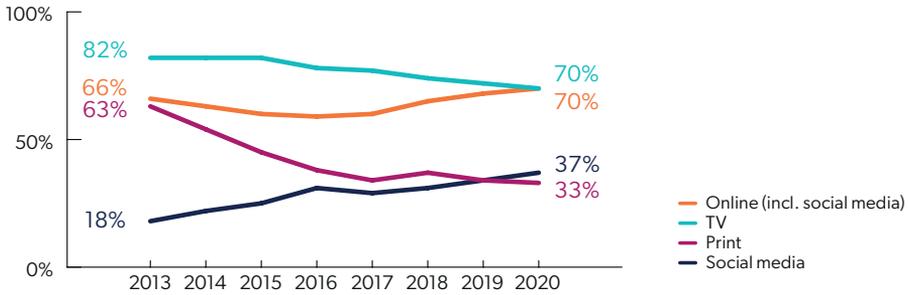
(F2) Patterns of news media use (consumption of news) 3 POINTS

The German citizen is well supplied with news from different sources.

IN 2011
2 POINTS

News information is amply available in Germany from a wide variety of sources. With an assumed literacy rate of nearly 100 per cent and a high per capita gross domestic product, media are affordable to most Germans. However, 12.1 per cent of the population has only low-level literacy (Grotlüschen et al., 2019). The broadcast media, newspapers, and the Internet are the main news providers for the German population. News consumption in Germany is still rather traditional, with television being the most important source of news.

Figure 1 Sources of news, 2013–2020



Source: Graph from Newman et al., 2020: 70

These patterns changed slightly due to the Covid-19 crisis. In April 2020, 69 per cent of Germans used online media as a source of news, 72 per cent television, 39 per cent social media, 41 per cent radio, and 26 per cent print (Newman et al., 2020).

Weekly offline reach for public service media news (ARD, ZDF, and Deutschlandradio) is at 66 per cent, with less reach for the commercial competitors (RTL 29%; n-tv 20%) (Schulz et al., 2019). However, television news consumption as well as radio news consumption has been declining over the years, while print shows a slight increase. The following is the data for people who are online, making up 89 per cent of the German population (Statista, 2019a).

95 per cent of the group watch, listen, or read the news at least several times a day – a stable percentage over the years. The number of adults who are online, who are very much or much interested in the news, has slightly declined to 68 per cent (Hölig & Hasebrink, 2019). Instagram has become a popular source on social media, with 38 per cent of 18–24-year-olds using it (Newman et al., 2020).

A different picture appears concerning print if we look at the whole population, comprised of Internet users as well as non-Internet users. More than half (55.8%) of the German population above 14 years old regularly read a printed newspaper (BDZV, 2020); 63.6 per cent of the German population above 14 years old are unique readers of the online version. Adding in mobile users who access news via smartphone or tablet, and 85 per cent of the population above 14 years old read printed or digital newspapers regularly. Regarding the vital regional and local mediascape of newspapers, 34 per cent use these newspapers at least once a week (Newman et al., 2019), which is a sharp decline of 5 per cent compared to the previous year (Newman et al., 2018).

Looking at differences in age groups, printed newspapers have their highest reach (72–76%) among people aged 50–70. On the other end, only 22.6 per

cent of 14–19-year-olds and 33.7 per cent of 20–29-year-olds read printed dailies regularly. These 14–29-year-olds together use the online version of dailies at 79 per cent (BDZV, 2020).

Public service providers like ARD and ZDF remain the most-trusted news brands in Germany along with regional newspapers. ARD news, the first channel of nationwide public service broadcasting, is regularly watched by 55 per cent of the online population above 14 years old, and ZDF news, the second channel of public service broadcasting, by 47 per cent (Newman et al., 2020). A study revealed that news is the most important genre on television (Gscheidle & Geese, 2017), with the average watching time of television news remaining stable over the years and amounting to 13 minutes per day in 2016. Three-quarters of the daily news consumption is allotted to public service channels. With 9.8 million viewers daily, the programme *Tagesschau* of the first public service channel ARD is the highest-ranked television news programme. The study showed that audiences demand competence and reliability.

(F3) Diversity of news sources

2 POINTS

IN 2011
2 POINTS

The variety of sources in news production is restricted in the sense that non-elite discourse and diversity of the social and cultural heterogeneity of society are reflected less. Some news agencies dominate the market. Investigation is mostly conducted in special units and is limited to large flagship media outlets.

The national news agency Deutsche Presse Agentur and Associated Press remain important sources in journalistic daily business. Deutsche Presse Agentur is a stockholder of 180 media companies, publishers, and broadcasting corporations in Germany. The concentration of publishers is also reflected in the concentration of news agencies. There have been significant mergers of German agencies since the 2011 MDM report. In December 2009, the German agency Deutscher Depeschendienst (ddp), with its customer base of over 350 customers, merged with the Associated Press (AP) and became the DAPD News Agency, in order to acquire an international focus in their news production. DAPD became insolvent in 2012 which, consequently, strengthened the market position for Deutsche Presse Agentur, which has been the main German news agency since then. The interviewees acknowledge the importance of Deutsche Presse Agentur and other news agencies, but made clear that material from news agencies is reviewed by in-house quality checks.

The magazine *Stern* and others also acquire text and images from quality international papers and print magazines like *The New York Times*. Content syndication is important both worldwide and within the European context. Content alliances in investigative reporting to create synergies for costly in-depth

reporting have been growing. Alliances with external fact-checking units (like Correctiv, a German network for fact-checking and investigative reporting) or international journalism networks (such as the International Consortium of Investigative Journalists – ICIJ), established over the last years, are a new phenomenon to counter false reporting and fake news. For the tabloid *Bild-Zeitung*, however, the exclusivity of a story is more important:

Of course, [...] we can only demand the money from our customers and buyers if the stories [...] that they hear, see and read in our shop are already exclusive, that is, originate from original BILD research. This is not usually possible, not always [...]. If we are of the opinion that other stories are so good, so entertaining, so exciting and [...] relevant for our readers [...], then, of course, we also report on these stories with reference to the primary source and try to go beyond the research of colleagues and provide added value.

Only if original research is not possible are other sources used as starting points for further research.

A strength of German media sources is a dense network of foreign correspondents, mostly due to public service broadcasters. ARD has around 100 foreign correspondents in 30 studios around the world (ARD Korrespondentenwelt, n.d.); ZDF has 17 foreign studios (ZDF, n.d.). The network of foreign studios of the commercial RTL Group consists of 24 studios (Deutschlandfunk, 2020).

The interviewees did not mention smaller specialised news agencies like special press services from the churches or the Mediendienst Integration, specialised in topics around Germany's diverse society, where about a quarter of citizens have a link to migration. The selection of news-making in terms of gender, age, and ethnicity is still a topic of major concern in Germany. Studies show that media content is characterised by poor representation when it comes to Islamic minorities, cultural diversity, and migrants (Hafez, 2009; Hafez & Richter, 2007). News is predominantly in line with news values; source diversity (Napoli, 1999), the diversity of personnel, and sources of news are not prioritised in terms of the above-mentioned categories. What is also worth mentioning here is that newspapers with fewer financial resources tend to unsubscribe to Deutsche Presse Agentur because their service is simply too costly.

Respondents unanimously rejected any significant influence of public relations material on their daily routine work. They say that the amount of such materials is increasing, but very little finds its way into coverage. However, in rare cases, such material triggers further investigations by journalists.

Compared to MDM 2011 (Marcinkowski & Donk, 2011), reservations against cooperating with competing or neighbouring media have dissipated. In Germany, such a network for investigative reporting has been established by the second-biggest newspaper, *Süddeutsche*, together with the public service broadcasters WDR and NDR (Rechercheverbund). While such cooperation has

duplicating effects for the audience when national media are involved, it may increase the diversity of sources when international networks are established. One such example is the *Panama Papers*, which had been analysed by the Rechercheverbund in cooperation with the ICIJ.

(F4) Internal rules for practice of newsroom democracy 1 POINT

Newsroom democracy is established by editorial statutes, which are common in German newsrooms. But journalists have limited influence on hiring decisions for editors-in-chief.

IN 2011
1 POINT

Media organisations in Germany implemented measures for internal transparency of newsroom decisions. Based on the Basic Law Art. 5 and federal broadcasting acts, newsroom democracy can be safeguarded by specific editorial statutes, internal programme councils, and editorial committees. Most of the public service media, like WDR or NDR, established editorial statutes. However, these instruments come into play only in conciliation when a conflict has already occurred (Kirchhof, 2017: 108).

Journalists are usually free to choose their reporting topics, however, the final decision lies with the managing editor.

We are confronted with this by the readers – “are you really independent?”

The truth is a very human one, there are group dynamics [in the editorial conference] and sometimes current dynamics decide what the dominant spin is.

On the question of journalists’ involvement in staff decisions, the answers differ. Editors-in-chief are usually appointed by the management, and in most cases, newsroom journalists are not involved in the process (as was the case a decade ago; see Marcinkowski & Donk, 2011):

The editor-in-chief is appointed by the board. For large brands like [our newspaper], he is appointed by the CEO. The deputy is proposed by the editor-in-chief, [...] whereby the board has to give their OK for each deputy of the editor-in-chief. It is not decided on a grass-roots basis [...], no chair group, no election, no primary election, no member survey.

When editors-in-chief are elected, usually the board of the publishing company are the electorate. In some print media, journalists also have a say in the election process of the editor-in-chief: “Yes, there is an editorial statute and it also provides for the rejection of the editor-in-chief as the ultimate weapon”.

The news magazine *Der Spiegel* has established more democratic, bottom-up election patterns. The magazine literally belongs to the staff, and everyone who is willing forms a committee that proposes and elects the editor-in-chief.

In public service broadcasting, the editors-in-chief are elected by the broadcasting council [Rundfunkräte], which is staffed by representatives of political parties, churches, unions, and other social groups. In 2009, a scandal made obvious that political influence in the broadcasting council had been dominant. The incumbent ZDF editor-in-chief Nikolaus Brender's contract had not been extended after massive intervention by the conservative parties and the Minister-President of Hesse, with insiders suggesting that even the chancellery was involved (see Indicator C2 – Independence of the news media from powerholders). Subsequently, stakeholders pressed charges and the Federal Constitutional Court decided in 2014 that politicians' representation in broadcasting councils and boards would be limited to 33 per cent.

All in all, there are no greater efforts to involve newsroom journalists in staff decisions except for broadcasting councils in public service media. The situation remains with neither routines for, nor obligations to, newsroom democracy in electing the editors-in-chief, and there is also no discussion about filling other leading positions in the newsroom. Generally, the decision lies with the editor-in-chief or the heads of department, as there is a strong hierarchical structure. All interview partners agreed that decisions on subjects and the framing of covered issues are debated in the daily editorial meeting, in which all journalists have an equal say (see also Marcinkowski & Donk, 2011). However, it is often the managing editor who makes the final decision.

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS

IN 2011
2 POINTS

Newsroom journalists enjoy independence on editorial decisions. The management, sales department, and newsrooms are separated most of the time. Although there was one severe case of political influence in public service media, this was resolved by a constitutional court proceeding.

Formal rules to separate newsrooms from management, including the board, rarely exist in private media, but are legally laid down in public service media. In daily practice, editors-in-chief report that they enjoy full independence from the management and the sales department. They say, "We are journalistically independent of the advertising department. There would be an immediate uproar if the advertising department wanted to have a say in journalistic issues". In one leading newspaper, this is laid down in a formal statute, while the others claim that the management fully accepts this independence.

However, in some management structures, journalists are also represented. Others report there is informal cooperation with the advertising sales department, referring to more general strategies on how to reach target groups. They say, "Yes, of course, you talk to each other more than before [...] The market

demands this, and we would be blind to refuse”. Nevertheless, editors-in-chief report a high sensitivity to advertising influence and claim to have no knowledge about the specific data on advertising revenues. They have no formal cooperation with the advertising sales department, and at most, they know which industries have the largest share of advertising.

Generally, the editor-in-chief is the formal leader of newsroom work. Furthermore, the German language and the practice in German newspapers differentiate between a publisher and a sort of general editor [*Verleger – Herausgeber*] who only has a responsibility for the general orientation of the news medium.

(F6) Company rules against *external* influence on newsroom/editorial staff

2 POINTS

IN 2011
2 POINTS

Leading news media in Germany receive their income from diverse sources. There is no single large advertiser.

Leading German media in our sample are either public service media, with a large part of their income coming from the licence fee, or they are part of bigger and (more or less) well-financed companies, where external influence is quite unlikely because no big advertiser could sustain a boycott for a long time. There are no explicit rules nor structural boundaries against such influence. Some editors-in-chief report rare attempts to impose an advertising boycott on a medium, but the editors resisted this. Advertising from the state or government does not play a role in Germany.

Traditional media still lead in advertising, with television being the most important advertising platform (48% of all advertising expenditure; newspapers have 15.4%; magazines have 10.7%; and online media has 10.9%) (Möbus & Heffler, 2019).

We find great variance with regard to the income composition of different media outlets. Commercial broadcasting, which is nearly completely financed by advertising, earns 92 per cent of all television advertising. In 2018, the second public service media channel, ZDF, was financed 85.4 per cent from the licence fee, 7.9 per cent from advertising and sponsoring, and 6.7 per cent from other incomes, such as programme selling and financial revenues (ZDF, n.d.). The first public service media channel, ARD, has a similar income structure. The financial situation of public service media is quite stable and secure, as it is determined by a complex procedure that inhibits governmental influence. The public broadcasting corporations declare their financial needs for four years, this claim is then proved by the independent commission for settling the financial need of public service media (KEF). KEF then pronounces on the basis of its own calculations a recommendation about the needed amount of the licence

fee, and this recommendation must be approved by all 16 parliaments of the *Länder* [states]. The current round of settling the amount of the licence fee failed because one of the *Länder* parliaments with a majority of the right-wing party Alternative for Germany (AfD) and Christian Democrats (CDU) did not agree to any augmentation of the licence fee. The AfD wants to abolish public service media altogether. The case has been taken to the Constitutional Court.

Newspaper income has changed significantly. While in 2008 it earned 45.2 per cent of its income from advertising, 46.2 per cent from sales, and 8.6 per cent from newspaper supplements (Marcinkowski & Donk, 2011), this ratio has changed in 2018 to 31.1 per cent advertising, 64.4 per cent sales, and 4.4 per cent newspaper supplements (Keller & Eggert, 2019). Details of advertisers for the whole print industry show a fairly diverse picture, such that dependence on only a few or even government advertisers seems to not be a problem for newspapers. It is even acceptable for some media to abstain completely from some advertising revenues if it clashes with reporting, for example, “In the health sector we have practically no advertising from pharmaceutical companies because we are very critical of medical issues”.

(F7) Procedures on news selection and news processing 2 POINTS

Internal debate on news production is practised more than once every day and is part of journalistic routines.

IN 2011
2 POINTS

Journalists are described as experienced and very professional. Like in MDM 2011, most of the journalists in the main news media have graduated from university, done an editorial traineeship, or attended a journalism school. By doing so, they learned the essential procedures of news selection by the time they started their careers. Specific socialisation for each medium is not regarded as necessary, as all media agree on the concept of news journalism, which is based on routines and procedures obligatory for all news media. The processing of news, as one of the central elements of a journalist’s self-image in Germany, is a basic competence – all journalists know how to “make the news” after they have been educated. Therefore, these procedures do not need to be written down in stylebooks for the newsroom (see also Marcinkowski & Donk, 2011).

This is partly event-driven of course, but the procedures are such that we meet in the morning. [...] and we as journalists are experts at sorting. This means that each of us comes to the editorial office in the morning with [...] various topics. Of course, we also see what other media have done that are awake before us. [...] then we sort here [...], and after our 10.00 a.m. meeting for our desk we go to the 11.30 a.m. meeting with [...] colleagues and then we negotiate again.

The rather strong impact of formal education of journalists in countries such as Germany – which is an example of North and Central European media systems – is also described in the current research (Hallin & Mancini, 2004: 173). Journalists do have a say in editorial meetings; however, managing editors claim to have the final say when it comes to the selection and processing of news.

There are so far no formal routines at play in ZDF to evaluate and check platform content, but journalists assert that analytical tools have become more important to understand underlying interests in social media content. The news magazine *Der Spiegel* established a special unit to analyse user-generated content (UGC).

Gender and diversity issues were not mentioned as regular topics in the daily editorial meetings.

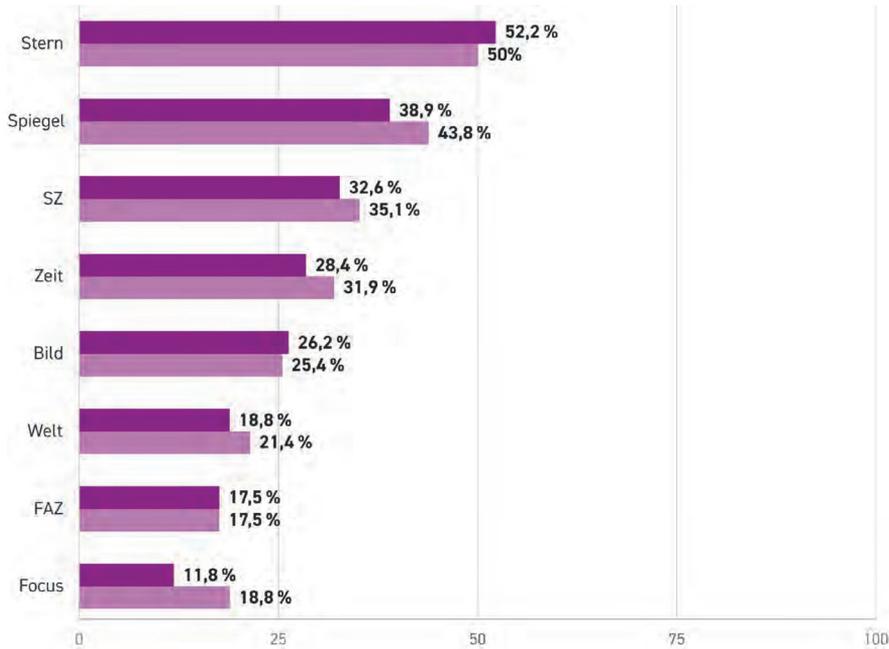
(F8) Rules and practices on internal gender equality 2 POINTS

Media organisations are more aware of gender inequalities than they were a decade ago. However, systematic measures to even out gender imbalances, like supporting female talent or fighting the gender pay gap, remain on the agenda. However, informal efforts to eliminate them exist and have already succeeded in some respect.

In Germany, about 52 per cent of those working in journalism and editorial boards were women in 2017, according to official jobs report (Statistisches Bundesamt, 2019b). These findings correspond with an International Women's Media Foundation (IWMF, 2011) study about female employees in important media companies in Western Europe. Taking a closer look at senior professional levels and higher, however, reveals the existence of a glass ceiling. In some media outlets, gender equality is accomplished at the lower levels of the professional hierarchy, but this is not true for leading positions in key media outlets.

In 2019, 10.2 per cent of editors-in-chief in regional newspapers were female. In nationwide newspapers, 20 per cent of editors-in-chief were female (Pro Quote Medien, 2019: 23). The liberal-left newspaper *taz* has the highest number of high-ranking women (50.8%), followed by the weekly *Die Zeit* (33.7%) (Pro Quote Medien, 2019: 24). The ranking in Figure 2 reflects the whole print sector.

Figure 2 Percentage of women in leading positions in eight German print media



Comments: The top (darker) bar indicates the “women’s power index”, consisting of high positions in the hierarchy, whereas the bottom (lighter) bar shows all leading positions, including middle and lower management.

Source: Graph from Pro Quote Medien, 2019: 52

The print magazine *Stern* has the highest “women’s power index”, with 52.2 per cent women at the highest level of the hierarchy; the news magazine *Focus* has the lowest, with 11.8 per cent and a 7 per cent gap between that and the scale which also features middle and lower management. In the online editions of traditional newspapers, the number of women in leadership is higher.

The editors-in-chief of the popular magazine *Stern* and the news magazine *Der Spiegel* pointed out in interviews that no internal rules, recommendations, codes, or guidelines to support and promote women journalists in their careers are in place. One chief editor is concerned about the cultural aspect of homogeneity within editorial units and its potential influence news stories:

For me, it is this aspect that I would call unconscious bias [...] because what worries me is what we do not see. And democracy is also the participation of the many and [...] we [journalists and editorial units] naturally live in our own bubble. [...] the media companies [in Germany] will not be able to hire on a large scale in the next few years. The possibility of change through people we bring in from outside is very limited [...]. But how do we ensure when generating our topics [...] that we are not blind?

However, at *Stern*, a top-down order finally enforced gender parity amongst their staff. This parity has not yet been reached in the gender pay gap. One editor-in-chief of a major paper says, “According to my [...] – and I have to know – it is not the case that women are paid less than men. In my observation, women earn as much (or little) as men”.

At the second-biggest newspaper, *Süddeutsche Zeitung* (SZ), women can take advantage of a variety of support schemes, like coaching or lunch talks with members of the executive board. There is basically no difference between women’s and men’s salaries, and staff is paid the standard wages according to their position. The weekly *Die Zeit* helps women combine professional and family life, as there is no mandatory attendance in the company, and meetings take place at family-friendly hours. Moreover, *Die Zeit*’s staff is especially aware of gender-sensitive language. However, looking at the bigger picture, gender equality in the German media landscape is still based on opaque and localised measures.

I have a watchlist [...] with women in investigative journalism [...], which is an imaginary pool of female colleagues, where I see whether they would be something for us at a certain point. [...] But it is not [...] that we have an automatic process for measuring and advancing gender equality in media.

The broadcasting sector shows slightly different patterns, whereas in public service media, the staff sometimes consists of one-half to two-thirds women, but they only make up 30–50 per cent of leading positions (Pro Quote Medien, 2018: 51). In commercial broadcasting, women also face this glass ceiling with an average of around 20–30 per cent reaching leading positions (Pro Quote Medien, 2018: 60–65).

Interviewees in the public service television sector reported that special awareness and some child-care assistance are the only instruments that currently exist to support female journalists. Although the figures differ from what the interviewee of the commercial sector said, the respondent from RTL said that diversity is of high importance. The broadcasting station established a special unit to empower female talent and professionals to take up leading positions. At least in middle management, women journalists outnumbered men. Again, there is no systematic tool, like a quota, but a special sensitivity to support women, such as with family-friendly working hours: “[We’re trying] to get women into these leadership positions – why? Because our news and magazines are mostly watched by women”.

Only one respondent in the sample of the leading news media made clear that there is an informal rule to positively discriminate against women and support their careers. A quota system as a formal rule is not in place in the leading news media. However, the female journalists’ association Pro Quote monitors media’s commitment to gender equality and publishes reports and easy-to-grasp

graphics about the state of women's careers in news media and hence functions as a pressure group. National legal frameworks enforce gender equality at the workplace with opportunities for parental leave.

(F9) Gender equality in media content

1 POINT

German media became increasingly sensitive to gender and diversity issues, but no formal or legal regulations are in force.

The issue of selection of sources that reflect societal diversity in terms of gender, age, and ethnic origin is a highly sensitive topic in German newsrooms. Nearly all interlocutors claimed that they have a strong newsroom commitment to cover gender equality or inequality and diversity issues. The thirtieth anniversary of German unification revealed how Eastern German topics had been neglected for a long time and increased the sensitivity to diversity issues and of all voices being heard in the media. Editors-in-chief and journalists report that they have newsroom discussions on how reporting of such issues should be done, although the use of gender-equitable headlines, pictures, and language was not mentioned in the interviews. The interviewees claim the existence of internal rules and recommendations regarding the promotion of gender equality in media content, although no codes or guidelines exist for this purpose. We did not find any mechanisms in place to monitor and guarantee gender balance in the news subjects, and also no internal rules or recommendations to produce gender-sensitive coverage of gender-based violence.

There is no official institution monitoring the representation of women in the media. The private foundation MaLisa, funded by famous television actors Maria and Elisabeth Furtwängler, tries to fill this gap. The NGO funds research about the representation of women in television and gender stereotypes. One of their findings concerning the coverage of the Covid-19 crisis reports that on television, only one in five experts was female (22%). In online reporting, women were only mentioned as experts about 7 per cent of the time. It was mainly men who were mentioned as health professionals, although almost half of all doctors in Germany are female. Only one in five of the doctors interviewed on television without a management function was female (Prommer & Stüve, 2020). Further studies are accessible online.

According to the Global Media Monitoring Project (GMMP, 2015), which analyses the representation of women in the media, the only successes were outside of news, such as in portraits, background stories, features, and fiction. Although legislation and public awareness focus on gender equality, women still do not appear equally in hard news. The GMMP further states that the set of factors defining newsworthiness excludes women structurally in traditional

media. However, in electronic media, there are less orthodox criteria, which leads to mixing the news, with cat content and celebrities featured alongside political news.

According to the latest GMMP data, 32.6 per cent of all news subjects in the classical media (print, radio, television) and 24 per cent on Twitter and online-news were women. However, it must also be noted that the GMMP's monitoring day in 2015 was not typical for news in Germany because of a dramatic German airplane crash in the French Alps. A large reason for the high representation of women as news subjects is the fact that Germany had a female chancellor at that time, Angela Merkel. Nevertheless, this is a significant change compared to 2010, when only 21 per cent of the people interviewed, heard, seen, or read about in German mainstream broadcast and print news were women. The report further states that there are seldom stories which highlight gender equality issues. Inequality was only mentioned in the areas of human rights and gender violence. Discussions of stereotyping of gender roles are nearly absent in serious German news reporting.

There is a relevant range of women's alternative media, offline and online, although the heyday of feminist media is gone, with the focus of feminist activities concerning the media more oriented to changing structures (see Indicator F8 – Rules and practices on internal gender equality). National legal frameworks concerning gender equality and relevant media content do not exist. Only the legislation passed in 2015 by the German parliament – which stipulates that 30 per cent of the members of supervisory boards of DAX-listed firms must be women – may affect the media.

The case for the representation of ethnic minorities and migrants is even worse. We observe a lot of activities aiming for the increase of these groups in reporting, but minorities are still a group not speaking for themselves and suffering stereotyping and discrimination.

(F10) Misinformation and digital platforms (alias social media)

2 POINTS

In most leading German news media, there exist specially trained experts to monitor misinformation. In only a few cases are algorithm-based tools used, as traditional means of fact-checking are considered more valuable.

Editors-in-chief of all newsrooms report they have specific rules and checks for combatting misinformation. Additional care is taken in newsrooms if digital platforms are the source of news. All journalists explain they rely more on traditional means of checking facts – as well as the documentation department and their own experts, where available – than on algorithmic tools. The major-

ity of the newsrooms have specialist, though small, teams for this task. Some newsrooms cooperate with external fact-checkers, and some have a special department searching for fake news on digital platforms and correcting them. One interviewee said, “We cooperate institutionally with Bellingcat for fact-checking, we have a picture documentation in house. We are also involved in international journalistic networks”. Algorithmic tools or other machine-based instruments are provided and in use in some cases, and not yet provided in others. In one case, software for qualitatively ranking user-comments is currently being tested. Training on how to distinguish facts from misinformation is provided regularly and is eagerly sought by journalists.

Some editorial news media have started to form content alliances with other media to expand their fact-checking competencies and resources. A preferred partner here is the research centre Correctiv. Public service media like ZDF and ARD have their own fact-checking units (ZDFheuteCheck & ARDFaktenfinder).

(F11) Protection of journalists against (online) harassment 2 POINTS

Journalists can rely on their employers in such cases, but the news media organisations decide whether they will assist on a case-by-case basis.

In Germany, online harassment in the sense of hate speech or badgering of journalists is increasing rapidly. A recent survey among 322 journalists of the University of Bielefeld and the special service Mediendienst Integration revealed that over 60 per cent of the respondents had been harassed online during the last 12 months, and that social media confrontations had become part of their daily routine (Pappendieck et al., 2020). Compared to 2017, figures rose by 20 per cent, and the researchers observed a radicalisation of assaults, mainly from the extreme right (Preuß et al., 2017). 16 per cent of journalists reported offences or even death threats, and also physical assaults, while doing their work. Women are a particular focus of online hate, as a female editor-in-chief indicates:

You have hundreds of comments on some topics within minutes. And that is when you write as a woman, and even more so when you have an immigrant background [...] that is really ugly. There is practically no topic that I can write about [...] where you don't get sexist comments, no matter what you write about. [...] and here we have to protect our colleagues.

Claudia Neuhaus, a well-known football reporter in the public service television provider ZDF, experienced a sexist social media storm just because she presented the football world cup for men in 2018 (Bau, 2018). For ZDF-presenter Dunja Hayali, Twitter hate speech has become part of her daily life. Hayali is

a member of various minority groups and speaks out against hate, making her an obvious target for right-wing extremists. She gets support from ZDF's legal department and personally copes by intimidating assaulters, and sometimes visiting them at home with a camera team to talk about their offence and her feelings about it. "We have become more aware of the problems, we are also working with the police [...]. However, I have to say that I am shaken by the low clarification rate by the police", observed her colleague.

WDR investigative journalist Georg Restle received a death threat via mail, which, according to the police, was linked to the murderer of a politician by the extreme right (Huber, 2019). Also, journalists belonging to a minority group are constantly under threat:

Our moderator [...] is black and [...] he is latently exposed to [harassment]. After this [...] broadcast he was affected by massive online harassment and also here [...] on the street. He is a freelancer, but of course, we protect him. [...] The legal department says it can cost 3,000 or maybe 50,000 euros. But we protect him, no matter what.

In the face of these alarming developments, the respondents also report a high amount of online harassment and hate speech against staff, with women being particular targets of sexist hate. Not all media organisations have special units to support journalists, though *Der Spiegel* and *Stern* make efforts to establish internal units or ombudspersons. Respondents point out that the organisations provide psychological and legal aid if the case can be clearly associated with work. However, no relevant provisions in work contracts are in place, and there seems to be a grey zone of assaults between private and work life where the companies may be reluctant to help. Additionally, the detection rate of law-enforcement agencies is also very low.

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 2 POINTS

The television audience market is extremely concentrated with a strong counterweight of public service broadcasters. Print and radio markets are not very highly concentrated.

IN 2011
2 POINTS

Traditionally, media concentration is measured in terms of the media sectors of print, television, radio, and online media. This is also the guiding ratio for this indicator. However, changes due to the convergence of media markets, media offerings, and end devices are not sufficiently taken into account by the current media concentration description, or by the media concentration law.

The television market is divided into public service and the commercial market. At the end of the first half of 2018, there were 21 public and 169 private television channels with a nationwide licence to broadcast, as well as teleshopping channels and programmes with a foreign licence. More than 200 regional and local programmes complement the television offering (KEK, 2018: 18). While public broadcasters altogether had a market share of 47.8 per cent of the audience, commercial broadcasters have a slight majority (AGF, 2019). These have, for a while, been divided into two big groups: one – the RTL group – being part of the Bertelsmann company; and the other – ProSiebenSat.1 Media AG – now a Societas Europaea/SE with the US-Investor Capital Group and Credit Suisse holding significant shares (Lang, 2019).

The RTL group has an audience market share of 27.2 per cent of the television audience market, Pro7-Sat1 has 17.8 per cent, and the rest goes to diverse broadcasters, the biggest among them being Sky, with a market share of 1.5 per cent of the whole television audience market (KEK, 2018: 68). Looking only at the commercial broadcasting market, the three biggest companies have a concentration ratio CR3 of 0.8 which is an extremely high ratio.

The German radio market is characterised by a pluralistic ownership structure and a multitude of local and regional radio programmes. The main owners include regional newspaper publishers and national media groups. On a nationwide scale, no broadcaster has a market share relevant under media concentration law. According to the Media Diversity Monitor (MedienVielfalts-Monitor, 2019), the opinion market for radio is dominated by ARD's public service programmes, with a market share of 55 per cent, the largest private provider is RTL Group with a market share of 7 per cent, ahead of Regiocast with 4 per cent and Müller Medien with 3 per cent (KEK, 2018: 20). Here, the CR3 on the commercial radio market is a weak 0.31.

In recent years, the increase in concentration has been moderate and has been in the range of a tenth of a percentage point. In 2018's first quarter, it had increased by 1.8 percentage points compared with 2016. The market share of the ten largest publishing groups in terms of total circulation is 61.6 per cent. Within the category of subscription newspapers, the five highest-circulation publishing groups have a market share of 38.6 per cent (Röper, 2018). Calculated according to concentration ratio with reference to the three biggest companies, the CR3 is at 0.31 – a low level. Concentration on the print market is increasing because of economic pressure due to declining circulation figures and advertising revenue. About 60 per cent of German districts are served by only one local or regional paper, and about 35 per cent by two (Schütz, 2012: 586). The highest concentration can be observed in the single-copy-sales segment of newspapers, with about 80 per cent belonging to Axel Springer SE. Their flagship tabloid daily *Bild* reaches 11.32 million readers, despite a 10 per cent

loss between 2018 and 2019 (KEK, 2019). E-paper sales and payment models in the online arena are still of low economic relevance.

The availability of a large number of newspaper editions is supported by a system of press wholesalers with the features of price maintenance, territorial protection, obligation to contract, and right of return.

The most important online news websites are *bild.de* (19.25% market share), *Spiegel online* (9.82%) (which has merged with *Der Spiegel* to form one brand), and *focus online* (7.56%). They sum up to a low CR3 of 0.36.

Transparency in the media market is protected by an independent commission (KEK Commission for Settling of Concentration in the Media Market), regular refined reports of press ownership (Röper, 2016, 2018), and the publication obligation of the press concentration law.

However, media concentration is not fully considered in terms of media cross-ownership. Cross-ownership between broadcasters of nationwide television and those publishing groups active in the daily newspaper market exists at Bertelsmann/Gruner + Jahr, Axel Springer Verlag, DvH Media, Bauer Media, and DuMont. These are only reported by KEK, but not covered by the media concentration law.

With respect to cross-ownership between traditional and online media, media companies can be classified as follows:

- private German television groups ProSiebenSat.1 Media SE and Medien-gruppe RTL Deutschland, whose online portfolios mainly comprise transferred television channel brands, video-on-demand platforms, video portals, and games portals;
- major publishers that are broadly diversified on the Internet, such as Axel Springer, Hubert Burda Media Holding, and Holtzbrinck, which have nearly all types of Internet offerings in their portfolios, in addition to transferred print brands;
- major German publishing houses that focus on the online transformation of their strong journalistic print brands (e.g., Der Spiegel, Gruner + Jahr);
- and typical regional newspaper publishers or publishing groups, which usually only diversify into Internet offerings with a regional reference and classified advertising cooperation (see Indicator E2 – Media ownership concentration regional (local) level).

Per the legislation currently in force, the Commission on Concentration in the Media Sector (KEK) is not competent to deal with concentration issues in the online sector. Nevertheless, KEK dealt in detail with the future of media concentration law in the last Concentration Report and emphasised the need for the timely introduction of an overall opinion market model and a new media concentration law designed independently of broadcasting (KEK, 2019).

(E2) Media ownership concentration regional (local) level 2 POINTS

On a regional level, ownership concentration remains remarkably high. In most German regions, one newspaper is dominant, and the public service broadcaster still dominates the local radio market.

IN 2011
2 POINTS

Germany has a large variety of media at the *Länder* level. But the situation is quite different with regards to television, radio, and print.

Regional public service news broadcasters operate at the level of the 16 German states. In some cases, they cooperate within one corporation, so that instead of 16, there are only 9 public service broadcasters of ARD. Table 2 below shows the market share of the third television programmes (ARD) in their transmission area. In each area, these television programmes also produce news for smaller sub-regions.

Table 2 Third television programmes in their transmission area

Broadcaster	Audience share (%)
NDR	8.0
RBB	6.4
MDR	10.0
WDR	7.7
HR	6.3
SWR/SR	6.9
BR	7.9

Source: BR Medienforschung (2021)

Local or regional broadcasters have been playing a minor role in commercial television. According to the interstate treaty on broadcasting, regional window programmes are to be set up in the two nationwide full-range television channels with the highest reach. This applies to RTL and SAT1. However, national broadcasters are based in different *Länder*, the most important ones in Cologne/Northrhine Westphalia (RTL group) and Munich/Bavaria (ProSiebenSat1). Non-commercial broadcasting projects such as open channels had been previously supported by the supervising bodies, but transformed into training channels for universities and other educational institutions.

The German radio landscape is largely shaped by regional and local offerings. This results from the regulatory competence of the federal states in matters of broadcasting, leading to regional rules for public broadcasting, and regional licensing of commercial broadcasting.

The public service broadcasting corporations each broadcast several radio programmes, so that altogether there are 64 public service radio programmes

in Germany on the regional level (ARD). Although this multitude of radio channels allows for a rich news provision in the regions, it is also the subject of numerous attacks on public service media, which is under strong pressure to reduce this diversity.

Table 3 Market share of radio programmes

Programme	Share
<i>BR (Bavaria)</i>	
Bayern 1	25.6
Bayern 2	4.3
BAYERN 3	19.7
BR-Klassik	1.9
B5 aktuell	5.5
Bayern plus	–
B5 plus	–
BR-Verkehr	–
BR Heimat	1.1
<i>HR (Hessia)</i>	
hr1	10.4
hr2	1.4
hr3	14.6
hr4	9.5
hr-iNFO	5.5
YOU FM	4.1
<i>MDR (Sachsen; Thuringia; Saxony-Anhalt)</i>	
MDR SACHSEN	25.4
MDR SACHSEN-ANHALT	22.1
MDR THÜRINGEN	27.6
MDR AKTUELL	3.9
MDR KULTUR	2.6
MDR JUMP	13.0
MDR SPUTNIK	2.6
MDR KLASSIK	0.3
<i>NDR (Niedersachsen; Mecklenburg-Western Pomerania; Hamburg)</i>	
NDR 90.3	13.8
NDR 1 Niedersachsen	18.5
NDR 1 Radio MV	24.8
NDR 1 Welle Nord	15.4
NDR 2	17.0
NDR Kultur	2.1
NDR Info	4.4
N-JOY	6.9

~ GERMANY ~
SOLID JOURNALISTIC PROFESSIONALISM AND STRONG PUBLIC SERVICE MEDIA

<i>RB (Bremen)</i>	
Bremen Eins	20.3
Bremen Zwei	4.7
Bremen Vier	16.7
Bremen Next	6.8
<i>RBB (Berlin; Brandenburg)</i>	
Antenne Brandenburg	8.6
Fritz	4.1
Inforadio	4.8
radioeins	6.4
rbbKultur	1.6
rbb 88.8	7.2
<i>SWR (Baden-Württemberg; Rheinland-Pfalz)</i>	
SWR1 Baden-Württemberg	13.0
SWR1 Rheinland-Pfalz / swr	13.2
SWR2	2.3
SWR3	21.6
DASDING	2.7
SWR4 Baden-Württemberg	11.7
SWR4 Rheinland-Pfalz	9.6
SWR Aktuell	0.9
<i>WDR (North Rhine-Westphalia)</i>	
1LIVE	18.0
1LIVE DIGGI	–
WDR 2	19.9
WDR 3	2.0
WDR 4	14.6
WDR 5	4.5
KiRaKa	–
COSMO	–
VERA	–
<i>SR (Saarland)</i>	
SR 1 / sr	20.5
SR 2 KulturRadio	3.5
SR 3 Saarlandwelle	23.3
UNSERDING / sr	–
Antenne Saar	–

Source: ARD, 2020

In the ranking of the top 20 radio programmes, the most popular channels of public service media hold 15 positions. Table 4 shows the daily reach in thousands.

Table 4 Top 20 radio programmes

Programme	Type	Reach per day (pop. 14 +) thousands
SWR3	PBS	3,912
WDR2	PBS	3,737
1Live	PBS	3,451
Antenne Bayern	Commercial	3,099
Bayern1	PBS	3,010
Bayern3	PBS	2,771
NDR2	PBS	2,740
WDR4	PBS	2,269
Deutschlandfunk	PBS	2,030
NDR1 Niedersachsen	PBS	1,831
Spotify	Music streaming	1,725
Hit Radio FFH	Commercial	1,555
Radio ffn	Commercial	1,397
SWR1 BW	PBS	1,337
SWR4 BW	PBS	1,258
N-Joy	PBS	1228
Hr3	PBS	1,209
MDR Jump	PBS	1,135
Klassik Radio	Commercial	1,087
MDR Sachsen	PBS	1,073

Comments: PBS = Public service broadcasting

Source: Gattringer & Turecek, 2018

Additionally, there are 383 commercial radio channels at a regional or local level (Vaunet, 2020). Between one and four commercial radio stations broadcast in each *Länder* – an exception is the Berlin area and Brandenburg, with 14 state-wide programmes (Rühle, 2014). There are also significant differences in the number of local radio stations between states. Some federal states (Hamburg, Lower Saxony, Schleswig-Holstein, Saxony-Anhalt, and Thuringia) have no local radio stations, whereas in Saxony, Rhineland-Palatinate, and Baden-Württemberg, there are 10–20 local radio stations. North Rhine-Westphalia

has 45 local stations, marketed by the state-wide radio NRW. The greatest local radio diversity is in Bavaria, with 65 local radio channels. However, the majority of them are owned by a few media owners, such as Axel Springer Verlag, Nordwest-Zeitung, Burda, Madsack, Moira, Oschmann, Regiocast, RTL Group, and Studio Gong (Lehmann, 2016).

Local and regional newspapers are published in and provide information about one of the 401 German districts (*Kreise* and *kreisfreie Städte*) (Der Bundeswahlleiter, 2019). A closer look at ownership concentration in the regional newspaper market reveals a tendency towards monopolisation. There are different figures, yet all of them yield the same result. In most of the districts, there is no competition between local and regional newspapers.

As an example, we describe the situation in North Rhine-Westphalia, which is the *Land* with the highest population. The efforts of a few large publishing houses led to (partial) takeovers, cooperations, and the establishment of new joint editorial offices. This also led to an increasing number of newspapers that are actually in competition with each other exchanging their content (Landtag Nordrhein-Westfalen, 2020). Various cooperation models of editorial offices are leading to increasing concentration in the daily newspaper market in the number of titles and main editorial offices, but circulation continues to decline. The number of monopoly areas is growing in local reporting, and the number of newspaper editorial offices that create content themselves is declining (Röper, 2018).

Table 5 Newspapers in North Rhine-Westphalia

	1993	2010	2012	2016	2019
Newspapers	50	42	40	39	38
Main editorial offices	22	18	18	18	14
Sold circulation	4,330,800	3,007,600	2,875,600	2,476,800	2,206,987
Average circulation per newspaper	86.6	71.6	71.5	63.5	58.1

Source: Landtag Nordrhein-Westfalen, 2020

The local media provision is thus problematic. While dozens of television channels and several national daily and weekly newspapers report about current events in Germany and all over the world, in some places, one can be glad if there is still a local edition or a locally reporting radio or television programme. In many places, local media diversity is no longer even conceivable. Some mayors supplement their official journal with editorial contributions on current events in the municipality; this is legally questionable, but in many cases, it is born out of necessity. If there is no one left to whom the official could send their press release, then they themselves quickly become a media provider.

(E3) Diversity news of formats

3 POINTS

IN 2011
3 POINTS

News formats are abundantly available, and citizens can choose from a very long list of news formats in all media sectors. Popular news formats offer snackable and mobile news with special apps. News formats are of high quality, and a majority trusts them.

German leading news media provide a long list of formats, from headline news online to two-hour long features in radio, in areas such as politics, economics, culture, and so on. Germany's public service broadcasting providers (ARD, ZDF, Deutschlandfunk) provide their audiences with a wide variety of news and information formats. Whereas ARD delivers nationwide television and radio formats, ZDF is a nationwide television provider, and Deutschlandfunk offers nationwide radio programmes. Das Erste (ARD) and ZDF show the highest information competence and provide the two most-viewed evening news shows on television (*heute*, 19:00, by ZDF, and *Tagesschau*, 20:00, by Das Erste – ARD). Table 6 shows the proportions of information for the top five stations and gives an impression of the diversity of formats.

Table 6 Average reach and market shares of television news, 2018 and 2019¹

Mon-Sun	Viewers (million) 2018	Viewers (million) 2019	Market share (%) 2018	Market share (%) 2019
Heute 19:00 (ZDF)	4.070	3.813	18.2	17.2
Tagesschau 20:00 (ARD)	9.630	9.795	34.5	35.5
RTL Aktuell 18:45	3.010	2.845	14.1	13.5
Sat 1 Nachrichten (19:55)	1.290	1.197	4.7	4.4
ProSieben Newstime 18:00	0.610	0.626	3.6	3.7
Heute-journal 21:45 (ZDF)	3.930	3.718	14.7	14.1
Tagesthemen 22:15 (ARD)	2.190	2.133	10.0	10.0

Source: Zubayr et al., 2020: 117

The two big public broadcasting services (ARD, ZDF) deliver news throughout the day, starting with a joint morning and midday magazine followed by news shows during the day and longer news programmes at 17:00, 19:00, and 20:00. Furthermore, both present a late-evening news magazine including reports, info magazines, and documentaries, as well as a news magazine at midnight. The news format with the broadest reach in Germany is the public service television news format *Tagesschau* (20:00), with average viewing figures of over 9 million viewers online and offline. In times of crisis, *Tagesschau* is the most consumed news source. During the peak of the Covid-19 crisis in March 2020,

tagesschau 20:00 sometimes reached over 17.4 million viewers and a market share of over 46 per cent (15 March 2020), about double the average. Famous mobile news products are the *tagesschau*-app and the hourly updated news streams *tagesschau24* and *tagesschau 100 seconds*. The second-biggest public service television station ZDF provides the less-known ZDFheute-app. These new formats are a response to changing viewing habits and increased mobile news consumption.

The news show *heute* (19:00) by the public service television provider ZDF is the second-biggest player in the television news sector. Both news formats are fifteen minutes long. The late-night formats *tagesthemen* and *heute-journal* (ZDF) have a broad reach as well. There is lesser variety in online and offline news formats in the commercial broadcasting stations RTL, and Pro7/Sat1, which are also consumed less due to the dual system of Germany's broadcasting sector. Whereas public service media are obliged to offer a variety of news and information as one of their core functions, commercial broadcasters mostly offer entertainment and only basic information. Sat1 broadcasts a morning show (*Frühstücksfernsehen*).

Besides these, special audiovisual news channels provide 24/7 news, consisting of two commercial and one public news channels (ntv, n24; Phoenix).

The public service media's information competency is also reflected in political and investigative magazines, reportages, and documentaries, which constitute an essential part of their programmes. Whereas ARD (Das Erste) broadcasts 34 per cent political news per day in a four-week random sample in 2018 (17:00–01:00), and ZDF 31 per cent, the main commercial newscasts present 29 per cent (RTL) and 18 per cent (Sat.1) per day on politics. However, commercial television's news formats tend to present more lurid information (Krüger et al., 2019).

Table 7 Share of informative content in television (per cent)

	News	TV magazines	Documentaries
ARD	34	29	23
ZDF	31	29	19
RTL	29	47	5
SAT1	18	36	22

Source: Krüger et al., 2019: 236

Radio news is delivered every hour by all public broadcasting services and most commercial stations. Every regional radio station uses one or two frequencies for special information programmes, such as WDR3 and WDR5 in the largest German state, North Rhine-Westphalia. The national radio information pro-

grammes are broadcast by *Deutschlandradio*, which offers three special interest format channels: *Deutschlandfunk* (news and information), *Deutschlandradio Kultur* (news about cultural aspects of life), and *DLF Nova* (for young target groups). All three are clearly news-oriented with only small amounts of music.

The print sector continuously lost market share during the last decade, and the online sector grew dramatically, often by serving snackable news for free. Users tend to avoid subscriptions, and editors are still searching for sustainable profit models. However, printed newspapers still reach a comparably high number of readers in Germany. The tabloid newspaper *Bild* is the most read with over 1.6 million copies sold in 2018, a decrease of over 7 per cent compared with the previous year. This is followed by five national quality newspapers: *Süddeutsche Zeitung* (357,000 sold copies incl. e-paper), *Frankfurter Allgemeine Zeitung* (over 252,000 copies sold), *Welt* (over 169,000 copies sold), *Tageszeitung* (53,000 copies sold). *Frankfurter Rundschau*, a liberal newspaper, lost most of its readers and does not provide print copies anymore; however, it has over 10 million visits to its e-paper (Schröder, 2018, 2019b).²

There also exists two weekly news magazines (*Der Spiegel*, *Focus*) and one major weekly newspaper (*Die Zeit*) (Schröder, 2018). During the last decade, every nationwide daily or weekly and print magazine established an online format. Germany's biggest tabloid newspaper, *Bild*, is uncontested and increased the number of visits to its *Bild Online* to 422 million per day in 2019. The quality magazine *Spiegel Online* (now *Der Spiegel*) has over 250 million daily visits, followed by the online version of the second-biggest print news magazine *Focus Online* (more than 180 million) (Schröder, 2019a).

Compared with MDM 2011 (Marcinkowski & Donk, 2011), the online news sector is highly networked, with Twitter becoming an important hub to access news. In Germany, Twitter is a forum highly frequented by journalists, politicians, and members of the public interested in news. Hence, renowned journalists like Dunya Hayali or Anja Reschke not only increase their personal reach on Twitter, but also help make political news more accessible, establish a broader online discourse about politics, and form counter-publics to hate speech and fake news.

(E4) Minority/Alternative media

2 POINTS

Large and mid-size minority groups are increasingly recognised by existing media, but, compared to the diversity of society, minority media are rather a niche-phenomenon, and only a few large and powerful minorities operate their own media.

IN 2011
3 POINTS

The term “alternative media” gained a negative undertone during the last decade because right-wing or populist movements claimed the term and defined it dif-

ferently. Without going into details, it can be stated that these kinds of media find an ideal medium on the Internet and will not be tackled here. Instead, we discuss minority and community media.

German society is very dynamic and heterogeneous. Minority representation in the media has different strands and can be differentiated along a horizontal and a vertical line. Along the horizontal line, we find various minorities under- or misrepresented in well-established and legacy media, grouped around diversity categories like race, class, gender, sexual preferences, (dis)ability, and others. On the vertical line, we see evidence that people with migration backgrounds lack equal participation opportunities to access jobs as editorial staff in the media. Sustainable diversity concepts are not in place even in public service media, which are obliged to serve society as a whole (Horz, 2020). Minority groups with Turkish and Polish roots who form the largest and longest resident immigrant groups in Germany are barely represented in national legacy media. The public service media are obliged by law to reach minorities, but reduced their multilingual target group radio programmes during the last decade. Under the aegis of ARD, only one Arabic language radio programme exists (*Cosmo*, ARD-cooperation). *Radjo Metropol* is the only important commercial Turkish radio programme in Germany, produced in Berlin.

However, diversity is dealt with in public service media and largely understood as a holistic cross-sectional task. This process is located in different areas of responsibility, and work contexts such as corporate planning, personnel development, commissioners for cultural diversity, integration, and gender and diversity. This includes continuing education programmes, journalistic internships, discussion events, and measures for personnel development and recruitment.

About a quarter of citizens have a so-called migration background. Since refugee immigration in 2015, the ethnic diversity of society has significantly increased. Public service media serve refugees and new residents with online offers like *WDR for you* in the four most-spoken languages of refugees. Immigrants also use Web 2.0 media as opportunities to inform and communicate directly with their communities. The largest Syrian network in Germany is Syrian House, run by a Syrian media specialist currently with over 257,000 members on Facebook. These media services, however, exist in niches; in mainstream nationwide and legacy media, refugees are mostly the objects – not the subjects – of reporting (Fengler & Kreutler, 2020), with a few exceptions in target-group content.

The small and long-existing official national minorities like Danes, Sorbes, Frisians, or the German Sinti and Roma are selectively provided with mother-tongue programmes in few public service media and not-for-profit radios or newspapers, like the Danish *Flensborg Avis*. The Sorbes in Saxonia, for instance, are provided with a radio programme by the public service broadcaster MDR.

The Sinti and Roma produce their Romanes programme *Latscho Dibes* [Good day] in a not-for-profit radio project in Hildesheim and are represented with one seat in the broadcasting council of the public service broadcaster SWR.

Apart from that, media from former home countries have produced newspapers for minorities like Turkish immigrants in Germany since the 1960s. The last decade not only disrupted the German print sector at large, but also those daily and weekly newspapers produced for the local minority groups in Germany. The Turkish newspaper market in Germany collapsed, and one of the biggest dailies, *Hürriyet*, stopped their production in Germany in 2013 because of a massive loss of readers.

Commercial television stations for Turkish-speaking and other minority groups in Germany still exist and are available plentifully via satellite, YouTube, or streaming. With the Turkish minority in Germany divided between those in favour and those against President Erdogan, the media market reflects this split. In 2017, the Turkish opposition channel Arti.TV was founded by exiled journalists in Cologne and is available via YouTube.

There are increased media offers for post-migrant communities, defined as new social groups consisting of people with or without a migrant background and who are linked to transcultural media products. Younger audiences can find those products in the public service media channel funk on YouTube, for example, the show *Datteltäter*. Another example is the online magazine *Migazin*, founded and run by Ekrem Şenol and recipient of the Grimme-Online Award for its quality content.

Other, smaller communities with fewer resources – like LGBTI+ community or communities of those with disabilities – also run small media enterprises, thanks to the opportunities the Internet offers. For example, a group of people with Down Syndrome founded the periodical *Ohrenkuss* in 1998, which is also available online.

(E5) Affordable public and private news media

3 POINTS

All news media are quite cheap compared to the average income of a German household.

IN 2011
3 POINTS

The gross domestic product per capita in Germany is EUR 41,345 (2018: EUR 40,800), thus exceeding the average gross domestic product per capita of the European Union, which is EUR 30,900 (2018) (Statista, 2020). The average disposable income of a German household in 2017 was about EUR 33,990 (DeStatis 2020a). The latest consumer statistics from 2017 show that an average household spent about EUR 2,517 per month. The costs for radio and television licence fees (excluding cable and satellite fees) were about EUR 17.50

per month, those for newspapers and news magazines EUR 21 per month on average (Statistisches Bundesamt, 2019a), and another EUR 64 was spent on telecommunications (DeStatis, 2020a). This means that the average costs of mass media (print, radio, television, and telecommunication) in Germany form an average of 4 per cent of total household expenditures.

The monthly cost for a newspaper subscription, which is the dominant distribution channel in Germany, is between EUR 27 (tabloid) and EUR 70 (broadsheet) for print and between EUR 4 (tabloid) and EUR 40 (broadsheet) for an e-paper. Broadcasting fees (EUR 17.50) are compulsory and paid per household as stipulated in the State Treaty on Broadcasting Financing [Rundfunkfinanzierungsstaatsvertrag]. People with disabilities can apply for reduction or remission of the licence fee; however, there is a debate around the absence of an income-based differentiation of the licence fee, the lack of which discriminates against low-income groups, including students.

90 per cent of all German households had broadband connections in 2019 (DeStatis, 2020b), which were available at a price between EUR 19–25.

Table 8 Expenses with media

Mass media	Annual price (EUR)	% of average household income (2017)
Newspaper (regional paper print, subscription)	540.00	1.5
Newspaper (tabloid, direct sale)	249.60	0.7
Broadcasting licence fee	210.00	0.61
Internet and landline (Telekom)	431.40	1.3
Mobile 5G 12 GB (Telekom)	599.40	1.8

Source: information by provider

(E6) Content monitoring instruments

3 POINTS

Continuous content monitoring is regularly provided and published by independent organisations, scholars, and media organisations.

IN 2011
3 POINTS

Like in MDM 2011 (Marcinkowski & Donk, 2011), scholars, university institutes, and specialised private agencies and companies still provide content monitoring. A private institution, linked to the biggest public service media provider ARD, provides mostly quantitative content analysis about the Internet and audiovisual media, as well as related usage patterns. Results and reports are published free of charge online and in the journal *Media Perspektiven*. Empirical data and studies offer independent insights and are highly useful

for research purposes. Two other institutions (IFEM – Institut für empirische Medienforschung and GöfaK Medienforschung) also produce print, Internet, and audiovisual content analysis, which are publicly funded and published on their websites, in *Media Perspektiven* and special reports. The InfoMonitor (IFEM) monthly reports feature the most salient political news, politicians, and topics. During the Covid-19 crisis, the institute published access to free quantitative research about Covid-19 discourse in the most-viewed news shows on television, *Tagesschau* and *heute*.

The GöfaK Institute conducts applied and contracted research for the Landesmedienanstalten, the authority responsible for licensing commercial television and radio stations and funded by public service licence fees. GöfaK is also concerned with the research topic media and migrants. Related studies are publicly accessible and free of charge, but are more relevant for scholars and research institutions. Between 1998 and 2018, the Landesmedienanstalten established a continuous television programme published in the ALM-report, which was replaced in 2016 by the annual *Content Bericht*. It analysed the content quality of public service and commercial television (Weiß et al., 2019).

Additionally, public service media are obliged to produce a report to justify the public value of their content, the Declaration of Self-Commitment [Selbstverpflichtungserklärung]. The Public Value Test [Drei-Stufen-Test], which is due if new services are implemented, is only published internally.

What is missing are external monitoring institutions to monitor the quality and performance of large media corporations. Accordingly, there is no systematic monitoring for the press. International companies like MediaTenor offer special strategic information and services for customers, like media companies or editorial units.

Free monitoring instruments have been established by unions and parts of non-governmental organisations and scientific institutions, or by initiatives. One of them is a privately funded non-governmental organisation by famous television actors Maria and Elisabeth Furtwängler, MaLisa foundation (see Indicator F9 – Gender equality in media content).

All of these monitoring instruments – free of charge or not – are usually not published by relevant news media, but by scientific journals or special interest magazines. Consequently, their public visibility is rather low.

(E7) Code of ethics at the national level

3 POINTS

A code is implemented and frequently used by all leading news media.

IN 2011
3 POINTS

Germany has had a press council since 1956 and a press code since 1973, which functions as the overall ethical guidelines for journalism in all media. A press

complaint commission is hosted by the press council, which judges complaints that anybody can submit. In 2020, there were 4,085 complaints, 294 sanctions, including 53 reprimands. Some scholars criticise the press council for not being well known among the general public, while others claim their judgments are not effective enough. However, all interviewed journalists except one and the journalists' trade unions claim they know the press code and respect it and that it is important in its guiding quality. They say, "The press code is self-evident, lived practice, and gives rise to debate, for example on the issue of the naming of ethnic or national provenance".

The results of a representative online survey from 2010 (Reinemann, 2010) show that only half of the surveyed journalists admit that they think the measures of the Press Council would affect the actions of editorial offices. The reason is that there are neither economic nor publicity incentives to act accordingly. Nevertheless, three-quarters of surveyed journalists think that the press council is relevant for their work.

All of our interviewees report the clause about the naming of ethnic or national provenance as an important example when they consult the press code. This is due to a highly controversial issue a mass sexual offence by hundreds of migrants that took place on New Year's Eve 2015, and the media did not report the provenance of the offenders because they lacked information from the police for the first few days after this event (Haarhoff, 2020). Other significant topics where the press code is consulted comprise questions of human dignity, reporting suicide, privacy, the right to one's own image, and so on.

The representative of the journalists' union bears in mind that journalists cannot always achieve what the press code calls for. However, it remains well suited to describe professional ethics in the near future. In recent years, there has been increased sensitivity for the application of the press code of ethics. It is not the number of cases of reprimands that is decisive, but the application of the code in a broader sense. A representative from a journalists' union suggests that journalists in start-ups and those who have not gone through a journalistic education are alien to the press code, creating issues.

(E8) Level of self-regulation

2 POINTS

Leading news media have self-regulation instruments in place but only use them occasionally.

IN 2011
2 POINTS

Self-regulation in leading German news media seems to be more informal than formal, although there are tendencies towards greater formality. The most formal provisions for self-regulation are in public service media, where they have a Declaration of Self-Commitment [Selbstverpflichtungserklärung] that

lays down principles of journalistic action as well as programming policies. They also have compliance rules, internal rules for the right to reply, and a code of conduct, which refers to democratic values and contains journalistic obligations to report in a politically balanced way. There is also a formal system for hearing complaints about alleged violations of ethical standards with the complaints committees of the broadcasting council. The reactions to journalists who violate ethical standards are more informal, in the sense that self-criticism takes place in a dialogue:

Experience has shown me that [...] this debate must be conducted again and again, almost on a weekly basis, at the latest on a monthly basis. [...] I am convinced that at this point, a jointly developed conviction is more important than something that is written down and passed by a committee.

The leading print media refer either to the compliance rules of their company, have editorial statutes, or are about to develop a framework of norms as part of the aftermath of a fake news scandal. All journalists and editors-in-chief underline that they consider internal discussions in the newsrooms and the expansion of self-criticism an important tool of self-regulation within their organisational culture. The representatives of a conservative media outlet report the existence of guidelines which prescribe certain political positions. These include advocacy of the so-called social market economy, reconciliation with Israel, and friendship with the US. Explicit efforts to guarantee gender balance in news subjects are not found, although a certain sensitivity in this respect is obvious. The efforts made to guarantee gender balance in the news subjects stem from top-down decisions. Labour law sanctions were only imposed in the rarest and most serious cases of violations of existing norms, and censure is usually preferred.

Ombudspersons are not an established instrument of media self-regulation in Germany (Eberwein et al., 2019). Although some media claim that their department working with the letters to the editor have an ombuds function as well, these cannot be regarded as a functional equivalent. Only one regional paper, *Main-Post* in Würzburg, has a well-known ombudsperson [Leseranwalt] with a good reputation.

There is a legal right to reply laid down in the press laws of the Federal states. Usually, the news media modestly comply with this by giving the contestation only a little space. Additionally, as these replies are only implemented after a lengthy court case, they are not considered very effective in the reader's view. However, quality media are eager to avoid the application of the right to reply.

An association for the promotion of media self-regulation (Verein zur Förderung der publizistischen Selbstkontrolle) tried to work over several years to improve self-regulation, but stopped its activities in 2020 due to a lack of interest and support from members.

(E9) Participation

2 POINTS

IN 2011
2 POINTS

After a period of openness, newsrooms tend to close commentary functions again after masses of inappropriate or outright hateful user comments. Selected news items are still open for comments from the public, but under the supervision of a moderator.

Traditional participation opportunities attributed to legacy media – like letters to the editor (print) or audience response to broadcasting councils (public service radio and television) – are certainly possible in Germany. Letters to the editor can be perceived as an enlargement of a topical discourse, although only a few replies are published in specific sections of the newspaper. Some papers, like the weekly broadsheet *Die Zeit*, increased their space for reader’s comments to one page, and also invite readers for Open Door Days. The daily *Süddeutsche Zeitung* mobilises readers to decide which issue journalists should investigate and created a “Workshop Democracy”, where readers are asked to discuss relevant democratic challenges. Television and radio stations usually do not provide this kind of space for audience feedback, except in call-in shows, online fora, and commentary sections for particular programmes. One editor-in-chief underscores the importance of user participation:

We have, for example, so-called audience apartments, where we really go into the areas of people, [...] also in the countryside, and rent an apartment there for a year or two [...] get into conversation with people. We have WhatsApp Groups with our viewers [...] to finally understand people because people [...] are changing faster and faster due to digitalisation.

Responses to broadcasting councils as the traditional path for enacting the citizen’s role of an external observer of programme quality and functions is contested. During the last decade, an increase of critical voices against this tedious practice was observed (Horz, 2020). At the regulatory level, however, measures were taken to increase citizens’ inclusion in informal considerations about legislative amendments like the WDR Gesetz. People were asked to answer an online survey about the future structure of the broadcasting council in the regional public service provider. Over 1,500 citizens took part, which was assessed as a success, considering the complex topic of media regulation. Responses to broadcasting councils, however, also must be considered in the context of a growing critique against public service media, which some NGOs and right-wing political parties play out in mass complaints against public service media.

The last decade was characterised by new forms of user participation associated with networked communication on the Internet. Some of the interviewed editors pointed out that the Internet is theoretically a good option as a platform both for exchange between readers, listeners, or viewers, and for communica-

tion with the news media. In practice, commentary functions are only seen as a feasible way to communicate if they are moderated:

But in some cases, we decided to close the comment section because we were overwhelmed by it. Because it became too much quantitatively and because what was said exceeded the limits of decency and what we wanted our employees to deal with.

As resources are rare, most of the interviewees said their media companies closed the commentary sections after figuring out that the sheer amount of inappropriate language and hate speech (particularly in the context of refugee migration) exceeded their moderation resources. Editors-in-chief of big print magazines like *Der Spiegel* or *Stern* infrequently open their newsrooms to the public, which is seen as a very successful way to build mutual trust. *Stern* is currently considering creating a regulars' table, where people from a neighbourhood can meet to informally discuss current affairs, to help them get a better sense of the pulse of ordinary citizens.

Users can also contact the editorial unit of a programme via contact forms. User-generated content plays a rather circumstantial role in public service media, but is an interesting option for commercial television stations like RTL that are generally more interested in personalised information. The public service television station ZDF runs the successful news format *heute+* with call-in options, and is popular amongst younger audiences. Moreover, ZDF editors go out to meet their audiences, and the public broadcaster implemented a corrections page at their website to add transparency and compensate for television programmes that do not provide any space for corrections.

Weeklies like the online paper *Der Freitag* (not part of the interview sample) changed their editorial processes and implemented a community section; readers act as civic journalists and produce about half the total content of this paper. Journalists edit these texts and award the best ones with a special button (Reimer et al., 2015). Both readers and journalists are satisfied with the output and the reader retention, which keeps the paper in the market.

The large print media companies, such as WAZ, founded reader councils, with relatively high influence on news processes, but it could not be verified that this council still existed after 2019.

Finally, radio shows like those of WDR or Deutschlandradio offer regular call-in options, but previously existing ListenerDays, with user-generated radio content, were abolished recently. All in all, there is still a lack of opportunities for user participation in content provision, with only a few of the main news media creating editorial space for the public voice. Digital opportunities, like commentary functions, proved not to be an appropriate way to include citizens' voices, because of the audience's unethical behaviour and a lack of human resources in editorial units.

User participation at the structural level in media institutions is almost completely lacking. Although public service broadcasting councils represent some major social groups, they do not reflect the dynamic transformation of society. Most of the public service media opened their council and board meetings to the public; however, citizens are not allowed to ask questions or comment. The opaque decision processes in PSM as public institutions are a topic of concern and are discussed among civil rights initiatives, scholars and special interest groups.

(E10) Rules and practices on internal pluralism

2 POINTS

No internal formal rules are in place, but newsroom meetings are a regular practice to discuss and check for pluralism.

IN 2011
2 POINTS

Compared with MDM 2011 (Marcinkowski & Donk, 2011), the focus of what is understood as internal pluralism has diversified. Political pluralism is still an important issue, but there is also a more social understanding of pluralism. The interviewees showed a growing awareness of the stratification and rising heterogeneity of society – culturally, politically, socially, and demographically. One journalist self-critically assessed the lack of cultural diversity in their editorial units:

I don't think [we are] diverse enough. And that applies to almost all groups and aspects that can be imagined. [...] We are not as colourful as a society. We are still very West German, bourgeois, (no longer) completely male.

This awareness can be underpinned by current research, indicating that only about 6 per cent of editors-in-chief have a migration background, and even if so, their roots are typically in the EU or neighbouring countries. The number of journalists with a migration background is estimated to be even less than that (Vassiliou-Enz, 2020).

How many German-Turks or German-Italians [...] are there [in our reporting]? Not so many. [...] It is also because not many are in leading positions in society – and a large part of our reporting is about the actors. And there we are the mirror of society.

Standardised procedures to ensure internal pluralism do not exist. Interviewees state that editorial meetings are usually a formal procedure to discuss political standpoints of a story and to ensure internal pluralism is safeguarded. If single measures are in place, they usually have been established by the management:

We started top-down from the editor-in-chief to say that when we do vox-pops, please take care that it is not always just the representative ladies and

gentlemen in fancy coats, but that it can also be other people, also [...] people who may speak German with an accent.

However, as print media in Germany are “ideological enterprises”, they are allowed to ask their journalist to adhere to a certain political or ideological line, like Axel Springer AG media (*Bild*).

With the recent entrance of right-wing parties in the German parliament, *Die Zeit* established a new format to address democratic debate in controversial debates, like *Deutschland spricht*. Journalists match two citizens with fundamentally opposing political positions and moderate the conversation. These two sides of the controversy are covered in personalised stories in the print and online version of the weekly.

Under these conditions, a journalist of the news magazine *Der Spiegel* pointed out that political pluralism is sometimes a challenge. Covering an interest group also means granting them attention, although the drivers behind these interests are not always obvious at first glance. News media are hence in danger of becoming instrumentalised by these drivers.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog “control of the controllers”

2 POINTS

IN 2011
2 POINTS

Media performance and content are publicly discussed in the media. Over the last decade, online fora and the journalistic enterprises of critical journalists have become a watchdog force to be reckoned with.

Besides monitoring the media in academic research projects, there are several mechanisms to perform the watchdog function on the media. First, there is media coverage about media performance, like the weekly television magazine *ZAPP* of the regional public television broadcaster NDR, or *@mediasres* from Deutschlandfunk. The magazine is one of few exceptions in the German media landscape, because of a systematic cut-down or complete abolishment of critical media rubrics in newspapers during the last decade.

Second, the shift from mass media control towards independent online watchdogs has intensified. One successful example is *Über Medien*, founded and run by the journalist Stefan Niggemeier. *Über Medien* monetises their quality content through a subscription model and has successfully attracted some 4,000 subscribers, proof that there exists a demand for media critique.

Third, media observers in specialised Internet blogs still exist. Several blogs comment on just one newspaper, like bildblog.de on the most-read tabloid,

BILD-Zeitung. Others focus on specific media segments like public service media. One example is a not-for-profit association that runs the blog *Publikums-rat.de*, which constructively criticises, but also defends, the public service media against populist voices who would rather see public service media abolished. One can assume that the reach of media blogs is still low, but the last decade proved that they function as an important driving force for a wider debate about media pluralism and quality of news media. However, a parallel development is the emergence of watchdogs from the populist and right-wing segment of the political spectrum. Their aim is not to constructively criticise and safeguard a pluralistic and democratic media system, but to get rid of media and media institutions offering unbiased information. Overall, the public debate about the media has become more antagonistic.

Fourth, there is still some institutionalised control of the media. The Landesmedienanstalten – the publicly funded supervising authorities for commercial television – control the content of the commercial programmes in every federal state according to the standards of their broadcasting licence. These standards include, most prominently, a minimum quota of news and cultural programmes, and threshold values for the ratio of advertising and programme content.

Public service broadcasting is to some extent supervised by special broadcasting councils representing highly influential social groups, such as unions and representatives of the state and the church, which consequently indicates a certain amount of political influence on public broadcasting.

The press is supervised by the Press Council, a co-determination body offering ethical guidelines for journalists in the *Pressekodex*. The guidelines are not unanimously accepted anymore, because of major changes in the discrimination act after sexual harassments during New Year's Eve 2015, attributed to immigrants. In the aftermath, moral panic and ethnosexism were rising, provoking the Press Council to weaken the discrimination act and to link the mention of the migration background of a suspect in the public interest (Dietze, 2017; Horz, 2017).

In comparison with the MDM 2011 (Marcinkowski & Donk, 2011), the above-mentioned institutionalised mechanisms of control of the controllers stand in opposition to heated public discussions in Internet fora, which sometimes gain a lot of public attention. On the other hand, constructive discussions on media ethics and the media's performance for democracy remain restricted to very specialised media coverage, expert circles, or events.

(C2) Independence of the news media from powerholders

2 POINTS

IN 2011
2 POINTS

Independence from powerholders is guaranteed by law and widely respected, though there was one important case of undue influence by powerholders.

In Germany, freedom of the press is guaranteed by constitutional law (Art. 5 Grundgesetz) and has been fostered by the jurisdiction of the federal constitutional court [Bundesverfassungsgericht] over the past fifty years. Article 5 of the constitution guarantees freedom of expression, freedom of access to information, and the absence of censorship. In an Interstate Agreement on Broadcast Services [Rundfunkstaatsvertrag], both governmental and state non-intervention in broadcasting is described in detail.

The public service media remit provides for independence from the state and government through clear statements in the broadcasting law (Interstate Broadcasting Treaty; die medienanstalten – ALM GbR, 2019b) and by legal provisions, which allow only a limited number of representatives from governments (federal and regional) and official bodies on the board, who can always be overruled. The selection procedure for the editor-in-chief of public service media is formally fully independent from the government, as they are appointed by the CEO with approval of the board. The CEO, for their part, is elected by the broadcasting council. However, public service media experienced one serious attempt by a political actor to influence the political agenda of the programme, when a politician who was part of the board created a majority for blocking the continuation of the contract of ZDF's editor-in-chief. This was followed by a constitutional court procedure, which ended in a ruling that the representation of members of the sphere of politics must be reduced to one-third of all self-governing bodies of public service media.

All leading editors we interviewed rejected any attempts of interference by powerholders or politicians. No severe case was reported. On the contrary, all of our journalistic interview partners were convinced that the management would back them against such attempts (as was also the case a decade ago; see Marcinkowski & Donk, 2011). The German media system is widely characterised by distancing itself from the state (Hallin & Mancini, 2004: 197), and the journalistic culture contributes actively to the value of keeping one's distance from powerholders (Hanitzsch & Seethaler, 2009). Nevertheless, journalists' trade unions plead for a statute for inner press freedom, giving more autonomy to the editors, which exists only in very few media outlets.

Party affiliation does not play any role among leading news media, except within the composition of the councils of the public service media, where a strict law (Rundfunkstaatsvertrag) equilibrates the representation of political parties according to the principle of internal pluralism. However, internal discussion networks, Freundeskreise [circles of friends], reflect political lean-

ings towards the leading social democrats and the conservative party, but are criticised as acting in a clandestine and non-transparent way. More important is the influence of financial investors in the news sector. The financial investor KKR became the largest shareholder in the Berlin media group Axel Springer, and even outstripped the publisher's widow Friede Springer. With their takeover offer, the American company secured about 42.5 per cent of Europe's largest digital publishing house.

(C3) Transparency of data on leading news media 3 POINTS

Transparency data on large parts of the media system is recorded and available to the public online. IN 2011
3 POINTS

The recent public debate about broadcasting fees and financial transparency of the leading public service media ARD and ZDF has been included in the reform process of these institutions. For a few years now, public service media published comprehensive online data on facts and figures such as the spending of broadcasting fees. The second-biggest nationwide public service television ZDF provides detailed information about corporate social responsibility activities online. An ARD-affiliated research unit edits the open access online professional publication *Media Perspektiven*, which is a trustworthy and valued source in academic ecologies, with mostly quantitative studies about the latest developments in the media industry. Apart from that, scholars publish information about leading news media according to their specific research focus.

The Landesmedienanstalten is an authority which licenses and supervises commercial broadcasters and promotes and finances research on the media system in each of the *Länder*. They are also responsible for conducting activities to increase media literacy. In a common annual yearbook, all fourteen Landesmedienanstalten present a complete list of all projects (die medienanstalten – ALM GbR, 2019a), which is also accessible online. As it was a decade ago (Marcinkowski & Donk, 2011), market shares of commercial broadcasting providers are legally restricted to 30 per cent.

There are legal provisions to ensure two different forms of plurality in the German media system. Firstly, external plurality of ownership of the press is guaranteed by national law and controlled by the Bundeskartellamt, the German antitrust agency. Additionally, there is a special commission that assesses and reports the degree of concentration within the media market with a special focus on the television market (KEK – Kommission zur Ermittlung der Konzentration im Medienbereich). Concentration in the print market is assessed and evaluated by the commercial research institute FormaTT for free. Both institutions publish their reports, and KEK also provides a free Internet database. Print and online

media are legally obliged to publicise an imprint in every edition containing the name and address of the responsible publisher. The clear duty to provide information about the person or company responsible for publishing is formulated in national law (Telemediengesetz [Telemedia Act]) as well as in federal law (Landesmediengesetze [State media laws]). Commercial media companies and press publishers like Axel Springer SE present key business figures and information on ownership and other relevant data online, although publishers are not obliged to the same extent to publish business data as other companies.

Second, internal pluralism is guaranteed by the Federal Constitutional Law and its “broadcasting decisions” and is also laid down in the Federal Broadcasting Act [Rundfunkstaatsvertrag]. As the public service media in Germany are equipped with a serve-all mandate, they are obliged to safeguard the broadest possible programme plurality and the plurality of opinions in their media offer. These programme principles are supervised by two governing bodies in each public service media broadcaster: the broadcasting council and the board. To some extent, they publish information about the composition of the bodies, their mandate, and their activities but not on the “circle of friends”, as it is not obvious which member belongs to which of these political leanings (see Indicator C2 – Independence of the news media from powerholders). Scholars, hence, critically assess that not all council meetings are open to the public and decisions are not made transparent enough. Overall, public service media increasingly publish reports on structural data and background information about the German media system, because the last decade saw a growing pressure on public service media to start reforms and digitisation, forcing them to reinvent themselves in the digital age (Herzog et al., 2018).

(C4) Journalism professionalism

3 POINTS

German journalists have a high level of education and a prevailing professional ethos, and resources are still sufficient in leading news media.

IN 2011
1 POINT

The representatives of the journalists’ unions are unanimous in their view that the professional standards are high in German journalism, but that the conditions of resources have worsened such that profound investigation is sometimes lacking: “We see significant gaps in resources that affect publications. Almost all the editorial offices we know of are staffed too tightly. Attempts have been made to improve the economic situation by cutting jobs”.

In the Worlds of Journalism Study, the respondents almost unanimously agreed that journalists should always adhere to codes of professional ethics, regardless of situation and context (Hanitzsch et al., 2016). The education of journalists is as high as ever, but working conditions and shortness of time

hinder journalists from performing in line with their skills. In 2016, 96 per cent of journalists had a university-entry diploma, and 75 per cent had a university degree, although a slight majority (56%) had not specialised in communication or journalism (Hanitzsch et al., 2016).

The prerequisite of cross-media skills is ubiquitous, and workload has increased because of digital publishing alongside the print version. This is in line with a survey where 44 per cent of interviewed journalists assess their working conditions as rather less good, and 11 per cent even as not good at all (Statista, 2020). This is especially true for daily newspapers and important regional and local papers. Additionally, there are critiques that the level of general education has decreased, and so background knowledge to classify and interpret news events is lacking. In public service media, conditions are considered comparatively better, but a sense of insecurity by political pressure to cut costs in public service media is weighing on working conditions.

Because of reductions in newsrooms, the workload has increased, and time for sound investigative research has been continuously lessened: “Where you used to go and do research for two weeks, let’s say today, six days must also be enough”. Still, two weekly publications, which can be regarded as market leaders, have good working conditions and are esteemed for their investigative power. Some of their investigative successes were the disclosure of the Ibiza video, which forced the Austrian government to resign, the *Panama Papers*, and disclosures on fraud in health insurances.

The level of self-organisation is high. There are two active competing and cooperating unions of journalists, publishing their own media thematising issues of professionalism and ethics. There also exists additional organisations (Network Investigation, Initiative Quality) working on these topics. According to interviewees from the unions, journalists show a high level of solidarity:

There is good solidarity among colleagues, because everyone sees that the situation as we see it is due to bottlenecks. Our colleagues exercise their profession with such passion that they say, no, we have reached a point here, we cannot go any further.

Public debates about ethical behaviour usually come up when big scandals happen, and are then picked up by journalists, but not initiated by them. For example, a big faking scandal within a leading weekly triggered a huge discussion about how far reportage may be embellished to captivate the reader.

Regular education is given by a tariff agreement stating the conditions of the initial training, which is a two-year paid internship. Journalists’ unions promote the necessity of further education by making it a component of the collective wage agreement.

Gender issues in further education are reported as being underexposed, although the journalists’ unions report a high level of women journalists to defend their claims.

(C5) Journalists' job security

2 POINTS

IN 2011
1 POINT

Journalists' job security depends on economic situations. Once employed, journalists normally remain employed for a long time. However, fixed and long-term contracts are thinning out, and there is an increased proportion of freelancers, who then must bear the brunt of economic disruptions.

On the level of the labour market, the journalist unions like DJV and Ver.di/DJU provide a differentiated view, whereas in MDM 2011 (Marcinkowski & Donk, 2011), it was clearly pessimistic. This change can be attributed to various causes. First, in the last decade, the fictitious self-employment in the media sector had finally been prosecuted, after a long period of legal laissez-faire. This led to a wave of contracts for formerly self-employed journalists. However, unions point out that publishers filtered out high potential journalists and dismissed the rest. Austerity also has other spill-over effects:

A situation of tension arises [dealing with the tight resources] because those who manage budgets in the editorial offices [...] are in a bind. [...] It is of course the case that a budget that is too tightly allocated [...] by the management [...] and the editors in the individual units have to manage parts of this budget. [They] are responsible for awarding contracts and can only offer lousy fees in order not to end up under pressure themselves because they exceed their budget.

Fixed-term contracting is widespread, and freelancers are seen as an important part of the German media system. The official statistics counted 27,000 freelancers in journalism alone in 2018 (Statistisches Bundesamt, 2019b: 365). Of about 220,000 employees in the media industry, 158,000 work in editorial boards and journalism (including public relations staff). These freelancers are heavily affected by the Covid-19 crisis, as they rarely meet the requirements for state subsidies. About 113,000 of these 220,000³ employees are under contract, and 60,000 are self-employed (Statistik der Bundesagentur für Arbeit, 2019: 121–123). The job market finally showed positive development, due to the overall solid economic growth in Germany; however, the seniority system of contracts makes the work of older journalists more expensive. In print journalism, this may have led to dismissals, but there is a tendency to keep experienced journalists, according to unionists. The digital transformation, however, created new challenges for legacy print media:

The people who are hired now are not journalists, they are reconfiguring the platform of journalism [...] In the print sector [...] they hire a lot of expensive people. [...] those who are hired there for digital transformation are really expensive. They are as expensive as an editor who has been around for twenty years.

In public service media, political pressure and austerity are driving forces for job instability. However, according to the Worlds of Journalism Study (Hanitzsch et al., 2016: 2–3), about 75 per cent of German journalists work full-time, of which 17.7 per cent are freelancers in 2016. Over 92 per cent hold permanent positions. Second, a trend towards stable working conditions is partly attributed to publishers' desire to attract younger journalists who can aid the digital transformation. Gen Z strives to keep a work-life balance and a stable future, which means employers need to offer better contract conditions. Moreover, the employability of academics decreased during the last decade, and interview partners assume that there is a battle for the best graduates. According to the DJV, the public debate about the quality of news and the trend of investing more in investigative reporting led to a rise in awareness about journalism's importance.

On the juridical level, the companies derived from classic print publishers in Germany are *Tendenzbetriebe*, which means that a company not only has economic, but may also have cultural or political, objectives. One example is Axel Springer SE (*Bild*), where journalists must consent to reporting in support of the Israeli state and liberal market economy. However, any influence on the editorial bent of news media by politicians or the industry is against federal constitutional law and federal law. Publishers still cannot force their editorial staff to follow their inclinations, so a journalist is not bound to write an article expressing the publisher's viewpoint exactly. Freedom of expression and human dignity (according to the German Basic Law) legally protects journalists from pressure, which can be interpreted as a *clause de conscience*. Above that, bylaws of editorial units, labour legislation, and last but not least, unions, protect journalists.

Female journalists are, like every working woman in Germany, supported by federal laws such as parental leave, which guarantees a leave for up to 36 months for each child. In media companies where unions are strong partners, women's contracts seem to be protected better. Male journalists can take the leave if resources are available, but this may interfere with advancing their career, according to DJU. Public debates during the last decade have led to a rise in awareness about workplace sexual harassment. When female journalist Laura Himmelreich shared her negative experiences with a politician's sexist advances during an interview via Twitter #aufschrei in 2013 (comparable to #metoo), it spurred an ongoing debate about everyday sexism. Legally, the victims of physical sexual harassment are protected by the law to protect sexual self-determination, which was implemented in November 2016 (§ 184i StGB).

Bullying is, as such, not a crime, but certain acts like discriminating or harassing someone are. The antidiscrimination law AAG (Allgemeines Gleichbehandlungsgesetz) obligates employers to offer comprehensive protection and implement measures against sexual harassment and bullying on various levels, which also contains the right to complain. The burden of proof lies on the suspect to prove they are not guilty.

(C6) Practice of access to information

2 POINTS

Public information is accessible by law, but not in reality. Journalists need to spend time and effort to get access.

IN 2011
2 POINTS

Although Germany has had a freedom of information law since 2007, which applies to all citizens, journalists from the trade unions and media outlets we interviewed complained that access to official sources and information is quite restricted and painful to obtain. The law contains many and very broad exceptions. Certain public interests remain protected, for example, if the disclosure of the information could have adverse effects on international relations, security-sensitive concerns of the military [*Bundeswehr*], on internal or external security, or control tasks of the financial, competition, and regulatory authorities. If ongoing legal proceedings or discussions with the authorities could be adversely affected, the principle of confidentiality continues to apply. The secret services are completely exempt from the right to information. Private interests also lead to exception clauses, for example, if conflicts with data protection arise or if business and trade secrets of a private company are being requested. Although the Constitutional Court ruled in 2015 that how journalists obtain information is protected by fundamental rights, there is no federal press information law, and the press laws on the level of the states do not suffice for journalists' investigations.

Authorities typically delay requests based on the freedom of information law, as the representative of a journalists' union states: "Due to delays and tactics by the federal authorities, it is sometimes not possible to continue research at all. We can provide legal protection through our state-based associations, or this can be done through the publisher". Through internal sources, journalists got to know that administrations have passed regulations to find exceptions for being obliged to give applicants insight into documents on the grounds of "disproportionate processing effort". A Federal Commissioner for Freedom of Information, who works on limiting the exceptions, is in charge, but there are some ministries where the acknowledgement of receipt contains by default the sentence, "Requests can cost up to 500 €". An exception of this overall situation is created by the Transparency Law of the State of Hamburg, which obliges the authorities to publish files not only upon request but automatically.

In rural areas, there are closer networks, and access to information can work better there. On the other hand, the accessibility of administrations is even worse here: "Journalism has become the covert press office, because investigation is no longer done at the grassroots level, with the people, but rather with the president, the deputy president or the press spokesman". The application of state law to federal agencies is only a makeshift solution. Because of delay and evasion, journalists often have no access or need a long court procedure to enforce their claim. Many investigations are eroded by delays, as then the

effort is too great or the matter is no longer topical. The regional associations of the journalists' union, DJV, often provide legal protection in these cases, and sometimes this is also possible through the publishing house. The DJV has fought through spectacular cases as an advocate of a federal press information law.

The answers of the interviewed journalists show, as well, that success in getting information is often dependent on the time and resources a newsroom has.

(C7) The watchdog and the news media's mission statement

2 POINTS

IN 2011
1 POINT

Investigative and watchdog journalism is, in most cases, part of the self-conception of leading news media. Austerity measures and the economic situation of the media, however, often don't leave enough resources for journalists to exercise it.

While only a few interviewed journalists and editors made remarks about the watchdog role, they did comment on the importance of investigative reporting as an important factor in their everyday work. This may correlate with previous studies, which showed that no more than 24 per cent of German journalists see themselves as watchdogs (Weischenberg et al., 2006: 106–110 & 279). We observed a different situation compared with MDM 2011 (Marcinkowski & Donk, 2011). The editor-in-chief of *Süddeutsche Zeitung* stated that the watchdog role is very important. Interviewees of *Der Spiegel*, *Die Zeit*, RTL, and the public service broadcaster ZDF invested in a specific investigative unit because they perceive investigative journalism as an asset in an overall highly competitive market, and normatively more important than ever.

One successful example of journalism's watchdog role is Ibiza-Gate, where *Spiegel* and *SZ-Online* published a video on 17 May 2019 in which the readiness of the former vice-chancellor of Austria to commit corruption and take over and control an independent newspaper was revealed.

The editor-in-chief of *Stern*, however, critically assesses that the watchdog role has been replaced by the role of journalism as a press office. Journalism is seen as too fixated on the elites, and the watchdog function is not taken seriously in German journalism any more. Other journalists differentiate between their own research, in the sense of journalistic quality norms and investigative research, in the sense of in-depth research for a longer period and with greater intensity. The first is perceived as increasingly important to safeguard the legitimacy of journalism. The latter, however, is seen as a long-term process which is not a matter of course and needs to be equipped with more resources to become a stable part of editorial units. Only the editor-in-chief of RTL, and those in RTL's school of journalism, mentioned investigative journalism as part

of the company's mission statement: "We have the [research] team here, where we do investigative journalism and it can happen that a colleague works on a topic for eight months".

Like in MDM 2011 (Marcinkowski & Donk, 2011), there are no mission statements that explicitly advertise active investigative journalism. On the other hand, digitisation is seen as an important task for the leading news media, where resources are invested. The assumptions of the global journalism project – mentioned in MDM 2011, concerning German journalists' obligation towards the watchdog role – is no longer as important (Hanitzsch et al., 2016: 2). Only 36.3 per cent perceive their role in "monitoring political leaders", whereas the commitment to "report things as they are" scores over 90 per cent in the sample; hence, they play not so much the watchdog role, but rather the role of the uninvolved observer. This outcome corroborates the hypothesis that objectivity is the highest value of journalists in Germany, which, on the other hand, also means that they may not be aware of (re)framing and the implications of the theory of constructivism for their work (Hillje, 2017).

(C8) Professional training

2 POINTS

In Germany, there are sufficient opportunities for journalism training. Journalists in well-established and economically sound news media are better off than their colleagues in weaker media.

IN 2011
2 POINTS

A two-year long internship in a medium, usually linked to an academic institution, is still the most important entrance track into journalism in Germany (von Matt, 2012). This is combined with a four-week-long intensive course in an independent institution for journalism education. For further education, there is a good range of offers in terms of journalistic techniques, genres, data journalism, cross-media production, and so on. These offers include not only skills but also knowledge training. Four of the sampled news media run their own academy, and there is a wide range of academies, courses, and university-based certificate courses for professional journalists.

The editors-in-chief interviewed underlined that they are extremely interested in journalists from their newsrooms undergoing further education, and journalists themselves also claimed that they can go for further education if they want.

Big Data analysis has become a hot topic and is mentioned as an opportunity by most of our interlocutors. However, there is no obligation for continuous training. Those newspapers which have explicit investigative departments claim their journalists are fit enough for investigation and that they do training on the job and in specific cooperative networks. One of these networks (Netzwerk Recherche) organises an annual conference with hundreds of participants and several dozens of short workshops.

In most cases, there also exist possibilities to attend extra courses at academies and institutes, or courses held by experts providing specialised knowledge; only one editorship does not offer any journalism training. The journalists' unions also provide a small number of professional training courses.

However, the representatives of trade unions state that there is still a big need not being met, as editors-in-chief do not promote possibilities for further education: "Not all journalists are up to date in training on Big Data analysis. We have noticed that the willingness of companies to actively offer such a service is very weak". This is why the trade unions have made it a component of the collective wage agreement. Whenever a journalist wants to level up in the salary hierarchy, this is connected to further education; thus, employers are structurally forced to offer this opportunity. Data journalism is more of interest to young journalists, with older journalists often refraining from taking it seriously.

Further training for female journalists is not an issue, although the trade unions admit that they want to push more strongly for it. Continuous training is expensive, as the newsroom must be sufficiently staffed for one or two colleagues to attend a course lasting several days. Also, sufficient funds must be set aside for ongoing professional training. Finally, journalists need to be encouraged by their superiors. Therefore, as most of the news media in our sample belong to financially sound publishing or broadcasting corporations, they have sufficient financial and staff resources at their disposal to enable ongoing journalism training, but conditions are not that positive in small and regional news outlets. Additionally, training in diversity, gender, and inclusion issues are rarely booked, and we have no data on the quality of trainings: "There is still room for improvement in gender-oriented continuing education. Here the German media landscape still has a considerable need for improvement".

(C9) Watchdog function and financial resources

2 POINTS

Journalistic investigation is perceived as more important than a decade ago, but resources are rare. Investigative journalism tends to be outsourced to special units. The number of investigations is clearly limited by financial means and focused on those topics that guarantee high attention.

IN 2011
2 POINTS

The austerity measures in public service broadcasting challenged the news units and led to a hiring freeze just when investigative reporting was beginning to be seen as a way to counter fake news and foster trust in the media. To accommodate the latter, the editor-in-chief of ZDF introduced a new investigative format, *ZDF Zoom*, and tried not to dismiss editorial staff. He also equipped the major news format of the television station heute.de with fact-checkers from Correctiv and data journalists. Accordingly, a leading ZDF journalist is convinced that money alone is not the barrier to more investigative reporting:

The linchpin in journalism is staff. [...] No better financial resources will help us there either. [...] if I don't have the people to [...] research [...] I can't do anything with the money. Money only translates into value for us if we can either recruit additional staff or reform structures [...] in such a way that the journalistic workforce is freed up again. That is the challenge for us at the moment [...].

Instead, a clever composition of the editorial personnel serves investigative journalism. Also, in print journalism, manpower is the core prerequisite for investigative reporting, because it requires time. What it means in practice is illustrated by a representative of the weekly *Die Zeit*. In this newspaper, 15 investigative journalists conduct about 30–50 investigative research projects per year, which finally leads to about ten stories. *Die Zeit* operates with an anonymous post box, similar to Wikileaks, to protect the sources. The massive amount of data can sometimes only be handled by cross-media teams. A *Zeit* journalist also critically assesses that television does not do enough in terms of investigative reporting: “Our resources are sufficient. [...] But if television were to use its financial power for investigation, democracy would be served. In terms of their potential, too little happens”.

The daily *Süddeutsche Zeitung* cooperates with the public service broadcaster NDR, and WDR if required. In *Süddeutsche Zeitung*, about eight to ten journalists work in the investigative unit. One example of a successful story concerning the watchdog function is the *Panama Papers*, where *Der Spiegel* was involved in editing the data. The important weekly news magazine, however, had been itself the subject of investigative research, as one of its journalists found out about his colleague's years-long fake investigative reporting.

In a nutshell, investigative reporting is, as in 2011, still a question of prestige, but now also of a change in attitudes. After Wikileaks, the news media discovered that the public needed and demanded more in-depth reporting. The time and financial situation does not seem too bad for investigative reporting. Commercial and publicly funded news media implemented special units and formats to fulfil their function as watchdogs. The staff and organisational structure of investigative units are, however, more agile, compared with the findings in MDM 2011 (Marcinkowski & Donk, 2011), and cross-media cooperation seems the best way to tackle the lack of trained specialist personnel in the individual news media – at least for the moment.

Conclusions

The 2019 research on the three dimensions for the 2021 MDM report shows German media to be in a fairly stable state, and even have some improvements compared with 2011. At that time, the aftermath of the economic crisis had

affected the media and their economic performance. The following period of high-density digitisation of all journalistic and editorial processes has transformed the media internally and exposed them to giant competitors such as digital platforms, in the form of search engines (Google) and interactive personalised services like Facebook and YouTube, as in many other Western European countries.

This potentially devastating transformation has not caused a deterioration in the performance of the German media, due to the solid base of journalistic professionalism. It is, as well, reflected in the high esteem German journalists have for the control function of the media and in slight improvements that have been made in strengthening the watchdog role and investigative reporting (Indicator C7), the professionalism of journalists (Indicator C4), and job security (Indicator C5). Compared to many other indicators, the state of gender equality in the media staff (Indicator F8), and consequently in media content (Indicator F9), is rather weak.

Freedom of information is formally secured by law in Germany, including an information freedom act, although in practice, getting information can be difficult. News is available at a moderate cost, though public service fees nevertheless create problems for low-income groups. Leading news media have effective measures in place to defend themselves against internal and external influence. Heavy efforts of political influence resulted in a big public debate and constitutional consequences (see Indicator F4 – Internal rules for practice of newsroom democracy). The increase of right-wing violence in society has led to harassment of journalists offline and online and even physical attacks on journalists and media people. Although the newsrooms protect the journalists, these attacks are impeding free information gathering.

Despite the growing importance of online news sources, legacy media – due to their successful digitisation strategy – are still an important source of news for the majority of the population, although the number of people getting their news only from social media is growing. But the Covid-19 crisis showed that legacy media still enjoy a great deal of credibility and trust. This is especially true for public service media, who are an important player and a reliable cornerstone in this respect.

Overall, Germany's leading news media managed to keep their standards during this turbulent decade of unleashed digitalisation. Measured by our indicators, Germany's news media serve democracy fairly well.

Notes

1. Including third programmes and special interest channels for ARD/ZDF news programmes.
2. Since 2013, Frankfurter Rundschau is part of the RheinMainMedia GmbH, and single data about sold copies or e-papers are barely published.
3. The official statistics do not differentiate between journalists and public relations professionals. It is hence hard to give a specific overview of the current employment situation in the news media.

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THE NETHERLANDS

On media concentration and resilient freelance journalists

Hanne Vandenberghe & Leen d'Haenens

Introduction

The Netherlands is a mid-sized country in Western Europe with a population of 17.4 million people. In 2019, the Netherlands was ranked 17th in the world based on its USD 914 billion gross domestic product, and 13th based on gross domestic product per capita (USD 53,016). At the end of 2017, minister Arie Slob (a member of the Christian Union, a socially conservative, centre-left Christian-democratic party) took over the media portfolio from State Secretary Sander Dekker (a member of the People's Party for Freedom and Democracy). Later, Mr. Slob allocated more money to journalism subsidies thanks to an investigative journalism scheme. Moreover, since 2019, a pilot scheme worth EUR 2.85 million, aimed at professionalising public local media services, was put in place to subsidise the appointment of journalists and support staff (e.g., managing volunteers, training neighbourhood reporters, supervising trainees) and improve the continuity, spread, depth, and quality of the local news infrastructure. Politically the Netherlands is considered a mature parliamentary democracy and a welfare state, although it became less generous on all fronts in 2020 compared with previous decades.

Freedom in the World 2021: status "free" (Score: 98/100, down from three years in a row at 99). Although known for its tolerance and political rights completely safeguarded in the Dutch society, tensions are mounting between its majority population and the Muslim and immigrant population. Therefore, the 1-point loss from 2016 to 2017 can be attributed to rising anti-immigrant and anti-Islamic sentiment as well as Muslims and immigrants experiencing harassment and intimidation. The 2021 report will be posted online when it becomes available (Freedom House, 2021).

Liberal Democracy Index 2020: the Netherlands is placed in the Top 10% bracket – rank 10 out of measured countries), which is a bit lower compared to a decade earlier, in 2009, but up from rank 16 in 2019 (Varieties of Democracy Institute, 2020, 2021).

Freedom of Expression Index 2018: rank 21 of measured countries, a slight decrease from 19 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 5 of 180 countries, fluctuating between 2 and 5 from 2013–2019 (Reporters Without Borders, 2020).

While the Netherlands is a small country whose language is shared by very few others (chief among which being Belgium, with which it shares a border), it can be considered a global media player. For instance, the Endemol Shine Group started as a Dutch production house and is now creating content for all platforms worldwide. Another example is RELX (previously known as Reed Elsevier), the product of a merger between British trade book and magazine publisher Reed and Netherlands-based scientific publisher Elsevier. RELX is a global provider of scientific books and information-based analytics. *Elsevier Weekblad* is published by RELX and is also the largest weekly in the country.

In the three decades that followed the launch of commercial television in Flanders (1989), very few Dutch-speaking Belgians followed Dutch media content, and there has never been a tradition in the other direction. Things are different when it comes to media acquisitions. In the last decade, two Flemish press companies – Mediahuis and DPG Media Group – have become major players in the Dutch market. In 2015, a Dutch subsidiary of Mediahuis took over the Nieuwe Rotterdamse Courant Media Holding (NRC), the publisher of daily newspapers *NRC Handelsblad* and *nrc.next*, which cater to the well-educated and wealthy audience. Two years on, in 2017, this expansion drive was still going strong, with Mediahuis taking over the Telegraaf Media Group, the publisher of popular daily *De Telegraaf* and regional newspapers such as *Noordhollands Dagblad*. As a result, Telegraaf Media Group was renamed Mediahuis Nederland in 2019. In 2017 as well, Mediahuis acquired the Media Groep Limburg, the publisher of regional newspaper *De Limburger*.

The other Flemish media company, DPG Media Group, had already taken over PCM Publishing in 2009 and rebranded its subsidiary De Persgroep Nederland. As a result, it became a publisher of national (*Algemeen Dagblad*, *de Volkskrant*, and *Trouw*) and regional (such as *Het Parool*, *Rotterdams Dagblad*, and *Utrechts Nieuwsblad*) newspapers in the Netherlands. In April 2015, DPG Media took over Wegener Media, becoming the publisher of seven Dutch regional newspapers (such as *De Twentsche Courant Tubantia*) in five provinces (Noord-Brabant, Zeeland, Gelderland, Overijssel, and Flevoland). In December 2019, DPG Media announced the acquisition of Sanoma Media Netherlands, the largest magazine publisher in the Netherlands. DPG Media also owns the *nu.nl* online news platform, the largest news site in the country.

The Netherlands has a unique public broadcasting system, commonly being characterised as “pillarised” and grounded on the principle of external diversity, representing many social and cultural segments, or “pillars” (Christian-protestant, Catholic, and Socialist) (Lijphart, 1975). The foundation of the

public broadcasting system, both television and radio, is the Dutch Public Broadcaster (NPO), which operates three public networks (NPO1, NPO2, and NPO3). Six member-based television broadcasters are given airtime on these three networks, which are regulated by the Dutch Media Act 2008. These six broadcasters are required to represent and appeal to the diversity of Dutch society in terms of age, lifestyle, geographic and cultural origin, and political orientation. Working alongside these is the task-based Nederlandse Omroep Stichting (NOS), which is under statutory obligation to make news programmes for television, radio, and the Internet. *NOS Journaal* is the umbrella name for the television and radio news broadcasts. There are, in addition, news programmes aimed at children (*Jeugdjournaal*), teenagers and young adults (*NOS op 3*), and the general public (*Nieuwsuur* [News hour], a daily current affairs programme co-produced by NOS). NOS is also responsible for two themed digital channels: *NPO Nieuws* [NPO news], a 24-hour news channel which rebroadcasts the latest *NOS Journaal* and covers live events, and *NPO Politiek* [NPO Politics], a live channel featuring coverage of parliamentary sessions, debates, and archival material.

According to risk assessments made through the Media Pluralism Monitor of the Centre for Media Pluralism and Media Freedom at the European University Institute in Florence, the risks to media pluralism in the Netherlands are low in terms of basic protection, political independence, and social inclusiveness, and somewhat moderate in terms of market plurality. This is complemented by a strong legal framework that guarantees freedom of expression. Political independence of the media is underpinned by a strong journalistic culture of self-regulation and editorial autonomy along with an independent public service media governance structure. Social inclusiveness is also seen to be upheld by purposeful policy and considered to be at low risk. While these three areas appear to represent low risk, there is still room for improvement: 1) journalists face hardship because of their employers' preferences for poorly paid, self-employed journalists, or freelancers; 2) there is lack of legislation to protect journalistic sources; 3) there is no legislation regarding conflicts of interests between media owners and political parties; and 4) some population groups, such as the visually impaired and women, have less access to media. Market plurality, on the other hand, is considered to be at medium risk, mostly because of high degree of media ownership concentration, with two Flemish media companies dominating the press sector, as well as low transparency related to ownership patterns (Rossini, 2017: 6).

Covid-19

From mid-March to mid-May or beginning of June 2020, the Rutte III cabinet took measures restricting freedom of movement (a so-called intelligent lock-

down) in the name of public health to prevent the spread of this viral disease. The lockdown included working from home, banning events and meetings involving the physical presence of more than 100 people, closing borders to neighbouring countries, and closing schools (under public pressure, following similar steps being taken by neighbouring countries), childcare centres, cafés, restaurants, and sport clubs. Shops, however, were not shut down.

At the beginning, the Covid-19 crisis resulted in an unprecedented hunger for news among the Dutch audience. Daily newspapers (both print and online) saw their sales of subscriptions increase significantly. Consequently, mainstream media organisations were able to reaffirm their authority as reliable sources for facts and opinions, bringing expertise and explanations to the Covid-19 debate. This had not been the case in the past decade. Also, radio and television stations appealed to a growing audience, with the public broadcaster reaching a record number of viewers. However, advertising-based news media revenues fell significantly (an estimated 30%). Such revenue shortfalls led to drastic decisions in the Dutch media market. For example, firstly, the last-ever print version of the free newspaper *Metro* appeared on Friday, 20 March 2020 (Bakker, 2020). Secondly, lifestyle magazine *VRIJ*, a weekend supplement of *De Telegraaf*, was discontinued as of July 2020 (De Telegraaf, 2020). Thirdly, Mediahuis Nederland said it would cut about 70 of its advertising department's 160 jobs (Rogmans, 2020).

As Covid-19 resulted in both decreasing advertising revenues and an increased demand for news, and considering that provision of information during a crisis is of vital importance, the government decided to create a temporary support fund. Local media organisations were the most vulnerable in this respect; hence, this special support fund was aimed at door-to-door newspapers and local public broadcasters. A total of EUR 9.3 million had been allocated to these media organisations. Most of the interviewees were against accepting support from the government for their own medium, given the importance they attached to their independence. Generally speaking, they were more understanding of the support given to local media organisations, considering they were the most vulnerable. However, interviewees made four key comments in this regard. First, they highlighted how many door-to-door newspapers did not provide (a lot of) information and news. Second, some indicated that local public broadcasters were already subsidised, and others pointed out that these subsidies were quite nominal. Third, some respondents reported that they could not understand why the so-called hyper-locals were originally not eligible to apply for extra money. Due to this reason, EUR 1.6 million of the special support fund has been allocated to local newspapers following a subscription model, as well as to local new sites (the hyper-locals) (SVDJ, 2020a). The most prominent, fourth, criticism was that the special support fund, rather than being backed by a new budget, is designed to deduct funds from subsidies earmarked for

“special research projects” in 2021. The latter corpus is an important source of income to sustain smaller or local media outlets such as *Investico* or *VersBeton*. Investigative journalism, in this connection, was considered far more important for democracy than door-to-door newspapers, the beneficiaries of this special support fund. In response to criticisms, special research projects will continue to be supported in 2021. Moreover, an additional subsidy of EUR 24 million has been made available to support local news media in the September–December 2020 period (SVDJ, 2020b).

Leading news media sample

This follow-up study to the 2011 Media for Democracy Monitor country report for the Netherlands (d’Haenens & Kik, 2011) is based on desk research and in-depth interviews. The secondary analysis of relevant documents, including quantitative data, is from 2018 or 2019, unless stated otherwise. Information collected from the interviews reflects the most up-to-date situation. Sixteen professionals in Dutch news media and representatives of the academic world were interviewed. The selected sample represents different media platforms (print, audiovisual, and information and communication technology) and different owners. Our interviewees include editors-in-chief, news chiefs, and leading journalists of news media.

Only two large print news media owners are left in the Dutch news market: DPG Media and Mediahuis (CvM, 2019a, 2020). For the purposes of our study, we selected two Mediahuis national newspapers, one DPG Media national newspaper, and one DPG Media regional paper. These are briefly characterised as follows:

- *De Telegraaf* (Mediahuis), a popular daily with the largest nation-wide circulation;
- *NRC Handelsblad/nrc.next* (Mediahuis), quality newspapers sharing one editor-in-chief with each following a course of its own, like *nrc.next* targeting a younger readership;
- *De Volkskrant* (DPG Media Group), a quality paper with the third-largest nationwide circulation;
- and *De Twentsche Courant Tubantia* (DPG Media Group), a regional newspaper.

We also looked at *De Groene Amsterdammer*, an independent and the oldest weekly magazine in the country. Despite the decline in the reach of print media and magazines in general, the number of readers of *De Groene Amsterdammer* has risen steadily since 2009 (Bakker, 2019).

There are two leading news owners for radio and television: the Dutch Public Broadcaster (NPO) and the RTL Group (CvM, 2019a; CvM, 2020). We selected the following news broadcast media:

- NOS: Within the Dutch public broadcasting system (NPO), NOS is the broadcaster with clearly outlined tasks. It is legally bound to provide daily newscasts for three television channels, six radio stations, as well as NPO start. The NPO start website and app make up NPO's video-on-demand service. The three television channels run a thematic digital channel (NPO 1 Extra, NPO 2 Extra, and NPO 3 Extra). The most important news bulletin on television is the *Achtuurjournaal* (NOS). NPO Radio 1 is a 24-hour news and sports station. NPO Nieuws and NPO Politiek are 24/7 news and political digital channels, available both on cable and on the NPO start website and app.
- RTL: RTL is the largest commercial counterpart of NOS and is active via television, apps, and a website. The news bulletin of RTL4 is the only counterpart to NOS's *Achtuurjournaal*.

Further, we selected the Business Nieuws Radio (BNR) station, owned by a relatively small media player, the Financieele Dagblad Media group (FD), which also owns the *Financieel Dagblad* newspaper. BNR Nieuwsradio can be characterised as a commercial radio station, which at first focused on financial and economic items only (BNR) but has become a quasi-generalist newscaster providing a wider news menu ranging from economic affairs, mobility, housing, and lifestyles, to sports. As far as format is concerned, it is the only counterpart to the public broadcaster's NPO Radio 1.

In addition to the national public broadcasters, there are also regional and local public broadcasters. The foundation Regional Public Broadcasting (RPO) is seen as another leading news medium in the Netherlands, which is a cooperation and coordination body of 13 regional public broadcasters spread across the country (RTV Noord, Omrop Fryslân, RTV Drenthe, RTV Oost, Omroep Gelderland, RTV Utrecht, Omroep Flevoland, RTV Noord-Holland, Omroep West, RTV Rijnmond, Omroep Brabant, Omroep Limburg, and Omroep Zeeland).

Our interviewees from the broadcast media included the editor-in-chief of *NOS Journaal*, the editor-in-chief of a regional public broadcaster, and a leading journalist of BNR Nieuwsradio. Unfortunately, we were not able to set up an interview with an RTL news journalist. Finally, the following online-only news media were selected, and editors-in-chief or leading journalists of these news platforms were interviewed:

- *Nu.nl*, the largest commercial website focusing on news from the Netherlands. It has been owned by DPG Media since the end of 2019, when the company took over the Dutch arm of publishing group Sanoma, the largest Dutch magazine publisher between 2001 and 2019.
- *ThePostOnline*, a private right-wing Dutch news and opinion website. The website published a print version between 2018 and 2019, called *ThePostOffline*.
- *Follow the Money*, an independent news website for financial-economic investigative journalism, which started in 2010.
- *Investico*, an online independent platform for investigative journalism, which started in 2016. It is a non-profit foundation aiming to collaborate with other news media organisations.
- *Versbeton.nl*, an independent online hyperlocal magazine, started in 2011, targeting Rotterdam individuals with high interest in news. It is a platform for in-depth reflection on the city of Rotterdam.

Additionally, three academics (Piet Bakker, Huub Evers, and Jo Bardoel), the chairman of the Dutch Association of Investigative Journalists (Evert de Vos) and the ombudsperson for journalistic productions of the NPO (Margo Smit) were interviewed. Huub Evers is also the ombudsperson of the regional newspaper *De Limburger*, owned by Mediahuis.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

A wide variety of news and information media is still available to all Dutch citizens, although several news outlets were shut down. Regional and local news coverage varies from region to region.

IN 2011
3 POINTS

In 2018, the Netherlands' print media market included eight national newspapers, one free-sheet, seventeen regional newspapers, and two weeklies (Bakker, 2019; CvM, 2019b). Compared with a decade earlier, (2008) one national newspaper disappeared, as *NRC Handelsblad* and *nrc.next* were no longer seen as two distinct publications. Moreover, three free-sheets were shut down, nine regional newspapers ended their operations, and two weeklies changed their periodicity to monthly publications. Among the national newspapers,

there are three quality newspapers (*De Volkskrant*, *NRC Handelsblad/nrc.next*, and *Trouw*), two popular newspapers (*Algemeen Dagblad* and *De Telegraaf*), two newspapers with a Christian-protestant profile (*Reformatorisch Dagblad* and *Nederlands Dagblad*), and one specialist daily (*Het Financieele Dagblad*).

In 2018, *Metro* was the only free-sheet distributed nationwide, mainly in the Dutch railway stations aimed at commuters, but was terminated as a print version in March 2020, as mentioned above in connection with the Covid-19 pandemic. As of 2018, circulation figures were no longer available. Instead, reach figures were provided based on the population aged 13+ and expressed in percentages. Between 2014 and 2018, *De Telegraaf* dropped from 12.9 to 8 per cent, *de Volkskrant* from 5.6 to 4.6 per cent, and *NRC Handelsblad/nrc.next* from 3.5 to 3 per cent (CvM, 2019b).

Of these, at least one regional newspaper is distributed in each of the twelve Dutch provinces. On average, regional newspapers reach around 1 to 2 per cent of the population. Most national dailies and weeklies are available all over the country, either in single issues or by subscription. Single copies of regional papers are only available in the region they focus on or by mail subscription. However, in total, for all newspapers, reach figures dropped from 57.1 per cent in 2014 to 40.4 per cent in 2018 (CvM, 2019b).

In addition, there are only two opinion weeklies and news magazines: *Elsevier Weekblad* and *De Groene Amsterdammer*. Although *Elsevier Weekblad* was the most circulated and read in 2018, amounting to about 60,000 copies, this figure was lower by 10 per cent as compared with that in 2017, and half of that in 2008. *De Groene Amsterdammer's* circulation of about 23,000 in 2018, in contrast, was higher than that in the previous two years (Bakker, 2019).

In 2019, the largest television owners in the Netherlands were public broadcaster NPO with three channels, commercial broadcaster RTL with seven channels, and commercial broadcaster Talpa TV with five channels (SKO, 2020). In 2018, 82.5 per cent of the Dutch population aged six and older watched the public broadcaster on a weekly basis, 79 per cent watched a programme on an RTL channel, and 72.4 per cent watched a programme on one of Talpa TV's channels. Average viewing time per day amounted to 156 minutes, which was 28 minutes less than in 2019 (SKO, 2020). There were 18 radio stations catering to the Dutch audience, with nearly all of them offering a specific music menu. Meanwhile, in 2018, NPO Radio 1 and BNR Nieuwradio were the only two stations broadcasting news bulletins around the clock, with a market share of 8.2 per cent and 0.8 per cent, respectively (CvM, 2019a).

In 2020, every news source is available online and offline, except for online-only news websites such as *nu.nl*. More than 95 per cent of the Dutch have Internet access, and 98 per cent of households have broadband access (CvM, 2019a; Eurostat Statistical Yearbook, 2020; Newman et al., 2020).

(F2) Patterns of news media use (consumption of news) 2 POINTS

IN 2011
3 POINTS

On average, eight out of ten Dutch nationals turn to the news on a daily basis, varying from seven out of ten in the younger age group (18–34 years) to nine out of ten in the oldest age group (55+). The average daily reach figures – not only for print media but also for television and radio – have declined in the last decade. The public broadcaster is seen as an important news source both online and offline.

In 2019, 57 per cent of the Dutch population said they were extremely or very interested in news, varying from 40 per cent in the youngest age group (18–24) to 63 per cent in the oldest age group (55+). Among all age groups, up to 10 per cent of people were not really interested in news (CvM, 2019a). Looking at the frequency of news use, 84 per cent of the Dutch were consuming news at least once a day, while 2 per cent consumed news less than once a week (CvM, 2019a; Newman et al., 2020).

Interestingly, on a weekly basis, the most popular news sources continue to be television newscasts (65%). This is followed by social media and all-news radio stations (each at 39%), websites or apps from traditional newspapers (36%), print newspapers as well as websites or apps from television or radio broadcasters (both at 31%), and websites or apps from other news services. Only 5 per cent of the respondents mentioned reading a print opinion or news magazine (CvM, 2019a). Consumption of all types of news has declined over the last three years, the hardest hit media being print and social media or blogs (CvM, 2019a). In 2019, 70 per cent of the Dutch used television as their main news source – 4 per cent less than in 2017. Additionally, online news sites were the second-most important news source (65% in 2019, 2% less than in 2017) followed by radio news and news on social media or blogs – both 39 per cent with a decline of, respectively, 3 per cent and 8 per cent compared with 2017 – in the third position. In recent times, print media was the least-used news source (33% in 2019, 7% less than in 2017) in the country. Considerable differences were also observed in the use of news media types across the age groups. Traditional news media (television, print, and radio) as main sources varied between 36 per cent for the 18–24 age group to over 42 per cent for the 25–34 age group. This reached more than 47 per cent for the 35–44 group, beyond 58 per cent for the 45–54 group, and 75 per cent for the 55+ group. The younger a person, the more likely they were to turn to online sources (including social media and blogs) as their main news medium. This varied between 65 per cent in the youngest group and 25 per cent in the oldest group. Overall, Table 1 shows that the average daily reach of traditional media declined between 2009 and 2018 – by 27 per cent for newspapers, by 7 per cent for television, and by 9 per cent for radio.

Table 1 Average daily reach of television, radio, and newspapers, 2009 & 2018 (%)

Media type	Daily reach 2009	Daily reach 2018
Newspapers	68	41
Television	76	69
Radio	72	63

Source: CvM (2019a, 2019c)

Nevertheless, Table 2 shows that public broadcaster NOS is the most-frequently used news source among the Dutch population, followed by free website *nu.nl*, RTL, and popular newspaper *De Telegraaf*, which is more often read online than offline. Finally, SBS 6 (Talpa TV) that broadcasts the *Hart van Nederland* [*Heart of the Netherlands*] programme – a popular news bulletin focusing on regional news – reaches 28 per cent of the population on a weekly basis. Meanwhile, the online Dutch-oriented news source *nu.nl* was the 10th most visited website in 2019 on a monthly basis (CvM, 2019a).

Table 2 Weekly and regular use of the largest news services, online and offline (%)

	Weekly (min. 1x per week)	Regularly (min. 3x per week)
NOS (total)	68	53
NOS (offline)	41	36
NOS (online)	6	5
NOS (online and offline)	21	12
Nu.nl	43	31
RTL (total)	42	26
RTL (offline)	24	16
RTL (online)	7	5
RTL (online and offline)	10	5
De Telegraaf (total)	31	21
De Telegraaf (offline)	8	5
De Telegraaf (online)	14	10
De Telegraaf (online and offline)	10	6
SBS6 Hart van Nederland (total)	28	18
SBS6 Hart van Nederland (offline)	21	13
SBS6 Hart van Nederland (online)	3	2
SBS6 Hart van Nederland (online and offline)	5	2

Source: CvM, 2019a

Therefore, on average, eight out of ten Dutch nationals followed the news on a daily basis. Nearly 69 per cent of those aged 18 to 34 consumed news on a daily basis, 80 per cent of those between ages 35 and 54 did, and 91 per cent of those older than 55. However, 29 per cent of the Dutch often and sometimes actively avoided news, which is a higher percentage compared with the other nine countries in the sample: that is Belgium (2%), Switzerland (3%), Germany (4%), South Korea (5%), Sweden (7%), Norway (8%), Hong Kong (9%), Finland (12%), and Denmark (14%) (CvM, 2019a; Newman et al., 2020).

(F3) Diversity of news sources

3 POINTS

IN 2011
3 POINTS

Editors-in-chief and journalists emphasised the crucial importance of checking news sources, especially in the case of social media. Exchange of information, be it international, national, or regional, is increasing. Much like the public broadcaster, reflection of societal reality in news was part of the mission of all news media organisations.

Journalists interviewed as part of our study based their news stories on a large variety of news sources; for example, news agencies such as Reuters or Dutch press agency Algemeen Nederland Persbureau (ANP), their own network of sources, social media, input of information via the audience, and international, national, and regional media were their regular go-to for news stories. According to interviewee Piet Bakker, the two main sources for journalists were from the government at all possible levels, and also the ANP.

In summary, it can be said that any “news medium” worth its salt must check its sources, and extra caution is recommended when using social media such as Twitter or Facebook. Twitter is used as a barometer of society rather than a real news source. Information received from news agencies is trusted as such, although some journalists rely more on foreign news agencies or sources such as the British Broadcasting Corporation than on domestic news agency such as ANP. This is especially the case for foreign (financial) news production.

Generally speaking, investigative journalism is viewed as important, but the ability to invest time in research varies according to the type of media. Quality newspapers such as *de Volkskrant* and *NRC Handelsblad* invest more time and money in investigative journalism than radio news stations or popular newspapers such as *De Telegraaf*. Obviously, there is an enormous difference between those news media that focus on daily current affairs and all other types of news media. Daily newspapers such as *De Telegraaf*, television newscasts such as *NOS Journaal*, all-news radio stations such as BNR Nieuwsradio, and general websites such as *nu.nl* are less keen on research than a weekly publication such as *De Groene Amsterdammer* or investigative online platforms such as *Investico* or *Follow the Money (FTM)*.

With regard to content exchange, *Investico* has paid partnerships with national media such as *Groene Amsterdammer* (weekly news magazine), *Trouw* (quality newspaper), *Financieel Dagblad* (specialist newspaper), *Argos* (radio news programme on NPO Radio 1), or *Nieuwsuur*, a television news programme on NPO 2) on the one hand, and with regional media such as *versbeton.nl* on the other. *Investico* is part of both the International Consortium of Investigative Journalism and the European team Investigate Europe, which lets it share, merge, and cross-check facts. Meanwhile, regional, national, and international news media organisations, such as *The Courier*, publish *Investico* articles on a regular basis.

While online platform *FTM* has no paid partnerships, it exchanges content on a regular basis with Flemish news website *Apache*, and once in a while with international news media outlets such as *The Guardian* and *The Financial Times*. Depending on the topic, *FTM*'s journalists work together with other European news outlets from the very start of a particular research project. The growing volume of internal content sharing within media companies is especially striking. Regional Mediahuis newspapers such as *De Limburger* frequently publish articles by national newspapers *De Telegraaf* and *NRC Handelsblad*. However, the reverse is not true. National newspapers do not reprint articles by regional newspapers, nor do *De Telegraaf* and *NRC Handelsblad* reprint the other's pieces. The latter, meanwhile, does collaborate on a regular basis with its Flemish counterpart *De Standaard*. According to one of our interviewees, this collaboration has lasted for many decades, long before the news titles shared the same owner.

Such information sharing is also done at DPG Media, whose national newspaper *Algemeen Dagblad* and regional newspapers such as *Twentsche Courant Tubantia* collaborate on several news stories. *Algemeen Dagblad* provides national news to all regional titles, and major regional news (including some sports reporting) also appears in it. Within the FD Media Group, there is information sharing between the BNR Nieuwsradio station and the *Financieel Dagblad* (specialist newspaper), with the latter feeding news to the former. Other forms of collaboration at a national or international level are based on the network of journalists. For instance, there has been collaboration between *NRC Handelsblad* and public news and current affairs programme *Nieuwsuur*.

There is also a permanent collaboration between the 13 regional public broadcasters within the Foundation Regional Public Broadcasting. Although no structural cooperation has been set up, regional public broadcasters also share materials and images with the national public broadcaster. From 1 July 2020, NOS (part of NPO) and the regional public broadcasters started to operate the same app. Interestingly, while regional public broadcasters are keen to cooperate, regional newspapers remain reluctant.

Overall, journalists and editors-in-chief emphasised the need for a clear distinction between sponsored and journalistic articles, highlighting the importance of transparency about corporate advertising disguising as content. Public relations material is increasing, but interviewees insisted that they were under no significant pressure as part of their daily work.

The importance attached to reflection on and sensitivity to social diversity was dependent on the news medium. While it is part of the mission of the public broadcaster, private news media outlets such as *VersBeton* and regional newspaper *Twentsche Courant Tubantia* also include it in their statement. According to interviewee Jo Bardoel, the issue of gender diversity in news sources has gained some prominence on the agenda of news media in the last two decades. Additionally, giving a voice to both ethnic minorities and younger people is given importance as well.

(F4) Internal rules for practice of newsroom democracy 3 POINTS

Newsroom democracy is provided for by editorial statutes, which are common in Dutch newsrooms. Journalists are represented via a newsroom council that influences decisions such as hiring an editor-in-chief or news chief. Most new media platforms draw up an editorial statute.

IN 2011
2 POINTS

All established news media in the Netherlands, including those in our sample, have an editorial statute with the following main characteristics:

- a procedure for the appointment of editors-in-chief or other managerial functions;
- most media have a newsroom council, representing the editors and those involved in the appointment procedures;
- editors can influence the appointment of the editor-in-chief (for instance, BNR Nieuwsradio's new editor-in-chief was suggested via e-mail by its former editor-in-chief, as well as its management, however, this was not in line with the editorial statute, and after editorial protest, a correct procedure based on open applications was set up);
- editors-in-chief need to be supported by editors, otherwise they will be toppled;
- in summary, staff decisions are taken by the owners and executives, but in connection with newsroom staff.

Most recent news platforms have put in place an editorial statute. In practice, the founders automatically become editors-in-chief (see *FTM*, *Investico*, *VersBeton*,

and *tpo.nl*). *FTM* has no editorial statute yet but, is working on one. *Tpo.nl* has an editorial statute, but there are no rules with respect to the appointment of the editor-in-chief.

In general, there is an open debate culture in the country based on which news stories are selected and presented in the news media. However, editors-in-chief have the last word, among other things, on the themes that are selected and whether diversity of news sources is an issue or not. Although most journalists try to stress their independence (which is also clearly imbedded in the editorial statutes), the editorial line is often a reflection of a news medium's ideological orientation (according to our interviews with Huub Evers and Piet Bakker). For instance, *tpo.nl* and *De Telegraaf* have a right-wing sensibility, while *NRC Handelsblad* is more liberal and *de Volkskrant* or *De Groene Amsterdammer* are labelled as progressive. Editorial meetings are scheduled on a regular basis, but editors are expected to introduce ideas, perspectives, and news stories at any time. Editorial meetings normally take place at the office, but they have gone online since the beginning of the Covid-19 pandemic. According to some journalists, a lack of face-to-face interactions has made their job more difficult.

Meanwhile, none of our interviewees mentioned internal rules meant to support female journalists in their careers or help them access managerial positions. No indications were given that women were paid less than men. The man–woman ratio among editorial staff was also more or less equal, although it was reported to be a matter of importance.

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS

IN 2011
2 POINTS

Editorial bylaws endorse the chief editor's final responsibility and protect the strict separation between editorial staff on the one hand, and management and shareholders on the other. However, concentration in the newspaper market has increased significantly over the last ten years, and editors-in-chief are getting more involved in managerial tasks.

Dutch news media is known to separate the newsroom from both owners and commercial departments' influence, and all – including the editorial staff – value this distinction. Independent researcher Huub Evers also confirmed this.

Media house owners never intervene in editorial matters, indicated the interviewed editors-in-chief. This also applied to public service radio and television channels, whose politically oriented executive board refrains from making any editorial interference.

Likewise, there is an explicit segregation between newsrooms and sales departments. Obviously, editors-in-chief coordinate with the sales department,

but everyone interviewed confirmed that there were no interferences. Advertisers may at times regret the publication of certain articles, but none of the interviewed journalists felt any pressure preventing them from being critical.

In 2009, Huub Wijffjes had indicated that with editors-in-chief being a part of the management board, there might have been an influence on their roles as gatekeepers of editorial independence. However, none of the journalists reported they had ever been in a position where they could not exercise such independence, nor did editors say anything to the contrary.

Concentration in the Netherlands' newspaper market has significantly increased in the last decade. Several interviewees indicated that working conditions and editorial independence varied from one news company to another. For example, DPG Media is seen as one of the most commercially influenced media companies. Evert de Vos called the situation with DPG Media in Belgium – one single, cross-media newsroom for both television and newspapers – a “nightmare vision for Dutch newspapers”.

(F6) Company rules against *external* influence on newsroom/editorial staff

2 POINTS

IN 2011
2 POINTS

Direct influence from external parties on newsroom work and content is strictly forbidden, although advertisers occasionally attempt to gain influence. Given their smaller markets, local, regional, and niche news media are at higher risk of external influence.

Rules or bylaws ensure the strict separation between editorial and advertising departments. The interviewed journalists were, on principle, opposed to any outside influence, independence being of prime value to them.

Journalists and editors-in-chief did not feel any pressure from advertisers, nor from owners. The editorial statutes guaranteed editorial freedom even when it appeared to go against the interests of an important advertiser or the sales department. All our interviewees, including Piet Bakker and Huub Evers, categorically rejected any influence from advertisers on editorial content. Advertising clients were diverse, without undue influence from any one of them. Some interviewees recalled rare cases of advertisers threatening to withdraw important advertising budgets over several years, without such incidents hindering critical reporting.

However, one of the newspaper journalists we interviewed pointed out the grey areas between journalistic articles and advertisements. He especially highlighted travel, leisure, or fashion journalism in magazines or weekend newspaper supplements where there were editorial influences by the sales department. Moreover, the risk of interference from advertisers, politicians, or

other important figures is much higher at a local or regional level because of the closer relationships between journalists and the subjects they are reporting on. For instance, a potentially relevant news story may not come out because freelancers at the local or regional level are financially dependent on one or more of its actors.

None of the media organisations under study said they were dependent on one or several advertisers. As mentioned earlier, the risk is much higher for regional and local media, as well as for media houses that focus on niche sectors such as cars, finance, or fashion, owing to the small market size. Leading national news media organisations do not face such an issue. Furthermore, being part of a larger media company is beneficial in this case, since such a company is better able to survive potential losses of advertising revenue. For instance, BNR Nieuwsradio is still in existence only thanks to the support of the *Financieel Dagblad* newspaper – which may or may not help it survive the current Covid-19 crisis.

Advertising on the public broadcasting media is organised via the Foundation Advertising on Radio and Television, which allocates advertising airtime to various NPO media platforms and collects their proceedings. Revenue was originally transferred to the government that further placed it in a fund intended to help newspapers experiencing temporary difficulties. This fund was managed by the Press Fund, created in 1974. In 2014, the fund renamed itself the Journalism Fund, with a view towards stimulating the quality, diversity, independence, and innovation of the journalistic infrastructure in the Netherlands. The original financing mechanism for loss of advertising revenue in the print media has also been abandoned. At the same time, the Foundation Advertising on Radio and Television secures the independence of NOS with respect to advertisers and media agencies.

Interestingly, another relevant finding has been the news media's development of other business models to secure their independence. For instance, the *Groene Amsterdammer* and *VersBeton* have largely switched to donation and subscriber formulas, making advertising revenues marginal. Online advertising is not very lucrative, and above all, it is described as disruptive. *FTM* made it a unique selling position to ban advertising completely as a way to underline its credibility and editorial independence. For instance, writing about the bank sector while raising money from it via advertising is viewed as sending the wrong signal to the readership.

(F7) Procedures on news selection and news processing 2 POINTS

IN 2011
2 POINTS

In the absence of formal news or document selection rules that might outline a definition of what is and what is not news, meetings and discussions held by editorial staff can be considered as informal selection procedures.

There are no formal rules that might underpin the news selection and production process, but a constant debate among the editorial staff about what could and did go wrong is regular practice. Journalistic values such as independence, objectivity, representation of both sides of an issue, checking news sources, and so forth, are valued to a great degree. Stylebooks are sometimes used only if problems arise, but not necessarily with any consistency. Some stylebooks define the importance of issues such as the diversity of news sources. Most news media is governed by the self-regulation body Netherlands Press Council, which looks at complaints of violation of good journalistic practice. Aiming to contribute to the transparency of its judgements on behalf of the professionals and the public, the Press Council publishes a guidebook for journalistic behaviour. This has been revised and amended several times since it first appeared in 2007, with the last changes made in 2018. Some media outlets – among them *De Telegraaf* – do not recognise the Press Council, which undermines its legitimacy.

(F8) Rules and practices on internal gender equality 2 POINTS

Employment conditions among male and female journalists are equal in terms of conditions and pay.

The Netherlands is ranked 6th on the Gender Equality Index, and 3rd in the “employment” domain (EIGE, 2019a, 2019b). Interviewee Jo Bardoel mentioned a tremendously positive evolution in this regard, in the last ten to twenty years. There is no indication that women are currently paid less than men, although more female than male journalists do tend to work part-time. It was also observed that women also tended to work more on “soft” topics such as fashion and lifestyle, in contrast to men working on “hard” topics such as crime, politics, and finance.

Strikingly, none of the interviewees could provide a very clear answer to the question: “Are men and women in the media equal in terms of compensation?” This may indicate that internal gender equality is not very high on the agenda, a view supported by the lack of any explicit language regarding staff gender diversity in the NPO’s performance agreement (Rijksoverheid, 2017). Moreover, in putting together a panel of 16 interviewees, we were only able to find four female respondents. Female inequality seems to be viewed as a thing of the past, with one of the two female editors-in-chief we interviewed stating

that gender was not an issue for them. However, one of them also said that only 35 per cent of her staff were female, a figure she would like to see increase and an issue that she would bear in mind as part of future recruitment procedures.

(F9) Gender equality in media content

2 POINTS

Although there is a growing sensitivity among journalists for gender equality in media content, media professionals overestimate the number of women in the news. No formal rules apply. The public broadcasters (at local, regional, and national level) do not follow a quota system, although they are supposed to represent women in a balanced way.

Gender equality was seen to be much more of a private and personal concern among journalists, and some are more sensitive to it than others. Our interviewees acknowledged its importance, but admitted that gender equality in media content continues to be limited. In daily practice, time constraints often meant that they turn to the same old and trusted sources. Therefore, although no formal rules exist, there was a general feeling among our interviewees that news stories are now more gender balanced, both when it came to the sources used and to the actors covered in the news stories. Some stylebooks mention gender equality regarding news sources. Our interviewees expressed the idea that female journalists put gender equality higher on the agenda.

The NPO's performance agreement (Rijksoverheid, 2017: 7) stipulates that it must ensure a balanced representation of women. While NPO is obligated to measure the representation of women in its television and radio broadcasts as part of its performance measurement, it does not have to adhere to quota rules. The representation of women in traditional news media (newspaper, television, and radio) is lower in the Netherlands (19.5%) when compared with worldwide (24%) and European (25%) proportions of the same in the 2015 edition of the Global Media Monitoring Project (GMMP) (Women Inc, 2017: 12). Strikingly, Dutch media professionals overestimated the quantum of female experts: 53 per cent of them felt that 20 to 40 per cent of experts are female, although the actual figure is only 12 per cent (Women Inc, 2017). The Media Authority noted that, of all the guests in Dutch news and opinion programmes between 2010 and 2015, only 22 per cent were women (Atria, 2017). Given an increased use of online news media sources, the GMMP has also included the representation of women in the digital news media as one of the aspects to monitor. The percentage of women in the news on four Dutch news sites varied from 9 per cent at *nu.nl*, to 10 per cent at *nos.nl*, to 33 per cent at *joop.nl*. All of these combined asserts that the Netherlands is less advanced in this respect than Europe as a whole (24%) or even when seen in relation to the group of 144 countries surveyed in the world (average = 25%).

(F10) Misinformation and digital platforms
(alias social media)

2 POINTS

Misinformation is a crucial issue in Dutch newsrooms. Only a few media outlets check online comments using algorithmic tools. Sufficient training is provided.

Misinformation and fake news are high on the agenda in Dutch newsrooms. Somewhat surprisingly, none of the journalists interviewed indicated that their news media were using automated fact-checking tools, such as the Google News Initiative or membership in the Open Data Institute, for instance.

Checking news sources seemed to rank at or near the very top of journalistic values in the Netherlands. For instance, *De Telegraaf* has the co-workers of the writer proofread articles. Further on, the news chief, the editor-in-chief, and the final editor read pieces to minimise the risk of publishing sloppy work or false information. In October 2019, a report commissioned by Interior Minister Ollongren (Rogers & Niederer, 2019) presented the impact of disinformation and so-called junk news appearing on social media before and during the 2019 Provincial Council elections and European Parliament elections in the Netherlands. This report signalled a proliferation of large volumes of tendentious and fake news. Examples of actual disinformation and fake news are hardly found in the Netherlands, but many hyperpartisan, extreme, and openly ideological “junk news” sites, such as *Opinie2*, *Stop de Bankiers*, *E.J. Bron*, *Dagelijkse Standaard*, *Climategate*, *geenstijl.nl*, *tpo.nl*, and so forth are in existence. Clickbait sites include *tpook*, *parra*, *viraaltjes*, *aboutmedia*, and *hardewaarheid*. In addition, sources that devote a lot of attention to conspiracy theories include, among others, *Nine for news*, *Martin Vrijland*, *DLM Plus*, *Wanttoknow*, and *Ellaster*.

There is certainly a growing need for fact-checking in the present times, compared with what was the case in the last five to ten years. Websites such as *hoaxmelding.nl* and *nieuwscheckers.nl* compile lists of instances of false news on social media (Rogers & Niederer, 2019). Investigative journalism platforms such as *Investico* (started in 2016) and *FTM* (started in 2010) were created to check the quantity of misinformation and fake news. Indeed, fact-checking has become a flourishing industry in recent years. Audiences have also proved to show a greater interest in fact-checks, more so during the Covid-19 crisis. Data journalism is also on the rise; two examples are 1) *FTM* and public broadcaster NOS have been working with LocalFocus, a company specialised in data visualisation, and 2) *De Telegraaf* has an editorial staff studying data relevant to various societal trends.

Some news media outlets have also been investing more time and staff in fact-checking. For instance, *nu.nl* has hired an extra full-time equivalent for that purpose. This is not the practice at NOS, where specific fact-checking is, more often than not, carried out by individual journalists. Generally speaking, content on social media is seen as a barometer but not as a main news source.

Algorithmic tools are not yet in use, except for screening online comments (still in beta testing at *nu.nl*). Some news media platforms such as *Twentsche Courant Tubantia* do not allow comments on their own website, but use Facebook as a moderating tool for online comments. Filtering out comments that are racist, promote violence, and so forth can be categorised as fact-checking, according to Huub Evers. In addition, the public broadcaster has been checking facts with the help of the University of Leiden. Training is provided on how to identify manipulated images or, for instance, on data scraping. The Association of Investigative Journalists (VVOJ) is taking the lead in providing relevant training.

(F11) Protection of journalists against (online) harassment 3 POINTS

(Online) harassment is an increasing problem in the Netherlands. *Persveilig.nl* was launched as a contact point to address problems. In general, journalists are supported and protected by their employer's legal department.

Dutch journalists are confronted with harassment, “shit storms”, and insults, especially online. In most cases, these matters tend to abate by themselves, but on occasion, the media company's legal department has had to be called upon, entailing a report being issued to the police. The general level of support provided was considered fair and sufficient by the journalists interviewed.

The website *persveilig.nl* was launched in November 2019 as a contact point where journalists could report threats of all kinds related to their profession. *Persveilig.nl* is a collaboration between the Dutch Association of Journalists (NVJ), the Association of Editors-in-Chief, the police, and the Public Prosecutor's Office. Strikingly, only a few of the journalists we interviewed had heard of this initiative.

At present, security agents protect NOS crews that film demonstrations on the ground. It has been commonly believed over the last few years that organised crime groups threaten crime reporters. An attack against the building of *De Telegraaf* in 2018 was directly linked with the newspaper's coverage of organised crime. However, the reporter in question and his family have since been under the constant protection of security agents.

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 1 POINT

Ownership concentration on a national level is remarkably high, with only five large media companies sharing the market among them. IN 2011
2 POINTS

It is a well-known fact that media concentration threatens pluralism of reporting. Such pluralism is considered a major value in its importance for healthy opinion formation in a democratic society. Given the current media landscape and the actual use that people make of the media, observers have been criticising the traditional division of media markets according to newspaper and magazine press, radio, and television. They have been in favour of looking at particular media markets to serve specific functions (information, leisure, etc.) in which media platforms are interchangeable. The media authority continues to monitor different media outlets, which is considered to be the most in line with international media practice, based on the sector-by-sector approach of competition policies. Moreover, each medium possesses particular characteristics that make a specific contribution to the provision of information. This is why such modes of dissemination must be looked at separately in order to determine actual media concentration and plurality of media content. There must be sufficient competition within each media type (see also CvM, n.d.).

As of 2018, the television market was dominated by three large players: public broadcaster NPO (NPO1, NPO2, and NPO3), RTL Nederland (RTL4, RTL5, RTL7, RTLZ, and RTL8), and Talpa Network (SBS6, Net 5, Veronica, and SBS9) (CvM, 2019a). NPO's market share was 35.5 per cent (CR1 = 0.35), RTL's 23.1 per cent (CR2 = 0.59), and Talpa Network's 15.9 per cent (CR3 = 0.75). In comparison with the situation in 2008, the CR3-index has improved very slightly (-0.028). However, it still reveals the highly concentrated nature of the television market (CvM, 2019a). In 2018, the first nine of the ten most-viewed channels (i.e., with the highest average daily reach among the Dutch population aged 6+) belonged to one of these three large players. The Regional Public Broadcasting Foundation (daily reach of 13 regional public service broadcasters) is the tenth most-viewed channel, and the only one not belonging to any of the "big three" players (CvM, 2019a).

In 2018, the radio market was comparably concentrated by three dominant players. Of these, Talpa Network (Radio 538, Sky Radio, Radio 10, and Radio Veronica) possessed a market share of 33 per cent (CR1 = 0.33), public broadcaster NPO (NPO Radio 1, NPO Radio 2, and NPO 3FM) 30 per cent (CR2 = 0.63), and DPG Media (Q-music) 8.7 per cent (CR3 = 0.72). The C3-index increased by 13.8 per cent between 2008 and 2018, primarily due to the takeover of Sky Radio by Talpa Network in 2017 (CvM, 2019a). Based on average

daily reach (which represented the Dutch population aged 10+), seven out of the ten most-listened-to channels were owned by one of these three radio players. The other three channels in the top ten were the regional public broadcaster, 100%NL (owned by RadioCorp, an independent media company), and E Power Radio (a private company comprised of fourteen regional commercial channels and one national channel).

The shares for the daily newspaper market are based on circulation data from Nationaal Onderzoek Multimedia, which represents the “total circulation in the Netherlands per year”. At present, only two big companies own most of the newspapers: Mediahuis (*De Telegraaf*, *NRC Media*, *Holland Media*, with regional titles) and DPG Media (*ADR Nieuwsmedia – Algemeen Dagblad*, and regional titles such as *Het Parool*, *de Volkskrant*, and *Trouw*). Besides these, there is the smaller FD Media group, owner of specialist newspaper *Financieel Dagblad* (as well as BNR Nieuwsradio, with a daily reach of 0.8 per cent in 2018 among the population aged 10+). The only available figures are the most recent (4th quarter of 2019), based on brand reach (online and offline, based on the population aged 13+). The first six newspapers are all owned by Mediahuis or DPG Media: *ADR Nieuwsmedia* (71.5%), *De Telegraaf* (55.1%), *de Volkskrant* (33.9%), *NRC* (26.8%), *Metro* (owned by Mediahuis – 26.4%), and *Trouw* (20.5%). *FD* is the first newspaper that is not owned by either of the two largest media companies. Its monthly branch reach is 9.3 per cent (NOM, 2020). These percentages combine online and offline reach. There were no figures available to indicate the reach of news websites exclusively. Since the end of 2019, *nu.nl* has been owned by DPG Media. It is the only Dutch news website in the top-10 list of the most visited websites on a monthly basis. Of those, *Alphabet* leads the list along with *Google*, *Google Maps*, and *Google Play* (CvM, 2019a).

(E2) Media ownership concentration regional (local) level 1 POINT

The same two large players dominate both the national and regional newspaper markets. By contrast, concentration in the regional radio and television market is considerably lower.

IN 2011
1 POINT

As of 2018, the major regional publishers – Mediahuis and DPG Media – also dominated the national level. For the most part, the regional news offering could be assigned to a specific owner, because separate figures were not available for each door-to-door magazine (CvM, 2019a). As Piet Bakker mentioned, hyperlocals are very diverse, both in the way they bring news to the readers and in terms of their reach figures, but most of them (such as *VersBeton*) are independent.

Concentration in the regional radio and television market was found to be considerably lower, because each province had its own regional public broadcaster. At the local level, 77 localities are defined, 9 of which have no local regional broadcaster at all (NLPO, 2020). The audiences of regional public broadcasters varied a lot across the different regions, but were able to be reached via radio, television, and the Internet. For instance, RTV Oost was found to really be in touch with the population of the province of Overijssel (east of the country, 25 villages, 1.15 million inhabitants), being a news leader, and providing high-profile stories via radio, television, app, and social media, resulting in 170,000 singular listeners, 660,000 singular viewers, and an average of 1,019,750 visitors online on a weekly basis. RTV Noord (in the northern province of Groningen – 12 villages with 584,000 inhabitants) demonstrated the following reach figures: 121,000 singular listeners, 812,000 singular viewers and an average of 715,250 visitors online on a weekly basis. In the province of Brabant (in the south – 62 villages with 2.5 million inhabitants), Omroep Brabant is available through radio, television, and online platforms. On a weekly basis, it reached 255,000 singular listeners, 961,000 singular viewers, and an average of 2,156,000 visitors online (ORN, 2020).

(E3) Diversity of news formats

3 POINTS

Dutch news media range across a wide array of different news formats, from headline news online to long-form reads in newspapers and discussion programmes on radio and television.

IN 2011
2 POINTS

All forms of news media are available online, and digital subscriptions for print media have crucially grown in the last five to ten years. This has resulted in a combination of news articles or sections (varying from headline news to one article in 24 hours) that are freely accessible, and other items behind a paywall. The public broadcaster as well as *nu.nl*, *Investico*, and *VersBeton* are the only exceptions, with all their online content being freely accessible. In 2009, there were four free-sheets available. As of 2020, *Metro* is the only one left, and this too became an online-only publication in the spring.

According to a *De Telegraaf* reporter, there has been an increase in the diversity of formats, owing to the availability and reach of various platforms. For instance, an article is constrained by a maximum length in the space of a newspaper, but its online platform offers more room for background information. The reporter also mentioned that she uses her personal Twitter account for live reporting and background information. In addition, she stated that she used Twitter to interact frequently with her audience (which includes answering questions). Huub Evers also noted that more background materials, such as full reports, are now accessible via Twitter.

Such a flexibility of online formats can also be illustrated by *Investico*'s work process. The journalists working for this platform of investigative journalism create content as part of their partnerships (for which they are paid), but in a few days' time, the original and long versions of their pieces are made available, including full disclosure of their sources.

Two other examples of the increasing diversity of formats include the recent emergence of podcasts focusing on economics, business, and world politics, available on the website of BNR Nieuwsradio, and the live talk shows that *Vers-Beton* has been conducting in Rotterdam, three to four times a year since 2018.

(E4) Minority/Alternative media

2 POINTS

IN 2011
3 POINTS

The public broadcaster aims at inclusive broadcasting. Minority groups, among them ethnic minorities, can make their voices heard. In this regard, some forms of media are doing better than others. Cultural diversity and diversity of opinion remain thorny issues.

“Public broadcasting is available for everyone, of whatever colour and age”, vide the Media Act. The NPO's concession policy plan 2016–2020, entitled “Het publiek voorop” [“The public first”], also mentions pluriformity and diversity as two key values of broadcasting policy: “NPO's media brands aim to offer to its audience a balanced picture of the society and diverse set of beliefs, opinions and interests among the population in the social and cultural field” (NPO, 2015: 70). In aiming towards a proportional representation of ethnic minorities, quota agreements were created in the past (e.g., 11%, proportional to the percentage in the population). Such an ethnic minority quota was later dismissed. In line with its performance agreement (Rijksoverheid, 2017: 7), NPO aims to represent people with a non-Western migration background in a balanced way as a way to mitigate prejudices against them. In their book *Heb je een boze moslim voor mij?* [Got an angry Muslim for me?], Annebregt Dijkman and Zoë Papaikononou (2018) criticise the lack of cultural and religious diversity in newsrooms of current affairs programmes, which – they argue – leads to unidimensional, often negative portrayals of certain groups. Like these authors, Shashi Roopman (quoted by Mercita Coronel in an interview published in *dekanttekening.nl* in December 2019), the editor of *Up! Network NL*, a right-wing online media platform, is convinced about the importance of diversity in the media, but his interpretation is different. In his view, ethnic representation is limited to a number of ethnic groups (Turks, Moroccans, Africans) and framed through a predominantly left-wing orientation: linking ethnicity automatically with the left-wing political frame. Conversely, right-wing broadcasters PowNed and Wij Nederland have joined the “left-wing” public broadcasting system. Ongehoord

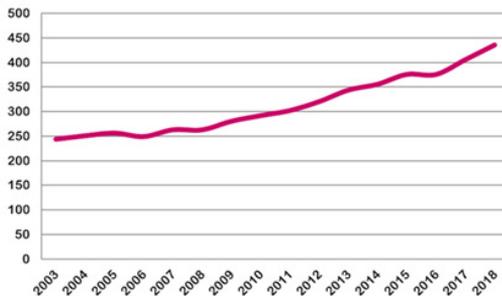
Nederland [Unheard Dutch] has come forward as an aspiring broadcaster. Other initiatives aimed at improving diversity in the newsroom relate to attracting news columnists by newspapers as well as the conscious decision of the correspondent to make its editorial staff less homogeneous. Public broadcaster NPO operates FunX Radio. While it was planning to add a sub channel called Turkpop to FunX Radio to reach youngsters and young adults with a Turkish migration background, the then State secretary Sander Dekker vetoed this. He argued that it would conflict with NPO's mandate to connect the populations (Ministerie van OCW, 2015). The days of target-group television are over, but no structural alternative has emerged in its place. Therefore, a key question remains on whether cultural diversity and a diversity of opinion can be found in the programmes of the mainstream media.

(E5) Affordable public and private news media 3 POINTS

News media have moderate sales prices compared to the average income of Dutch households. IN 2011
3 POINTS

Bakker (2018) conducted research on the prices of newspapers over the years. Figure 1 shows the trend in price increase between 2003 and 2018 (4% between 2003 and 2012, and 5% between 2013 and 2018). For the purpose of comparison, let us indicate that in 2017, the average yearly disposable income of more than 7.7 million Dutch households was EUR 41,000, which was a 10.8 per cent increase from 2013 (EUR 37,000 per year, per household) (CBS, 2019).

Figure 1 Average annual price for a full newspaper subscription (online and offline)



Comments: Only the prices of six regional titles were available in 2018. The 2017 figure is based on a 2016–2018 average, as no figures were available.

Source: Graph from Bakker, 2018

The Netherlands also has several (wireless) Internet providers: the price of an Internet connection varies from EUR 22 to approximately EUR 80 per month. These prices are dependent on the connection times and various extra options, with the speed of the connection being one of them. The cheapest Internet and television combination package is EUR 45 per month, but prices of about EUR 100 per month are also found (internetvergelijk.nl, 2020).

NPO Start (the national public broadcaster's online video platform) has three subscription modes: 1) free of charge without creating an account, in which one can watch or listen live to television and radio, with a possibility to time-shift specific programmes (e.g., radio podcasts) in order to view or listen to them after the live broadcast; 2) free of charge with an account, which comes with extra options such as writing a child profile or starring programmes as favourites; and 3) NPO Start Plus, which makes it possible to watch and listen to ad-free radio and television programmes for EUR 2.95 per month. Programmes are available in HD quality and can be time-shifted, with the options of being viewed or listened to for a longer period. Previous seasons of some programmes are also available (NPO, 2019).

(E6) Content monitoring instruments

3 POINTS

The Dutch Media Authority publishes the Media Monitor, an annual report that analyses ownership relations and markets, with a specific focus on pluralism in news media. The Dutch Journalism Fund strongly focuses on research and monitoring news media, including those related to local and regional news.

IN 2011
3 POINTS

One of the tasks entrusted to the Dutch Media Authority is to watch over the separation between the editorial and the commercial aspects of television and radio. It does this through the Media Law, which lays down rules for public and commercial broadcasters to follow, enforcing them at the national, regional, and local levels. The Media Authority is, additionally, also in charge of granting broadcasting licences for radio and television, and auditing the annual accounts of public broadcasting organisations.

Since 2002, the Media Authority has been publishing the Media Monitor, an annual report analysing ownership relations in the media market, with a specific focus on pluralism in news media. Since 2018, the Media Monitor has been primarily based on the *Reuters Institute Digital News Report*. Since 2005, separate studies have been carried out each year focusing specifically on the news market in the Netherlands. The most recent of these studies pertain to the representation of men and women on television, as well as filter bubbles. Since 2017, there is also a yearly study which looks at diversity on television as well as the satisfaction and viewing behaviour of the audience.

The Dutch Journalism Fund is heavily involved in research that monitors the Dutch news media market with a specific focus on the local and regional news supply. In the recent past, examples are 1) a 2014 study which mapped news use and news supply before and during the municipal elections (Landman et al., 2015); 2) a large-scale scenario study published in 2015 about the future of journalism (Kasem et al., 2015); and 3) a 2018 study of the news ecosystems in the four largest Dutch cities (Utrecht, Amsterdam, The Hague, and Rotterdam). Moreover, under the heading “State of the News media”, the Dutch Journalism Fund provides constant updates about the Dutch news media.¹

(E7) Code of ethics at the national level

2 POINTS

Most media organisations comply with the guidelines of the Press Council and the Code of the Association of Editors-in-Chief or observe a code of conduct of their own.

IN 2011
2 POINTS

The guidelines of the Netherlands Press Council list general rules to further objectivity in journalism. The Press Council resorts to these guidelines when dealing with complaints. The *Genootschap van Hoofdredacteuren* then writes the second. The latter is a more specific manual than the general guidelines. It lists a number of concepts which constitute the basis of an open and democratic society. The members of the Association are committed to heeding these rules.

Some media, such as *De Telegraaf* and *Het Parool*, do not recognise the authority of the Council. However, since 2013, *Elsevier Weekblad* and RTL have been affiliated again with the Council after a 13-year hiatus. There is no published list of Council members. In the annual report (RvDj, 2019), the following media organisations were mentioned as part of the foundation and financially contributing to the continuation of the Council: RTL, Talpa TV, NPO (national public broadcaster), RPO (regional public broadcaster), and NLPO (local public broadcaster).

Media researcher Huub Evers indicated that in the last one or two decades, news media organisations have developed their own codes. However, in practice, these are only referred to when problems arise. NPO ombudsperson Margo Smit also shared this experience. She expressed her regrets over the lack of discussions and open debate about the internal codes as well as the national codes.

(E8) Level of self-regulation**2 POINTS**

The Press Council, which examines complaints about media coverage, is a self-regulatory organisation. Self-regulation can also be found in the open debate culture on fairness, balance, and impartiality in the newsrooms.

IN 2011
3 POINTS

The Press Council is a self-regulatory organisation that examines complaints lodged by citizens or other media outlets about reports and articles in the media. The primary aim is to find a compromise between two parties so that a lawsuit can be avoided. To this end, the Council has written down a code of conduct or guidelines in a guidebook that serves as the basis for high-quality and objective journalistic practice that will not harm anyone's rights.

A second instrument intended to promote journalistic quality was the Nederlandse Nieuwsmonitor [Dutch News Monitor], launched in 2005. It had three types of reports: a continuous monitor, an event monitor, and an issue monitor. The latest study published on *nieuwsmonitor.org* about the future of the ANP (Dutch press agency) in the rapidly changing media landscape dates back to December 2018.

The Media Ombudsman Foundation (MON) is the other organisation dedicated to journalistic ethics and self-regulation in the Dutch language area. The MON chairman has also published his views about national and international news trends on the organisation's website. MON's overarching mission is to make a relevant and substantive contribution to the recalibration of basic journalistic principles such as reliability, diligence, independence, objectification of the facts, hearing both sides, (self-) critical analysis, ethical justification, and willingness to rectify. MON also tests news media (both printed, audiovisual, and online) against moral and ethical standards.

All journalists interviewed referred to an oral-debate newsroom culture revolving around fairness, balance, and impartiality of news reporting. They indicated that most of these discussions usually take place on an ad hoc basis during editorial meetings.

(E9) Participation**3 POINTS**

Audience participation happens by posting comments in some online newspaper editions or via Facebook pages, and by e-mails to the editor-in-chief or the ombudsperson.

IN 2011
3 POINTS

An open debate with the news audience is highly valued, and the news media is always on the lookout for innovative methods to interact with its audiences, said the interviewed journalists. In comparison with 2009, most news sites today do not have a facility to post comments online. When comments are allowed,

sites apply some sort of moderation to achieve a healthy debate. Most of them use a registration system. Some news media outlets, meanwhile, choose Facebook as a way of communicating with their readers, as well as a monitoring tool. The audience is asked for information in specific cases via websites, social media platforms, or newspapers. All interviewed journalists said user-generated content was never an option for them. They firmly said that journalism was a serious profession and audiences could only be used as witnesses in case of specific news events.

The business model of donations followed by *VersBeton* or *FTM* encourages direct interaction with the audience, where members can send e-mails to the editors-in-chief. Sending e-mails or letters to the editor is still a common practice in the Dutch news media. Twitter is also used to interact with the audience (see Indicator E3 – Diversity of news formats). News media with an ombudsperson such as NPO, *De Limburger*, *NRC Handelsblad*, and *de Volkskrant* can rely on intermediaries between the editorial staff and the audience. An interesting example of interaction with the audience is the *nujij.nl* platform of the *nu.nl* general website. This distinct website, reopened in April 2018 after a one-and-half-year hiatus, discusses news by getting in touch with editors and contributing to articles. In an effort to ensure a constructive discussion, there are specific rules in place, and the website assigns editors to moderate the content.

Meanwhile, one of the missions of MON (not mentioned under Indicator E8 – Level of self-regulation) is its role as a contact point for fighting misinformation. The audience, along with journalists with professional values, is deemed responsible for fighting the information crises. However, the comments on the MON website actually reflect a very poor practice of public interaction.

In NPO's 2016–2020 concession policy plan (“The public first”), interaction with the audience is a key aspect: programme content can be found on the public broadcaster's website, on social media, or on a search engine. Through these gateways, which include search options and referrals, viewers are catered to on the platform of their choice.

(E10) Rules and practices on internal pluralism

2 POINTS

Most news media organisations enjoy a culture of openness with room for discussion on internal pluralism, although this is still a matter of individual interests of journalists. No formal rules are in place.

IN 2011
2 POINTS

Compared with 2009, sensitivity towards internal pluralism has increased in Dutch newsrooms, confirmed Jo Bardoel. While the NPO has a legal obligation to represent all significant voices in society, private media outlets follow their own preferences. The newsroom journalists we interviewed confirmed that the choice of experts and voices was repeatedly discussed, although it was more of

a private and personal concern among journalists (see also Indicator F8 – Rules and practices on internal gender equality). However, most of our interviewees admitted that looking for new, diverse faces and voices regularly falls prey to time constraints and tight editorial deadlines. Also, experienced experts know what is expected from them based on media logic, making the journalists' lives easier with quick and adequate responses.

Overall, diverse opinions are welcome in Dutch newsrooms and are promoted by most editors-in-chief, albeit within the scope of the news medium's focus. Some stylebooks mention gender equality of news sources. In general, the search for ethnic minorities is a trickier issue, because newsrooms include only a few journalists with an ethnic minority background. Most of the editors-in-chief we interviewed spontaneously brought up their explicit search for suitable journalists with an ethnic profile other than Dutch.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog “control of the controllers”

2 POINTS

IN 2011
2 POINTS

There is no independent institution in the country that systematically monitors media performance, although the website *denieuwereporter.nl* and Media Ombudsman Foundation (MON) are inviting citizens and media professionals to think about the media's role as a watchdog.

Compared with 2009, the independent foundation Stichting Mediadebatbureau, which aimed at stimulating reflections among citizens about media quality, reliability, and diversity, no longer exists. The BNR Nieuwsradio discussion programme *Mediazaken* [*Media matters*], in which media professionals reviewed issues concerning journalism and the media, was discontinued in April 2016. However, online-only initiatives such as *FTM* and *De Correspondent* have started their operations in the past decade. Their mission statements – “revealing the truth” and “acting as watchdog” – are crucial, including in relation to other media organisations. In general, experts, journalists, and audiences do trust the Dutch news media to play their roles as watchdogs. Trust in news is also relatively high in the Netherlands: 14 per cent of the population indicated that they did not trust the news, compared with 53 per cent stating they did (CvM, 2019a).

However, openness to external evaluation is low because independence is very highly valued. Moreover, the journalists interviewed were convinced that journalistic values were automatically embedded in each individual journalist, resulting in no need for an external assessment of their professionalism.

An initiative to stimulate discussion of and research on the influence of new media and social-cultural developments can be found on the *denieuwereporter.nl* website, started in 2005. Its editor-in-chief is university lecturer Alexander Pleijter. The website is an independent blog about journalistic practice, with an open forum for debate and comments about developments in the media, a refreshing source of ideas for self-reflection among journalistic circles (De Nieuwe Reporter, 2020).

The MON (see Indicators E8 – Level of self-regulation and Indicator, & E9 – Participation) also works on deliberations over journalistic ethics and values. An ongoing debate in the Netherlands is about the need for an independent news ombudsperson. In 2019, MON chairman Jan van Groesen had stated that due to the absence of an independent ombudsperson, news media couldn't properly fulfil their function as an information provider. It is worth noting, however, that the website's publication rate is very low (in 2020, so far there is only one article; 2019 had one article, 2018 two articles, and 2017 three articles) and the most recent reaction to a piece dated back to 2016.

(C2) Independence of the news media from powerholders 1 POINT

The Dutch news media enjoy relative independence from the powers that be. Media ownership concentration increased in the last decade, with more media titles held by a single owner.

IN 2011
1 POINT

Mergers and acquisitions reshaped the Dutch media landscape in the last decade. Strikingly, more media titles and brands are held by one and the same owner compared with 2009, leading to a higher risk of influence of power and conflict of interests. For instance, in 2009, RTL Nederland was also partly held by Talpa media, but is now fully owned by the RTL Group. Earlier, Talpa Media and Mecom owned the Telegraaf Media Groep, but since 2018, 99.5 per cent of its shares are held by Mediahuis. The last example is that of Talpa Network, created by John de Mol, who set up Talpa Holding NV to host all his media activities, mainly focusing on radio and television (having sold all shares in newspapers). Since 2018, John de Mol also owns the Dutch news agency ANP. An exception in this concentration trend is the FD Mediagroep: controlled (98%) by HAL Holding, it owns both *Het Financieele Dagblad* and BNR Nieuwsradio.

Some of the journalists we interviewed indicated that the high level of media ownership concentration (see Indicators E1 & E2 – Media ownership concentration national and regional (local) levels) is making it more difficult for journalists and especially freelancers to move from one media company to another, if the latter is owned by the same company. However, our interviewees denied any

direct influence of owners over the journalistic daily routines (see Indicator F6 – Company rules against *external* influence on newsroom/editorial staff).

(C3) Transparency of data on leading news media 3 POINTS

On its *mediamonitor.nl* website, the media authority describes the current media ownership relations.

IN 2011
3 POINTS

The websites of the commercial media's parent companies and their annual accounts usually provide all the data needed about their (major) shareholders, but they don't mention advertising markets. The information regarding Indicators E1, E2, and C3 do not appear in the colophons of newspapers or magazines, nor on the websites of television or radio channels. Some media organisations (such as *NRC Handelsblad* or *Investico*) make their editorial statutes and mission statements available online, while others (such as *nu.nl* and *Twentsche Courant Tubantia*) do not.

On *mediamonitor.nl*, which is open to the general public, the media authority describes both the current ownership situation, and the news consumption trends.

(C4) Journalism professionalism 2 POINTS

The Dutch newsrooms have become highly professionalised over the past decades. Close examination of the work done, and being done, is a regular feature of editorial meetings. However, this mostly occurs on an ad hoc basis. Only a few news media organisations have an ombudsperson.

IN 2011
3 POINTS

As Jo Bardoel pointed out, journalism has become highly professionalised over the past decades, with an increase in academic profiles and well-developed curricula both at the bachelor's and master's level. According to Bardoel, journalism was never as good as it is today. Investigative journalism has also become more powerful in recent years.

This positive outlook was tempered somewhat by Evert de Vos, the chairman of the Dutch Association of Investigative Journalists, who did recognise that professionalism and investigative journalism had improved, but added that it very much depended on what news medium one was looking at. The cutbacks in regional print media had closed the door to investigative journalism. Moreover, de Vos indicated that a lot of smaller investigative platforms were depending on subsidies, which was not a sustainable business model, especially in view of the decision to allocate the 2021 "special research projects" funding to the

special Covid-19 fund intended to help door-to-door newspapers and local public broadcasters (see also the “Covid-19” section).

The journalists interviewed indicated that, in practice, self-reflection was limited to an ad hoc and fleeting critical evaluation during editorial meetings. The open debate culture (see Indicator F4 – Internal rules for practice of newsroom democracy) often resulted in lively discussions on how news was selected and framed. Such discussions were more difficult to achieve when everyone was working from home, as had been the case during the Covid-19 lockdown.

Another facet was the open debate culture with the audience (see Indicator E8 – Level of self-regulation). For instance, the editor-in-chief of *Twentsche Courant Tubantia* often responded to audience comments based on disagreements on how a news article ought to be written or on the timing of a news story. The most effective form of self-reflection was also found in news media with an ombudsperson, such as NPO, *De Limburger*, *NRC Handelsblad*, and *de Volkskrant*. These media outlets benefitted from the buffer effect created by the presence of intermediaries between the editorial staff and the audience (see also Indicators E8 – Level of self-regulation, & E9 – Participation).

(C5) Journalists’ job security

2 POINTS

In general, the Association of Journalists controls the basic working conditions of professional journalists in the Netherlands.

IN 2011
2 POINTS

The Dutch Association of Journalists (NVJ) controls the basic working conditions for professional journalists in the Netherlands. They are into negotiating collective employment agreements and copyright contributions, providing legal advice to its members, discussing insurance issues, and so forth. A notable trend, however, is that permanent contracts have become very scarce in journalism. Freelancers are more and more the norm in the Netherlands. Jo Bardoel, Piet Bakker, and Huub Evers confirmed this trend. Younger journalists with “flexible” (read “uberised”) contracts were replacing their retired predecessors, said Bardoel. Piet Bakker also indicated that the increased number of freelancers was a direct consequence of the media concentration, characterised by ever fewer media companies. This has resulted in a fierce battle in the rates paid to freelancers, as confirmed by the journalists we interviewed. The NVJ is doing a good job, also in the case of conflicts with freelance contractors, thinks Piet Bakker. He has no knowledge of cases in which freelancers or journalists were dismissed due to personal convictions. The increase in the number of freelancers reduces job security, especially in times of crisis such as the Covid-19 pandemic. Even now, some news media organisations are refraining from hiring, fearing that the crisis will only make things worse in the future.

(C6) Practice of access to information

1 POINT

IN 2011
1 POINT

One of the most important sources of news is government, with Dutch legislation on the public nature of government records giving citizens (and hence journalists) the right to access government data. The way in which the law functions as well as the lengthy procedures involved are strongly criticised.

For citizens to be well informed, it is important that journalists have easy access to information. As government information is one of the most important sources, free access is mandatory. The primary tool in Dutch legislation is the Public Access Act, which gives citizens (and hence journalists) the right to access government data. However, it is crucial that this kind of information is made easily accessible and understandable. It would be unacceptable if things were otherwise. Democracy can only benefit if government activities, at whatever level, can be followed and scrutinised.

In the past 10 to 15 years, journalists have time and again attacked the way in which the Public Access Act functions. It takes lengthy procedures to gain access to government information and often leads to dissatisfaction. Every journalist we interviewed complained about the time it took to obtain information and the quality of the information obtained, where often a lot of information was made illegible. Moreover, during the Covid-19 pandemic, the Public Access Act was suspended, under the pretext that public servants lacked time. This measure was viewed as an attack against a fundamental democratic right. Journalists were becoming increasingly dependent on leaks and whistle-blowers, which is a clear frustration among the journalists interviewed. Journalists also use the Public Access Act for very simple questions which entail no political danger. One journalist told us that these simple questions could have been answered very easily via the telephone, as was the case 15 to 20 years ago. The first prerequisite of the Public Access Act is that everything is publicly accessible unless there is a good reason to make it inaccessible – but as it is, things seem to be working the other way around.

(C7) The watchdog and the news media's mission statement

3 POINTS

IN 2011
3 POINTS

The media themselves decide on the extent to which they play their role as watchdog, on the basis of their distinctive characteristics.

It goes without saying that it is the media's prerogative to choose the extent of their role as a watchdog. For instance, *De Telegraaf* journalists maintained that their task was to report the news based on the perception of what their audience wants. As their newspaper is not affiliated with the Press Council, one may

wonder whether it even has any concept of a watchdog. Quality newspapers *de Volkskrant* and *NRC Handelsblad* considered investigative journalism as their priority, noted Huub Evers. This is also the case for regional newspapers such as *Twentsche Courant Tubantia*, which won two “Tegels” awards (in 2009 and 2015) and was also nominated in 2020. *De Tegel* [*The Tile*] is a Dutch prize for journalism awarded since 2006. The 2019 winners included *NRC Handelsblad* (“background information” category), NOS and *NRC Handelsblad* (“news” category), *Algemeen Dagblad* (“reporting” category), *Trouw* and RTL Nieuws (“research” category), *De Limburger* (“regional/local” category), *de Volkskrant* (“text” category), and *Investico* (“pioneer” category).

Investigative online platforms such as *Investico* and *FTM* considered the watchdog role as part of their mission statements. *Investico* says on its website:

We strengthen the democratic rule of law by fuelling public debate. Not by presenting whipped-up scandals, but by explaining via news and research stories how decisions are made on social issues that are important to the Dutch audience, and by monitoring the implementation of these decisions.

The name of the *FTM* platform refers to the watchdog role: “When in doubt, follow the money”, or as mentioned on their website:

We do research on people, systems and organisations that misbehave (financially and economically) and thereby possibly cause damage to groups in society. Our weapon: radically independent journalism. “Follow the money” is our editorial Leitmotiv. Because if you follow the money trail you will discover the truth, whether it concerns care, the financial world, politics or education.

(C8) Professional training

2 POINTS

Training courses are offered by the Dutch Association of Journalists (NVJ) and the Association of Investigative Journalists (VVOJ). Some media (companies) have set up their own training structures. Training opportunities depend on the news medium.

IN 2011
1 POINT

The Dutch Association of Journalists (NVJ) and the Association of Investigative Journalists (VVOJ) offer a variety of training courses, ranging from an introduction to Big Data, to interviewing techniques, to how to deal with unsafe situations. As digital media is turning the entire profession of journalism on its ear – from text creation to Big Data analysis – requests for further professional training are mounting. The VVOJ’s annual conference is a big event that everyone wants to attend. Amid the Covid-19 pandemic, the VVOJ has been offering online training courses – these are always fully booked.

Some media organisations have an “in-house academy” of their own. This is the case of NPO, *NRC Handelsblad*, DPG Media, *Investico*, and *FTM*. At the public broadcaster’s, a training budget is made available to in-house employees but not to freelancers. *NRC Handelsblad* has its “NRC Academy”, with training courses run by internal and external instructors. As part of a talent programme, young journalists are trained and coached in the profession. *Investico* also runs a talent programme, which trains and coaches young journalists: “the masterclass”. *FTM* has a monthly knowledge session about topics such as data analysis or narrative techniques.

At the regional level, training courses are co-organised with students of university campuses, such as the school for journalism in Tilburg, regional public broadcasters, and regional newspapers. Other news media such as *nu.nl* offer more limited training options, such as less-frequent internal or external workshops or training sessions at the editorial level. The BNR Nieuwsradio journalist even said that there was no time at all for training, as working for radio meant being willing to pull out all the stops.

According to our interviewees, staff training requires time and money, both of which are scarce in newsrooms. Most editors-in-chief (who are in charge of approving any training course) are willing to support their journalists, but overall, possibilities are limited.

(C9) Watchdog function and financial resources

2 POINTS

Dutch newsrooms provide resources for investigative reporting as much as possible – no more, no less. The Dutch Journalism Fund subsidises specific projects on a temporary basis, as well as investigative journalism.

IN 2011
1 POINT

According to our academic interviewees, more staff and financial resources have been invested in media investigations of late, although no figures have been disclosed. Traditional news media have come to understand that in these times of freely accessible content, the need to be distinctive becomes that much more pressing, as indicated by our expert interviewee Jo Bardoel. According to Piet Bakker, so-called time or money constraints are poor excuses for an unwillingness to take a hard look at priorities. All journalists and editors-in-chief confirmed that resources could be, and are, made available for investigations. Overall, however, funds are limited. Teams are established and financed on an ad hoc basis. They are also based on subsidies such as those of the Fund for Special Journalistic Projects, which enables journalists and writers to set up projects of a special nature or quality. The fund seeks help to explore new angles based on which special news projects could be carried out.

Another subsidy fund is the Investigative Journalism Fund. It is intended to structurally strengthen the watchdog role of the news media by increasing the

investigative journalism function in the Dutch newsrooms. No less than 75 per cent of its budget goes to regional or local news media because, as mentioned earlier, they are the most vulnerable of all. This explains the government's decision to set up a temporary support fund for local and regional news media outlets in response to the current Covid-19 crisis (see "Covid-19" section). The other 25 per cent is allocated to national news media. An annual contribution of approximately EUR 5 million from the Ministry of Education, Culture, and Science goes to the Dutch Journalism Fund in a bid to share knowledge, facilitate research, and stimulate collaboration and innovation.

Conclusions

Overall, we can conclude that Dutch journalists are able to play their role of buttresses of democracy. However, there are three problem areas. First, media ownership concentration is high in the Netherlands (see Indicator E1 – Media ownership concentration national level). This was a major concern among the journalists and experts we interviewed, as it constitutes a clear threat to media pluralism. It is not yet seen as an acute risk because news brands still retain enough differentiating features, catering to different audiences. However, the newsrooms of the regional newspapers of DPG Media are being dismantled. And the fact that in Flanders, the television, newspaper, and magazine newsrooms of DPG Media (News City) have been merged, does nothing to allay such fears.

Another critical issue is the lack of access to government data (see Indicator C6 – Practice of access to information). The Public Access Act procedure (the public nature of government records) is under strong criticism as being needlessly complicated and time consuming. The fact that the law was suspended during the Covid-19 pandemic is seen as a subtle move towards "autocratisation".

A third possible threat to a well-functioning journalistic infrastructure is the fact that permanent contracts are being exchanged for freelance deals, which entail very limited job security and low pay (see Indicator C5 – Journalists' job security), with increased ownership concentration making it even less easy to negotiate pay rates. The crisis also has a clearly noticeable impact on freelancers in the newsrooms of *De Telegraaf* and BNR Nieuwsradio. The loss of a number of media companies also detracts from freedom of expression, as new job opportunities are becoming scarcer. As a result, freelancers are being forced to work several jobs to make ends meet, more so at the regional and local levels. In other words, with freelancers' living hinged on the good will of the very actors of the stories they should be reporting on, the journalistic function is now increasingly in lockdown (see Indicator F7 – Procedures on news selection and news processing).

Note

1. see <https://www.svdj.nl/stand-van-de-nieuwsmedia/>

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PORTUGAL

Impoverished media struggling for survival

Joaquim Fidalgo

Introduction

The Portuguese media landscape has been strongly influenced by its political, economic, cultural, and social evolution during the last decades of the twentieth century and the first decades of the twenty-first century. Five main factors should be considered. First, the small size of the country (with a population of 10.3 million), associated with a very low rate of news media consumption, makes it difficult for media outlets to achieve enough scale to be viable. Second, the economic weakness of the country (an annual gross domestic product per capita of EUR 18,550 compared with the EUR 28,630 average for EU/28 countries; Eurostat, 2019) leads to low purchasing power for media consumers and little advertising for the media industry. Third, there has been a rather brief experience of life in a democracy, after almost half a century (1926–1974) of political dictatorship where basic rights – freedom of expression, freedom of the press, freedom of association – were either forbidden or strictly controlled. Fourth, the long-standing tradition of a centralised society is very dependent on the state and has low levels of autonomous social dynamism and tends towards solving problems at the macro-level of the law, but not necessarily at the micro-level of actual practices. And fifth, economic, cultural, and technological development in the country has been quick in more recent years, particularly after joining the EU in 1986.

The legal and regulatory framework for the media still bears marks of the revolutionary period in the country between 1974 and 1975, when democracy was reinstated and important changes occurred. For some years, the state was the owner of virtually all of the media as a result of the nationalisation of the main industries. In the 1980s, when the democratic regime stabilised and began to emulate Western European patterns, all print media was privatised again and new commercial projects also emerged. Nowadays, the presence of the state as a shareholder in the media is limited to public television and public

radio, as well as to the national news agency, as was the case a decade ago in the previous Media for Democracy Monitor (MDM) report (Fidalgo, 2011).

Because of this political evolution, the legal framework for the media is different from that of other countries with a liberal tradition, with many laws: Press, Radio, and Television Laws, a public broadcasting service (PBS) Law, a Journalist Statute, Electronic Communications and Advertising Laws, a Law for the Regulatory Entity for the Media, and so on. The state has been very present in terms of media regulation, although the effective respect for the laws is frequently doubted, a situation unchanged from 2011 (Fidalgo, 2011).

The importance granted to this sector is evident when we look at the Constitution of the Portuguese Republic itself. Freedom of expression and freedom of information have constitutional validity (art. 37), as do freedom of the press and the mass media (art. 38), the obligation of media regulation through an administrative entity (art. 39), and the rights to reply, to rectify, to respond politically, and to have access to broadcast time (art. 40). The obligation of the state to offer a national public service of radio and television is also a constitutional norm. Some rights of journalists – the right to participate in the “editorial orientation” of the news media they work for, the right of access to official information sources, the right to elect newsroom councils, have constitutional dignity as well. Politically, Portugal is considered a stable parliamentary democracy.

Freedom in the World 2021: status “free” (Score: 96/100 in 2020, down from 97 in 2018) (Freedom House, 2021).

Liberal Democracy Index 2020: Portugal is placed in the Top 10% bracket – rank 18 of measured countries, down from 7 in 2019 (Varieties of Democracy Institute, 2020, 2021).

Freedom of Expression Index 2018: rank 16 of measured countries, down from 11 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 10 of 180 countries, with a score of 11.83, up from rank 14 in 2018, with 14.17 (Reporters Without Borders, 2020).

Media Pluralism Monitor 2020: the risks to media pluralism in Portugal were considered low for eight indicators, medium for eight indicators, and high for four indicators. The four high-risk indicators are the universal reach of traditional media and access to the Internet, news media concentration, online platform concentration, and access to media for minorities (Cádima et al., 2020).

Looking at the media landscape in more general terms, television consumption is very high in Portugal, but more for entertainment than for information. Since 1992, public television has coexisted with two private channels, with one of these leading in audience share. There is also an increasing number of channels distributed by cable and paid for by subscription. The cable network

presently covers 88 per cent of Portuguese households, reaching circa four million inhabitants (ANACOM, 2020a).

Radio has both a national and a regional, local presence. The liberalisation of the sector occurred in the late 1980s, with hundreds of stations launched after. Many of them did not survive and at the local level, only a few have their own information service. The public service is present in radio through three different channels, but the Catholic Church owns the leading radio group.

Newspapers have modernised only recently. In keeping with global trends, their circulation rates have been falling, although the subscriptions for online editions are rising. Apart from the five daily national newspapers, and one online-only news outlet, Portugal also has three daily sports newspapers and one economy daily. The biggest daily newspaper sells 76,056 copies a day, according to data from 2019, compared with 129,219 copies in 2010 (APCT, 2020).

Computer and broadband usage are fast developing, with 76.2 per cent of the population regularly using the Internet. Most media companies have been investing in their websites, usually associated with a specific title (a newspaper, a radio, or television channel), but with informational content that goes beyond that.

Covid-19

The Covid-19 pandemic had a strong impact on all Portuguese media. On the one hand, media consumption rose to levels never seen before, especially in television and online news. Newspapers almost lost their paper editions, because the general confinement rules for everybody during three months made it impossible to go out to buy a paper copy, and many newspaper shops were closed for weeks. In December 2019, the four main dailies together had an online reach of 10.4 million, and in April 2020, they had increased their reach by 23 per cent to 12.8 million, according to NetAudience data (Marktest, 2020a). Disregarding the paywalls they had put in place, they all decided to give free access to all content related to the pandemic. While they did this, they also tried to increase their online subscriptions by running marketing campaigns and offering more discounts than usual, thus convincing people of the importance of having good timely information, particularly during crises like this. Many of them had good and necessary results. With sales of print copies strongly decreasing and advertising virtually disappearing from their pages, as most industry and commerce was inactive, media outlets were hard-pressed to keep the business running and pay their workers. Most companies were forced to put a lot of journalists in temporary unemployment – with the state paying a part of their salary – while almost all of the newsroom was required to work from home, using computers, smartphones, and Skype or Zoom to keep in touch with each other.

According to a report by the Regulatory Entity for the Media (ERC, 2020) focusing on the first two months of Covid-19 impact, “global revenues of all media decreased sharply” in March and April 2020, with “one-third of media companies reporting losses between 61 and 80%” (Martins et al., 2020: 5). The same report states that about 30 per cent of local newspapers had to suspend their print editions.

In May 2020, given the crisis and the losses faced by news media in advertising revenues, the government decided to grant them emergency aid. A total of EUR 15 million was distributed to national and local media (television, radio, press, online) in the form of advertising campaigns paid in advance. There was some controversy about the criteria used by the government to allocate different amounts to various media outlets. Two online publications that would have received a small amount of money and are known as very critical of the present government, led by the Socialist Party, even refused those advertising campaigns, in pursuit of total independence from political power.

In the meantime, a couple of studies and surveys were launched, either by journalist institutions (Journalists’ Union, Commission of the Journalists’ Professional Chart) or by research centres at universities, trying to evaluate the seriousness of the impact of the pandemic on news media and to understand the challenges caused by the pandemic to journalism. One of these recently published studies concluded that almost all journalists were forced to leave the newsroom and work from home, many of them had their income reduced, the trend of precariousness in the labour market worsened, and the fear of losing one’s job is now much higher among journalists (Camponez et al., 2020).

Leading news media sample

The general, quantitative data underlying this report refers to the whole country and all news media. Some more specific qualitative data was gathered among a sample of media companies intended to be representative of the Portuguese situation (in terms of mass media primarily devoted to news and information). In these cases, data and opinions were gathered through access to internal documents and personal interviews with the editors-in-chief. Interviews with members of different newsrooms also took place, to obtain data from the “rank-and-file” journalists and their practical experiences. The interviews were conducted in late 2019 and early 2020. In addition to representatives of the media industry, I conducted one more formal interview with the president of the journalists’ union [*Sindicato dos Jornalistas*], the only national professional association of this kind.

There were four main criteria for our choice of interviewees: a balanced presence of public and commercial media (which applies to television); a guaranteed presence of different types of media (newspaper, radio, television,

online); a focus on the most relevant media in terms of news and information; and a balanced presence of popular (audience-driven) and quality (elite-driven) media. No regional or local news media were chosen for this sample, because they are not relevant in the country’s media landscape given the existence of dozens of very small newspapers or radios with a very low reach. Additionally, some daily newspapers labelled as “national” are actually regional, with their circulation concentrated either in the northern or southern half of Portugal.

Table 1 Sample

Media	Media type	Financing	Reach	Circulation (2010)	Circulation (2019)
Correio da Manhã	Daily newspaper	Commercial (Cofina group)	National, popular	129,119 (only paper)	77,768 (76,056 – paper 1,712 – digital)
Expresso	Weekly newspaper	Commercial (Impresa group)	National, quality	110,257 (109,057 – paper 1,200 – digital)	88,116 (57,519 – paper 30,597 – digital)
Público	Daily newspaper	Commercial (Sonae industry group)	National, quality	35,137 (34,246 – paper 891 – digital)	34,781 (17,786 – paper 16,994 – digital)
Observador	Online-only newspaper	Commercial (Observador group)	National, quality	(launched in 2014)	6.7 million unique visits; 51.3 million page views (Jan 2020)
RTP 1	Main public service TV channel	Public – PBS (State)	National, mixed	Share: 24% (third position in the ranking)	Share: 12.5% (third position in the ranking)
Sociedade Independente de Comunicação (SIC)	Main private TV channel	Commercial (Impresa group)	National, popular	Share: 28.7% (first position in the ranking)	Share: 19.2% (first position in the ranking) ^a
Rádio Renascença	Main radio station (group)	Commercial (Catholic church)	National, mixed	Share: 39% (group).	Share: 34.8% (group). Share of its first channel: 6.5%

^aSIC reached the first position in the ranking of free to air television channels at the end of 2019, with a global share of 19.2 per cent (followed by *Televisão Independente* (TVI), with 15.6% and RTP1 with 12.5%). Therefore, I decided to include it in the sample, while TVI – the previous leader – had been the choice in the previous report (Fidalgo, 2011).

Source: Marktest, 2019a, 2020b; APCT, 2020

Regarding online media, the leading positions in Portugal are consistently occupied by the online versions of traditional print media. In the last few years, the situation has changed a little, with the 2014 launch of an online-only news outlet *Observador* that has since accrued relevance. Because of that, I

decided to include it in the sample. When it comes to traditional newspapers, I looked both at their print and online editions, thus taking into consideration the online flow of information that is increasingly important for them in terms of subscription revenue.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

Relevant news media are generally available to all citizens.

IN 2011
3 POINTS

Newspapers are generally accessible all over the country, and the online editions have some of their content accessible for free. There are 403 newspapers in the country, compared with 732 in 2010, but most of them are very small (Pordata, 2019). In terms of consumption of publications (newspapers and magazines), circulation figures decreased from 62.1 printed copies per inhabitant in 2010 to 22.6 printed copies per inhabitant in 2018. There were 231 daily and weekly newspapers in 2010 – now there are no more than 142. As for daily general newspapers, only five have national distribution. Three dailies are devoted to sports, and one daily concentrates on economy and finance. There are also 13 regional or local dailies, but they produce only around 2,000–3,000 copies and have relatively low public impact. One relevant weekly newspaper and two weekly news magazines are also worth recording. All these publications have an increasingly important online presence.

According to a recent study by Markttest (2020c) about cross-media use in 2019, eight of ten Portuguese inhabitants (older than 15) have used one or more news media, either in print or digital form. Maximum coverage in paper editions is 60 per cent, while it is 56 per cent in digital editions, but most readers use both platforms. Still, according to the same study, there is a clear trend, with more readership increasing for digital editions than paper editions.

As in 2010, the main open access, free-to-air television channels (two public – RTP1, RTP2 – and two private – SIC, TVI) can be watched all over the country, either by terrestrial digital television or through cable packages. Three more thematic public channels – RTP3 (news), ARTV (Parliament), and RTP Memória – are also available to everybody. The commercial channels are free, while the public ones are subject to a monthly tax of EUR 2.85 per household (EUR 1.00 for families with very low income) which is compulsorily collected with the energy invoice.

In terms of cable television, in 2009, 78 per cent of households were served by cable, and 66 per cent of them (ca. 2.5 million people) subscribed to cable

television and therefore to several dozens of channels, most of them broadcasting from abroad. In 2019, those figures went up, and presently, 88 per cent of Portuguese households are served by cable or similar. The total number of residents that actually pay for a subscription of cable television is 4.1 million (ANACOM, 2020a). There are four major pay-TV operators, with the following market shares: NOS/ZON (40.1%), MEO (39.6%), Vodafone (16.3%), and NOWO/MásMóvil (3.9%). The three main television operators in Portugal also have a 24/7 channel specifically devoted to news and information: RTP3, SIC Notícias, TVI 24. There is another 24/7 channel, Correio da Manhã TV (CMTV), distributed through cable, and almost entirely dedicated to news and information.

National radio stations are typically accessible all over the country, either because they cover the entire territory or because they are broadcast in channels of regional or local stations. Their current investment in online distribution is strong as well. In 2018, there were 329 radio stations, of which 6 had a national reach, 5 regional, and the others were all local (ERC, 2018).

Considering the Internet, more than 66.9 per cent of the population (aged 16–74) use a computer regularly, and 76.2 per cent use the Internet (see Tables 2 and 3). These figures vary significantly according to age: in the younger group (16–24 years old), the percentage of regular users of a computer increases to 94 per cent. The broadband penetration rate rose from 50.3 per cent of households in 2010 to 78.0 per cent in 2019 (ANACOM, 2020a).

Table 2 *Households with computer and Internet access (per cent)*

	2010	2019
Households with connection to Internet	53.7	80.9 ^a
Households using broadband	50.3	78.0

^aIn families with children aged 15 or less, this percentage goes up to 94.5%.

Table 3 *Population 16–74 years old using computer and Internet (per cent)*

	2010	2019
Regularly use a computer	55.4	66.9
Regularly access the Internet ^a	51.1	76.2
Regularly use the Internet to participate in social media	–	80.2

^aA total of 84.1 per cent of the users access the Internet through portable equipment, mostly smartphones.

Source: INE, 2019; Pordata, 2020

(F2) Patterns of news media use (consumption of news) 2 POINTS

Consumption of news is less than that of entertainment or fiction, especially given the overwhelming presence of television. Accessing news through social media is an increasing trend.

IN 2011
2 POINTS

Television has an overwhelming presence in the country, with a total reach of 84 per cent of the population over four years old (about 8 million people; see Table 4).

Table 4 Reach, rate, and share of television, 2009, 2019 (per cent)

	Reach			Rate			Share		
	2009	2019	Dif.	2009	2019	Dif.	2009	2019	Dif.
SIC (private)	63.4	46.3	-27.0	3.2	3.9	21.9	23.4	19.2	-17.9
TVI (private)	64.7	40.0	-38.2	3.9	3.2	-17.9	28.7	15.6	-45.6
RTP1 (public)	63.1	38.6	-38.8	2.4	2.6	8.3	24.0	12.5	-47.9
RTP2 (public)	49.8	13.1	-73.7	0.3	0.3	0.0	5.8	1.5	-74.1
Pay TV - Total	34.4	57.4	66.9	2.6	7.7	196.2	18.2	37.6	106.6
Others	–	42.6	–	–	2.4	–	–	11.8	–
Total TV	81.2	84.0	3.4	14.5	20.4	40.7	100	100	0

Comments: Reach = Total audience (the percentage of people who watched the channel for at least one second). Rate = Average audience (total number of seconds spent by the population watching the channel versus the year under analysis). Share = Percentage of the TV-watching population watching each channel (average for the year).

Others refers to other uses of television, for example, videogames and pre-recorded programmes.

Source: Marktest, 2009, 2020b

In 2009, every citizen spent an average of 3 hours and 29 minutes per day watching television. In 2018, these numbers went up to 4 hours, 43 minutes, and 35 seconds (ERC, 2018). However, news and information still do not have a very strong presence in the programming of the main channels, when compared with entertainment and fiction, particularly in comparison to popular Portuguese and Brazilian “telenovelas” (see also Fidalgo, 2011).

In spite of this, the evening news bulletins of the three main chains (TVI, SIC, and RTP1), all broadcast at the same time (20:00), are still usually among the top ten programmes every week (as was the case a decade ago; see Fidalgo, 2011). Both leaders (TVI and SIC) have audience rates around 10–13 per cent (ca. 1 million people). These news bulletins, however, are very often a mix of a few hard and many soft news items, entertainment, and *fait-divers*. They last for about one and a half hours, particularly in the two private-commercial

channels, SIC and TVI. Since information programmes (debates, interviews, news magazines, etc.) virtually disappeared from the free-to-air channels, the evening news bulletins got longer and longer, including for those genres that would previously be part of specific information programmes (Lopes, 2007).

In the last ten years, there was a very strong increase in pay-TV (distributed by cable), largely exceeding all the open access channels, as can be seen in Table 4. Today, the four free-to-air channels have a total share of 48.8 per cent, compared with 81.9 per cent in 2009.

It is important to note that in cable television, there are now three chains exclusively devoted to news and information: SIC Notícias (SIC group), TVI 24 (TVI group), and RTP3 (RTP group – PBS). There is also a fourth one mostly devoted to the news, CMTV. This is owned by Cofina, the group that owns the popular daily *Correio da Manhã*. This means that the three main players in free-to-air television also have a smaller news channel on cable television, although with comparatively low audience rates, with an average of 1 per cent for RTP3, 1.5 per cent for TVI 24, 1.8 per cent for SIC Notícias, and 4.1 per cent for the popular CMTV. It is perhaps because of this that the time devoted to news and information in the four main free-to-air television channels is not very high. It is 27 per cent in RTP1, 17 per cent in RTP2, 18 per cent in SIC, and 19 per cent in TVI (Markttest, 2020b).

Compared with television, newspapers have a lower reach. Still, according to Bareme Imprensa (Markttest, 2019b), a total of 76.8 per cent of Portuguese people aged 15 or more, circa 6.6 million, had some contact with newspapers or magazines in 2019. The average audience rate for newspapers was 50.3 per cent in 2019, corresponding to 4.3 million people. Despite this, Portugal consistently continues to be in the list of European countries with lower rates of press readership. The figures for the main newspapers show important losses between 2009 and 2019 in terms of circulation (see Table 5). The same does not occur in terms of audience, because more and more people read the online versions.

Table 5 Newspapers' circulation and audience, 2009, 2019

	Total circulation			Audience		
	(number of copies sold per edition, paper and digital – subscriptions included)			(% of the population over 15)		
	2009	2019	Dif. (%)	2009	2019	Dif. (%)
Expresso (quality weekly)	111,000	88,116	- 20.6	7.7	4.9	- 36.4
Sol (quality/popular weekly)	45,000	n.a. ^a	–	3.0	1.1	- 63.3
Correio da Manhã (popular daily)	122,000	77,768	- 36.3	12.4	10.7	- 13.7
Jornal de Notícias (popular daily)	91,000	45,571	- 50.0	12.1	9.6	- 20.7
Público (quality daily)	37,000	34,781	- 6.0	4.5	4.8	6.7
Diário de Notícias ^b (quality daily)	34,000	7,628 ^b	- 78.0	4.1	2.9	- 29.3
I Informação (quality, popular daily)	n.a.	n.a. ^a	–	–	0.9	–
A Bola (sports daily)	n.a.	n.a. ^a	–	9.4	8.1	- 13.8
Record (sports daily)	73,000	32,433	- 55.6	10.1	7.5	- 25.7
O Jogo (sports daily)	30,000	17,432	- 41.9	6.3	5.8	- 7.9
Destak (free daily)	99,000	55,000	- 44.4	5.5	1.6	- 70.9
Jornal de Negócios (economy daily)	11,000	10,297	- 1.0	2.0	1.7	- 15.0

^aThese newspapers do not belong to APCT (participation is voluntary), and therefore do not show their numbers.

^bThe daily *Diário de Notícias* now has only one paper edition on Saturdays, being online-only on the other days.

Source: APCT, 2020; Marktest, 2009, 2020b

The websites of traditional newspapers rank among the most visited in the country in terms of news. They keep growing very fast, but the fact that measurement criteria have changed recently doesn't allow for comparisons with years before 2018. Their reach is rather high too, as can be seen in Table 6.

Table 6 Access to online sites of newspapers

	Mar. 2018 Visitors (millions)	Mar. 2018 Reach (%)	Dec. 2019 Visitors (millions)	Dec. 2019 Reach (%)
Correio da Manhã (popular daily)	1.852	21.6	3.198	37.4
Jornal de Notícias (popular daily)	1.753	21.5	2.782	32.5
Público (quality daily)	1.874	21.9	2.532	29.6
Expresso (quality weekly)	1.666	19.5	2.076	24.3
Diário de Notícias (quality daily)	1.770	22.2	1.898	22.2
Record (sports daily)	1.172	13.7	1.851	21.6
O Jogo (sports daily)	–	–	1.258	14.7
Jornal de Negócios (economy daily)	1.180	13.8	1.249	14.6
Sábado (weekly newsmagazine)	0.819	9.6	1.161	13.6
ZeroZero (online-only sports website)	–	–	1.016	11.9

Comments: Two relevant publications, as the sports daily *A Bola* and the online-only newspaper *Observador*, are absent of this ranking because they refuse to be audited in this index (NetAudience/Marktest)

Source: Marktest, 2020a

As for radio, the total reach was 57 per cent of the population over 15 in 2009; it is now 60 per cent (Marktest, 2009, 2020b). However, the radio station almost exclusively devoted to news (TSF) has an average audience of 3.3 per cent, which is about 250,000 people. The time spent listening to the radio seems to be stable over time: 3 hours and 15 minutes per day in 2010, and 3 hours and 8 minutes in 2019 (Marktest, 2009, 2020b). However, there are changes concerning the places where people listen to the radio, now listening to it less at home and more in the car (72.4% of the total) and through the Internet (15.7%) (ERC, 2019c: 124). I should add that, presently, there are 329 radio stations active in the country, of which only 6 are national in range, 5 regional, and the rest local with many of them accessible only through the Internet (ERC, 2019c: 125).

With this media consumption landscape, I can say there is a fairly high interest in news and information in the country. According to data from the *Reuters Institute Digital News Report* (Newman et al., 2019: 102–103), 61 per cent of Portuguese people say they are “very much” or “much” interested in news, and 25 per cent say they look for news more than six times a day. Inversely, 41.5 per cent say they are tired of the high quantity of news they continuously face. Portugal also scores very high in the Reuters report rankings on trust in news: 58 per cent of Portuguese people say they trust in the news most of the time (only Finland scores higher with 59%), although only 27 per cent trust news when it comes to them via social media (Newman et al., 2019: 20–21).

Television continues to be the main source of news and information (58%), followed by the Internet (30.9%, including social media), with radio and press far behind (5.8% and 3.8%, respectively). The relative importance of television is much higher among older people, while younger people increasingly prefer the Internet and social media as a source for news. The main way people access online news is through social media (26.3%), which is higher than access through news websites (20.4%). One of the reasons to do so is to escape any direct payment. Only 7.1 per cent of Portuguese people admit to having paid for online news in 2018. This was one of the lowest figures among the 38 countries monitored by the *Digital News Report*, with the average being 13 per cent. Not surprisingly, 47.2 per cent of Portuguese people regularly use a news aggregator, with Google News used more than any other (36.1%). All this helps explain why news outlets are having more and more problems with their business, since they lose money in two ways: they are selling their product or service to fewer people, and they have less advertising because advertisers tend to prefer platforms such as Google, Facebook, Instagram, and so on.

The way to access news is also changing rapidly: 62.3 per cent of users prefer to do this using a smartphone (only 34% in 2015), while 57 per cent use a computer (78% in 2015) (Cardoso et al., 2019).

The overwhelming presence of television has relevant consequences for the business, too, as its share of advertising is much higher than the share for newspapers, radio, or even the Internet (see Table 7). Although things are changing in this domain, with growing advertisement on the Internet, they are not changing rapidly enough to affect television's market share.

Table 7 *Distribution of advertisement among media (per cent)*

	2010	2019
Share of advertisement in TV	75.4	81.9
Share of advertisement in press	14.3	4.1
Share of advertisement in radio	4.0	2.4
Share of advertisement in Internet	–	8.0
Others (billboards, posters, etc.)	5.8	3.6

Source: Markttest, 2010, 2020b

(F3) Diversity of news sources

1 POINT

IN 2011
1 POINT

There is little diversity of news sources, with a high dependency on a single national agency. Some investigative journalism is present, but not on a large scale.

There is only one news agency (in which the state is a major shareholder), and its presence as a news source for the media continues to be very relevant. Agência de Notícias de Portugal (Lusa) has newsrooms in Lisbon and Oporto, regional delegations in all the districts, as well as some presence abroad, such as in former colonies, Portuguese-speaking countries, and major European capitals. Besides the provision of news and photos, the agency has recently also started providing its clients with audio and video as well, thus increasing its presence across media.

It is not uncommon for journalists, following orders from above, to hide the fact that a piece of news has Lusa as its source by either not quoting the source or rewriting the source material to make it look original. This trend increased in the online sections of media companies, where most of the newsrooms are composed of very few – and very young – professionals, which causes most of the journalistic work to be no more than desk work. Because the speed of publication is the first rule in many information websites, the importance of the agency in breaking news is huge, turning it into “the biggest agenda-setter in the country”, to quote one of the editors I interviewed. There is also a relatively high interdependence among most of the news media. Morning newspapers usually set the agenda for television and radio news bulletins in the morning, evening television newscasts often set the agenda for newspapers the next day, and all of them are permanently watching what the competitors diffuse through social media to catch up. It is a so-called circular circulation of information, with news media frequently talking to each other about the same issues.

As for news from abroad, the dependence on international news agencies is also high. Having their own full-time journalists working abroad is rare among Portuguese news media. The public broadcast, RTP, is more present than any other media outlet and has some correspondents in Brussels (to cover EU-related issues), plus one or two in Paris, Madrid, Washington, Rio de Janeiro.

Two other trends are widespread: the high dependence on institutional, official sources, and the increasing ability of public relations (PR) organisations to get their material placed as news. A study on the origin of political news in the four main Portuguese dailies (Ribeiro, 2009) showed that about 60 per cent of news items originated directly from PR material or communication agencies rather than from the media themselves. As one leading PR manager then said, “For better and for worse, news sources are installed in the newsrooms” (as cited in Souza, 2008). The situation has not changed much in this respect since the last MDM report (Fidalgo, 2011).

In recent years, some efforts have been made to have more first-hand news and information, with more investment in investigative reporting, either for large features or for medium pieces of work to be included in daily television newscasts. As told by the editors I interviewed, the news media in our sample try to have one or two journalists permanently free from day-to-day agenda needs in order to be able to investigate. Two of them even have a small team permanently devoted to investigative reporting. Some newspapers are also involved in international cooperation, particularly the weekly *Expresso*, which is part of the International Consortium of Investigative Journalists. This network has been responsible for important public revelations recently, such as *Panama Papers*, *Paradise Papers*, *China Cables*, *Luanda Leaks*, and so on. Still, all these efforts are relatively minor when compared to the larger picture of news, which is more similar than it is different, with the same sources used across media. There now exist devoted social media teams in all newsrooms who closely follow discussions on social media platforms. This leads to the growing influence of social media in the process of agenda-setting, which further hampers the originality and autonomy of news outlets.

Considering the diversity of news sources in terms of gender, we see that the strong male presence in the public sphere is also reflected in the Portuguese media landscape. A study by the Regulatory Entity for the Media (ERC, 2019b), covering the years 2015–2017, analysed gender diversity of news sources in the prime time news bulletins of the main television channels – RTP1, RTP2, SIC, TVI, and CMTV. The results showed that 69–75 per cent (according to the different channels) of those sources are male, while only 24–29 per cent are female (the rest have both or are not identifiable). In this study, the regulator urged television channels to pay more attention to these issues, particularly when reporting on “social contexts where *women* are present, but that are consistently represented in the news by *men* [emphasis original]” (ERC, 2019b: 67).

(F4) Internal rules for practice of newsroom democracy 2 POINTS

Several laws and mechanisms for journalists’ democratic participation exist, but they are not always followed in practice. IN 2011
2 POINTS

The formal involvement of journalists in newsroom decisions has been law since the 25 April 1974 revolution that brought democracy to the country. The Constitution states the right of journalists to elect newsroom councils, as well as their right to have a word in the editorial orientation of the news media. The underlying concept is that media activity is not just a business like any other (Kovach & Rosenstiel, 2001), only regulated by the supply-and-demand market laws. On the contrary, it deals with a public good of great importance

for social and political life, nourishing democracy, and stimulating citizenship. For this reason, journalists are expected to actively work to guarantee that the media meet their social responsibilities. Furthermore, because the media deal with sensitive issues concerning the fundamental rights of citizens, they are supposed to adopt serious principles and standards of ethical behaviour. Journalists must be especially committed to these, even when they conflict with management priorities (Fidalgo, 2008a, 2011). The permanent tension in the journalistic field between the “cultural pole” and the “commercial pole” (Bourdieu, 2005), with a clear over-valuation of the commercial dimension in recent times (Garcia, 2009), makes participation in newsroom democracy even more delicate.

All news media with at least five journalists must have a newsroom council. And most of them have it, even if their function is sometimes confined just to formal consultations. There are two known exceptions in our sample: the leading radio station Rádio Renascença and the leading popular daily *Correio da Manhã*. The newsroom council must be consulted when a new editor-in-chief or deputy editor-in-chief is appointed, but, unlike in the first years after the democratic revolution, that is now a non-binding opinion. As for media in the public sector (public television, public radio, and public news agency), the appointment of editors-in-chief (made by the board) must have the favourable opinion of the ERC after a formal hearing. Apart from this, regular meetings of the newsroom council with the editor-in-chief take place in order to discuss the editorial orientation of the medium and discuss internal problems that may arise. In most media in our sample (*Público*, *Expresso*, RTP, SIC), there is a dynamic tradition of involving the newsroom council in all the relevant decisions, such as when a journalist is appointed in a leading position, when new journalists are to be hired or when some controversy arises involving the outlet. The editors-in-chief interviewed for this report give great importance to this relationship and participate monthly in the council meetings. The council is elected by the newsroom, but the editor-in-chief is formally its president.

The weekly *Expresso* has a detailed Code of Conduct and the daily *Público* has a Style Book that goes far beyond the technical standards of newsmaking. It is an important instrument of accountability because it is often quoted when readers present their complaints to the newspaper’s ombudsperson. There is also a Style Book in public television (RTP).

Since July 2019, *Expresso* also has a special recommendation for all its journalists regarding their individual participation on social media (Expresso, 2019). The newspaper suggests that journalists do not separate their personal and professional profiles, in order to have “a coherent management of the online journalist’s identity and in accordance with the ethical principles” of the profession. It also recommends that journalists “be aware if the expression of their opinions compromises their independence”.

Some democratic control by journalists in the newsrooms still exists. However, the economic and financial problems of the media industry put a great deal of pressure on the newsrooms, which threatens journalists' jobs and contributes to their demobilisation, as was the case a decade ago (see Fidalgo, 2011). On the other hand, with the importance given by all media to online breaking news and follow-ups (even if they will later be developed in the traditional editions), time to debate is increasingly reduced in the newsroom, as several journalists interviewed in this research project revealed. With a downsized labour force and an increased demand for news on different platforms all the time, meetings are reduced to a minimum, and time to discuss or reflect on what is being done has almost disappeared.

Internal rules to promote female journalists' careers or their access to managerial positions do not exist at all. All the editors-in-chief from our sample (six editors-in-chief and one deputy editor-in-chief) insisted in their interviews that discrimination of female journalists is not an issue in their newsrooms. All these seven editors are men, although five of them have female journalists in their managing teams; and in intermediate leading positions (editorial departments) there is a fair balance in terms of gender.

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS

IN 2011
2 POINTS

The degree of independence of the newsroom against ownership is high in leading media, but weak in small news outlets.

Portuguese laws formally guarantee the independence of journalists from the owner as well as the exclusive responsibility of the editor-in-chief over the content of the publication. Those laws, starting with the Portuguese Constitution itself, also establish the right for journalists to “participate in the editorial orientation” of the media they work in (art. 38). Some media reinforce these laws and guidance through internal rules. The question, then, is what happens at a more informal level in the daily routines of journalistic choices.

All of the editors interviewed for this report insisted there is complete independence of the newsroom from the ownership and management. In its first issue in 1990, the quality daily *Público* even published a text, endorsed by both the editorial board and the owner, in which a formal commitment to independence was made. Rádio Renascença is in a special situation, as it is property of the Catholic Church and makes it clear that it is a radio station “with a Christian inspiration”. Nevertheless, the editor-in-chief does not think this puts editorial independence at stake, because the station clearly distinguishes between what is “pluralism of information” and what is “a doctrinal inspiration”.

The issue of independence of the public broadcasting service (PBS) in relation to the government remains a permanent matter of debate in Portugal, especially with television. Their editors-in-chief pledge that the information area is completely independent of the government, but opposition parties occasionally raise doubts about this, especially since the board of PBS was, until six years ago, directly appointed by the government. An important change occurred in 2014, when the Parliament approved a law (nr. 39/2014) that created a General Independent Council for Rádio e Televisão de Portugal (RTP), to “de-governmentalise” public television and radio (Assembleia da República, 2014). This council is composed of six members: two appointed by the government, two appointed by the Opinion Council of the PBS, and two co-opted by the previous four. All of them are supposed to be “outstanding personalities with relevant professional experience and personal credibility”, guaranteeing adequate diversity in terms of regional origin, culture, and gender. Its main task is to supervise and monitor the fulfilment of contractual obligations by the public service radio and television. The appointment of the managing board is one of its main tasks, to ensure more independence from the government, its operational owner.

Independence from the marketing and advertisement departments of media companies is also a rule, although no one denies some timid attempts to break it. There is an increase in stories that are strongly informed by the commercial interests of advertisers. But those directly involved usually deny them, as it would harm their credibility.

The golden rule of separation between the editorial area and the commercial or management area is a strict one; nevertheless, problems of self-censorship occasionally arise. As one of our respondents confessed, “when we work in a company owned by an important group, of course we don’t forget that situation and, even in a non-explicit way, that tends to influence our choices”. This “can be felt at different levels of the newsroom”, beginning at the top and going down to the “individual work of some journalists”. Similar revelations were made by various journalists interviewed for a book, published in 2015, intended to discuss the increasing risks and menaces that affect this professional group in Portugal (Lopes, 2015).

(F6) Company rules against *external* influence on newsroom/editorial staff

1 POINT

IN 2011
1 POINT

Although news media generally receive revenues from a multitude of advertisers, they are increasingly permeable to advertising formats, allowing some confusion between the editorial and commercial areas.

Portuguese news media, in general, continue to face a serious problem of economic survival, because the audience rates and circulation figures are generally very low, making advertising their major (or unique) source of income – a situation largely the same as it was for the 2011 MDM (Fidalgo, 2011). But the advertising market itself is small, given all the existing competitors, which puts them all under enormous pressure, as they must accept either some unpleasant advertising formats or significant price reductions. In recent years, it is more and more common to find intrusions of advertising in the editorial area. Despite this, all the editors interviewed in our sample strongly deny any abusive interference from external parties. Independence from advertisers is rather common in the bigger or more important news media, but the same does not apply to smaller companies (regional or local newspapers and radio stations), where the fight for survival often compels them to make some commercial deals with an editorial counterpart.

Regarding sponsorship, some newspapers now have the good practice of informing readers whenever their reporters travel by invitation of some company or institution. And a lot of examples of sponsored content or content marketing are increasingly marking the landscape of newspapers' pages and websites. The most relevant news media now have specific departments to develop commercial products in a journalistic form (so-called infomercials and advertorials), trying to gain some extra credibility for being confused with real news. This content is usually labelled as “sponsored content”, but sometimes in very soft or subtle ways, confusing readers, as is the intention.

Public advertising, on the other hand, is not relevant enough to compromise the independence of news media. In 2018, the total amount of advertisement with a public origin was EUR 1.3 million, compared with EUR 915,000 in the previous year. National media received 77 per cent of it, and regional or local media the other 23 per cent. Television, as usual, got the largest share, with EUR 595,000, followed by the press (EUR 350,000), the radio (EUR 262,000), and the digital arena (EUR 32,000). Values are relatively low, as we can see, and they are strictly scrutinised, in order to ensure the transparency of the whole process. A law issued in 2015 establishes the rules to be followed in these processes and the obligation for all public institutions and departments to record what advertisement services are bought, from whom, and at what price. This information must be sent to the Digital Platform of the State Institutional

Advertising, monitored and managed by the Regulatory Entity for the Media (ERC, n.d.).

In May 2020, due to the serious crisis caused by the Covid-19 pandemic, which brought about serious losses for news media in advertising revenues, the state decided to grant them emergency aid. A total of EUR 15 million was distributed to different media (television, radio, press, online) in the form of advertising campaigns paid in advance. There was some controversy about the criteria followed by the government to allocate the different amounts to the various media. Two online publications refused those advertising campaigns, claiming to do so in the pursuit of total independence from the state.

After all, the big problem here seems to be the economic weakness of Portuguese media companies. There is strong competition and decreasing advertising revenues, with more and more revenue taken up by global online distributing platforms like Google, Facebook, YouTube, and so on. In such a scenario, it becomes easier for advertisers to get what they want, and if they don't, there is a high likelihood that a competitor will.

(F7) Procedures on news selection and news processing 1 POINT

Rules and standards for news processing exist, but they are not always present in day-to-day routines. The pressure of online breaking news and the dependence on clicks by the audience, as well as the permanent presence of social media, leaves almost no room for debates.

IN 2011
2 POINTS

Again, this indicator must be balanced between what is formally prescribed in some newsrooms and what the day-to-day routines actually show. Furthermore, it must be balanced between what the editors say about the allegedly existing procedures and what the rank-and-file journalists have to say on the subject. The former guarantee that clear procedures are generally followed, and the latter complain that teamwork and collective dynamics in the newsroom are disappearing. The economic crisis, the decreasing circulation figures, the downsizing of most newsrooms – all of these things seem to favour a climate of uncertainty, demobilisation, and fear of losing one's job, which reinforces an individualistic approach to work and a disinterest in more collective initiatives.

The leading reference newspapers, such as *Público* and *Expresso*, have defined extensive internal rules for selecting and processing news. They are commonly respected and seem to be very useful, for example, in the process of integration of new journalists. However, this should be regarded as more of an exception than a rule.

In the past two decades, the role of press ombudsperson in recalling the principles for news processing, and in adding a reflective voice to the speed

of journalistic routines, has been important (see also Fidalgo, 2011). Three of the major dailies (*Jornal de Notícias*, *Público*, and *Diário de Notícias*) used to have an ombudsperson, but presently none of them has one. They only exist in Public Service Radio and Television.

(F8) Rules and practices on internal gender equality 2 POINTS

Employment conditions are basically equal between men and women, although there is still a lower presence of female journalists in senior managing positions, which causes some gender pay gaps.

Currently, women journalists in Portugal form 41 per cent of the total cohort of journalists (2,094 of 5,124), with men forming the remaining 59 per cent (3,030 of 5,124) (CCPJ, 2020). But the percentages change if we look at younger groups: 57 per cent of journalists 20–40 years old are women, with 43 per cent men. Accordingly, there is a clear majority of male journalists if we look at older groups: 64 per cent of journalists 40–70 years old are men, and 36 per cent are women. The trend is clearly changing in favour of women, as can be seen in journalism schools, where female students are the overwhelming majority. In the news media in our sample, no one has specific rules or internal formal orientations in order to guarantee a balanced newsroom in terms of gender. However, all the editors interviewed claim that is not an issue and there is no discrimination at all, be it in terms of professional careers or of pay. The fact is, all these seven editors-in-chief are men, although there are women in their managing teams and many women in intermediate managing positions too. The increasingly important presence of women journalists in the Portuguese newsrooms is not reflected in leading positions.

Regarding gender issues in general, it's important to refer to a law approved in 2018 (law nr. 60/2018), which defined a series of measures to promote equality of payment between men and women (“equal pay for equal work”), with an obligation for companies to make regular reports on similar opportunities for both sexes (Assembleia da República, 2018). These similar opportunities, together with non-discrimination of payment, are part of the Labour Code in use in the country and are mandatory for companies in general. At the same time, a Commission for Equality in Work and Employment was created with the mandate to observe these issues and to receive eventual complaints by workers being discriminated against.

The government also decided to publish an annual barometer of gender discrimination. The first one was published in June 2019, with data gathered through 2017, and showed that the gender pay gap was 14.8 per cent. This refers to the difference between the average pay for men and women, in general

national terms, regardless of sector, level of qualification, or seniority in the job. If these items are taken into account, there is still a gender pay gap of 11.2 per cent in favour of men. There was not much difference in the data gathered in 2018 for the same barometer, the gender gap reduced from 14.8 per cent to 14.4 per cent, always in favour of men. In terms of money, the difference results in average monthly pay of EUR 1,034.9 for men and EUR 886.0 for women – a difference of EUR 148.9 per month. The barometer shows a bigger gender gap in highly qualified jobs (20.9%) and in senior management positions (27.3%). The situation in Portugal is slightly better than the situation in other EU countries, where the gender pay gap stood, on average, at 16 per cent in 2017 (EIGE, 2019a). There are big differences in European countries, ranging from a minimum of 3.5 per cent in Romania to a maximum of 25.6 per cent in Estonia.

There is no specific data about gender gaps in media, but two studies show us the situation in public television (RTP) and the public news agency (Lusa). The report from RTP (2019), *Report for gender equality, citizenship and non-discrimination*, focuses on a total of 1,709 workers, of which 1,026 are men and 683 are women. The larger professional category of journalists [jornalista – redactor] has 371 people (201 women and 170 men). In terms of pay, there is a slight gap in favour of men: the average monthly pay in the whole company (including journalists and non-journalists) is EUR 2,547.32 for men and EUR 2,419.48 for women, which the board considers “not a significant discrepancy”. The conclusions in the report from the national news agency Lusa are different (Casaca et al., 2019). In a total of 186 journalists (2018 data), 98 are women and 88 are men. 66.72 per cent of male journalists do not have any leading position (editor, deputy editor, coordinator, etc.), but this percentage goes up to 73.20 per cent when it comes to female journalists. The pay gap is also relatively higher, as the average monthly pay is 18.06 per cent lower for female journalists than for males (EUR 2,170.69 vs. EUR 2,649.04). The report suggests that this gap happens because there are some discrepancies in terms of gender within the same professional categories, and because women occupy positions less associated with higher pay. It seems that promotions in professional careers tend to be faster for men than for women. Only 5 per cent of women hold positions in the highest levels of their profession, compared with 22 per cent of men. And the same occurs with leading management positions: 26.35 per cent of women journalists occupy those positions, against 34.09 per cent of men. Because such positions usually involve some extra pay, the gender gap tends to be bigger.

In recent years, Portugal has taken some legal measures to guarantee more equality in terms of gender. In politics, for example, since 2019, all lists of candidates in elections for the Parliament, for the European Parliament, or for municipal councils must have a minimum of 40 per cent women and men (the

previous limits of the “parity gender law” were 33%). These same limits also apply, since 2019, to the appointment of senior management positions in the Civil Service. Now, at least 40 per cent must be women, compared with 32 per cent in 2015 and 37 per cent in 2018. In public companies managed by the state, boards must also include at least 33.3 per cent women, according to a law approved in 2018 (Governo, 2019).

The positive evolution of Portugal in this issue can be confirmed in some international rankings, such as the European Institute for Gender Equality (EIGE, 2019a). When compared with the EU countries, Portugal ranks 16th in the European Institute for Gender Equality list, with 59.9/100 (less 7.5 than EU average). It improved 5 points between 2015 and 2019: “Portugal is moving towards gender equality at a faster rate than the EU, narrowing the distance to the EU’s scores over time” (EIGE, 2019b).

(F9) Gender equality in media content

1 POINT

There is an overwhelming dominance of male actors and protagonists in the news.

A study by media regulator ERC (2019b), regarding the information programming of the four main free-to-air television channels (RTP1, RTP2, SIC, TVI), showed that 75 per cent of the news protagonists were male and 15 per cent were female, in 8 per cent of situations there were both male and female actors, and in 2 per cent no clear identification was possible. Furthermore, the only categories where women were more present than men as actors were “family issues” (a prevalence of 85% of women), “public figures and celebrities”, and “doctors and health technicians”. All other categories largely featured male actors, particularly “political actors”, where men formed 90 per cent of the group. There is an interesting gender bias similarity among all the television channels. The presence of women as protagonists or actors in the news was only 15 per cent in RTP1, 16 per cent in RTP2, 14 per cent in SIC, and 16 per cent in TVI. The study analysed a total of 7,206 news and features programmes.

The media regulator (ERC) has been paying attention, in recent years, to the issue of gender discrimination in the media, monitoring content in the main news media, particularly in television. In 2018, an analysis was conducted of the main newscasts in prime time, specifically looking at gender diversity and pluralism of the protagonists of news. These results show an even higher prevalence of men than the previous study (2015–2017), as can be seen in Table 8.

Table 8 *Protagonists of television prime-time news by sex, 2018 (per cent)*

	Telejornal (RTP1)	Jornal 2 (RTP2)	Jornal da Noite (SIC)	Jornal das 8 (TVI)	CH Jornal 20H (CMTV)
Male protagonists	79	80	81	76	81
Female protagonists	14	15	13	16	13
Both sexes	5	3	4	6	4

Source: ERC, 2019b

Portugal is involved, along with 120 countries, in the Global Media Monitoring Project, which began in 1995 and is preparing its sixth edition this year (Martins, 2020). It monitors news published in a single day, based on a set of pre-defined indicators, in order to ascertain how gender inequalities and discrimination are present in the media, either through its sources or through its actors. Similarly, the media regulator ERC is also part, since 2014, of the Gender and Media Group that operates within the Network of Mediterranean Regulatory Entities and analyses gender discrimination in the news, and particularly issues of gender violence.

(F10) Misinformation and digital platforms (alias social media)

2 POINTS

There are a number of fact-checking mechanisms in some newsrooms, as well as monitoring initiatives regarding “fake news” and disinformation. The need to deal carefully with social media is a major concern in most news media.

According to the *Reuters Institute Digital News Report* (Newman et al., 2019), Portuguese people show a rather high level of trust in the news (58%), but this percentage goes down to 26.7 per cent when that news comes to them through social media. This is increasingly relevant because more and more people in the country choose social media as their primary source of information. In 2019, 81.2 per cent still referred to television as their main source for news, but the figure was very close to the Internet and social media together (79.8%). For comparison, the print press is selected as a primary source of information only by 36.2 per cent. The most popular social media in Portugal, Facebook, is regularly used by 76.9 per cent of citizens, and 52.9 per cent of them specifically use it to get news. 23.8 per cent do the same with YouTube, 20 per cent with Facebook Messenger, 14.8 per cent with WhatsApp, and 11.7 per cent with Instagram.

In global terms, 74.7 per cent of the respondents in the *Digital News Report 2019* say they are concerned with the veracity of what they see on the Internet,

compared with 71.3 per cent in 2018. This is the second-highest percentage among the 38 countries covered by the report, the highest being Brazil (85%) and the lowest being the Netherlands (31%). This shows how fake news and disinformation are a matter of great concern in recent years, and a couple of initiatives have appeared to deal with the problem. One of them is the project Monitoring of Propaganda and Disinformation in Social Media, launched by MediaLab (2020), a specialised observatory at an institute integrated into the University of Lisbon (CIES_Iscte). They generate weekly reports about political disinformation in social media and they also cooperate with the national news agency (Lusa) in a fact-checking project, supported by the EU and the European Parliament: Combat to Fake News – A Democratic Question (Lusa, 2020). Another well-known fact-checking initiative is the website *Polígrafo*, launched and run by a team of journalists, defining itself as “a journalistic online project whose main purpose is to find the truth – and not the lie – in the public space” (Polígrafo, 2020). They call themselves “the first fact-checking Portuguese newspaper”, and received much more visibility after they made a partnership with leading television channel SIC and began broadcasting a 30-minute weekly programme on prime time.

Since 2019, *Polígrafo* has been a partner of Facebook’s international fact-checking programme. Another Portuguese publication, the online-only *Observador* (one of the news media from our sample) is also a partner of Facebook’s International Fact-Checking Network, an initiative developed in collaboration with the Poynter Institute (Pinheiro, 2019). *Observador* regularly publishes a section called “Fact Check”. Investigative journalism has also been interested in what lies behind fake news and their fabricators. A journalist from the daily *Diário de Notícias* has been publishing very relevant information about this, and recently published a book (*Factory of Lies*). In this book he reveals that in Portugal, there are presently “more than 40 websites creating lies” that are diffused through social media, particularly Facebook, with its 3.5 million Portuguese users (Pena, 2019: 12).

All the editors interviewed for this research project showed much concern about the serious problems of disinformation and “fake news”, especially in social media. They all now have special teams to deal with those networks (which they also use as distributors of their own news) and to pay attention to “what’s going on” in Facebook, Twitter, or Instagram, but none of them has any particular internal rules to manage the issue of disinformation.

(F11) Protection of journalists against (online) harassment 3 POINTS

There have been no such situations in the country; it is not an issue (at least for now).

To our knowledge, there have been no cases of online harassment involving journalists. Furthermore, the editors and journalists interviewed, as well as the president of the Portuguese Journalists' Union, confirmed they do not have notice of such situations. Nothing is previewed in the journalists' labour contracts on this particular issue, but it is not difficult to forecast that both the media company and the union would guarantee legal help and protection if necessary.

The only situations of some kind of harassment against journalists have occurred in the coverage of football games or activities. In some cases, directors of a certain club try to prevent a journalist from accessing its facilities, with the argument that they are biased and unfriendly. In other cases, similar attitudes are taken by organised groups of fans, threatening the free presence of journalists in the area and trying to condition their professional work. When this eventually happened, both the outlet they work for and the Journalists' Union gave public and juridical support, and no serious consequences came from the incidents.

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 2 POINTS

There are three or more competitors for every area. There is some concentration in a few media groups, but various relevant titles still exist outside those groups.

IN 2011
2 POINTS

Four big groups (Impresa, Global Media, Cofina, and MediaCapital) control a large share of television and radio stations, newspapers, magazines, and online news sites (see Table 9). The state has an important position too, as does the Catholic Church. The continuing situation of a small market and low news-consuming habits makes it more difficult for single companies to invest in a news medium and survive (see also Fidalgo, 2011).

There are three competitors in open access television: the State owns RTP1, RTP2, and RTP3; one Portuguese media group owns SIC; and a foreigner media group, the Spanish PRISA, presently owns TVI. All these companies also have paid-for channels, distributed through cable, devoted to news and information 24 hours a day. The Cofina group also owns a news channel distributed through cable – the popular CMTV.

Table 9 The main media groups in Portugal, 2019

Group	Media
Global Media (part. Chinese capital)	<p><i>Daily Newspapers:</i> Jornal de Notícias; Diário de Notícias; O Jogo (sports); Açoriano Or. (reg.); DN Madeira (reg.)</p> <p><i>Weekly newspapers and news magazines:</i> Notícias Magazine; Evasões+</p> <p><i>Online news:</i> All newspapers, newsmagazines, TV, and radio stations also have online editions</p> <p><i>TV (cable):</i> SporTV (participation)</p> <p><i>Radio:</i> TSF – Rádio Notícias</p> <p><i>Others:</i> Advertising in sports events; Television transmission rights (football); Printing; News agency (part.); Newspaper distribution</p>
Impresa	<p><i>Weekly newspapers and news magazines:</i> Expresso (weekly); Blitz (online)</p> <p><i>Online news:</i> All newspapers, newsmagazines, TV, and radio stations also have online editions</p> <p><i>TV (open access):</i> SIC</p> <p><i>TV (cable):</i> SIC Notícias (news); SIC Radical; SIC Mulher; SIC Internacional; SIC Caras</p> <p><i>Others:</i> News agency (part); Printing; Newspaper distribution</p>
Cofina	<p><i>Daily Newspapers:</i> Correio da Manhã; Record (sports); Jornal de Negócios (economy); Destak (free)</p> <p><i>Weekly newspapers and news magazines:</i> Sábado (newsmag.)</p> <p><i>Online news:</i> All newspapers, newsmagazines, TV, and radio stations also have online editions</p> <p><i>TV (cable):</i> CMTV (news)</p> <p><i>Others:</i> Newspaper distribution; Printing; Various industrial companies outside media</p>
Media Capital (Spanish capital)	<p><i>Online news:</i> All newspapers, newsmagazines, TV, and radio stations also have online editions; MaisFutebol (sport)</p> <p><i>TV (open access):</i> TVI</p> <p><i>TV (cable):</i> TVI 24 (news); TVI Ficção; TVI Reality; TVI África</p> <p><i>Radio:</i> Rádio Comercial; M80; Rádio Cidade; Smooth</p> <p><i>Others:</i> Plural Entertainment (TV producing company)</p>

Source: ERC, 2010, 2019c

There are three major cable television suppliers: NOS (40.1% market share), MEO (39.6%), Vodafone (16.3%), and a smaller one, NOWO/MásMóvil (3.9%) (ANACOM, 2020a).

There are four competitors in the national generalist daily press. One media group owns two (*Jornal de Notícias* and *Diário de Notícias*) of the five existing newspapers – plus one of the three sports dailies. There is now only one competitor in the market of generalist free dailies (*Destak*), but these newspapers have virtually disappeared from the Portuguese media landscape anyway.

In radio, there are more than three competitors at the national level, and many more at the regional and local levels. As for Internet, there are also three major competitors in the market, with the same operating cable, since virtually all Internet clients are also cable television and mobile phone consumers, subscribing to the popular triple-play or fourth-play packages.

In 2018, Impresa group sold all its magazines to a new group (Trust in News) and Cofina group tried to buy Media Capital group, owner of the free-to-air television channel TVI and the cable TVI24, which raised fears of excessive concentration, but the deal failed. Presently, a new businessman with interests mostly in the area of tourism bought a share of 30 per cent of TVI, and there are rumours (still not confirmed) that he will buy the majority of the shares and take over the company. The Spanish group PRISA has repeatedly showed its desire to sell their participation in the Portuguese television sector.

Apart from these groups, there are, on the national level, the following relevant news media:

- national television channels (RTP1, RTP2, RTP3, ARTV) and national radio stations (Antena1, Antena 2, Antena 3) belonging to the state, Public Broadcasting Service (PBS);
- the leading national radio group (Rádio Renascença), owned by the Catholic Church;
- the most influential daily newspaper (*Público*), owned by an industrial group (Sonae);
- the most influential online-only news medium (*Observador* – site & radio), owned by a number of private investors (it was launched in 2014);
- the leading sports daily (*A Bola*), owned by private investors;
- one national daily (*i Informação*) and one national weekly (*Sol*), owned by a non-aligned private investor;
- and the first news magazine (*Visão*), owned by a small media group (Trust in News).

Some attempts were made in the past to pass a law against media concentration, but they never succeeded, with the argument that it was not an urgent problem and that “a broader political consensus” on that matter should be reached. In spite of this, whenever a group or a company wants to buy a news outlet, they must have the approval of the Regulatory Entity for the Media (ERC) and of the Competition Authority.

In 2015, the so-called transparency law for the media was approved, forcing every media outlet to regularly provide information about their owners, major shareholders, financial results, and so on (for further information on this, see Indicator C3 – Transparency of data on leading news media).

(E2) Media ownership concentration regional (local) level 3 POINTS

Ownership concentration at the regional level is very low, with many dozens of small newspapers belonging to different owners

IN 2011
3 POINTS

Regions are not a political entity in Portugal. In spite of that, considering the geographical scope of the publications, there are many regional and local newspapers, but they are generally very small. For the thirteen existing dailies, circulation rates are usually between 3,000 and 5,000 copies. For the weeklies, which are much more common at the regional level, there are hundreds, but these are usually small, rather traditional, and not very professionalised, with only a dozen exceptions. Many of them are now moving online too, and digital editions are replacing paper in some cases.

There are also many local radio stations, but all of these very small too; most of them do not even have a newsroom or information services. There are no regional television stations, because they are not allowed by law, which some consider “a serious democratic shortcoming” (Cádima, 2009). The exceptions are some local web-TV stations, distributed over the Internet, and two regional channels of the public television for Madeira and Azores.

One of the biggest national media groups (Global Media) owns two regional newspapers, one in Madeira Island, another in the Azores islands. There are two regional groups of some importance at this geographical level, both in the centre of the country – Adriano Lucas and Sojormedia. The first owns four small dailies (one online-only) and one weekly. The second owns one small daily, six weeklies, two regional radio stations, and a regional web-TV. But this does not signify much concentration in a landscape where regional and local titles can be counted in the hundreds.

Regional newspapers play an interesting role in terms of local information, but also (or mostly) in terms of creating community bond. Many people who left their hometown to work and live in other regions, or immigrants that live

abroad, often subscribe to their small local newspapers in order to keep in touch with their roots. An interesting percentage of inhabitants say they have some regular contact with regional or local press: 14.5 per cent of them, according to the *Digital News Report Portugal* (Cardoso et al., 2019).

(E3) Diversity of news formats

1 POINT

There is an increasing homogenisation of formats, leading to less diversity in the public offer.

IN 2011
1 POINT

Although time devoted to news and information has been increasing in free-to-air television programming, the presence of entertainment and fiction is still much stronger, particularly in commercial channels. The fiction consists largely of popular soap operas referred to as “telenovelas”, originating in Brazil but now being produced in Portugal with great public success. This trend is clear when we look at the comparative shares – measured in terms of airtime devoted to each item – offered by the main channels (see Table 10).

Table 10 Diversity of thematic areas in television (per cent)

	SIC (commercial)		TVI (commercial)		RTP1 (public)	
	2009	2019	2009	2019	2009	2019
News and information	14.8	17.6	15.4	18.7	26.1	26.6
Fiction	30.3	22.3	30.1	25.4	19.2	11.8
Entertainment	14.7	28.0	16.2	22.8	29.7	31.5
Sport	1.3	0.3	2.5	0.3	5	2.3
General culture and knowledge	3.1	2.1	1.9	1.7	4.2	4.6
Children and youth	6.1	1.0	2.3	0.0	1.5	1.6 ^a
Others	11.4	4.6	8.8	6.1	3.3	3.4
Advertising	18.3	24.0	22.9	24.9	11.2	18.0 ^b

^aThe public service television has relevant programming for children and youth but concentrates it in its second channel (RTP2), also an open access channel. Its airtime devoted to this target was 29.1 per cent of the total in 2019.

^bRTP1 has legal limitations concerning the amount of time dedicated to advertisement: no more than six minutes per hour (the commercial channels may have until twelve minutes per hour). The other open access channel of the public service, RTP2, has no advertisement at all, except for the (not paid) announcement of cultural products and services.

Source: Marktest, 2009, 2020b

News and information programmes in the main television channels are almost reduced only to the evening newscasts (20:00). Other news formats (interviews, debates, in-depth reporting, etc.) remain very much absent, except for some specific situations in public television (RTP1 and RTP2). Besides this, the evening news bulletins, as said before, include a great deal of soft news, *fait-divers*, shocking reporting, and trivial subjects.

Each of the three main television stations also has a channel exclusively devoted to 24/7 news and information: SIC Notícias (a subsidiary of SIC), RTP3 (a subsidiary of RTP), and TVI 24 (a subsidiary of TVI). There is a fourth channel, CMTV, belonging to the media group Cofina, that is also devoted mostly to news with a rather popular or sensationalist tone, which leads this segment. However, all of them are distributed through cable and are paid for, which means they reach about two-thirds of Portuguese households, and all with low audience rates, when compared with the free-to-air channels. This limitation notwithstanding, those channels have a more diverse set of news formats, including many debates, extensive interviews, political commentaries, and special features.

The online editions of traditional media, in particular, are developing more innovative news formats online, and multimedia approaches such as infographics, podcasts, and videos are expanding.

As for newspapers, the trend goes more towards popularisation, soft news, and light products, even among quality papers. The differences between newspapers are not as evident as they used to be. The free dailies grew very quickly in the years 2006–2008, but they have been quickly decreasing in circulation and now only a small and rather irrelevant one, *Destak*, is left (see also Fidalgo, 2011).

(E4) Minority/Alternative media

1 POINT

Relatively little attention is paid to minorities in the mainstream media, and they have little media of their own.

IN 2011
1 POINT

There are 480,300 foreigners living in the country. The largest group (105,400) comes from Brazil, which means they have no linguistic barriers to accessing the national media. The same is true of other communities coming from former Portuguese colonies such as Cape Verde, Angola, and Guinea, which together have 69,100 residents in Portugal. But, in recent years, the percentage of immigrants from Eastern European countries has grown rapidly. For example, there are presently 29,200 Ukrainians and 30,900 Rumanians. The Chinese community is also relevant, with 25,300 residents. In terms of European citizens, the larger shares come from the UK (26,400) and France (19,700). Dozens of other nationalities are present in Portugal, but with relatively low figures (SEF, 2019).

There are a couple of newspapers written in foreign languages (in some cases, bilingual), but they are not relevant in the media landscape, since circulation figures are at most in the hundreds. They were usually created by the foreigner communities' associations, of which there are about 40 in Portugal, according to the High Commission for Migration, a public institution directly dependent of the Presidency of the Ministers Council (ACM, 2020a). There is also a Commission for Equality and Against Racial Discrimination, created by law in 2017 (ACM, 2020b).

There are sometimes complaints made by those communities regarding the way immigrants are misrepresented and mistreated by the mainstream media. A study funded by ERC and conducted by a group of scholars concluded that between 2003 and 2008, the visibility of immigrants in the mainstream media was usually associated with “crime” and “social transgression” (Férin, 2009: 124). Moreover, the news reporting on those issues tends to give a voice to police, security forces, and institutional sources, rather than to immigrants' associations or common people from these communities of foreigners (Férin, 2009). More recently (2018), ERC conducted another study about sociocultural diversity in the media between 2015 and 2017 and concluded that only 3 per cent of the news in the prime-time newscasts in open access television had some references to immigrants, refugees, or exiled people in Portugal (ERC, 2019b). According to the study, they are the central focus of a piece of news especially when there is some negative situation, such as a crime or illicit behaviour.

This same study also monitored the presence of different religious themes in prime-time television news and found that only 6 per cent of their airtime had some reference to these themes. There is a clear prevalence of Catholicism, which made up 66 per cent of the references, contrasted with Islam (18%) and Judaism (8%). When talking about Catholicism, a central actor of that news is Pope Francis. The study shows that when Islam is in the news, it most often has some connection with armed conflicts or terrorist attacks (ERC, 2019b).

All the open access television channels, either because of the public service remit (RTP1 and RTP2) or because of the concession contract they signed (SIC and TVI) have an obligation towards pluralism and diversity in their programming. Specifically, they must pay attention to cultural diversity and the interests of minority groups and are subject to the scrutiny of the media regulator (ERC). In 2018, ERC concluded that RTP1 devoted to these specific areas a total of 9 hours, 56 minutes, and 7 seconds of airtime, while SIC had 103 hours, 25 minutes, and 51 seconds (about 1.5%), and TVI had only one weekly programme dedicated to minority groups. The channel that pays most attention to these themes (RTP2) is the one with less audience share, and much of the time devoted to them has to do with time offered to different religious programmes (ERC, 2019c).

A pluri-annual plan was set up in 2017 by the regulatory entity regarding people with disabilities or special needs, with specific obligations for the main television operators on subtitles in Portuguese and sign language. This implies that a minimum of 20 hours a week of a diverse set of programmes must have subtitles, and a minimum of 12 hours a week plus one full newscast a week must be delivered in sign language too. The conclusion made by ERC shows that all television channels not only fulfilled, but also largely exceeded, those obligations.

The enormous increase of the Internet's reach, and particularly the strong development of weblogs and social media, brought new possibilities for various minorities (political, religious, sexual, cultural, etc.) to have their own information flows, although not ones as visible as those in mainstream media.

(E5) Affordable public and private news media

1 POINT

IN 2011
2 POINTS

Prices are decreasing and much free content is available, but the cost of news media is still relatively high for an average household. In the sensitive area of telecommunications (cable television, Internet access, mobile phone), prices are increasing, while they are decreasing in most other European countries.

Considering that the gross domestic product per capita in Portugal is around EUR 18,550 (Eurostat, 2019), the amount spent on basic news media, in a scenario like the one shown above, is fairly high, although the evolution in the last ten years shows some important reductions (see Table 11). But spending about EUR 80 per month (or EUR 50 per month if you choose digital subscriptions) for access to the main media and the Internet means it is a significant expense in a country where the minimum salary, legally prescribed, is now EUR 600 a month (it was EUR 450 in 2009), and the average monthly income is slightly higher than EUR 1,000.

Prices for a print newspaper copy vary between EUR 1.10–1.20 for weekdays and EUR 1.50–1.70 for Saturdays and Sundays, when there's usually an extra supplement or magazine. The weekly *Expresso* costs EUR 4 and the newsmagazine *Visão* costs EUR 3.50. But paper editions are being sold less and less, while digital editions rise, and with much more competitive prices. You can subscribe to the digital edition of the main dailies for less than EUR 80 per year, which is about EUR 0.20 per day. All the newspapers now have more-or-less generous paywalls. Part of the content is open¹ and another part (usually the most required pieces of reporting) is “premium”, which means it must be paid for, be it as a single purchase or through subscription.

Table 11 *Prices of news media and access (EUR)*

	2010	2019
Annual subscription to a quality daily newspaper (Público)	320	384 (paper + digital); 78 (digital)
Annual subscription to a weekly newsmagazine (Visão)	130	96.20 (paper); 76.80 (digital)
Annual subscription to broadband access 12 MB (average: 20x12)	240	–
Annual subscription to general Cable TV (average 100 channels)	348	–
Annual subscription to Cable TV + Internet (100 MB) + Telephone (Fix / mobile)	–	420 (package)
Annual tax for Public Service of TV and Radio (compulsory) -	22	34.20
Total	1,060	934.40 (print and digital) / 609.00 (digital only)

Source: Elaboration by the author, according to information available on the companies' websites.

Prices for Internet access and cable television together are not very high, but they are higher than they should be if we compare them internationally. The National Authority for Communications (ANACOM), which regulates electronic communications in the country, recently published a comparative study showing that prices for telecommunications in Portugal went up by 7.7 per cent between 2009 and 2020, while they went down 10.4 per cent in the EU countries (ANACOM, 2020b). This puts Portugal among the European countries where telecommunications are more expensive, holding the 25th position in the ranking of the EU 28 countries in prices for broadband mobile access, and a position between 11th and 18th in mobile voice service and mobile Internet access.

The reason for this, according to ANACOM, is the fact that all the operators focus on selling triple-play or fourth-play packages (cable television + Internet access + telephone or mobile) that include more services than an average consumer needs. For example, all packages include telephone, when the vast majority of people do not use it any longer, preferring the mobile phone. Moreover, all packages include 120 or 200 television channels, when the average consumer regularly sees only a very small part. All packages offer up to 2,000 or 3,500 minutes of conversation on the mobile when the average doesn't go much beyond 200 minutes. Some packages even include 1,000 minutes of international calls, when, according to ANACOM data, the average use is only five minutes. This means that consumers buy more than they need, and pay more than they should, because of this "package logic" that is actively pursued

by all the operators in the market. The very aggressive marketing campaigns of those operators, offering interesting monthly packages that cost EUR 29.99 or EUR 34.99 (usually with a fidelity clause that obliges you to stay 24 months with that specific operator) end up being seductive, and consumers accept them as a seemingly good deal.

(E6) Content monitoring instruments

2 POINTS

There are different monitoring instruments and they are publicly available, but some complaints about their inaction or passivity arise now and then.

IN 2011
3 POINTS

Four main entities regularly deal with media monitoring issues. First, there is the ERC (Entidade Reguladora para a Comunicação Social [Regulatory Entity for the Media]), an official regulatory body for the media, with its members elected by the Parliament by a minimum majority of two-thirds of votes. Apart from other activities (licensing, regulating, sanctioning), ERC also has a monitoring function to check whether the general rules and obligations are fulfilled, such as in the PBS, as well as in the open access private television stations, also obliged by a concession contract. Besides its annual report, including a great deal of data on the media field, it regularly publishes information through its website and social media. It also launches and sponsors, in partnership with universities, relevant studies on specific issues about media activity and performance.

Second, there is Obercom (Observatório da Comunicação [Communication Observatory]). Although private, this observatory has great involvement in public institutions connected with the media and uses state facilities to carry out its work. The most important associations and media companies are partners. It regularly publishes dossiers with a detailed description of the media business in Portugal and leads (or funds) studies and research projects aimed to achieve “better knowledge of the communication area”. It also publishes an online scientific refereed journal. It is the national partner for the *Reuters Institute Digital News Report*.

Third is Marktest, a private company responsible for monitoring activities regarding media audiences and audiometric, either in television or radio, the press, or the Internet. The results of its monitoring work are regularly used when anyone wants to describe the state of the media, for its reception and audience (both offline and online). Some major figures from its findings go public regularly, but the detailed information must be paid for.

And finally, there is APCT (Associação Portuguesa para o Controlo de Tiragem e de Circulação [Portuguese Association for the Control of Printing and Circulation]), also a private entity, created by the voluntary association of the press companies and designed to permanently monitor the number of

copies printed, distributed, and sold. Membership is voluntary, but almost all relevant print media have joined it.

Two other entities have some activity concerning media content and journalistic work. The first is the Commission of the Journalists' Professional Chart (CCPJ, 2020), responsible for the journalists' professional licence, which is a legal obligation in Portugal, and for the scrutiny of their incompatibilities. The other is the Journalists Union (SJ, 2020), whose Ethics Council frequently brings to the public comments and recommendations about questionable media content.

Besides the regular activity of these institutions, some media monitoring work comes from research groups at universities and individual or collective blogs concerned with the media business. Not to mention the increasing debate over these issues in social media, particularly Facebook. Well-known Facebook pages such as "Os Truques da Imprensa Portuguesa" (with 199,000 followers) or "Uma página numa rede social" (75,000 followers) regularly scrutinise what is published by the mainstream media and publish some of the most interesting critical reflections on the subject.

Despite all these monitoring entities, now and then public discussions arise about the apparent "impunity" of non-ethical behaviour in journalistic work, particularly in popular, sensationalist newspapers and television channels (as is the more common case of CMTV). Although the regulatory entity ERC has the power not only to monitor but also to condemn and to sanction in material terms misbehaviour in media coverage, the fact is, this rarely happens. ERC usually prefers to issue a public critical note and to advise the media in question to be more careful in the future, instead of punishing them.

(E7) Code of ethics at the national level

2 POINTS

A national Code of Ethics exists, but not all leading media respect it.

IN 2011
2 POINTS

There is a Code of Ethics for journalists, prepared under the responsibility of the national Journalists' Union – the only national association of journalists in the country. Within the Journalists' Union, there is also an Ethics Council.

The Code is well known, but the fact that it was created in the context of the Journalists' Union, along with the fact that Portuguese journalists are not obliged to join the Union (only ca. one-third are members), raises frequent questions about its reach and jurisdiction. In 2007, this situation changed by the initiative of the government. Apart from the Union – where an Ethics Council continues to exist – there is now a national commission presided over by a judge that has the responsibility to grant journalists' professional credentials. No one can work as a journalist in Portugal if they do not have the professional card

(Carteira Profissional de Jornalista), which must be renewed every two years and which depends on some legal conditions. Since 2007, this Commission also has disciplinary powers regarding journalists' ethical duties. This means that, under the new law, a journalist, regardless of whether they belong to the Union, can suffer sanctions if they prove to have disrespected the Code of Ethics.

Although this Commission is composed entirely of journalists, half of them are elected by the professional group and the other half are appointed by the media companies. The new system still raises strong debates among Portuguese journalists. Most of them would prefer ethical questions to be treated by the journalists themselves, on an autonomous, self-regulatory basis, and not by a Commission imposed by law – a model of what some scholars call “regulated self-regulation” (Schulz & Held, 2004). On its behalf, the government argued that this measure was taken simply because the journalists' professional group did not prove, over time, to be capable of dealing with this problem autonomously.

There is no Press Council in the country. Anyone who wants to complain about media ethical abuses must address either the Regulatory Entity for the Media (ERC) or the Commission of the Journalists' Professional Chart (CCPJ).

All the professionals interviewed for this report, both editors and journalists, agreed that the Code of Ethics is generally well known and a relevant reference in newsroom debates. In some cases, media outlets developed their own Codes of Conduct, which reference the norms of the national Code of Ethics but go into more detail to regulate journalists' practices and routines, calling attention to more concrete issues (see Indicator E8 – Level of self-regulation). This is the case for the daily *Público*, the weekly *Expresso*, the newsmagazine *Visão*, and the news agency Lusa.

(E8) Level of self-regulation

1 POINT

Some self-regulation mechanisms exist on the level of the main news media, but their presence is less visible than in the past.

IN 2011
2 POINTS

As explained above, there is not a national self-regulatory entity (like a Press Council), although there are several self-regulation instruments in the leading news media.

Every media outlet has an Editorial Statute, with a mission statement emphasising their independence from political and economic powers, their respect for people's fundamental rights, their commitment to democratic values, and their attachment to journalistic ethical principles. However, these are, in most cases, just formal statements with very general intentions. Some of these outlets have more detailed internal accountability mechanisms. This is the case, for exam-

ple, with *Expresso*, which has a Code of Conduct dealing with such issues as objectivity, accuracy, plagiarism, identification of information sources, error correction, limits to gifts offered to journalists, and journalists' exposition in social media. *Público* has a Style Book that has a first part devoted entirely to ethical questions, journalism social responsibility, conflict of interests, and so on. RTP has an Editorial Statute that underlines the particular responsibilities of a public service television, namely their obligation to promote pluralism and diversity.

Three dailies (*Público*, *Diário de Notícias*, and *Jornal de Notícias*) had an ombudsperson for several years (the first one appeared in 1997), but the position is vacant now in all cases. According to our interviewees, financial constraints have forced media outlets to invest less in these instruments of quality control. Since 2006, there have also been news ombudspersons in public television and public radio.² They are both still active, with a broadcasting time every week prepared under their exclusive responsibility.

The right of reply is a legal and even constitutional obligation and is usually respected by all, with no need for judicial measures.

(E9) Participation

2 POINTS

People are not particularly encouraged to participate in the news process, in spite of some improvements in the online context, where the possibility for commentary is generally available.

IN 2011
1 POINT

The traditional section of letters to the editor remains the most common way for people to participate in the news process (see also Fidalgo, 2011). It exists in every newspaper, sometimes augmented with other small sections where the readers' opinions or active participation, either with texts or with photos or videos, is welcome.

The Internet and the development of these newspapers' online editions continue to strongly expand opportunities for public participation, with comments on the news, voting in daily opinion polls, and so on. The newspapers are open to these forms of participation and encourage them, but in a rather disorganised way, as they do not usually promote real public discussions or debates, and they do not have regular contacts with the readers. Of course, there are cases where the "commentary boxes" that follow the news turn to unpleasant or nasty debates among readers with different opinions. The strategy of dealing with these commentaries varies among different media outlets. In most cases, comments are moderated, either automatically by software that prevents the use of some words, or by the readers themselves who apply voluntarily to self-regulate. When more sensitive issues come to the news,

media sometimes decide to close the commentary boxes, to prevent the hateful discourse or similar abuse.

Since most media are now also present on social media (particularly on Facebook and Twitter), with pages that are updated almost by the minute, there are increasing opportunities for the public to comment on all the issues that are in the news.

Some national radio stations (TSF, Antena Um), as well as a cable television channel (SIC Notícias) have daily forums open to the public, to discuss a given subject according to the news of the day. But not all of them agree with this. The leading Radio Renascença is against forums in which “anyone can say anything”. In fact, now and then these forums are used by organised groups or even by political parties to distribute their propaganda in a seemingly spontaneous way.

In public television and radio, an Opinion Council represents different areas and social groups. They are asked to give their opinion about PBS strategy programming, and in some situations, they have a binding vote, such as in the appointment of a new ombudsperson for television and radio.

The editors interviewed for this report are generally rather sceptical about user-generated content. In spite of interesting promises about so-called citizen journalism some years ago, they now tend to limit the participation of the public only to very specific situations, for instance, if no journalists could reach the place where events occurred. In general, readers and viewers “should be regarded as information sources, not as potential journalists”, as one editor-in-chief told us.

(E10) Rules and practices on internal pluralism

3 POINTS

Internal pluralism is fairly well promoted in the main news media, and they give voice to various groups.

IN 2011
3 POINTS

In Portugal, there exists no tradition for news media to endorse publicly a political party or a presidential candidate. All of the main media insist on independence as their supreme value, promising to offer their audience all the relevant perspectives on any issue under debate. The lack of any kind of institutionalised external pluralism is thus fulfilled by internal pluralism, both in the newsroom and in the set of outsiders invited to regularly write opinion columns. Notwithstanding this general position, the fact is that we sometimes listen to complaints by the public against bias in the media, to the point of suggestions that everything would be more transparent if those in the media assumed a clear political position instead of dubious independence.

The leading news media, except the online-only *Observador*, are usually very open to different voices in the op-ed pages, thus stimulating the politi-

cal debate. Additionally, journalists also have the opportunity to analyse and comment in different ways.

News media still tend to be critical of the government and of the ruling party, following a tradition of counter-power that is usually associated with journalism and with its watchdog function. The opposite occurs when it comes to the PBS, or even to the national news agency. There is a consistent suspicion that the government tends to get better coverage by these media outlets because they depend directly on public funding (an attitude largely the same as in 2011; see Fidalgo, 2011).

The ERC systematically monitors the existence or absence of political pluralism in the PBS news bulletins and has concluded several times that there is some over-representation of the government and its supporting party (the Socialist Party) in the news, apparently at the cost of the main opposition party (the Social-Democrat Party) which is often under-represented. More recently, in its report about political pluralism on the main television channels in 2018, ERC generally concluded that this trend remains. In fact, daily information programmes tend to give between 17.0 and 23.5 per cent of their time to government and its supporting party, while the other five parties represented in Parliament get between 10.0 and 24.1 per cent, according to different newscasts and channels (ERC, 2019a). As for political parties not represented in Parliament, their time doesn't go beyond 0.1 to 0.3 per cent of the time dedicated to news.

The results of this monitoring activity are present in the minds of the editors of public television, as I was told by different sources from the newsroom. There is nowadays more concern in PBS when it comes to deciding what to cover in the political agenda, with an effort to balance the journalistic relevance of the issues with the need to respect the "quotas" of broadcasting time defined by ERC in terms of "reference values" for each political party.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog "control of the controllers"

2 POINTS

IN 2011
2 POINTS

There are institutionalised mechanisms to control media performance as a watchdog, but these issues are not very present in public debates.

The Regulatory Entity for the Media (ERC) must guarantee that the news media respect everyone's rights, act with independence, fairness, and accuracy, allow the exercise of the right of reply, respect pluralism, promote diversity, and so on. In this context, it acts as a clear control mechanism of media performance, either on its initiative or because of complaints received from the public. It

started working in 2006, though there was another institution with a similar purpose before. There are political controversies about its statute – since its members are appointed by the Parliament according to nominations supported by the biggest political parties – and about the need for media regulation that is contested by some media owners and editors according to an increasingly disseminated neoliberal ideology. However, the fact is that some more attention is being paid to media performance and to the media’s complex roles in contemporary societies.

Journalistic work is also monitored and controlled by the CCPJ, which has jurisdiction over good practices and ethical standards in the media. As explained before (see Indicator E6 – Content monitoring instruments), an Ethics Council exists within the Journalists’ Union (SJ), often nurturing and fostering the public discussion of media performance and journalistic work.

Besides this, the general landscape concerning news monitoring and debate within the journalistic community remains not very promising. The Journalists’ Club publishes a bi-monthly magazine (*Jornalismo e Jornalistas*) and regularly updates an online site devoted to media and journalism issues, where some interesting debates arise from time to time. A couple of blogs made by journalists (individual or collective) also exist. Nowadays, a dozen of them are the most consistent, attentive, and stimulating instruments for media analysis and media criticism. As explained before, some Facebook pages devoted to media scrutiny and criticism are very popular these days, gathering thousands of followers.

The role played by universities that offer journalism courses and journalism or media research centres is relevant as well. Some of them have been responsible, during recent years, for the publication of dozens of books dealing with media issues. Most of the former press ombudspersons also published books with a selection of their public interventions that are often used in schools and training institutions for journalists. This means that the discussion of these questions is now more open to the public than it used to be when these books circulated only within the academy. Besides this, some observatories of media performance also play a relevant role in this intersection between the academy and the audience.

(C2) Independence of the news media from powerholders

2 POINTS

IN 2011
2 POINTS

Various laws and regulations guarantee some independence, but real practice shows some difficulties.

The Journalist Statute, which is actually a law approved by the Parliament, grants journalists a set of important rights and guarantees to protect their

activity. The most relevant are the right to independence and “free creation and expression” (containing the so-called consciousness clause), the right “to participate in the editorial orientation” of the media, the right of access to “official sources of information” and to “public places”, and the right to “professional secrecy”, which means they are allowed to not disclose the identity of their sources (a shield law) (Assembleia da República, 1999).³

This does not mean, however, that problems do not arise now and then. For example, the separation of the editorial area and management is not respected in all situations. In 2009, a weekly news bulletin of the leading television channel TVI, which had gained a reputation for being very strongly against the Portuguese prime minister, was terminated by a direct order coming from the board of managers, and not by the editor-in-chief. This was considered illegal by ERC, but the fact is that the news bulletin did not show up again.

There seems to be a feeling among most journalists that due to the precarious situation that many of them are in, it is not easy to defend those rights. Keeping silent and trying not to raise too many questions is apparently an option more and more followed by journalists, particularly when media companies are economically weak or when journalists are young interns trying to get a more stable job.

In terms of diagonal concentration or cross-media ownership, there are also several situations to consider:

- The owner of the reference daily *Público* is one of the biggest businesspersons in the country (SONAE group), whose major assets are supermarkets and shopping centres.
- Global Media, the owner of the dailies *Jornal de Notícias*, *Diário de Notícias*, and *O Jogo* (sports), as well as of SporTV (cable), has important interests in the advertising industry, in the football industry, and transmission rights for football games.
- Cofina, the owner of the dailies *Correio da Manhã*, *Record* (sports), *Jornal de Negócios* (economy), and *Destak* (free), has various interests in different industrial areas.
- The owner of the leading radio station, Rádio Renascença, is the Catholic Church, which also owns several small regional newspapers.

Despite all this, the idea is that journalistic independence from these private interests is the general rule, rather than the exception. However, it is also true that some self-censorship temptations (or real actions) are sometimes reported privately by reporters, particularly in a time of great economic difficulties in the media industry, with companies downsizing their workforce or just closing.

(C3) Transparency of data on leading news media

3 POINTS

Information on news media exists and is easily accessible, namely after the creation of a “Transparency Portal”.

IN 2011
3 POINTS

Every news medium is legally obliged to publish regularly the list of its main shareholders, but this is not always a guarantee of full transparency, either because of cross-ownership or because of financial investors who are difficult to identify. Nowadays, however, as the main news media of the country are concentrated in the hands of four or five well-known groups, the question of ownership is not a disputed issue. Moreover, most of the Internet sites of those news media usually provide some information about all the other media belonging to the same group.

The Regulatory Entity for the Media (ERC) made the first step in this field in 2010, through the creation of a “Database for the Transparency of Media Ownership”. Later, in 2015, a further step further was taken with the Parliamentary approval of the so-called “transparency law” for the media. This obliges every media outlet and group to regularly provide information about its owners, major shareholders, financial results, cross-ownership, and so on. It took some years for this law to be implemented, but in late 2019, the results of the initiative finally came to the public. A “transparency portal” now exists on ERC’s website, and this information is open for public consultation (ERC, 2020a). There is, however, some doubt about the total transparency of media ownership. In a couple of situations, major shareholders are presented as individuals, but some inside information suggests they may be just a front for other (local or foreign) investors who don’t want to be identified. The regulatory entity promises to try to uncover these situations, but so far, one or two remain under suspicion.

Another transparency mechanism has to do with advertisement made by public institutions in the media, both national and local. All contracts in this domain must be publicly accessible, with information about all the actors involved and the amounts of money paid for them (ERC, 2020b). A “transparency portal” within this scope is managed by ERC, and its annual report details how much advertisement was bought by public institutions, and where it was placed. In order to prevent abuse or malpractice, there is some strict regulation about the fair distribution of state advertisement among national and local media, to guarantee equal treatment to all titles.

(C4) Journalism professionalism

2 POINTS

IN 2011
2 POINTS

Professional ethos is not too strong in absolute terms, considering the heterogeneity of the professional group. Professionalism is sometimes compromised by a lack of resources.

Following the classification of media systems by Hallin and Mancini (2004), Portugal belongs to the “polarised pluralist model” which has as one of its main characteristics a relatively low level of professionalisation of journalists. This means a low degree of professional autonomy, some weakness in the definition and implementation of distinct professional and ethical norms, and a relative lack of public service orientation. These traits do apply to the Portuguese situation, although with nuances (Fidalgo, 2008b; Santos, 2010).

During most of the twentieth century, because there was no freedom of expression or association, journalists’ professional organisations had no autonomy at all. In such conditions, it was particularly difficult for them to implement their specific ethical values and professional norms, and this contributed to a “weak professional culture” (Correia & Baptista, 2007). Things changed quickly after 1974, when democracy prevailed. One of the first laws to be put into practice was a new press law. Journalists organised themselves in a now free and autonomous strong national union and were able to convince political powers to make laws on a large set of items considered very important to journalistic work. If the instruments of journalistic professionalisation had been absent before, they were now conquered by the professional group, although more because of pressure on the state rather than because of a dynamic autonomous process. However, dependence on a very centralised state, which is typical of “pluralist polarised systems”, continued in the country.

Portuguese journalists have important laws to protect their activity as well as their Code of Ethics, but they were never able to put into practice an efficient and consensual mechanism of self-regulation. The existing Ethics Council works in the context of the union, but many of the 5,124 professional journalists that existed in May 2020⁴ (see Figure 1) do not belong to it (according to the president of the Journalists Union, only about one-third of professional journalists are members) and, therefore, tend not to acknowledge its jurisdiction.

Figure 1 Number of professional journalists by gender, 2009–2020

Source: CCPJ, 2020

The teaching of journalism is very recent as well, as it only appeared at a Portuguese university for the first time in 1979. But it then developed very fast, and nowadays journalism courses (usually integrated into communication sciences courses), as well as master's degrees, are very popular in the country and are present in all relevant universities, both public and private. If we look at the group of actual professional journalists (5,124, of which there are 3,030 men and 2,094 women), it is relevant to notice that 43 per cent of them hold a university degree (bachelor's, master's, or PhD). This number goes up to 69 per cent if we include those who began a university course but never finished it. Female journalists with a university degree are 61 per cent (87% if we include unfinished university courses), while male journalists with a degree are 31 per cent (57% if we include unfinished university courses). This data confirms the idea that there are more young female journalists, and more old male journalists who come from a time when no course was taken to become a journalist (CCPJ, 2020; Subtil & Silveirinha, 2017).

Journalists are a rather heterogeneous professional group and still have not succeeded in putting forward a strong collective dynamic. Some progress in recent years is partly counterbalanced by the negative economic situation in the media industry, which pushes journalists more towards proletarianisation than professionalisation. A 2016 survey among journalists (with 1,494 valid respondents) confirmed this increasingly difficult situation for the professional group: 80.6 per cent of them received less monthly pay than EUR 1,500 net, 57.3 per cent got less than EUR 1,000 per month, and 11.6 per cent less than EUR 500.⁵ The average monthly income for the respondents was EUR 1,113,

which is, even for a poor country like Portugal, a very low pay. This is particularly worrying if we remember that most of the journalists have a university education and the work they do holds significant responsibility (Crespo et al., 2017). In this scenario, it is not surprising that 48.8 per cent of the journalists feel very unhappy with their labour conditions, and 64.2 per cent confess to having already considered leaving the job. In recent years, many journalists decided to exchange journalism for another job in the area of communication such as public relations, press attaché, communication manager, marketer, and so on, because they are usually much better paid, even though they have a lower status in terms of social recognition (Fidalgo, 2019).

(C5) Journalists' job security

1 POINT

There is a relatively high level of job security in the legal framework, but the economic crisis and the weakness of media outlets make job security much more fragile in practical terms.

IN 2011
2 POINTS

Portuguese journalists do not have many reasons to complain about job security when it comes to legal dispositions. However, in practical terms, the structural economic weakness of most media industries and the economic and financial crises play a major role when it comes to assessing their effective security. The legal guarantees aside, according to multiple sources, the day-to-day routine in media companies shows that things continue to become increasingly difficult for journalists, and this leads to silence and resignation rather than to confrontation and a struggle for one's rights (see also Fidalgo, 2011). "It's better to try to avoid problems than to be involved in a long process in a court of law", as a seasoned journalist at a major newspaper said.

In the last decade or so, all of the most important Portuguese news media downsized their newsrooms, dismissing dozens of journalists – some of them, but not all, through friendly negotiations. As we can see in Figure 1, between 2009 and 2020, the number of professional journalists decreased from 6,673 to 5,124, which means a reduction of 1,549 journalists (a drop of 23%). Not all of these are now unemployed, as some of them probably switched to another job, but some hundreds lost their jobs for sure, given the frequent news we read about media companies downsizing their labour force, especially in the newsrooms (official numbers are not available). Even among those who are still working, many complain about their precarious situation. In the aforementioned study sponsored by Obercom (Crespo et al., 2017), only 56.3 per cent of respondents said they have a permanent labour contract and, therefore, legal job security. This means that all the others (nearly half of the respondents) have a more-or-less precarious labour condition. A total of 17 per cent are freelancers,⁶ 10.5

per cent have a short-term contract, and 16.4 per cent have a “collaborator” status, which means no labour contract at all and no regular salary because they are paid according to the work they do. These last ones are the first to be “fired” because they have no formal link to the company they work for.

The fear of being the next to lose one’s job spreads among journalists and inculcates a more passive outlook. With this scenario, it is increasingly difficult for young people to find a new job in the media (Miranda & Gama, 2019). The competition is very strong because hundreds of them graduate from universities every year. Many of them will work as interns for three months with no pay, and then again as interns in another newsroom, again with no pay. “It’s good to make the curriculum and to be prepared for a permanent job when it comes”, they hear frequently. Therefore, it is not difficult to find someone who will accept precarious labour conditions (Graça, 2007), usually in the form of short-term contracts or no contracts at all. Legal job security does not help much in these situations.

This said, it is important to acknowledge that some important legal protections are in place for journalists, particularly those related to the *clause de conscience*, according to which no one may be forced to write something against their convictions and ethical norms, and no one may suffer any kind of punishment for not doing it.

(C6) Practice of access to information

2 POINTS

No legal barriers exist to accessing public information, with a law guaranteeing access to public documents, but access is sometimes difficult in practice.

IN 2011
2 POINTS

According to the Journalist Statute (Assembleia da República, 1999: art. 8), the right of journalists to access information sources must be guaranteed by the organs of public administration, and whoever refuses that access may be legally prosecuted “with urgency”. This applies not only to journalists, but in the name of “transparency of public affairs”, everyone has the right of access to administrative documents from the public sector, with “no need to invoke any particular interest” (Assembleia da República, 2007).

Because the law is sometimes disrespected, or because the interpretations of what falls under the category of restricted information may be divergent, a special commission works next to the Parliament (since 1995) as an instance of appeal. Every year, about 400 complaints are brought to this Commission of Access to Administrative Documents, several of them presented by journalists.

Traditionally, the Portuguese public administration tended to be closed off and kept most of its documents secret, but this behaviour is slowly changing. Sometimes, journalists complain that public administration, although not for-

mally forbidding access to this or that information, raises practical problems of consultation, making them seek what they are looking for among hundreds of files. This is why the work of the aforementioned Commission is important.

(C7) The watchdog and the news media's mission statement

1 POINT

IN 2011
1 POINT

News media only indirectly refer to the watchdog function in their mission statements.

An analysis of the Editorial Statute of the different news media points to the main idea of independence.

Radio Renascença emphasises the Catholic affiliation of the station and, therefore, insists mostly on Human Rights and the defence of all human beings' dignity. It also insists on the need for pluralistic, comprehensive, objective, and honest information, with respect for journalistic professional standards and journalism ethics.

RTP's mission statement stresses the particular social responsibility of a public television station, together with the need for "accurate and independent" information. Independence from any kind of power is emphasised, because the station must be committed only to "its duty to inform citizens".

Público insists it is completely independent from any kind of political or economic powers, considering itself responsible to its readers and nobody else. It underlines that "the existence of a well-informed and active public opinion is a fundamental condition for democracy and for the existence of an open, dynamic society".

Expresso refers to the issue of independence from any powers including "its advertisers". It insists that news media should not serve any particular interests; they should always be "autonomous institutions through which the citizens [...] can look for all the information they need to make their choices".

Correio da Manhã underlines "total independence" from all "powers and interests", whether economic, political, religious, or professionals. Furthermore, it states it will be "firm" in condemning any "abuse of power".

SIC defines its main purpose as the diffusion of quality programming, "independent from political or economic power, and from any doctrine or ideology". The information it produces "will be fair and accurate", which means "distinguishing between news and opinions". "Responsibility" and "tolerance" are referred to as other guidelines for its information, with "exclusion of any incitement to the practice of crimes or the violation of fundamental rights".

Observador, an online-only newspaper (now also running a radio station), defines itself by two main characteristics: "independent" and "free". The Edito-

rial Statute says that the publication does not have any political programme, but “has a view over the country and the world”. It aims “to contribute to a well-informed and active public opinion”, “valuing controversy and open discussion”.

Only indirectly do the news media refer to their watchdog mission or to their commitment to investigate and control the different powers present in society.

(C8) Professional training

1 POINT

Journalists’ training is not a high priority among leading news media, except for technical skills attached to the new convergence efforts.

IN 2011
1 POINT

All the editors interviewed for this report assign “a great importance” to journalism training, which does not necessarily mean that activities devoted to journalism training are part of the companies’ routines. Most of the training offered to journalists has to do more with skills than knowledge. Because these media outlets use new technologies more and more, and several of them are involved in multimedia projects, they must update their staff to meet the new industry requirements. Sometimes they organise internal sessions for this training, or they hire specialised training companies or universities to provide a course. In recent years, special attention is being given to Big Data and ways to manage and publish it in engaging ways. For example, interactive infographics are one of the most developed techniques.

Continuous training sessions for journalists are sometimes organised by entities outside media companies, as with the Centre for Training of Journalists or the Journalists’ Union. For example, courses on legal matters, war coverage, and education, have already taken place in recent years. However, they do not occur regularly or depend on the direct commitment of the news media themselves. In this field, the situation is rather poor, with the single exception of new skills training required to use new technologies or by the convergence trend occurring in most media outlets.

RTP, the public service television operator, has a permanent training centre with a very regular and diverse set of practical courses.

Although the companies don’t offer as many training opportunities as they would like, many journalists invest in their own training, either in specific areas they want to improve their expertise or in university courses, with many applying to master’s or doctoral courses in communication sciences. In the survey referred to above (Crespo at al., 2017), 60 per cent of respondents said that in the last five years, they had been involved in some training activity, either by their initiative (40%) or by the initiative of the company they work for (15.3%). The Centre for Training of Journalists and the universities are the institutions most often referred to as training institutions.

(C9) Watchdog function and financial resources

2 POINTS

Journalistic investigation has some priority, but the number and extent of investigations are limited by financial means.

IN 2011
1 POINT

The financial situation of the Portuguese news media remains generally rather weak and seems to be much worse in 2021 when compared with 2011, though the dramatic consequences of the Covid-19 pandemic are still to be fully evaluated (Martins et al., 2020; see also Fidalgo, 2011). Economic survival is their first priority, because most of them actually lose money every year, and the situation is evolving negatively. A small market, not much advertising, low rates of news media consumption, and an increasing presence of free Internet sites all help to explain the crisis. When it comes to budget cuts and downsizing measures, the first area to suffer is usually human resources. With smaller newsrooms, news media have increasing problems to invest in investigative reporting, because such reporting takes more time and more money.

Several editors interviewed for this report complained about this situation, saying “we have limitations as far as material resources are concerned, but we try not to depend too much on news agencies” (Rádio Renascença) and “the ambition and mission of a newspaper like ours would require many more resources, both human and material” (*Público*).

The views of *Expresso* and *Correio da Manhã* (both with a better economic situation) are more optimistic, saying “we have enough resources for our work, including our own investigative reporting” (*Expresso*) and “we have all the necessary resources to produce our model of newspaper. Never has an investigative story been abandoned due to lack of material resources” (*Correio da Manhã*). Even in television channels, as heard from both the public RTP and the private SIC, some room for investigative work developed in recent years, because longer format pieces of reporting with 10–15 minutes are now common and have good audience results in the evening newscasts. They also have weekly programmes and corresponding teams specifically devoted to investigation. Furthermore, the participation of Portuguese media in some of the recent international networks of investigative journalism also increased the attention given to these issues and brought interesting public support. All the recent political and economic scandals in the country have been uncovered and publicly denounced by journalists.

In general terms, and looking further than our sample of leading news media, the fact is that Portuguese newspapers, television, and radio stations still depend a great deal on news agencies. Investigative reporting is not as extensive as it should be and tends to be concentrated mostly in four or five news outlets. Coverage of international affairs, except for football games and very big disasters, is also mostly dependent on news agencies as well. Again, the small dimension of Portuguese media outlets and their lack of resources is responsible for this.

Conclusions

In political terms, the relatively recent conquest of democracy, after a long period of dictatorship and isolation from the outside world, helps to explain the strong presence of a centralised state and the absence (or fragility) of autonomous social dynamics. Accordingly, the existence of important progressive laws is not always strong enough to counterbalance the weight of practices and day-to-day routines.

In economic terms, the structural weakness of the Portuguese media industry, worsened by the 2008 financial crisis and by the 2020 pandemic, makes it difficult to run a profitable business and guarantee good conditions for journalists to do their work.

The ongoing changes in the traditional media business model, with advertising severely decreasing (or moving to technological distribution platforms such as Google or Facebook) and with sales also affected by the generalised trend of audiences to consume free-of-charge information on the Internet, endanger the survival of most media outlets. The alternative of more media concentration and larger conglomerates is not good news for freedom, pluralism, and diversity of information.

The popularity of the Internet and the multiplication of social media networks brought new challenges to the media industry in general, and to journalism in particular, changing habits of news consumption, but also of news production. These are increasingly conditioned by outside agendas, vertiginous rhythms, and audience likes.

In cultural terms, a long history of low literacy and low reading habits is responsible for very low rates of media consumption, with the exception of television, although the fast development of the Internet may help to change things.

Media in Portugal have made an important contribution to democracy and given precious help to consolidate democracy itself. However, there still seems to be a great deal to do to guarantee that this contribution goes beyond the formal aspects of media functioning and pays attention to such issues as quality of news and information, media literacy, public participation, and commitment to citizenship.

Notes

1. During the first months of the Covid-19 pandemic, all Portuguese newspapers decided to give free access to all content directly or indirectly related with the disease and corresponding healthcare.
2. The existence of a news ombudsperson both in public radio and in public television is mandatory by law, since the approval of the last version of the Law on the Public Service Broadcasting in 2006. Although television and radio belong to the same public company, there is an ombudsperson for each medium.

3. This traditional right to journalists' professional secrecy was changed in the last revision of the Statute. The right to not disclose the identity of information sources is still granted in general terms, but an exception is previewed in the Penal Code. This means that if and when a judge in a court of law decides that the identity of an information source is essential to pursuing justice, the journalist may be compelled to reveal it. Nevertheless, the journalists' Code of Ethics plainly states that those professionals must not disclose the identity of their sources. Because of this, one journalist has already been convicted in court because, in spite of an order given by the judge, he insisted on protecting his sources.
4. The number of journalists has decreased in recent years (see Figure 1), but it grew very quickly during the previous three decades: between 1987 and 2006, it increased from 1,281 to 7,402 professionals, most of them (ca. 60%) with some academic degree in journalism or communication sciences (Fernandes, 2008). It should also be noted that only 19.8 per cent of them were women in 1987, but the figure was about 41 per cent in 2006 – and this same percentage continues nowadays (41% women journalists, 59% men journalists) (Salim, 2008; CCPJ, 2020).
5. Another survey of journalists, made in 2015 and involving 806 valid respondents, reached similar conclusions, with 55.4 per cent of the inquired confessing to receiving less than EUR 1,000 per month (Miranda & Gama, 2019).
6. This percentage must be read with caution, because, according to the Journalists' Union sources, the real freelancers (journalists who choose to work with that status) are very few in Portugal – and always have been. Many of these “freelancers” are actually collaborators, with no labour contract, usually working for a specific media outlet, but preferring to be free in order to get an opportunity in another company, if one appears.

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SWEDEN

Continuity and change in a more fragmented media landscape

Lars Nord & Torbjörn von Krogh

Introduction

Sweden is the largest of the Nordic countries, in terms of both geographic size (449,964 km²) and population (ten million people). Swedish democracy is based on a multiparty parliamentary system, where political parties have traditionally been more important than candidates in national elections. Modern Swedish political history has been dominated by a single party, The Social Democrats, which has been in power for 71 of the past 88 years. The party has been positively associated with the principles of the welfare state, economic growth, and outstanding political leadership. However, the two most recent national elections in 2014 and 2018 have also resulted in big successes for the right-wing populist party, The Sweden Democrats, which has led to complicated parliamentary situations and a more fragmented party system. Sweden joined the European Union in 1995 but is not a member of the euro currency zone. Politically, Sweden is considered a mature liberal democracy.

Freedom in the World 2021: status “free” (Score: 100/100, stable since 2017).

Liberal Democracy Index 2020: Sweden is placed high in the Top 10% bracket – rank 2 of 183 countries (Varieties of Democracy Institute, 2021).

Freedom of Expression Index 2018: rank 10 of 183 countries, down from 7 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 4 of 180 countries, fluctuating between 2 and 10 from 2013–2019 (Reporters Without Borders, 2020).

The Swedish media system has traditionally been a mixture of classical liberal notions of the press as an independent and monitoring “fourth estate”, and social responsibility ideas with necessary relationships between the political

system and media system to maintain diversity and public service in broadcast media. From a historical perspective, the prospects for independent journalism could not be better. Sweden was the first country in the world to include a Freedom of Information Act in its constitution, as early as 1766, and since then, freedom of expression and freedom of information have been embedded in the Swedish constitution, which provides stronger protection than common law. However, in reality, this liberal media approach has co-existed with numerous state regulations of the media sector and with a reactive media policy.

Traditionally, there have been very stable and fixed relations between the political system and the media system. The party press system, with different newspapers representing different political views and diverging societal interests, guaranteed external pluralism in print media during the twentieth century (Nord, 2001; Høyer, 2005). The public service broadcasting system in radio and television contributed to this picture, when introduced in 1924 and 1956 respectively, by offering internal pluralism in programmes based upon the concepts of objective and non-partisan reporting about political events (Hadenius, 1998).

Today, Swedish journalists are highly professionalised, and the country has a developed and institutionalised system for self-regulation as well as state regulations regarding, for example, the public service media, impartial and neutral programming in broadcast media, programming for children, and media subsidies for companies with weak market positions or operations in areas with low media presence (Weibull & Wadbring, 2020). As was the case for the previous Media for Democracy (MDM) report (von Krogh & Nord, 2011), Sweden still has no law against limiting media ownership despite many political suggestions in this area. Thus far, the problems associated with implementing such a law effectively have stopped the process. Besides the legal system, with its strong constitutional protection for freedom of information and freedom of speech, Sweden is characterised by a system of institutionalised self-regulation in the print market (cf. Hallin & Mancini, 2004). The Swedish Press Council, founded in 1916, was part of this corporatist structure. Although the Swedish Press Council was not affiliated with the government, changes to make it more accountable to the public were encouraged by the parliament. The council made decisions concerning media ethics issues in public and also published regular reports with considerations and explanations regarding its policy positions (von Krogh, 2016). In 2020, the council changed its name to the Swedish Media Council and broadened its scope to include radio and television.

The party press system in the print media (including the press subsidy system) and the public service broadcast media were undoubtedly the core concepts of Swedish media policy during the 1950–2000 period. However, they have become less important as established media policy models have been challenged

by digital media technology developments, the rise of social media and dramatically changing media use patterns (Nord, 2008; SOU, 2016b).

In recent decades, the Swedish media landscape has undergone substantial changes. Newspapers, particularly on local and regional levels, face huge economic difficulties due to losses in readership and advertising revenues that have moved to global actors. Between 2008 and 2018, commercial media in Sweden lost one-third of its advertising revenue (Newman et al., 2019). Recent years have also seen unexpected media mergers, with the biggest private player, Bonnier, re-entering the local newspaper market after nine years of absence. Newspaper ownership concentration is higher than ever, the number of journalists is declining, and more editorial offices in rural areas are closing down (Truedson, 2019). Public service radio and television still hold relatively strong market positions but are increasingly questioned politically, both for their online activities, which are perceived as market distortions that undermine private media's profitability, and for not being impartial in their coverage of current events. Trust in public service media has become increasingly politically polarised with high trust in the middle and the left side of the political spectrum, and declining trust on the right side (Andersson, 2019).

However, the most significant media trend in Sweden is digital transformation. Online and mobile platforms have, to a large extent, supplemented and replaced print and broadcast media in a country where broadband penetration is 97 per cent today and expected to be 100 per cent by 2025. 70 per cent of the Swedish population now access news via smartphones, and 27 per cent pay for online news (Newman et al., 2019). The digital media infrastructure encourages more fragmented media consumption patterns, with social media playing a more important role than ever, also as a news provider. However, media habits vary strongly between generations and also between socioeconomic backgrounds (Nord et al., 2019). The mass media era where media offered everything for everyone has thus developed into a segmented media era where everyone puts together their own media diet, mainly based on personal interests and tastes.

Covid-19

From the middle of March 2020, public health authorities confirmed general diffusion of coronavirus in specific areas in Sweden. The government soon imposed restrictions on travelling and public meetings with more than 50 people. However, compulsory schools and nurseries remained open. The Swedish model deviated from other countries and was perceived as softer, and based more on recommendations and individual responsibilities. At the time of writing, death rates per capita have been high in comparison with neighbouring countries, and protection of the elderly has been particularly unsuccessful.

As normally is the case during crises, news media consumption in Sweden generally increased during the Covid-19 pandemic. The topic of the pandemic dominated the news media agenda completely as a major event of great importance for society and with huge implications for every single individual. The most significant change in traditional media use was observed among younger people, aged 15–24, where the share of daily news consumers increased from 49 to 59 per cent during Spring 2020 (Holmberg, 2020).

The Covid-19 crisis hit the media industry badly, and the loss of advertising revenues was particularly heavy in regional print media. The government announced two economic aid packages for news media. In April 2020, the existing media subsidy system was expanded, with approximately EUR 20 million per year for print newspapers to cover distribution costs and journalism in insufficiently covered geographic areas. One month later, the package was followed up by an extra amount of approximately EUR 50 million available for all types of news media facing economic difficulties due to the pandemic.

Leading news media sample

The data for the MDM 2021 edition is based on media statistics and some assessments concerning the general media situation, while the interviews relate to three national and two regional media outlets. Media selection was based on balancing private and public media, leading national and regional media, and including both reporters and editors. The interviews were conducted between November 2019 and January 2020 and included the media professionals presented in Table 1.

Table 1 *Leading news media sample*

	Media type	Ownership	Interviewees
Aftonbladet	Daily tabloid, print & net	Schibsted	Associate editor; Reporter
Dagens Nyheter	Daily morning paper, print & net	Bonnier	Managing editor; Reporter
Sveriges Television (SVT)	National television	Public service	Deputy director; Reporter
Bonnier Local News	Regional daily, print & net	Bonnier	Editor-in-chief
Sveriges Radio	Regional radio station	Public service	Reporter
Journalist's Union	–	–	Chair person

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

The media landscape has become more crowded and competitive.

IN 2011
3 POINTS

The Swedish population is concentrated in the southern part of the country, while only one of its ten million people live in the much more sparsely populated northern part. However, the supply of news media is satisfactory wherever people live. Newspapers are distributed all over the country, broadcast media reach all regions, and most households have access to broadband and smartphones for digital news consumption.

During the last few decades, the Swedish media landscape has become highly digitalised and undergone considerable changes, with commercial radio and television channels, free tabloid newspapers, hyperlocal media, and various social media platforms being introduced (Weibull & Wadbring, 2020). The digital media landscape can be described as more competitive and crowded, and the supply of diverse media channels has increased significantly. But at the same time, media ownership became more concentrated, and the number of journalists and newsrooms decreased (Truedson, 2019). The free tabloid *Metro* is no longer operating in Sweden, and the commercial television channel TV4 has closed its local news departments.

As was the case a decade ago (see von Krogh & Nord, 2011), Swedish daily newspapers are still available for subscription all over the country, and evening tabloids are sold everywhere. Traditionally, local and regional newspapers have relatively strong market positions and cover all parts of Sweden. In 2015, 164 dailies existed in Sweden and 70 of them were published five days a week or more (Harrie, 2018). The newspaper market is rather stable in terms of the number of titles (see Table 2). One explanation for this is the state press subsidy system that has existed in Sweden since 1971. The system supports newspapers with a weak market position in order to keep them in the market, and in 2019, it was supplemented by new platform-neutral subsidies to media companies operating in areas without previous local journalism.

Table 2 Newspaper titles in Sweden, 2010–2018

Publication frequency	2010	2015	2018
6–7 days a week	70	66	63
5 days a week	4	4	4
3–4 days a week	18	20	19
1–2 days a week	69	69	56
Total	161	159	142

Source: Nordicom Media Statistics, 2021

The latest decade has also seen continued increased competition between broadcast media. In 2019, there were 30 public service radio stations (4 national and 26 local), 38 commercial radio stations (3 national and 35 local), and 139 community radio stations. The same year, there were 5 public service television channels and 36 Swedish private television channels available to the audience (Facht & Ohlsson, 2019). Since the introduction of the Internet, the boundaries of both radio and television have become increasingly unclear.

The movement from traditional to digital media is happening at a rapid pace. In 2019, 92 per cent of Swedes had a smartphone and 70 per cent had a tablet (Internetstiftelsen, 2019). Internet infrastructure is well developed, and broadband connections are now available for the majority of Swedish households. All national news media and all leading regional media offer online and mobile news services, as do international news media and global platform companies.

(F2) Patterns of news media use (consumption of news) 2 POINTS

News consumption has lessened and become more fragmented.

IN 2011
3 POINTS

Even if news media is available all over Sweden, it tends to reach people to a lesser extent than before. News is consumed regularly by segments of the population, but overall figures of news consumption are declining. As shown by data from *Reuters Institute Digital News Report*, 22 per cent of Swedish media consumers consider themselves news avoiders and actively stay away from news often or sometimes (Newman et al., 2019).

The *Reuters Institute Digital News Report* also indicates that peoples' general use of specific media as a news source is going down. Traditional media like print newspapers have seen a decline between 2016 and 2019, going from 43 per cent of the population saying they use newspapers as a news source to 30 per cent. During the same period, television figures have dropped from 72 to 67 per cent and the trend is the same for social media, where numbers

have decreased from 56 per cent in 2016 to 46 per cent in 2019 (Newman et al., 2019). The decline of social media news use is partly a result of changed Facebook algorithms, and partly an effect of regional news media focusing more on their own websites.

News consumption patterns have changed, and the most remarkable trend in recent years is that tabloids have a much larger digital audience compared with their print versions. Radio and television news still reach more people in broadcast formats, while local and regional newspapers have about the same reach in print and digital versions (see Table 3). A huge majority of Swedish digital news consumers (70%) access news on smartphones, which is one of the highest figures in the *Reuters Institute Digital News Report* (Newman et al., 2019).

Table 3 News media reach of top brands

Media	Type	Weekly usage (%)
SVT News	Public TV	56 (offline) 31 (online)
TV4 News	Private TV	49 (offline) 18 (online)
SR News	Public radio	36 (offline)
Regional or local newspaper	–	22 (offline) 16 (online)
Aftonbladet	Tabloid	15 (offline) 45 (online)
Expressen	Tabloid	34 (online)

Source: Newman et al., 2019

These results are confirmed to a large extent by national surveys of media use in Sweden. They also show great differences in generational media use, as young people (aged 16–29) have social media as their main news source. 69 per cent in this age category regularly consume news on social media platforms, compared with 16 per cent of social media users among senior citizens. Even if there have always been age-based differences in news consumption, the contemporary generational digital divide based on social media use is remarkable (Andersson, 2019).

The above-mentioned trends confirm an ongoing transformation of media usage patterns in Sweden. The overall decline in news consumption and the increased gaps between younger and older audiences are the main reasons for lowering the grade of this indicator from three in 2011 to two a decade later.

(F3) Diversity of news sources

2 POINTS

IN 2011
2 POINTS

There is an increased understanding of the importance of diversity of news sources, but elite dominance persists.

As in most other countries, powerful interests in society, representing political and economic elite groups, generally seem to be over-represented in the news. Systematic content analyses of Swedish news media during recent decades confirm this. Even if the total number of sources seems to have increased, journalists tend to rely on the same sources to a large extent (see Table 4). Politicians, experts, and spokespersons for companies and organisations dominate the news and journalists themselves also appear more frequently as experts commenting on current events, but over time, citizens have been the most frequent source category in regional news (Nygren, 2019).

Table 4 Most frequent sources in regional news (per cent)

	2007	2014	2018
Citizens	15	17	18
Public officials	15	9	14
Politicians	9	10	12
Experts	5	5	7
Public relations, spokespersons	2	3	4

Comments: Data based on content analysis of 4,809–5,631 news items from media in four selected regions.

Source: Nygren, 2019

This is confirmed by interviews with representatives of leading national media outlets. Editors and journalists are generally sceptical towards public relations material and try to find alternative frames for news stories. The diversity of sources is also positively associated with more resources spent on investigative journalism in both public service and private media.

There are policy documents with guidelines promoting diversity in most newsrooms. However, in daily work and stressful news situations, these principles are not always followed, and easily accessible elite sources are used more frequently. On the other hand, interviews show that concerns over the division between city and countryside have increased over the last years and resulted in editorial initiatives.

(F4) Internal rules for practice of newsroom democracy 2 POINTS

Journalists have influence on editorial matters.

IN 2011
2 POINTS

The Swedish Constitution places all legal responsibility for newspaper content in the hands of the editor-in-chief, who is appointed by the owner, under the press laws. It is always the editor-in-chief who pays fines or goes to jail if editorial content is deemed illegal by a court of law. This is thought to make it more difficult for external forces to intimidate reporters. The situation remains largely the same as it was a decade ago (see von Krogh & Nord, 2011), with editors-in-chief appointed by the owners and the board of the newspaper. The same general rules in these processes are applied to broadcast media. Hence, no newsrooms in Sweden have internal rules for electing their editor-in-chief, and the debate on conditions for quality journalism in Sweden has never centred on the issue of newsroom democracy.

However, the lack of influence from journalists regarding the appointment of editor-in-chief does not mean they lack influence on other editorial matters. Daily news selection and news value processes are transparent, and the framing of political issues is openly discussed in the newsrooms. National media interviews indicate a mixture of ways to enhance impartiality and quality in framing and reporting political issues.

(F5) Company rules against *internal* influence on newsroom/editorial staff 2 POINTS

IN 2011
2 POINTS

The management and the newsroom are separate most of the time.

According to the Swedish Constitution and its Freedom of the Press Act, the owner has no right to interfere with editorial content. Only the person filed as responsible according to the press law, the editor-in-chief, has that right. If the owner wishes to decide editorial content, they must fire the responsible person and appoint a new editor-in-chief.

Interviews with leading news media representatives indicate that management, sales departments, and newsrooms are separated most of the time. This is particularly true for public service media, but private media also refers to restrictive internal rules in this matter and underlines the division between journalism and business. At the same time, some editors admit that increased market competition and economic pressure have led to less distinct boundaries between news and advertisements. In most cases where cooperation between commercial and editorial departments exists, it is conducted more subtly, as the issue of market influence on news content is still highly controversial. The Journalists' Union is worried about such issues in some news organisations.

(F6) Company rules against *external* influence on newsroom/editorial staff

3 POINTS

IN 2011
3 POINTS

There is less external pressure as subscriptions are becoming the single most important revenue source.

External influence on newsrooms and editorial staff has typically been considered a minor problem in Sweden. Public service media charters and organisational structures minimise the risk of direct political interference in news production. Sponsorship in public television is strictly regulated, with a limit on the number of yearly events that can be sponsored. In commercial television, rising revenues might be hidden in product placements by external production companies.

In print media, the editor-in-chief has a strong position according to press laws. Newspapers generally have no formal links to political parties, and political opinions are expressed only on editorial and debate pages.

Commercial pressure from large advertisers sometimes exists but is not common, neither on national nor local levels. It is also important to note that overall revenue patterns have changed for private media companies. Morning newspapers used to rely heavily on advertisement revenues, but now receive most of their income from subscriptions. In 2017, reports from the Swedish Newspapers' Association showed that 55 per cent of newspapers' average revenue came from subscriptions. This development also makes private media less sensitive to pressure from advertisers.

(F7) Procedures on news selection and news processing

3 POINTS

IN 2011
3 POINTS

Newsroom practices are in line with formal rules.

News policy documents exist in most newsrooms, often developed during editorial conferences and workshops and well known among the editorial staff. They play a significant role and are often referred to when journalists discuss the diversity of voices and framing of news stories during daily news conferences.

Internal debates about news selection and news processing take place regularly, and previous news decisions may be openly criticised in the newsroom. Even though policy documents are important as guidelines and recommendations for newsroom work, professional perceptions of newsworthiness are still the single most decisive factor in the news production process. Final news decisions are often based on editorial routines and taken by news editors, but the individual journalist often has space for negotiations about how to develop the news story and has great freedom to decide the framing of the story and the main sources to rely on (Ghersetti, 2012).

Most newsrooms strive to combine weekly or monthly planning, allowing for spontaneous initiatives and investigative reporting according to policies, with the important political events of the day, emerging themes in social media, and suggestions from specialised reporters within the newsroom.

(F8) Rules and practices on internal gender equality 3 POINTS

There are more women in top positions and newsrooms.

In a country where almost all leading politicians declare themselves as feminist, it is hardly surprising to find several women in top media positions. For example, in 2020, all three public service companies had a female director and two of four national newspapers based in Stockholm had a female editor-in-chief. Generally speaking, employment conditions are equal between men and women in the media sector, including equal pay for equal work.

Data on journalists' salaries shows that differences still exist between pay for men and women. These differences are mainly explained by the previous domination of men in the profession, and the fact that more experience as a journalist is normally linked to a higher salary. Gradually, more women are working in newsrooms, and journalist education programmes at the university level in Sweden are nowadays also dominated by female students. Interviews show that the biggest news organisations have special programmes to increase the number of women in leading positions.

(F9) Gender equality in media content 2 POINTS

The accepted principles are not always practised.

Gender equality is a basic principle in most news policy documents and is respected in daily routines. A significant change in recent years is the increased number of female sources in the news. In the mid-1990s, about 23 per cent of sources in leading news media were women. In 2018, the share of female sources had increased to 40 per cent. One possible reason is that there are more women in elite positions in Swedish society today, but there are also indicators of growing awareness of source diversity in newsrooms (Nygren, 2019). Several national newsrooms use gender metrics of their published editorial content as an instrument for change, and some even use software where reporters can check their content before publication.

Even if gender equality in media has improved over time and is generally accepted in newsroom work, these principles are not always easy to follow in

dramatic news situations, where easy access to established sources and spokespersons often prove to be more important than strict gender principles.

(F10) Misinformation and digital platforms
(alias social media)

2 POINTS

Doubtful information is usually checked.

Newsrooms are generally aware of the risks of misinformation and information coming from social media platforms and regularly discuss these problems. Even though there are no specially trained experts in place, leading news media maintain professional journalistic values such as fact-checking and getting information on news stories from various sources. However, voluminous and continuous information flows, time pressure, and limited editorial resources, particularly in regional media, make efficient checking of doubtful information difficult. Our interviews show that some newsrooms are pressing for more advanced artificial intelligence initiatives to tackle this problem.

While daily fact-checking procedures are not always working well, leading news media have been successful with single fact-checking initiatives. For example, during the latest election campaign, political statements and arguments were thoroughly scrutinised.

(F11) Protection of journalists against (online) harassment 3 POINTS

In the face of increasing harassment, there is now better security for all staff.

Sweden, like many other countries, reports increasing cases where journalists are threatened or harassed. Leading politicians have declared that such actions should be perceived as threats to democracy and free media. Significant steps to protect journalists have also been taken by news media companies, who provide full and unlimited legal support for their journalists.

The public service company SVT has established a special cybersecurity team to counter attacks against individual reporters and the work they produce. Some 35 cases per day are handled, including hate-mail, digital and physical threats, and acts of violence. Cases are reported to the police, and security consultants provide protection to reporters and their families. In some instances, newsrooms have been evacuated after threats. The financial cost for security measures has quadrupled over the last five years. On the company level, cyberattacks and political attacks from other countries have been directed against investigative reporting on money laundering in the eastern parts of Europe and against reporting on human rights in China (Stjärne, 2020).

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 2 POINTS

The previously existing oligopoly situation continues to be in place.

IN 2011
2 POINTS

Sweden has no law against media ownership concentration. In the newspapers market, there are three dominant players: Bonnier (*Dagens Nyheter*, *Expressen*, *Sydsvenskan*, *Mittmedia*), Schibsted (*Aftonbladet*, *Svenska Dagbladet*), and Polaris (*Göteborgs-Posten* and regional newspapers). Bonnier is the biggest owner group, and its business interests have expanded significantly in other parts of the country outside Stockholm. However, there is intense market competition between print and digital newspapers from different owner groups, both between national morning dailies and between national tabloids. Overall figures show gradually increasing owner concentration in the newspaper market (see Table 5).

Table 5 Owner concentration in the newspaper market (per cent of total circulation)

	1997	2003	2007	2010	2013	2015
Three biggest owners	40	45	58	59	55	62

Comments: Table shows newspapers published three times a week or more.

Source: Nordicom Media Statistics, 2021

The national radio market is traditionally dominated by public service radio, even though a few national private radio stations have been established in recent years. The national television market has four dominant players: Sveriges Television, SVT (public service); Telia (TV4 AB); Nent (Nordic Entertainment Group); and Discovery. They control a major part of the television market in terms of audience market shares (see Table 6).

Table 6 Owner concentration in the television market (per cent of audience market shares)

	1997	2005	2017	2018
Three biggest owners	88	80	82	82

Source: Nordicom Media Statistics, 2021

To conclude, levels of owner concentration on the national level are relatively high in most media sectors in Sweden. Still, national newspapers, radio stations, and television companies face competition, and alternative news sources are available for the audience.

(E2) Media ownership concentration regional (local) level 2 POINTS

Regional media empires have emerged.

IN 2011
2 POINTS

Fundamental structural changes have taken place in regional media markets in recent years. In 2019, the biggest national media owner Bonnier and Norwegian media company Amedia bought Mittmedia with its 28 local newspapers. Later in the same year, another Norwegian media consortium, Polaris, became the main owner of Stampen, the leading newspaper company in the Gothenburg region. Finally, Bonnier and Amedia also took over Hall Media in February 2020. Sweden is now strictly geographically divided between a few media owner groups, and the trend is definitely moving towards increased concentration. True competitive regional media markets are very rare, and only a limited number of newspapers do not belong to one of the main media owner groups. In 2017, the three biggest regional newspaper owners' share of the total circulation of daily regional newspapers was 51 per cent.

Private regional newspapers' main competitors are regional public service media. Regional public service radio offers 26 regional stations and 21 versions of regional television news are produced by 34 editorial offices all over the country. In 2015, the public broadcaster SVT opened four new editorial offices. The fourth public service radio channel, P4, is dominated by regional news and programmes. Regional television news is not offered on separate television channels but appears in regional news windows on the national channels. Public service broadcast media are the only regional and local news providers in radio and television. In 2014, the commercial competitor TV4 decided to close down its local television stations for economic reasons.

Overall, media ownership concentration has increased during the recent decade, and this development is more prominent regionally than on a national level. Despite this trend, most relevant regions in Sweden still have a competitive regional media market with both private media companies and public service media present.

(E3) Diversity of news formats 3 POINTS

There is an abundance of news formats of different types.

IN 2011
3 POINTS

Diverse news formats are available to the audience, both in traditional media and on digital media platforms. News is available at any time on the Internet and teletext. Public service radio newscasts are updated every hour of the day. Digital news is updated continuously, and a wide range of news formats are also offered on mobile devices. Traditional news reporting is supplemented by news podcasts, video play formats, and social media news feeds. News also appears

in weekly news magazines and freesheets. Radio and television produce daily news follow-up programmes and important news events are often covered live on radio, or on digital platforms.

Journalistic work is increasingly influenced by the variety of publishing platforms, and journalists on regional and local levels normally produce news material for different formats when reporting on current events.

(E4) Minority / Alternative media

2 POINTS

Minority and alternative media reach a limited audience.

IN 2011
1 POINT

Sweden is increasingly becoming a multicultural society and has received more immigrants per capita than most other European countries. In 2019, 19 per cent of the population was born outside Sweden. However, media content largely does not reflect these minorities, and they are not particularly well represented in the news. Journalists and editors are mainly ethnic Swedes and news consumption is generally lower among immigrant groups – a situation similar to what it was a decade ago (see von Krogh & Nord, 2011).

Public service media are obliged to provide content for ethnic minorities in Finnish, Sámi, Meänkieli, and Romani Chib. Programmes in immigrant languages like Arabic, Kurdish, Persian, and Somali are offered by public service radio on regular basis, and newspapers published in these languages may receive state subsidies for production and distribution. However, the supply of regular news is still relatively limited in suburban areas where many immigrants live.

The alternative media scene has become slightly more important in recent years. In Sweden, alternative media are mostly found on the far-right, and they have positioned themselves as alternatives for those who do not find legacy news media credible. *Fria Tider*, *Nyheter Idag*, and *Samhällsnytt* are the three most widely consumed, each reaching around one-tenth of the Swedish online population every week (Newman et al., 2019).

(E5) Affordable public and private news media

2 POINTS

Media spending is dominated by non-news media.

IN 2011
3 POINTS

Generally speaking, prices for newspapers, broadcast media, and the Internet are reasonable, as Sweden is a comparably rich country. Comparisons with other countries also show that Swedes are generally more willing to pay for news on digital platforms.

The change from licence fees to the tax system means that every individual now pays a maximum of EUR 130 for public service media every year. Prices

for print newspaper subscriptions have risen significantly, and the number of subscriptions for print newspapers has declined. In 2017, for the first time, the majority of Swedish households did not have a newspaper subscription, not even a digital one (Facht & Ohlsson, 2019).

Statistics show that Swedish households' overall costs for media use are now dominated by digital media, broadband connections, and mobile communications. At the same time, money spent on news media consumption has declined (see Table 7). During the period between 2014 and 2018, households' average total costs for media use increased from circa EUR 1,658 per year to circa EUR 1,966. The rise in costs was dominated by access costs (subscriptions) and video (streaming, pay-TV). During the same period, households' average costs for news media decreased from about EUR 170 per year to about EUR 157 (MPRT, 2019).

Table 7 Households' media costs per year (EUR)

	2014	2018
Access costs	609	775
Streaming	551	642
News media	170	157
Total costs	1,685	1,966

Comments: Examples of access costs are broadband connection, pay-TV, and mobile fee. News media costs include public service tax and fee, and newspaper subscriptions, both for print and digital versions. Approximate calculation of costs from SEK to EUR.

Source: MPRT, 2019

So, even if a majority of Swedish individuals and households still find single news media affordable in relation to their incomes, increasing media costs related to digital media technology have affected media budgets, and less money is now spent on news media than before.

(E6) Content monitoring instruments

1 POINT

Content monitoring is done occasionally.

IN 2011
1 POINT

There is no permanent independent monitoring institution, but content analyses are conducted on an irregular basis by research institutes, universities, and private companies. Specific events, such as election campaigns or crises, are more often analysed than ordinary news situations. Media coverage during election campaigns has been systematically checked since 1979, with a particular focus

on the political neutrality of news media (Asp & Bjerling, 2014). Besides these, there is no effective and publicly available monitoring instrument.

(E7) Code of ethics at the national level

3 POINTS

The code of ethics is implemented and frequently used.

IN 2011
3 POINTS

A code of ethics for leading national news media has existed for more than 100 years and has been regularly discussed and updated. The code of ethics is issued by the Media Administration Agency, which is an umbrella organisation for the main publishers' associations and the journalists' union. The code of ethics is well known in the newsrooms and often referred to in the debate on media performance.

Sweden also has many specialised journalists' associations for different purposes, such as investigative journalism, environmental journalism, science reporting, and so forth, that discuss ethical issues within these sectors. Interviews at the national and regional levels verify the importance attached to the recommendations made in the national code of ethics. The increase in live reporting of breaking news on the Internet has led to in-house training programmes of what the code implies for on-air decision-making for a wider group of reporters and editors. Interviews also reveal that links to the code are used by reporters to inform their sources of their rights.

(E8) Level of self-regulation

3 POINTS

Self-regulation instruments are in place.

IN 2011
2 POINTS

The first Press Council was established in 1916. It was restructured after political pressure in 1969 when members of the public were included in the council, a national press ombudsperson was added, and economic sanctions were introduced against erring newspaper organisations. In 2020, both institutions were replaced by The Media Council and The Media Ombudsman, as broadcast media were also included in the self-regulation system along with print and digital publications. The Media Ombudsman is an independent self-disciplinary body that facilitates complaints from the public and selects cases to bring to The Media Council (Media Ombudsman & Media Council, 2021). The council then decides whether or not the media outlet deserves the blame. The code of ethics includes referral to democratic values and rights of reply. The journalists' union has a committee that can sanction members for unethical behaviour, but in practice – and as was the case in 2011 as well (see von Krogh & Nord, 2011) – it rarely does.

The Publicists' Club, which is a member of the umbrella organisation the Press Cooperation Committee, upholds a continuous function of self-criticism with regular panels and debates on critical media matters. Top editors at leading national news media regularly comment upon current publicity debates and publishing decisions taken by them.

The self-regulation system is frequently under debate in Sweden, but has hitherto shown its strength and is generally respected by media companies. The system can't be described as completely decisive for daily newsroom work, but it is occasionally used when principles for news selection and publishing criteria are discussed. The system was tested in 2017 when the threshold for publishing rumours and allegations of sexual harassment was lowered during the #metoo movement. 38 complaints were handled by The Media Council and 24 of them were approved, all criticising newsrooms for lack of reporting and substantiation. The current ombudsperson for the media has toured newsrooms in Sweden discussing the #metoo cases.

(E9) Participation

2 POINTS

IN 2011
2 POINTS

Participation is only sometimes welcome.

In theory, most editors and journalists are in favour of increased citizen participation in newsrooms, as this strengthens connections between news media and their audiences. In the first years of the digital revolution, most news media also opened up for readers' comments on news stories and argued that there was great value in an ongoing discussion with the public on news published.

This has changed significantly in recent years, as commentary fields often tended to be dominated by extreme, often far-right, opinions not in line with ethical publication principles. The resources required for editorial monitoring of commentary fields have resulted in more restricted policies for citizen participation in general. However, leading news media may open up for commentaries on carefully selected – and less controversial – topics, and there is still a huge demand for amateur pictures or videos from eyewitnesses at accidents or dramatic events.

Generally speaking, the main reasons given for user participation are democratic values, more perspectives, more value for readers in online forums discussing the relevance of news, and possibilities to develop new forms and formats of journalism. On the other hand, user participation is perceived as costly to monitor and with a lower level of quality than professional journalism.

Several newsrooms provide live chats with their audiences on current topics, use external firms for moderating comments with support of artificial intelligence, and monitor their audiences' news preferences on social media platforms.

(E10) Rules and practices on internal pluralism

2 POINTS

There are no formal rules, but a regular debate is ongoing.

IN 2011
2 POINTS

Internal pluralism is considered important in both national and regional newsrooms. The homogeneity of newsrooms in terms of age and ethnicity is regarded as a problem in most media companies, and various strategies have been implemented to counter this. There are no standardised procedures to promote internal pluralism, but the topic is discussed in various forms. Some examples are internal monitoring, internal goals, targeted recruiting, special online projects, workgroups with representatives from newsroom management and the journalists' union, daily and weekly newsroom debates, and encouraging online participation of special groups and interests.

Interviews indicate that top editors are concerned with the broad overall picture of Sweden that their newsroom is presenting, thinking about issues such as how much content is relevant only to an educated middle class in the bigger cities. Reporters say they are concerned with finding a more diverse group of expert sources to interview.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog "control of the controllers"

2 POINTS

Media performance is often discussed.

IN 2011
2 POINTS

Media coverage of major news events is often discussed in public and followed up in news commentaries in the press or in debate shows on radio and television. Public service radio, Sveriges Radio, produces a daily show on current topics, including discussions of media performance and a weekly show dedicated solely to media matters, *Medierna* [*The Media*]. Specific media critique is also offered on websites by media bloggers, and in podcasts about journalism. Private and state-financed institutes publish books on media performance based on investigative journalism and academic research and arrange public seminars or debates to discuss the findings. The Publicists' Club holds monthly live-streamed debates on current media and journalistic issues, and the current media ombudsperson, Ola Sigvardsson, is an active participant in the general debate on media ethics and media performance on his blog, op-ed pages, public service shows, and the union magazine *Journalisten's* podcast.

Even though the "control of the controllers" takes place in diverse fora, it is difficult to articulate a permanent debate on media watchdog functions,

although there are indications of top editors' growing awareness of potential scrutiny in *Medierna* on Sveriges Radio (Rosenvinge, 2019). Discussions can be very intense, but they often occur outside any specific organisational setting. Furthermore, debates generally only include media professionals, academics, and other elite groups. Media critique that engages a wider public is rare, and when it happens, it is most often politically biased, and less focused on the democratic role of news media. Some exceptions to this are increasing awareness of blind spots in local journalism and social media influence on #metoo reporting in general news media.

(C2) Independence of the news media from powerholders

3 POINTS

IN 2011
3 POINTS

The independence of private and public news media is well protected from powerholders.

The Swedish Freedom of Information Act generally forbids journalists from revealing their sources and forbids authorities from searching for sources who have given secret material to media for publication purposes. As previously noted, journalists are also not sentenced by law for offensive publications, and only the editor-in-chief is responsible by law. There are exceptions, but these deal not with content, but with conduct while gathering information. For instance, journalists can be prosecuted for posing as officials or for trespassing on private property. Overall, legal instruments work well and private news media have good protection from influential power groups in society.

Public service media have clauses in their charters to publish news items that are factual and impartial, and powerholders in society (which includes the state itself) are to be scrutinised. The only imposed partialities concern defending democracy and human rights. The financing of public service media is decided in periods of six years at a time. An arm's length principle is the norm to establish a certain distance between the government or parliament and the public broadcasters. The government appoints a committee, which in turn appoints board members of the different public broadcasters of radio, education, and television.

The recent (2019) transformation of the financing model of public service media from licence fee system to tax system has the potential to increase state influence. However, public service financing is not directly included in the negotiated state budget decided every year, but technically administrated in another way. Of course, all models of public financing include possible risks for state interventions and political pressure at different stages of the decision-making process.

(C3) Transparency of data on leading news media

2 POINTS

Information is easily available online.

IN 2011
2 POINTS

Government inquiries on private and public media are regularly conducted by parliamentary committees, expert groups, and public servants. Their conclusions on media policy and the data they base their conclusions on are published on governmental websites. The latest news media inquiry was completed in 2016 (SOU, 2016b), and the latest public service media inquiry in 2018 (SOU, 2018: 50).

News media ownership information is not very easy to find. The academic research institution Nordicom at the University of Gothenburg publishes regular reports on the media, including the ownership structure, that are available for download. Ownership information is not widely spread among the population. The rapid transformation of the media landscape and the increased ownership concentration in regional media markets in recent years is briefly on the agenda but hardly reported on a more regular basis.

The newspapers in our sample do not print information about their owners in every issue. Their websites, however, contain information on, for instance, owners, circulation, finances, and editorial policies. The public service websites include information on management, financing, and government relations.

(C4) Journalism professionalism

3 POINTS

There is a high degree of professionalisation.

IN 2011
3 POINTS

According to national surveys among Swedish journalists, a huge majority strongly endorse the professional goals of independent scrutinising of power-holders, gathering and distributing information to citizens to inform decisions in a democracy and giving a voice to the voiceless. The figures are high from a comparative perspective (Strömbäck et al., 2012).

According to national interviews, investigative reporting is considered the top priority in leading news organisations. Professional and democratic aspirations are accompanied by a commercial interest in reader revenues. The journalists' union stressed the increased workload of journalists when newsrooms are downsized and expressed concern about the professional identity of those who combine journalistic freelance work or short-term employments with other kinds of communication and information occupations. The union monitors native advertising and issues warnings when professional conduct may be threatened.

In the regional interviews, media representatives said that investigative journalism remains poorly developed, with no regional media having journalists or routines designed for investigative journalism. When such journalism

does occur, it is more likely to be the result of ad hoc decisions than of long-term editorial planning – similar to the situation in 2011 (see von Krogh & Nord, 2011). Analyses of regional media newsroom practices have even been referred to as a possible de-professionalisation of journalism on the regional level (Nygren, 2008).

Leading national news media in Sweden must be considered highly professional and with sufficient and sustainable resources to maintain basic democratic functions, including independent investigative journalism.

(C5) Journalists' job security

2 POINTS

Conditions are good but there are fewer permanent positions.

IN 2011
2 POINTS

Permanently employed journalists have pretty stable job security, but the number of temporarily employed persons is increasing. Staffing agencies for journalists have become more common, as has the use of freelance journalists.

Swedish labour laws protect employees from being dismissed for their personal convictions. The Journalists' Union argues for less short-term employments to protect members' financial situation, but also to foster a more secure work atmosphere with healthy opposition and debate on journalistic issues. The journalists' union estimates that staffing agencies' share of the workforce has been somewhat reduced, but is still considered a problem.

(C6) Practice of access to information

3 POINTS

Old traditions still work.

IN 2011
3 POINTS

Sweden has a very old tradition of open government, and the default status for governmental documents since 1766 is public. They are open to anyone, not just to journalists, although journalists are more experienced than ordinary citizens in gathering and using public documents. During the past 50 years, secrecy clauses have become increasingly common in legislation. The motives for this are said to be privacy concerns due to the openness of digital documentation, protection of personal integrity, and protection of commercial and state interests.

Swedish citizens and journalists still have very good access to most kinds of governmental documents. Some cases have been reported when government officials have not documented their decisions in writing in order to avoid public scrutiny.

The journalists' union declared that the principle of transparency needed to be continuously defended. Interviews with reporters revealed differences

between state agencies and problems in gathering information when schools go from being public to operating privately.

(C7) The watchdog and the news media's mission statement 3 POINTS
IN 2011
2 POINTS

Watchdog journalism exists where possible.

The watchdog function of the media is present both in written documents and, as previously noted, in the overall rhetoric motivating newsgathering. Few observers in Sweden ascribe any decisive force to the mission statements. They are most important during the process of formulation, but not particularly important in later stages (von Krogh, 2008). None of the regional media studied here has editorial policy documents that explicitly mention the watchdog role (unchanged over ten years; see von Krogh & Nord, 2011), but all leading national news media in the sample refer to it and exercise it.

Generally speaking, news media tend to focus on audience-oriented news and on providing people with important and interesting news. Such statements may implicitly include investigative journalism and an active watchdog role, but this is not very often explicitly mentioned in mission statements. One could argue that the tradition of highly professionalised journalism in Sweden makes it less natural to specifically highlight in statements what is more or less commonly expected from news media performances.

National interviews with reporters and editors show that rather than a one-way traffic from words in a mission statement to practices in the newsroom, the growing amount of investigative reporting has also been reflected in policy documents under the label of agenda-setting reporting.

(C8) Professional training 2 POINTS
IN 2011
2 POINTS

The idea of training is applauded, but not practised often.

The benefits of further professional training for journalists are widely acknowledged by both employers and employees. There is also a special government-financed institute for further education of journalists in the south of Sweden, Fojo. This institute most often commonly offers week-long courses at no charge, and journalists keep their salaries during the course period. In addition, there are many funds to which journalists can apply for scholarships for further education.

Public service media companies have their own programmes for in-house training. Some national newspapers underline the possibilities for on-the-spot

training by skilled veterans as news events unfold. Training opportunities for journalists in regional news media companies are less frequent. The journalists' union wishes to see an increase in further education and recommends more cooperation with universities.

National interviews with editors and reporters indicate that growing attention for investigative reporting is also reflected in terms of further education of journalists, as investigative data journalism has top priority.

(C9) Watchdog function and financial resources 3 POINTS

There are increased differences between national and regional or local media.

IN 2011
2 POINTS

Interviews with editors in leading media organisations led to the unanimous conclusion that investigative reporting is first on their list of priorities. After a period, ten years ago, with a somewhat uncertain perspective on the future for journalism, a new sense of purpose is now visible. Democratic, professional, and commercial values converge with unique reporting on matters of importance to society and democracy to make readers willing to pay for digital news.

Editors in privately owned newsrooms estimate that about 10 per cent of their editorial resources are devoted to investigative reporting. “We pretty much try to give them the software and the time they ask for”, one top editor declared. Interviews with reporters do not contradict this picture. “This is a good time for investigative reporters”, a journalist explained.

The public service broadcaster SVT has a weekly flagship show for investigative journalism called *Uppdrag Granskning* [*Mission Investigation*] that alone counts for 7 per cent of the nationwide company's budget. If the funds for spreading knowledge and practice of investigative methods within the company to specialised parts of the newsroom (sports, culture, economy, environment, etc.) and to some 20 regional newsrooms is included, the share of the budget rises to 20–25 per cent.

Regional privately-owned media house editors show the same enthusiasm and need for investigative reporting, but also admit they are not always able to fulfil their watchdog function in local municipalities due to limited personal and economic resources.

The journalists' union applauded the resources allocated to investigative journalism but criticised the long period of time it took publishers, educated in finance more than journalism, to realise the commercial value of watchdog journalism.

Conclusions

The overall developments of media performance during the last decade show signs of both continuity and change, but leading news media in Sweden still generally meet most democratic criteria in terms of freedom, equality, and control functions. Professional journalism is highly valued and extensively practised, both on national and regional levels. Traditions of openness and transparency remain, and the idea of independent media is widely supported in society.

The most important changes in recent years are mainly explained by the more fragmented media landscape. As a result, news consumption patterns diverge in different segments of the population with increasing gaps between high consumers of news and so-called news avoiders. Swedish households also spend more money on media consumption in general, but the share of costs for news media consumption is declining. Finally, trust in news media has become more politically polarised in recent years, with right-wing populist supporters being more distrustful.

Freedom of information is secure in the Swedish media system. News media cover all areas of Sweden, and news regularly reaches most citizens. The arm's length principle is a cornerstone in relations between public service media and the state, and private media newsrooms are to a very large extent protected from internal and external pressure. Professional journalistic values guide news selection processes and the use of sources in news.

Equality is still achieved in some areas, but increased owner concentration in commercial media markets remains a problem. During the last decade, this process has been most visible on regional media markets which are now dominated by a few key actors, present both on national and regional levels of the media system. Minority groups tend to be less covered by news media.

The watchdog function of the media is considered extremely important by all interviewed editors and journalists in the study. Investigative reporting is highly prioritised in leading national news media, but regional media representatives feel limited by the few resources available for such initiatives. Debates of media performances are relatively frequent, but most of the time they only include media professionals and experts.

To conclude, leading news media in Sweden fulfil their democratic roles to a considerable extent, and the situation has improved slightly over time. When the same criteria were examined in 2011, Sweden received 60 points in total, corresponding to 77 per cent of maximum points. Ten years later, the result is 73 points, corresponding to 81 per cent of the maximum points.

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SWITZERLAND

Highly concentrated leading news media in austerity and downsizing mode

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Introduction

Switzerland, a small, landlocked country in the centre of Europe, enjoys a remarkably long and continuous tradition of independence, stability, and political neutrality. In early 2020, the Switzerland's population was 8.6 million residents, about 25 per cent of which were foreigners. Consequently, one key characteristic of this country is its cultural diversity. There are four official languages – German (primary spoken language of 62% of the population in 2018), French (23%), Italian (8%), and Rhaeto-Romanic (0.5%), which more or less also define the land's four different cultural mentalities. Therefore, issues related to the integration of a big and heterogeneous group of immigrants, and new refugees, often become a controversial topic in the politics of the country. Politically, Switzerland is considered a semi-direct democracy with strong federalism in addition to a high degree of autonomy in its 26 cantons and nearly 2,200 communities.

Freedom in the World 2021: status "free" (Score: 96/100, stable since 2017). In 2020, Switzerland ranked 12th among 210 countries for its political rights and civil liberties (Freedom House, 2021).

Liberal Democracy Index 2020: Switzerland is placed in the Top 10% bracket – rank 5 of measured countries (Varieties of Democracy Institute, 2021).

Freedom of Expression Index 2018: rank 1 of measured countries, up from 4 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 8 of 180 countries, down from 6 in 2019 (Reporters Without Borders, 2020).

The diversified structure of the Swiss society, with its high obligation for civic engagement, has been an important precondition for its differentiated media landscape (Bonfadelli, 2010; Künzler, 2013; Studer et al., 2014; Meier, 2016). It is shaped, on the one hand, by the Swiss Public Broadcasting Corporation SRG SSR, with its radio and television programmes in each of the three language regions (SRG SSR, 2020a) and, on the other, by a regionally based press, dominated by the three biggest publishing houses, the TX Group (former Tamedia AG), the NZZ Mediengruppe, and the newly created CH Media, a joint venture started in 2018 based on a partnership between AZ Medien and NZZ-Regionalmedien with head offices in Aarau. Meanwhile, the private commercial radio and television stations in the country are quite weak and mostly owned by the dominant publishing houses. Interestingly, there was also a merger in 2018, in the background, of Swiss news agency Keystone-SDA – a corporation with stocks by the Swiss media – and the Austrian Press Agency APA, which resulted in 40 job cuts across 150 full-time positions.

The Federal Constitution (FC) of the Swiss Confederation's Article 16 guarantees "freedom of opinion and information", namely of the media. Furthermore, the Constitution prohibits censorship and also guarantees editorial secrecy. Freedom of the press, the ability to gather and publish information and express opinions freely, is traditionally interpreted in Switzerland as protecting the right to establish newspapers or other such media outlets. The independence of the Public Broadcasting Corporation SRG SSR is specifically underlined in the RTVG, the Swiss Radio and Television Act. Swiss television and radio stations have the mandate to reflect and maintain the linguistic and cultural diversity of the country by providing specific programming.

Switzerland's media policy is governed by several national and regional institutions along with other stakeholders, who influence the norms and values of the Swiss media landscape. The Federal Council, the Swiss Parliament, the Federal Department of the Environment, Transportation, Energy and Communication (DETEC), the Federal Office of Communications (OFCOM), and the Independent Complaints Authority for Radio and Television (ICA), play a crucial role in media governance together with political parties, media organisations, and inter-trade organisations like Verband Schweizer Medien [Swiss Media Association] (VSM), who also have a say in governmental media policy strategies. Therefore, the nation's media political debate in the past 20 years has been strongly influenced by questions of press concentration and the future financing of the press, including indirect subsidies for distribution, direct subsidies, and financing, together with cost savings of the Public Broadcasting Corporation SRG SSR.

Covid-19

Switzerland, like all other European countries, was hit by the Covid-19 pandemic in the spring of 2020. As a result, the Federal Office of Public Health (FOPH) quickly launched a large-scale information campaign. For example, through posters and advertisements, as well as online information in more than one dozen languages, strict social distancing rules were implemented. Meanwhile, it was only in August that wearing masks in public transportation was made compulsory for everyone. However, there were still no stringent rules for wearing masks while shopping in stores. As a result, from the start of the pandemic until mid-August 2020, Switzerland remained affected by the Covid-19 crisis with around 38,500 infections and around 1,720 deaths. The effects of Covid-19 were not only limited to patients, but also traders, shopkeepers, and the media industry. The media industry was severely impacted by newspaper bans in restaurants and loss of advertising. The Federal Council, therefore, formulated an emergency package for the media amounting to CHF 30 million by the end of May 2020.

From the beginning, Swiss federal spokesperson and FOPH official Daniel Koch updated the public about the Covid-19 situation almost daily, always in the main news of the public broadcasting corporation SRG SSR. And probably analogous to the rest of Europe, the Covid-19 crisis largely dominated media coverage, prompting an increase in the public's use of news (Mediapulse, 2020). In addition, early on in April 2020 (see Russ-Mohl, 2020), communication scientists in Switzerland like Stephan Russ-Mohl, Vinzenz Wyss, or Otfried Jarren were reasonably critical about the quality of media coverage. Among other things, questions were raised on the lack of transparent reporting, media's handling of figures, the focus on dramatic individual cases and fearmongering, and virologists as infallible media stars.

By the end of July, the first systematic content analysis of 22 leading news media from German- and French-speaking Switzerland in the period from 1 January 2020 to 30 April 2020, based on a representative sample of 1,448 articles from 28,695 articles on the Covid-19 topic, was published by the fög – Forschungszentrum Öffentlichkeit und Gesellschaft [Research Center for the Public Sphere and Society] at the University of Zurich. This concluded that performance of the Swiss media during the pandemic tended to be positive. There was diversity in topics discussed, and expert views were represented; however, dominance of men was observed. While the relevance of reporting was relatively high, a low level of thematic integration was a key shortcoming. Despite critical discussions about the government and authorities as well as a distance of the media from the measures prescribed by the authorities was observed, in some ways the media appeared to have behaved relatively uncritically, especially in the sensitive phase before the shutdown – in the opinion

of the fög – and possible developments were not contextualised enough. In addition, a problematic handling of figures and statistics was revealed, which had already been criticised by Klaus Meier and Vinzenz Wyss. These general findings on media performance differed by media type, with public broadcasting performing particularly well. Tabloid and commuter newspapers, on the other hand, were less diverse in their reporting, according to the fög's analysis, which revealed their tendency to convey bare numbers without classification and largely with an alarmist-dramatising stance in reporting.

From the perspective of media users, Mediapulse AG, which measures usage of television and radio in Switzerland, pointed out in a press release at the beginning of April 2020 that in the first two weeks of shutdown, significantly more people watched television, especially during prime time, and also for longer. Thomas Friemel from the IKMZ – Institute for Communication Science and Media Research at the University of Zurich, and his team, conducted a representative survey of around 1,000 people on information and communication behaviour during the Covid-19 crisis from 19–24 March 2020. According to their findings, the German-Swiss population attributed great relevance to the information both from the Federal Council and the FOPH, and from Swiss television, regarding the Covid-19 crisis. Interpersonal communication also played an important role, for example, via telephone or SMS, whereby social media was classified as not very relevant (see also Hargittai & Nguyen, 2020). From the respondents' point of view, the journalistic media offerings contributed the most with their information for orientation and ordering, and also helped to deal emotionally with the uncertainties during the pandemic. At the beginning of the shutdown, the German-Swiss population felt well or very well informed, and confidence in the Swiss public institutions was very high. Interestingly, a majority – especially the younger demographic – found that the Covid-19 crisis was over-addressed.

The two empirical studies of the situation in Switzerland concluded with good performance of the media, apart from certain shortcomings, and an intensive assessment by the people also evaluated it positively. Good journalism is still important and needed, especially in times of crisis, as the example of the Covid-19 pandemic illustrates (Brost & Pörksen, 2020; see also Sandhu, 2013; Winter & Rösner, 2019).

Leading news media sample

The media indicators for the 2021 Media for Democracy Monitor (MDM) report are based on relevant statistical media data and current scientific findings on the news media landscape in Switzerland (for the previous report, see Meier et al., 2011). Furthermore, eight in-depth interviews were conducted

with leading professional heads and journalists of large publishing houses and the public broadcasting corporation SRG SSR (2020a). These were supplemented by one interview with the representative of the biggest journalists' union and several interviews with other media experts. They provide a more in-depth insight and a clear picture of the media's performance for democracy as well as the everyday routines employed in practice. We decided to focus on the German-speaking part of Switzerland, where the media had its highest audience reach and the largest publishing houses are located. Table 1 outlines the nine media practitioners interviewed.

Table 1 Interviewees

Gender & role	Organisation	Media
Male editor	bz (CH Media)	Regional newspaper
Female editor-in-chief	20 Minuten (TX Group)	Daily free-sheet
Female editor	Tages-Anzeiger (TX Group)	Biggest regional paper
Male editor	NZZ am Sonntag (NZZ Media Group)	Quality Sunday paper
Male editor-in-chief	CH Media	20 regional papers
Female editor-in-chief	Swiss Radio DRS & SR	Public service broadcast
Male editor news office	SF DRS	Public service broadcast
Female editor	Swiss Radio DRS	Public service broadcast
Female vice president	syndicom (formerly Comedia)	Media trade union

Swiss news media and journalism in transition

Digitalisation of media and journalism is discussed in an ambivalent way. Whereas enabling feedback, dialogue, and even participation by citizens is interpreted rather positively, increased speed of production, stronger reader orientation, and economic influences are criticised.

As a general entry into the expert interview, the responding journalists and media experts of Switzerland were asked to interpret and assess the ongoing developments of the Swiss media system and the future of its journalism (see also VSM, 2016). They mentioned positive issues as well as negative trends and challenges. Digitalisation is mentioned mostly in a positive context, namely enabling more feedback, direct contacts, dialogue, and participation by citizens in the process of newsmaking. Conversely, the pressures to react immediately, and the increased speed and complexity of the processes of newsmaking is criticised as a problem, especially jeopardising the quality of news. These tendencies are referred to mostly in relation to the intensified importance of the commercialised media logic in journalism (Umbricht & Esser, 2016; Fürst, 2018), because

of the economic press crisis and diminishing resources. In addition, positions on the quality of journalism varied. Some journalists recognised an increase of quality – for example, in the form of a more critical stance against politicians, authorities, and administration – whereas others observed tendencies of decreasing politicisation in media coverage (Tresch, 2009; fög, 2019). But online platforms and social media in news markets were judged in an ambivalent way (Klinger & Svensson, 2017; Cairncross Review, 2019). They tend to weaken the agenda-setting function of the classic media by delivering diverse topics and are used as (alternative) sources of information. Additionally, they exert pressure in the form of personalisation, emotionalization, and scandalisation by “shitstorms” and increasing harassment of journalists.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

News media are widely available in all language regions of Switzerland with no major restrictions, despite strong horizontal press concentration since 2000.

IN 2011
3 POINTS

The media landscape is characterised by a high level of technical reach and, in principle, unlimited public access, disregarding costs of newspaper subscription and broadcast fees (see Indicator E5 – Affordable public and private news media). There are hardly any linguistic or regional, and only limited urban-country divides as far as the supply of newspapers is concerned, although broadband access to the Internet is partly restricted in remote areas. Each linguistic area is provided with its own media: private-commercial and public service radio and television programs, daily and weekly newspapers, as well as various periodicals (Meier et al., 2011). Extensive cable networks (e.g., by UPC) and Swisscom, together with mobile telecommunication networks by Swisscom and digital platforms (e.g., by UPC or Sunrise), allow most Swiss households to access programmes from neighbouring countries, sharing one of the country’s national languages. Increasing access to electronic media, particularly via the Internet, has further expanded the availability of news and information sources. This holds true even in 2020.

But since the 1990s, press concentration in the form of large-scale mergers into monopoly newspapers in central and eastern Switzerland has strongly increased (e.g., Bühler & Moser, 2020), combined with a background of declining readership of subscribed newspapers and advertising flows into Internet platforms. In addition, newspapers are increasingly now read online, for exam-

ple, via mobile phones, and television programs are watched via computers and not necessarily in real time.

Concerning broadcast media, in past years, the Swiss radio and television landscape has experienced some fundamental changes. In 2006, the Swiss Parliament adopted a new Federal Radio and Television Act (RTVG) to ensure the dominant role of SRG SSR. In parallel, the law supports local-regional, commercial licensed broadcasters with performance mandates. Ten years later, public service broadcasting came under political pressure, mainly because of the “No Billag” initiative, which called for the abolition of radio and television reception fees. However, in March 2018, 71.6 per cent of the voters said no to the initiative against SRG SSR.

The public broadcasting corporation SRG SSR is the most important producer of radio and television programmes. Institutionalised by law and financed by obligatory household charge fees, it is entrusted with the mandate to provide all linguistic regions with programmes of equal quality on a public service basis. Its programming mission, Art. 24 in RTVG (2006), states:

Comprehensive supply of the entire population and promotion of understanding, cohesion and exchange among the national regions, language communities, cultures and social groups through comprehensive, diverse and appropriate information on political, economic and social contexts, namely for the free formation of opinion, cultural development, education and entertainment of the public.

The SRG SSR operates between three and six radio stations in each language region in German, French, and Italian, with a total of 17 radio programmes. A full programme is also being produced for the Rhaeto-Romanesque regions. In each linguistic region, there are television studios in Zurich, Genf (Geneva), and Lugano producing seven television programmes, two for each region, and one in Chur for the Rhaeto-Romanic language (only a few hours per week). In addition, the German part of Switzerland is provided with a 24-hour information channel, repeating the latest news programmes initially shown on one of the two regular channels. Furthermore, 37 private radios with 149 programmes and 13 private television stations with 155 programmes exist in the local and regional markets (BAKOM, 2020a).

In addition, the SRG SSR produces and offers the widest broadcasts on both television and radio with market shares of about 38 per cent for SRF Television, compared with 11 per cent of the commercial local television stations, and a market share of 61 per cent for SRF Radio, while the commercial local radio stations in the German part of Switzerland (2019 data) possess 35 per cent. Of the Swiss population (15+), 60 per cent use television, 61 per cent listen to radio programmes, and 33 per cent use online supply every week, all provided by SRG SSR (2020b).

Table 2 Number of broadcast media and programmes and market shares in per cent

Category	Number of programmes (2009)	Number of programmes (2019)	Market shares (per cent)
TV Public Broadcaster SRG SSR	8	8	2009: 34 (DS), 31 (WS), 34 (IS) 2019: 31 (DS), 27 (WS), 27 (IS)
Private TV broadcasters (with licence ^a & notified without licence ^b)	15 ^a 90 ^b	14 ^a 149 ^b	2009: 6 (DS), 1.7 (WS), 1.7 (IS) 2019: 10 (DS), 1.7 (WS), 1.5 (IS)
Radio Public Broadcaster SRG SSR	18	18	2009: 66.1 (DS), 67.3 (WS), 84.0 (IS) 2019: 60.8 (DS), 61.7 (WS), 73.6 (IS)
Private Radio (with licence ^c & services notified without licence ^d)	49 ^c 38 ^d	37 ^c 144 ^d	2009: 28.8 (DS), 22.3 (WS), 8.1 (IS) 2019: 35.6 (DS), 29.1 (WS), 20.9 (IS)
Online:- Schweizer Nachrichten SWI swissinfo.ch (in several languages)	1	1	–

Comments: Market Shares: people 15+, Mo-Su, 24h; DS = German, WS = French, IS = Italian part of Switzerland.

Source: Mediapulse, 2019a–c

In terms of press, Switzerland has renowned, high-quality elite newspapers such as the *Neue Zürcher Zeitung (NZZ)*, which is mainly read by economic elites. Popular media such as the tabloid newspaper *Blick* are read more by the rural population, while the free-sheet *20Minuten* has the highest reach and is aimed at young commuters in major agglomerations. As in most European countries, traditional regional press in Switzerland also came under severe pressure due to the launch of the free-sheet *20Minuten* in 1999 by Tamedia, for commuters, in the German-speaking Switzerland, followed by its introduction in Roman- die in 2006 and Ticino in 2011. Paradoxically, even high-quality newspapers such as the *NZZ* now publish advertisements as editorial articles, which are misleadingly referred to by the readership as “Publireportage” or “Sponsored Content”. Sponsored travel and car items have also increased because of the commercial pressure on newspapers in the small market of Switzerland. Processes of horizontal concentration (see Indicators E1 & E2 – Media ownership concentration national and regional level) have also been very strong in the

last 20 years. Today, there are only five media companies dominating the press market (all circulation numbers by WEMF, 2019; 1 April 2018–31 March 2019).

Tamedia, today named TX Group – the largest publishing company, with over 50 brands, 3,700 employees, and a business volume of CHF 1,080 million in 2019 – published the following regionally leading daily newspapers: *Tages-Anzeiger* (130,957); the Sunday paper *SonntagsZeitung* (146,126); the *Berner Zeitung* and *Der Bund* (119,700 total), both published in Bern, the capital of Switzerland; and *Basler Zeitung* (40,422). Tamedia also publishes *20Minuten* (424,502) in German and *20 minutes* (169,453) in the French-speaking part, a Monday-to-Friday daily for commuters, free of charge. The title *20 minuti* for the Italian-speaking Switzerland has a circulation of 32,192 copies. In addition, Tamedia, in 2010, bought the three leading daily newspapers *24Heures* (49,107), *Le Matin* (after 2018 online-only), and *Tribune de Genève* (31,282) in the French-speaking part of Switzerland with approximately 3,600 employees and sales payment media approximately for CHF 570 million (2018).

Ringier AG produces the daily tabloid newspaper *Blick* (107,119), the evening free-sheet *Blick am Abend* (2008–2018), and the Sunday newspaper *Sonntagsblick* (129,715), together with 30 magazines, comprising about 550 employees and a total business volume of CHF 1,004 million in 2018.

CH Media produces different regional newspapers, which – before 2018 – were published by AZ Medien in the region of Aargau, Solothurn, Basel-Land (Basel country), and owned by Peter Wanner. It was integrated in the form of a joint venture in 2018 with the NZZ-Media Group and its regional titles like *Luzerner Zeitung* (110,081 total) and *St. Galler Tagblatt* (109,077 total), totalled to about 20 local newspapers with a central editorial office in Aarau, about 2,000 employees and a business volume of CHF 448 million in 2019.

The NZZ Media Group with its flagship *NZZ* (96,109) is a highly regarded national daily newspaper, and its Sunday counterpart *NZZ am Sonntag* (110,815) has a partly separate editorial staff. In addition, it owned several regional newspapers, now integrated into the joint venture CH Media, which has 780 employees and a business volume in 2019 of CHF 231 million.

Somedia, the former Südostschweiz Media House by Hanspeter Lebrument, publishes several regional and local newspapers in the Cantons Graubünden (Grisons), Glarus, and St. Gallen (St. Gall), namely the *Südostschweiz* together with the *Bündner Zeitung* (73,252 total), and *La Quotidiana* in Rätoromansch (romansh) language (3,917).

There are also local free papers. Christoph Blocher, a well-known right-wing conservative SVP (Schweizerische Volkspartei [Swiss People's Party]) politician and former Federal Councillor, bought the Zehnder publishing house in 2018, which issued 25 local-regional free papers with a total circulation of approximately 835,000 examples.

The five big media companies mentioned above, together with further titles, produced and distributed a total of 312 newspapers (including local non-dailies)

in 2009, and 269 in 2019, with a total circulation of 9.2 million in 2009 and 5.9 million in 2019. Switzerland is still one of the richest countries in terms of number of newspapers published in proportion to its population and geographical size (VSM, 2019). However, many titles are virtually identical in terms of foreign and domestic reporting. Newspapers are also widely available in all regions: 221 titles with a total circulation of 4.8 million in the German part, 35 titles with a circulation of 94,000 in the French part, and 11 titles with a circulation of 172,700 in the Italian part of Switzerland in 2019. More than half of the cantonal capitals and almost all major cities have at least one regional newspaper, although 12 cantons do not have their own daily newspaper, but only a local editorial office, such as Appenzell Outer Rhodes, Basel-Country, Glarus, Lucerne, Nidwald, Obwald, Schwyz, Solothurn, St. Gall, Thurgovia, Uri, and Zug.

Table 3 *Leading regional newspapers in the 26 cantons*

Newspapers	Canton	Characteristics	Editorial office	Owner
Aargauer Zeitung	Argovia	CH Regional Media ^a	Aarau/Baden	CH Media
Appenzeller Zeitung	Appenzell OR	St. Galler Tagblatt ^a	St. Gall	CH Media
Appenzeller Volksfreund	Appenzell I.R.	–	Appenzell	Print by Appenzeller Volksfreund
Basellandschaftliche Zeitung	Basel-Country	CH Regional Media ^a	Aarau/Baden	CH Media
Basler Zeitung (BaZ)	Basel-City	Tages-Anzeiger ^a	Basel	TX Group
Berner Zeitung	Bern	Tages-Anzeiger ^a	Bern	TX Group
Bund ^b	Bern	Tages-Anzeiger ^a	Bern	TX Group
Bieler Tagblatt (German)	Bern	Berner Zeitung ^b	Biel	W. Gassmann AG
Journal du Jura (French)	Bern	–	Biel	W. Gassmann AG
Freiburger Nachrichten (German)	Freiburg	Berner Zeitung ^a	Fribourg	Paulus Druckerei → TX Media
La Liberté (French)	Fribourg	–	Fribourg	Saint Paul Holding SA
Tribune de Genève	Geneva	–	Geneva	TX Group
Südostschweiz Glarus	Glarus	Südostschweiz ^a	Chur	Somedia Chur
Südostschweiz	Grisons	Main edition	Chur	Somedia Chur
La Quotidiana (Romantsch)	Grisons	–	Chur	Somedia Chur
Le Quoditien Jurassien	Jura	–	Delémont	Editions D+P SA
Neue Luzerner Zeitung	Lucerne	Main edition	Lucerne	CH Media
ArcInfo (until 2018 L'Express)	Neuchâtel	–	Neuchâtel	ESH Médias
ArcInfo (until 2018 L'Impartial)	Neuchâtel	–	Neuchâtel	ESH Médias
Neue Nidwaldner Zeitung	Nidwald	Neue Luzerner Zeitung ^a	Lucerne	CH Media
Neue Obwaldner Zeitung	Obwald	Neue Luzerner Zeitung ^a	Lucerne	CH Media
Schaffhauser Nachrichten	Schaffhausen	Der Landbote ^b	Schaffhausen	Meier + Cie AG Schaffhausen

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Neue Schwyzer Zeitung	Schwyz	Neue Luzerner Zeitung ^a	Lucerne	CH Media
Solothurner Zeitung	Solothurn	CH Regional Media ^a	Aarau	CH Media
St. Galler Tagblatt	St. Gall	Main edition	St. Gall	CH Media
Il Corriere del Ticino	Ticino	–	Muzzano	Società editrice Corriere del Ticino
La Regione	Ticino	–	Bellinzona	Giacomo Salvioni Editore
Thurgauer Zeitung	Thurgovia	St. Galler Tagblatt ^a	St. Gall	CH Media
Neue Urner Zeitung	Uri	Neue Luzerner Zeitung ^a	Lucerne	CH Media
24 Heures	Vaud	–	Lausanne	TX Group
Walliser Bote (German)	Valais	–	Visp	Mengis Druck + Verlag
Le Nouvelliste (French)	Valais	–	Sion	ESH Médias
Neue Zuger Zeitung	Zug	Neue Luzerner Zeitung ^a	Lucerne	CH Media
NZZ-Group	Zurich	–	Zurich	NZZ-Gruppe
Tages-Anzeiger	Zurich	–	Zurich	TX Group
Zürcher Regionalzeitungen	Zurich	Tages-Anzeiger ^a	Winterthur/ Stäfa	TX Group

^aStrong content syndication: newspaper is subsidiary and only produces regional section and takes over culture, foreign politics, national politics, economy from the main edition of its newspaper.

^bContent syndication: newspaper relies on content of another newspaper insofar as it prints a selection of articles from its “mother” newspaper/main edition. The newspaper *Der Bund* consists of 60 per cent of articles from *Tages-Anzeiger*.

Source: Künzler, 2013: 74–78; Schweizer Medien, n.d.

Nonetheless, the number of newspapers and the total circulation has decreased in the past decade by about a third. Furthermore, big publishing houses are in possession of different newspapers in different regions. This diminishes the diversity of newspapers, as they share most of the international and national politics sections and only provide the bare minimum on exclusive local or regional content (Meier, 2017; Studer, 2017). Table 3 illustrates that only a few publishing houses control the leading newspapers in the 26 cantons like TX Group, Ringier Axel Springer, NZZ Media Group, and CH Media in the German part of Switzerland. The total number of “independent” titles, meanwhile, are about 35 (VSM, 2019).

Today, all press titles are also present on the Internet. This also applies to broadcasters. In addition, there are usually smaller local-regional news media with an online presence only, such as *tsüri.ch*, *bajour.ch*, and *zentralplus.ch*, or national news platforms such as *infosperber.ch* or *watson.ch*.

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(F2) Patterns of news media use (consumption of news) 2 POINTS

The Swiss population still uses traditional media such as the press, television, and radio to inform about news, but the Internet and social media have become the main source of information, especially for young people.

IN 2011
3 POINTS

Media ownership and access to it are prerequisites of media use. In 2019, 92 per cent of the Swiss households have been equipped with one or more television receivers (2009: 95%) and 69 per cent had one or more radio receivers (2009: 93%); 93 per cent of all households owned a computer (2009: 87%), 91 per cent a smartphone, and 47 per cent a tablet. In 2019, 93 per cent had access to the Internet (2009: 85%). As many as 47 per cent of the people surveyed lived in a household with a subscribed newspaper. This was significantly less than the 65 per cent who subscribed to newspapers in spring 2009 (Bonfadelli & Fretwurst, 2009; Fretwurst & Bonfadelli, 2019). Thus, ownership of media and media access are at a very high level in Switzerland, although there are still age-, education-, and income-related gaps in access to and use of the Internet and social media (Latzer et al., 2020).

Concerning general media use, for television, in 2009, citizens (3+) spent 145 minutes watching television every day in the German-speaking part of Switzerland, and 161 and 188 minutes in its French- and Italian-speaking parts, respectively (Monday–Sunday). This represented a daily reach of about 70 per cent, according to the data measured by Mediapulse. In 2019, the daily reach of television decreased slightly, especially in the German- and French-speaking parts of Switzerland, but increased somewhat in the Italian-speaking part. This represents an overall decrease in daily television hours across all language regions. The drop of 20 per cent was more in the German- and French-speaking parts compared with 13 per cent in the Italian part of Switzerland (see Table 4). Based on a representative sample of personal interviews in 2019 (Bonfadelli & Fretwurst, 2009; Fretwurst & Bonfadelli, 2019), 62 per cent of viewers said they used SRG SSR’s public television programmes at least several times per week or almost daily – this amount had decreased from 77 per cent in 2009; whereas only 30 per cent viewed the programmes of the private regional television stations regularly in 2019, compared with 46 per cent in 2009.

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Table 4 *Reach and usage of Swiss broadcasting television and radio programmes, by region*

	German		French		Italian	
	2009	2019	2009	2019	2009	2019
TV daily reach (%)	67	63	68	66	70	73
Radio daily reach (%)	91	83	89	80	90	87
Newspaper daily reach (%)	41	56	49	57	38	48
Internet daily reach (%)	29	68	37	78	27	66
TV daily use (min.)	145	113	161	138	188	170
Radio daily use (min.)	127	102	113	83	115	101
Newspaper daily use (min.)	30	37	34	38	30	40
Internet daily use (min.)	35	97	49	154	31	94

Comments: Monday–Friday. Age: 12+ (2009), 15+ (2019)

Source: Mediapulse 2009, 2019a–c

The market share of television by the public broadcaster SRG SSR was about a third in 2009 and decreased only slightly to 31 per cent in 2019. Almost two-thirds of the time spent by Swiss inhabitants in front of the television was devoted mostly to entertainment programmes by foreign television providers. Furthermore, only very few Swiss people watch television programmes from other Swiss language areas. The market shares of the private Swiss television stations still remained fairly low. In the last ten years, while it increased steadily from 6 to 10 per cent in the German-speaking part, it decreased slightly from the already low 1.7 per cent in 2009 to 1.6 per cent in 2019 in the French-speaking part, and from 1.7 per cent in 2009 to 1.5 per cent in 2019 in the Italian part of Switzerland for the only private station, Tele Ticino (Mediapulse, 2009, 2019).

In terms of radio, the daily reach in all language regions is even higher than television. However, it dropped between 2009 and 2019 from 91 to 83 per cent in the German part, from 89 to 80 per cent in the French part, and from 90 to 87 per cent in the Italian part of Switzerland (see Table 4). The time spent with radio today is about one and a half hours per day, but that decreased in the last ten years as well from 127 to 102 minutes in the German part, from 113 to 83 minutes in the French part, and from 115 to 101 minutes in the Italian part of Switzerland.

Contrary to television viewing, the radio programmes of SRG SSR predominated radio listening with a market share in 2009 of about two-thirds in the German and French part and with 84 per cent in the Italian part of Switzerland. But that saw a decline too in the last few years to 61 per cent in the German and French part, and 74 per cent in the Italian part of Switzerland in 2019. The private Swiss radio stations have a higher market share compared with the only

minor significance of the private Swiss television stations. It rose from 28.8 per cent in 2009 to 35.6 per cent 2019 in the German part, from 22.3 per cent in 2009 to 29.6 per cent in 2019 in the French part, and even more in the Italian part of Switzerland, from 8.1 per cent in 2009 to 20.9 per cent in 2019, mostly by the local radio station 3iii.

In terms of press, the largest daily newspapers in Switzerland (see Table 5) show a fall in circulation and readership in the last ten years since 2010 for almost all titles. In a representative survey conducted in 2009 (Bonfadelli & Fretwurst, 2009), 55 per cent of the interviewed people said they were reading a newspaper without free-sheets and 24 per cent with free-sheets on a daily basis. That survey also showed that the Swiss spent 37 minutes per day reading print media. In the same follow-up survey in 2019, only 30 per cent reported reading a newspaper on a daily basis, and only 13 per cent were reading free-sheets daily. More men than women and the older, more educated population read newspapers more frequently. In addition, newspaper reading in 2019 was highest in the Italian part of Switzerland (35%), followed by the German (31%) and French (27%) parts.

Table 5 *Leading Swiss daily newspapers, circulations and readers*

Language region	Newspaper title	Circulation		Print readers		Reach print (%)	Unique users of website per week (%)
		2010	2018/19 ^a	2010	2020-1 ^b	2018-1 ^a	2020-1
German	20Minuten D-CH	494,368	424,592	1,315,000	1,183,000	27.1	31.9
	Blick	214,880	107,119	628,000	426,000	9.5	29.4
	Tages-Anzeiger	203,636	130,957	472,000	361,000	7.6	12.7
	AZ Aargauer Zeitung (GES) ^c	192,234	70,258	391,000	204,000	7.7	–
	Berner Zeitung & Bund (GES) ^c	181,705	119,700	353,000	312,000	6.7	4.5 / 3.0
	Luzerner Zeitung (GES) ^c	127,244	110,081	271,000	271,000	6.1	5.8
	NZZ	125,228	104,460	246,000	239,000	4.8	18.1
French Romandie	20Minutes	207,112	169,453	461,000	496,000	30.8	11
	24 Heures	78,964	49,107	231,000	164,000	9.8	5
	Tribune de Genève	54,068	31,282	140,000	97,000	6.6	4.5
	Le Temps	44,450	33,508	132,000	111,000	7.0	5.4
Italian Ticino	20Minuti	–	32,192	–	86,000	30.3	1.8
	Corriere del Ticino	37,092	30,962	123,000	98,000	33.8	1.9
	La Regione	32,479	27,794	103,000	95,000	31.0	1.1

^a Circulation number reached with several subsidiaries

^b Total number of print readers of media brand

^c (GES = total edition)

Source: WEMF, 2019; circulation and print readers 2010 from Künzler & Kradolfer, 2012: S. 26

The loss of press advertising during the Covid-19 crisis, coupled with increased commercial pressures, stimulated parliamentary debates about an extension of governmental press aid. As a consequence, the Swiss Federal Council and the parliament are planning at the moment to increase the existing subsidising of the postal delivery of newspapers as indirect press aid.

In terms of online use, it is not surprising that the daily reaches, shown in Table 4, and the duration of daily use of the Internet have risen sharply since 2009: between two-thirds and even three-quarters of the respondents in French part of Switzerland are online every day, around 90 minutes, whereas over two-and-a-half hours in the Romandie.

Concerning news media use, Switzerland has a high level of interest in national and international news in general, with 42 per cent people having very strong interests and 46 per cent with rather strong interests (Fretwurst & Bonfadelli, 2019). Men, the older, and the more educated people expressed higher interest in daily news. Consequently, Werner A. Meier and colleagues (2011: 294) concluded in the 2011 MDM report: “Swiss citizens are generally well informed on political issues due to regular public debates on referenda”. It’s not necessarily because these political topics were covered and discussed by the Swiss news media. The 2011 MDM report also stated: “Radio and television, as well as newspapers are the main sources of information for Swiss citizens. However, the Internet has also turned into an important source of information” (Meier et al., 2011: 294). The Internet and social media were used by 63 per cent of citizens for functions like “socialising & casual news consumption” via WhatsApp and Facebook and by 39 per cent for “entertainment & news casually”. Another 39 per cent also gathered “news and information” via YouTube videos (fög, 2019: 12).

To sum up, the increasing importance of Internet platforms like Facebook, Instagram, or Twitter has fundamentally altered news consumption in the last few years. And reciprocally, the usage of traditional media brands like *NZZ* or *Tages-Anzeiger* has decreased and is obviously substituted by social media, especially among younger people. While interests and attention to news were still high in other European countries, with the exception of Southern Europe, social media was the more preferred news source over traditional media.

The comparison of empirical audience data between 2009 and 2019 documents these striking transformations (fög, 2019: 31–32). Over the years, the importance of traditional information media has gone down. The usage (often or very often) of television to gather information decreased from 75 per cent in 2009 to 50 per cent in 2019, for subscribed newspapers from 56 to 32 per cent, and for information of the free-sheets from 55 to 40 per cent. This loss of importance of the classical media was compensated for by a significant increase of digital news media: 52 per cent in 2009 to 61 per cent in 2019. With 70 per cent usage of social media as a news source in 2019, the Internet

was now the most-often used for information gathering. Interestingly, only 15 per cent use blogs as information sources (fög, 2019: 10). In the World Internet Project – Switzerland (Latzer et al., 2020), 85 per cent people said they were using the Internet to search for news. To sum up, social media seems to be the most-common news source today. In addition, the usage of varied forms of media and online channels for news was also noticeable in so-called media repertoires. There was an increase of the “News Deprived” from 21 per cent in 2009 to 36 per cent in 2019. It was at 56 per cent in the age group 16–29, and the so-called global surfers increased from 17 to 25 per cent. For them, online and social media had become the most important source of news.

However, the Covid-19 crisis and the consequent lockdown in Switzerland from 16 March 2020 stimulated the use of broadcast news significantly. The reach of prime time television news by the SRG SSR increased from 37 per cent (2–15 March 2020) to 45 per cent (16–29 March 2020), and daily television consumption rate also jumped from 148 minutes to 179 minutes (Mediapulse, 2020).

In assessment, it can be said that, with the exception of Southern Europe, news use is still high in both Switzerland and most European countries. Around 80 per cent of the adult population are interested in and regularly use daily news. The older generation is still strongly oriented towards the traditional media. Television remains the leading medium, followed by radio and daily newspapers, with the importance of the press, in particular, declining in all countries. Meanwhile, the news content of these leading media organisations is increasingly accessed online or via smartphone by most users. The change in the media is particularly evident among young people between the ages of 15 and 25. On the one hand, interest in the traditional news media has declined and, on the other, the news is being used most by the young generation via social media (e.g., fög, 2019; Fretwurst et al., 2019).

In terms of trust in media and quality assessment of news media, surprisingly, the shift in news usage from traditional media to the digital public sphere have not impaired trust in the media. Disinformation or scepticism seemed to not be a problem in Switzerland until recently (Newman et al., 2019). Overall, 47 per cent of people trust the news and 55 per cent the “news I use”. However, only 17 per cent trust social media as reliable sources of information. The “Brand Trust Scores” are highest for the news produced by SRG SSR, followed by the quality newspapers *NZZ* in the German part of Switzerland and *Le Temps* in the French part. Only 27 per cent of the representative survey have stated they have come across “news with purposely forged facts” until now (e.g., Arlt, 2018).

In addition, two representative standardised opinion surveys asked media users in 2009 and 2019 to assess the quality of media used, based on different indicators (Bonfadelli & Fretwurst, 2009; Fretwurst et al., 2019). In general, the radio and television news of the SRG SSR got significantly better values

than the private local radio programmes, and the private regional television programmes got the lowest scores. For 80 per cent or more, public radio and television programmes were professional and credible, and about two-thirds considered them balanced. Nevertheless, in 2018, 55 per cent of media users surveyed thought fake news was a problem in general (Fretwurst et al., 2018), whereas two-thirds considered fake news to become a major problem in the future (see Indicator F10 – Misinformation and digital platforms).

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(F3) Diversity of news sources

2 POINTS

The diversity of news sources has become smaller because of media concentration, especially since 2000.

IN 2011
3 POINTS

While news sources could mean sources used in news coverage or the handling of news sources in the editorial offices, it should also be kept in mind that in view of the increasing search for news and their use via search engines on the Internet, it would also be necessary to analyse how diverse the news sources found in this way are.

For a long time, news agencies such as the Schweizerische Depeschagentur (SDA) or Deutsche Presse-Agentur in Germany, on the one hand, and correspondents of leading media organisations, on the other, were the most important sources of news. Leading media organisations in Switzerland still rely on a variety of news sources. However, it must be mentioned that journalists are increasingly using the Internet for their stories and neglecting investigations outside the newsroom.

Switzerland has had only one national news agency since 2010, the SDA. It sells material to most media organisations in three languages. In 2018, the SDA also integrated the picture agency Keystone, but reduced its staff due to declining revenues. According to our interviewed media experts, Keystone-SDA has lost ground as a leading news source; for example, CH Media has even cancelled its SDA subscription. And agency texts marked with the acronym SDA are usually only placed as isolated short messages or used as a trigger for additional research, besides original and named reports and interviews as well as contributions and comments from guest authors.

In addition, the concentration of Swiss media into three leading print media houses, – Tamedia (TX Group), NZZ Media Group, and the new CH Media – together with staff reductions over the last twenty years, has led to reports from the same media company being taken as a reference or source. And the strengthening of the international cooperation of the leading Swiss press with foreign newspapers such as the *Tages-Anzeiger* with the *Süddeutsche Zeitung*,

or the *NZZ* with the *Frankfurter Allgemeine Zeitung* in Germany, led to reduced diversity of news sources. Furthermore, the introduction of so-called integrated newsrooms also stimulated the use of external sources of information for multiple print titles.

Diversity, thus, suffers from cooperation between various newspapers and their news editors. Over the years, content syndication has also become commonplace at different levels. Newspapers take over entire sections or single articles from other newspapers. At the level of national news and more so in international news, performance of most newspapers has declined. Readers receive the same news about national or international politics in almost all newspapers. This reduction in diversity in media content was measured by an “Analysis of Unique Items” that said only 62 per cent of the national political news articles of the twelve main newspapers analysed in the German part of Switzerland were “unique” (38% of articles analysed had appeared in at least two newspapers) (fög, 2019: 20).

Today, only a few publishing companies can afford regional offices in Switzerland as well as foreign correspondents. The public broadcasting corporation SRG SSR, however, still maintains their regional offices and, along with quality newspaper *NZZ*, continues to rely on foreign correspondents.

Meanwhile, the working pressure and constraints have increased dramatically in the current media crisis (Puppis et al., 2014; Hofstetter, 2017). This forces journalists to opt for the growing supply of public relations (PR) material from different stakeholders more easily. Thus, powerful actors from politics and business bring their interests into the media without difficulty (e.g., Grosenbacher, 2010: 133f.).

Although supply of PR material has grown exponentially in recent times, most journalists interviewed, presumably also for self-protection, said they believed this had limited or no influence on their own journalistic works, and that they would themselves be very critical of PR material. However, it is indeed a problem that the increasing sponsored content in the form of so-called “Publireportage” or “Sponsored Content” is regularly produced and published in many newspapers as a source of revenue. Moreover, external comments from outside stakeholders are increasingly being placed in leading news media.

Similar trends have also been observed in our international comparison. In general, diversity of news sources has decreased. Moreover, importance of news agencies in small and medium-sized countries has declined slightly since our interviews, and cooperation and exchange between syndicated leading news media have intensified. It should also be noted that the content of news agencies is usually not taken “one-to-one” but are often used only as triggers for additional original research.

Heinz Bonfadelli

(F4) Internal rules for practice of newsroom democracy 2 POINTS

The newsroom practices, especially of Swiss leading newspapers, are not guided by clear and explicit democratic structures. And journalists have only limited influence regarding the selection of the editor-in-chief.

IN 2011
1 POINT

It is assumed that democratic freedom is greater if journalists can independently decide on editorial matters such as selection, agenda-setting, and interpretation and framing of issues. Our interviews reflect a mixed picture. On one hand, there is no direct pressure on journalists working in the newsroom; however, on the other, there are no clear democratic structures in most editorial offices, and the editor-in-chief is nominated and appointed solely by the owners of the newspapers.

Although journalists in newsrooms can decide how political topics are to be presented, interpreted, and evaluated, they usually take a neutral stance according to the professional understanding of their roles, or otherwise must agree with the editor-in-chief. There is no newsroom council in any of the selected media organisations. The Swiss Broadcasting Corporation SRG SSR has a formal editorial statute, which was formulated in 2019 by employees of SRG, ORF, ARD, and ZDF (AGRA, 2019). Pietro Supino and Res Strehle of the Tamedia Group formulated *Guidelines for Quality in the Media* in 2017. Currently, the NZZ is revising editorial guidelines, based on an older version prepared by its former editor-in-chief Hugo Bütler from 1998 (Atasoy, 2019). While these documents focus on basic principles and minimum standards for journalism, they say little about internal practices in newsrooms. Moreover, the importance of these principles in daily journalistic work remains unclear.

For the media analysed, the nomination of the editor-in-chief is exclusively in the hands of management. In some cases, the acting editor-in-chief holds informal discussions with the heads of other editorial departments; however, this does not seem to have any influence on the management's final decision. Some interviewees stated there were no formal procedures or company rules to ensure the participation of journalists in decision-making processes. At least, the general opinion of newsroom journalists is taken into account when a new editor-in-chief or a new newsroom boss is nominated. However, past experience has shown that editors-in-chief who take over the job against the will of the staff have a hard time succeeding. There is, so to speak, an informal democratic practice, but no formal bottom-up democracy.

Also, leading news media organisations in other European countries usually have no formal rules regarding democratic practices in newsrooms. Media professionals can (co)decide on the selection and interpretation of the news in editorial conferences. However, there are exceptions. For example, in Germany, Austria, and the Netherlands, the decision-making processes are documented in editorial statutes. But like in Switzerland, there is no formal co-determination

anywhere. In practice, a prior hearing is usually held on the appointment of the editor-in-chief.

Heinz Bonfadelli

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

The media representatives of the leading Swiss newspapers attach great importance to separating business-entrepreneurial decisions and journalistic work processes. In practice, this hardly ever succeeds, as business decisions have a major impact on the daily work of the editorial staff and editorial cultures.

According to their own statements, all leading Swiss media organisations fundamentally strive to separate their economic objectives from journalistic services. Even though there are no formal rules on the separation of editorial and entrepreneurial functions, all those surveyed paid attention to a more or less rigorous separation and denied any “toxic” interference from owners, shareholders, or boards of directors. For the respondents, journalistic principles always came first.

Although publishers and the extended chief editorial staff met regularly, this exchange was not seen as interference, but as a legitimate perception of entrepreneurial leadership and responsibility. Nowadays, the editor-in-chief seems to be more involved in economic and strategic management than in the past. At the level of editor-in-chief or journalistic management, “cooperation” with owners, shareholder groups, advertising departments, and “commercial editorial departments” is, therefore, almost constitutive.

In any case, entrepreneurial decisions often have a major impact on the organisation of editorial work, especially in the case of nationwide cost-cutting measures in the face of rapidly increasing declines in advertising revenues. Thus, all media workers are constantly confronted with the precarious economic conditions and must consider their consequences in their daily work. The rapid announcement of short-time working by all leading publishers during the shutdown imposed due to Covid-19 drew attention to these dependencies. There are also publishers who explicitly expect media workers to make not only journalistic but also entrepreneurial considerations at work. Not just publishers but media professionals, too, would have to share responsibility for their jobs.

The journalistic director of CH Media and head of over 500 media workers in 11 cantons consults their publisher before taking important editorial and personnel decisions. The publisher is the most important co-owner of his media group, with over 50 per cent of shares, and is also the chairman of the board of directors. The journalistic director is also on the management board and

is confronted with development of the advertising market. This cooperation is intended because as a member of the management board, the journalistic director also bears financial responsibility.

At the middle and lower employee level, media professionals work without direct interference from the management, the owner, or the advertising department; possibly, however, with a personally adjusted “pair of scissors” in their heads in accordance with the “prevailing” editorial culture, which can be different in every media organisation. In everyday work, there are constant negotiation processes between pragmatic, entrepreneurial, and socio-political desires or necessities. Media workers are anything but independent, but are primarily wage dependent, and just like the media company itself, they are very strongly and diversely socially embedded in society. A very experienced journalist told us that he usually calls his own publisher and asks for advice when working on a problematic story in which his own company plays a significant role. In the *NZZ am Sonntag*, too, media representatives maintain informal contacts with management, boards of directors and, if necessary, shareholders, who are widely spread.

The public service provider SRG SSR has a better line of separation between management and journalistic work than in commercial print and broadcasting media. The editorial boards are comparatively less involved in strategic decisions by the eight-member executive board of the SRG Directorate-General, the highest operational management body, which currently comprises seven men and one woman. However, when it comes to cost-cutting measures, their staff are also affected to a great extent by “centralised work locations” and “optimised” work processes.

All wage-earning media workers must first adhere to the respective local working conditions and corporate publishing objectives. They are confronted with specific dependencies that the respective management has decided on and over which they usually have little influence. The media professionals carry out professional journalism primarily on behalf of their media organisations. They have very little operational co-determination, let alone democratic participation. Only after the media professionals have formally and informally adapted to editorial-cultural practices can they even think of practising professional journalism on behalf of civil society.

Werner A. Meier

(F6) Company rules against *external* influence on newsroom/editorial staff

1 POINT

IN 2011
1 POINT

There are at least some informal rules in media companies to deal with external advertising influences. At the same time, however, problematic forms of advertising, such as “native advertising”, have increased.

Publishing houses do not usually publish their earning figures advertising sales, sponsorship, and subscriptions. However, one can assume that the sale of subscriptions is currently higher than the revenue from various forms of advertising. Andreas Häuptli, managing director of the publishers’ association VSM, recently drew attention to a rampant decline in advertising, speaking of a decline in advertising by half in April and over 40 per cent in May 2020. He said that even in June 2020, around a quarter of revenues had not been received. In July 2020, it was 7 per cent less than in the previous year (Schweizer Medien, 2020).

At SRG SSR, however, revenues are reported in the annual report. Annual revenues amount to around CHF 1.65 billion. While 77 per cent of SRG’s revenues come from reception fees (household tax), 23 per cent comes from commercial revenues. With a good fifth of its budget, the SRG SSR also has a veritable management problem with the collapse in advertising revenues.

As advertising revenues have fallen sharply everywhere – not only for daily newspapers, but also for regional radio and television broadcasters and the volume of regional and local advertisements – advertising and advertising boycotts have lost much of their explosive power. The big debates about advertising boycotts seem to be over – boycott threats have lost their horror. There are, however, cases where major advertisers are angry with the editorial staff for reporting. From a commercial point of view, such incidents must be taken seriously in the editorial office, and advertising clients must be told why the editorial office has reported about their company in this form. The extent to which commercial enterprises or advertising clients of various origins succeed in influencing the reporting remains unclear, because neither the editorial staff nor any of the companies involved have an interest in transparency and public debate (Lauerer & Keel, 2019). In any case, most daily newspapers depend on individual large advertising customers in the food sector. These represent a cluster risk for the daily press.

On the other hand, publishing supplements and “sponsored content”, “Publireportage”, “native advertising”, and “paid posts” have increased. The publishing houses feel responsible for maintaining profitability and viability of their companies with more or less problematic forms of advertising, despite reduced advertising shares, often against the will of the media professionals in their own companies. It can be assumed that the publishing houses make customer-oriented offers in order to create a correspondingly attractive advertising environment. Even if advertising revenues fall, structural problems

remain: the more daily news media are compromised by economic interests in their publishing activities and tasks, the more their journalistic credibility and performance suffers. In any case, the impact of native advertising on digital journalism is likely to increase further (Porlezza, 2017).

Dependence on readers and the advertising market does not mean publishers and editors must take certain advertisers into account. However, in the case of news media, financed exclusively by advertising, consideration must be given, and good relations with the advertising clients must be maintained. The compulsive adherence to old and new forms of advertising financing can also be taken as an indicator that even after 20 years of declining advertising revenues, publishing houses have still not succeeded in developing a new business model compatible with consumers, citizens, and a democratic society.

Werner A. Meier

(F7) Procedures on news selection and news processing 2 POINTS

News selection and news framing became more audience oriented. But there is variation according to the type of media, for example, public versus private broadcast or elite versus popular versus free press.

IN 2011
2 POINTS

The selection of news in Swiss media is still based on the professional routines of individual journalists, more than on formalised guidelines. As our interviews emphasised, and also highlighted by the editorial statutes, news selection is still oriented towards social relevance of topics. In 2020, however, news selection to a certain extent is more tailored according to expected audience needs (Umbricht & Esser, 2016). For example, due to online click rates (Hofstetter & Schönhagen 2014), newsworthy topics, or “shitstorms” on social media, news selection is more focused on personalisation (Vogler et al., 2019). And concurrent to other European countries, news selection takes place in the newsroom’s daily editorial meetings. When interpreting news, namely the way in which an event or topic must be framed, leading media professionals have “the last word” after interviews, but they cannot determine how their journalists would interpret a particular event.

Basically, the difference is based on media types. The selection of news is influenced by the characteristics of the media, such as elite press as opposed to tabloid or free commuter press (e.g., Engesser et al., 2014). Especially those with a tendency towards “boulevard” journalism, such as *Blick* in Switzerland or the free-sheet *20Minuten*, choose content according to the perceived entertainment-oriented wishes of their audiences. But the journalistic selection also differs between the press and the public broadcaster SRG SSR, because not every topic on the political agenda is equally suitable for every medium. The selection and interpretation of topics is also influenced by the political

position of a newspaper, for example, the selection of topics of the *NZZ* as an elite newspaper committed to liberalism is not the same as that of the politically slightly left-wing *Tages-Anzeiger*.

On the basis of our interviews with journalists, it can be said that all leading news media have at least one editorial meeting every day, in which the main topics are selected and defined. This selection is made according to the medium and its readership, viewers, or listeners. Public service radio and television must fulfil their public service mission. When it comes to politically controversial (voting) issues or elections, however, all media seem to try to report neutrally or at least without bias by looking at and presenting both sides, namely pros and cons, according to the comments of our interviewees.

Recent findings based on empirical content analyses show that Swiss media tend to focus on the powerful. Established performers from politics, business, and culture get significantly more space in the media (Tresch, 2009). This is legitimate in that they are usually relevant in society or in the specific discourse. But journalism for minorities, for example, in the form of advocacy for weaker or marginalised groups, is rather rare. The left-wing weekly *Die Wochenzeitung (WOZ)*, or the new online magazine *Republik*, remain exceptions in this respect.

The processes of news selection in the Swiss media are largely in line with the leading news media in the other European countries. In these, too, news selection tends to follow informal rules or editorial meetings, and there are usually no formal rules in editorial statutes or so-called stylebooks, which play a role in the selection of news. The pressure to respond to “breaking news” due to online information or social media, as well as the importance of click rates, have increased in most media landscapes around the world.

Heinz Bonfadelli

(F8) Rules and practices on internal gender equality 2 POINTS

Gender equality has improved significantly, but there are still more male journalists working in the politics department and especially in higher positions in newspapers.

The federal constitutional mandate for equality (Art. 8(3) Federal Constitution) requires both legal and actual equality between women and men, particularly in the areas of family, education, and work. The requirement of equal pay for work of equal value is also explicitly enshrined. The *Federal Act on Equal Opportunities for Women and Men* (Equal Opportunities Act, GlG 2020) puts the equality article into concrete terms and aims to promote actual equality in working life. It prohibits all discrimination on the basis of gender and for the entire duration of employment in both the private and public sectors.

In our study, none of the five female journalists complained about discrimination. Individually, they all asserted themselves and achieved their goals, despite

all male-dominated networks. However, the editor-in-chief of public broadcasting in German-speaking Switzerland sees the following difficulties: “Where a woman sits down, a man goes. Women must “be better” and be willing to take responsibility”.

Although the will to promote female media workers is present in the leading publishing houses, only the public broadcaster SRG SSR has concrete measures and ambitious plans. “We want 50 per cent women. We will achieve this in the next five years”, the editor-in-chief said. All media, not just the tabloid *Blick*, have “a women’s problem”. The publishing house Ringier has, therefore, launched an initiative “EqualVoice”, with four main goals. “We let more women have their say, we make strong women visible, we make children and careers compatible, and we want more female journalists in the newsrooms” (Blick, 2019). Specifically, project teams are to be put together in each editorial office of the group in order to implement this in the daily work of the newsrooms.

The efforts described are more than justified, if one consults the relevant literature. In 2015, 39 per cent of journalists who took part in the survey were women (Dingerkus et al., 2018). In comparison with previous studies, the proportion of female journalists in Switzerland has continued to increase over the years. In 1980, the proportion of female journalists in the two regions covered by this study was 17 per cent. In 1998, their share rose to 32 per cent and in 2008 to 35 per cent (Keel, 2011). However, in the Global Media Monitoring Project (GMMP) study, which was conducted almost simultaneously, the authors conclude that the proportion of women among media professionals has fallen by around 5 per cent compared with 2010 and still amounts to just under 30 per cent (GMMP, 2015). But there is still something like male dominance in the newsrooms of leading publishing houses. About 69 per cent of all newspaper journalists are men, and three out of four management positions in the Swiss media industry are occupied by men. On average, women earn CHF 700 less than men for the same work experience; in management positions, the monthly wage difference averages CHF 1,400. In the editorial departments of the daily news, politics, and business, the proportion of female journalists is around 30 per cent, while more than two-thirds of the news written are written by men. This proportion has increased compared with 2010 (GMMP, 2015).

Furthermore, the proportion of women in radio and television is higher than in newspapers, namely 46 versus 38 per cent. An above-average number of female journalists work in the low-paid online sector. As far as academic education is concerned, three of four women have a university degree, while only two of three men have an academic education (Hanitzsch et al., 2019).

In Hanitzsch and colleagues’ most recent publication (2019), these male authors come to a contradictory conclusion. Female journalists – who make up the majority of the new generation of journalists and start out better educated and enter the profession faster – are still underrepresented in newsrooms. On

average, only four of ten media workers are female, and they are over-represented in those departments that tend to be lower in the editorial hierarchy (e.g., education, science, service, lifestyle, health, and religion). Not only do women journalists have fewer opportunities for advancement than men, they also earn less when they take on leadership positions. However, many of them are lost to journalism because they leave the profession due to domestic responsibilities and are unable or unwilling to return to work, either full-time or part-time. Only a minority of women are willing or able to take up leading positions in editorial departments.

In connection with the national women's strike in Switzerland in 2019, young women working in the media sector articulated five demands: first, more women in leadership positions, more gender justice, and thus more journalistic power; second, equal pay; third, better flexibility for taking care of family and career; fourth, protection against harassment; and fifth, no sexism in reporting.

On the basis of the responses of four male editors-in-chief and the female editor-in-chief of tabloid online-news platform *blick.ch*, whose responses were collected and presented by the media platform *persönlich.com* (Widmer, 2020), it can be stated that the demands made, in their deliberately abstract form, are accepted by all editorial heads. (Which editor-in-chief can seriously imagine campaigning for poorer wages for even fewer women and for the incompatibility of work and family life?) Equal pay, protection against harassment in the workplace, and the compatibility of family and career seem to be well on the way, while the editor-in-chief's editorial team is quickly reaching its limits in terms of argumentation in fulfilling the first and last demands. Without concretising company-specific objectives and making promises, all editors-in-chief are trying to put their own efforts to date in perspective and promise improvement on a case-by-case basis.

Arthur Rutishauser, editor-in-chief of Tamedia Publication in German-speaking Switzerland, promised improvement: "The proportion of women in management is still only 30 per cent in the newsrooms. We must clearly improve". Relatively helplessly, the respective editorial heads are confronted with the rather cursory representation of women in the media. Pascal Hollenstein, journalistic director of the CH Media, is at least reasonable: "We are aware that it is more difficult to find a female audience for products that are heavily male-oriented. Under these circumstances, how should – and at best, how can – the visibility of women in reporting be increased?"

A survey conducted by the magazine *Edito* (1/20) of the Professional Association of Media Professionals and the Media Trade Union revealed that selected newsrooms of leading media have 16–38 per cent women in management positions. The *NZZ* is at the lower end, while the *NZZ am Sonntag* from the same publishing house is at the top. The largest commuter newspaper in Switzerland, *20Minuten*, has a 33 per cent share of women in management positions and

a 47 per cent share in editorial positions. In the politics and business editorial department of SRF, the proportion of women in management is 28 per cent and in the editorial department as a whole 38 per cent.

Last year, Nora Bader and Andrea Fopp interviewed female journalists and asked them the following question, among others: “Does gender play a role in their professional lives?” The majority of the women interviewed stood by the spoken word, but a few completely rewrote the text or withdrew from the interview shortly before publication – probably for fear they would ruin their reputation in the media industry if they spoke plainly (Bader & Fopp, 2020: 19). In their book, they published 15 interviews, and in their introduction, they drew a conclusion under the title “Welcome to the shark tank”:

We have drawn the following conclusions: newsrooms are places of power struggle. Men are constantly fighting over who is the boss or the silverback in the pack. Accordingly, editorial meetings are rarely about who has the best ideas or does the most careful research, but rather about who roars the loudest, because the impostor syndrome is particularly widespread in journalism. As a woman, every now and then you feel compelled to shout: “Hey, buddy, if you want war, let’s make war!” (Susan Boos)

A latent sexism, especially disparaging slogans and abusive touches, apparently belong to the media industry. Tamed journalists found out in a survey in 2019 that half of the 458 female journalists who responded had already experienced sexual harassment and assaults from work colleagues or interview partners at work – for men, the figure was 11 per cent. If a woman defends herself against such “work culture”, she is quickly considered hysterical, humourless, or bitchy, and her promotion is a long way off. As a woman, one should not be “too sensitive” or make “politically incorrect” remarks. This is obviously also part of newsroom culture.

Where promotion is important, men are clearly in the majority. Around 70 per cent of political and business journalists are male; these hardcore departments are the powerhouse of journalism, with their topics considered the most relevant and their journalists the most competent and ambitious. Publishers also like to give editor-in-chief positions to well-connected political and business journalists. From an experienced domestic editor of *Weltwoche* – a woman – this means: “Come on – what are you waiting for? Why don’t you write about finance, social security, and armaments policy and don’t let yourself be pushed into the lifestyle league!”

When it comes to overcoming unequal power relations, only a few of the few successful media women plead for structural reforms in the fight against manifest and latent discrimination. One of them is Susan Boos, a long-standing member of the chief editorial staff of the weekly *WOZ*: “It can’t be right that women should simply have to adapt to male structures. Our lifetime is too

good for that” (Bader & Fopp, 2020: 28). Patrizia Laeri of the SRF business editorial team also criticised the structural conditions. “The incentives in the workplace are wrongly set” (Bader & Fopp, 2020: 28). She complained that working hours in the hard-core departments of politics and business are often particularly unfriendly to families. Even if it is not only about equal career opportunities, but also about diverse reporting, this includes topics that deal with women and primarily affect women.

Although most publishing houses and public broadcasters make efforts to achieve equality in newsrooms, the media industry and their trade associations are ultimately rather indifferent to gender equality and equal career opportunities. The disinterest of publishing houses and media politics is still so pronounced that reliable and comparable figures on the listed demands of media women are still missing.

Werner A. Meier

(F9) Gender equality in media content

1 POINT

Women have received more media coverage in the last decade, but men are still more prominent, especially in the political news sections of the Swiss media.

Similar to editorial and management positions, women are clearly under-represented in reporting. Women are not very visible as active subjects, and with age, they disappear from reporting. According to the GMMP study, 76 per cent of the people mentioned in daily news are men and only 24 per cent are women. In traditional print media, mentions of women were at 23 per cent, still slightly lower than in electronic media. In the *NZZ*, the newspaper by and for elites, the proportion of women dropped to 13 per cent. On Twitter channels, on the other hand, women and men are mentioned about equally often. There are also differences between the language regions. In French-speaking Switzerland, women are mentioned more often (30%) than in the German-speaking (20%) or Italian-speaking (18%) parts of the country. Women are mentioned or quoted below average in economic, political, and public affairs topics and in their role as experts, commentators, or activists. Following the spectacular women’s strike, political scientist Fabrizio Gilardi of the University of Zurich analysed the elections to the National Council and Council of States in Switzerland in October 2019 through 54,000 articles in 84 media titles. He found a double disadvantage, as only 41 per cent of the electoral lists were held by women, and in terms of journalism, they received 32 per cent of the newspaper articles. In other words: the “democracy-relevant” newspapers do not correct the under-representation of women, but rather reinforce it. In concrete terms, for the FDP (liberal party) women this means:

In the FDP, for example, 42 per cent of the candidacies are female, but only 30 per cent of the mentions of FDP candidacies in the media are from women. Men are therefore taken up, named and quoted significantly more often. If we exclude party president Petra Gössi from the FDP, the proportion of female nominations drops to 22 per cent, just under a fifth. This figure is only undercut by the SVP, where women are mentioned in only 17 per cent of media reports (and then it is often Magdalena Martullo-Blocher). (Gilardi, 2019; see also Fiechtner et al., 2016)

The hypothesis that male journalists prefer men and powerful women, while female media professionals do not mention women more often than men, is a bold one.

Especially with regard to gender equality, the conclusions of the GMMP study are not very optimistic. The 2015 results show that leading news media still convey a very traditional image of the sexes. Women who appear in the news are often portrayed not in their professional but in their family roles. Only in 3 per cent of news are role models presented atypically, while in 97 per cent of news, traditional role models are transported (GMMP, 2015). What is striking is the discrepancy between the high employment of Swiss women and their role as employees, which is hardly ever seen in the media. Only in articles on celebrities from the media and sports do women make up an above-average proportion (GMMP, 2015). According to our conclusion, the “glass ceiling” is still a reality and can probably only be broken in the particularly resilient Swiss media structures through targeted control measures within and outside media organisations.

Werner A. Meier

(F10) Misinformation and digital platforms
(alias social media)

2 POINTS

Misinformation and false information have been recognised, and most editorial offices defend themselves with special internal units or collaboration with external fact-checking organisations.

In mid-July 2020, a flyer similar to official publications of the Federal Office of Public Health (BAG) appeared. It claimed, among other warnings on a red background, that wearing masks is promoting the transmission of Covid-19 by the multiplication of bacteria and viruses in the lungs (e.g., Büchi, 2020). This example shows that wrong or false information, called “fake news” or disinformation to the public, has also become a problem for leading media organisations and their media creators since the advent of social media.

In the end of 2019 and beginning 2020, the Association of Swiss Media VSM launched an information campaign in the newspapers of its members, with the big red title “Fake News? Not in the Swiss press”. The reasoning for fake news-free Switzerland was as follows: “Our editors analyse current events, check sources, interpret events, provide background information and help you to form your own opinion. Credibility is our number one priority – with no alternatives: so that you can distinguish lies from facts”.

In the meantime, communication science has also begun to deal with this phenomenon (e.g., Zimmermann & Kohring, 2018). The already extensive literature shows that the term encompasses various phenomena and contains different aspects: Is the dissemination of fake news conscious and intentional, especially with the intention of deception? Are the claims objectively false with or without intention to be true, or just twisted claims? Is it about current topics or about historical “lies”?

Against this background, the journalists of leading news media were asked in our interviews how they could defend themselves against misinformation, for example, with a special editorial unit to combat misinformation or by working with external fact-checking organisations.

All media professionals interviewed were aware of the problem and stressed the importance of avoiding misinformation as gatekeepers. As a result, various editorial offices have institutionalised teams for fact-checking information and its sources, or in the event of uncertainty, the parties sit together with the department’s management or editor-in-chief. In addition, as a rule, no information is published without explicitly mentioning one or two existing independent sources. This applies not only to text information, but also to images or videos and especially to messages from social media. But automated or algorithmic tools do not seem to be used yet.

Also, in an international comparison, in most of the countries involved in the MDM project, false or “misinformation” is recognised as a problem and appropriate measures are being taken against it, with the exception of Iceland, Austria, and Italy, where the phenomenon appears to be of rather minor relevance and no defence mechanisms have been institutionalised. In most editorial offices, therefore, the verification of supposed facts, often by specialised experts or even special departments such as public broadcasting in Greece, has become institutionalised. But it is only in various countries, such as Finland, Belgium (Flanders), and Portugal, that independent organisations have emerged which have been specialised in fact-checking. And in the Netherlands, algorithmic tools appear to be used by some media to verify online comments.

Heinz Bonfadelli

(F11) Protection of journalists against (online) harassment 2 POINTS

Online harassment of journalists became a problem in the last years, but Swiss journalists are protected by assistance, for example, by specialised internal (legal) centres.

In the past few years, critiques, threats, hate speech, and even personal and physical harassment of journalists have increased in most countries, including Switzerland. The harassments are not only by rude people on social media, but also by authoritarian politicians, like former American president, Donald Trump. In Germany, for example, 60 per cent of 322 interviewed journalists reported such incidents in 2019 (Hildebrand, 2020). Moreover, the Covid-19 crisis was used by autocratic regimes to restrict press and media freedom. For this reason, the editors-in-chief and journalists were asked about the kinds of protective measures that were being taken by editorial offices and publishing companies against such types of (online) harassments.

In general, the situation vis-à-vis this is not too bad in Switzerland. However, there have been at least two publicly known cases of personal attacks, one against the chief editor of the political weekly magazine *Weltwoche* and the other against a journalist of Radio Télévision Suisse (RTS) in Geneva, both in 2019. Other incidents of cyberstalking have also been reported by our interviewed journalists, like an incident involving a female journalist by the Albanian community.

It was mentioned in our interviews that such incidents would usually be discussed with the superiors of the directly concerned journalists, who would be provided with assistance. Furthermore, most print media organisations have a legal department or at least a specialised service dealing with social media. And on the national level, there exists a centre for complaints by the Swiss Press Council. To conclude, at least at the moment, personal harassment of journalists in Switzerland seems to be not a major problem (so far), compared to staff reductions in most editorial offices, especially due to the ongoing the Covid-19 crisis through the beginning of 2020.

Heinz Bonfadelli

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 2 POINTS

Only a few media companies dominate the print media market in the four language regions, while the public service broadcaster SRG SSR leads the electronic sector in all language regions.

IN 2011
2 POINTS

At the national or linguistic-regional level, three-and-a-half private-commercial media companies dominate the print media market, namely Tamedia (TX Group) (Zurich), Ringier (Zurich), CH Media (Aarau), and the NZZ Media Group (Zurich). CH Media is a merger of AZ Media Group and NZZ Media Group in the field of regional media. In contrast to this, the public broadcaster SRG SSR dominates the radio and television sector in all four language regions of Switzerland.

At the national level, many forms of media concentration have been observed for some time: the concentration of ownership (declining number of independent media houses), journalistic concentration (many newspaper titles are mainly supplied by a mantle or central newsroom), multimedia concentration (media houses produce newspapers, radio, television, and online offerings in the regions), and circulation concentration (the declining newspaper circulation is spread over a shrinking number of titles. This trend seems to be heading towards a two-tier newspaper landscape. Few daily and weekly newspapers with regional and local language coverage serve the economic centres and agglomerations, while free-sheets and small paid local newspapers try to fill the remaining gaps. In addition, for about 30 years now, concentration has progressively become both horizontal and also across media genres. All dominant media houses usually have cross-media portfolios. Only Tamedia (TX Group) sold its radio and television stations to prevent jeopardising its dominance in the print sector through antitrust regulations. A summary of the online platform *Republik* shows that since the 1990s, large mergers and sales have been taking place in waves. With the launch of several free commuter newspapers distributed at the turn of the century, traditional regional newspapers came under massive additional pressure due to their modest market power. The big winner in the commercial competition is Tamedia (TX Group), which dominates not only the Zurich region, but also the Bern and the attractive Lake Geneva regions, from an entrepreneurial point of view. It is progressively becoming the largest commercial media group. At the end of 2017, NZZ Media Group and AZ Media Group announced an intention to merge their regional media businesses. The new group CH Media started its publishing activities in autumn 2018, following an examination by the Competition Commission. Its centralised newsroom serves more than 20 regional media houses across 13 cantons to position itself as the second-

strongest force, despite massive job cuts. In terms of domestic business, a third dominant place is occupied by the Ringier Group, which discontinued its commuter free newspaper *Blick am Abend* in late 2018. The Covid-19 crisis has not only intensified the advertising crisis of daily newspapers and regional Sunday newspapers, but has also jeopardised commercially successful publications such as *20Minuten Friday* or even *20Minuten*. The Table 6 lists the most important media companies in the three main language regions.

The city of Zurich prominently stands out as the journalistic and economic media capital of Switzerland. This orientation is reinforced by the SRG SSR, which also has a strong presence in the city in the broadcasting sector. Additionally, Tamedia (TX Group) is also the only commercial media company active in all language-regional markets, especially with its free commuter newspaper *20Minuten* (*20Minutes*, *20Minuti*).

In French-speaking Switzerland, TX Group has an even larger market share than in German-speaking Switzerland. Its dominance is concentrated in the large cities in German- and French-speaking Switzerland, including agglomerations such as Zurich, Geneva, Basel, Bern, Lausanne, and Winterthur, especially in the daily newspaper and online media business. Although Ringier no longer runs any regional newspapers, it does have four strong media brands throughout German-speaking Switzerland, namely the tabloid *Blick*, the weekly *Sonntagsblick*, *blick-online*, and the magazine *Schweizer Illustrierte*, which also deals with some politics. TX Group and Ringier have mutated into digital groups and earn more income from commercial services than from journalistic news media. CH Media, the joint venture of NZZ Media Group and AZ Media Group, has its economic and journalistic focus primarily in regional newspapers outside the major centres, and exclusively in German-speaking Switzerland. The market share of CH Media is 19 per cent (fög, 2019). With the selling-out of its regional newspapers, the NZZ Media Group has further lost market share and can only rely on its two renowned newspapers *NZZ* and *NZZ am Sonntag*. The other groups, Somedia, Editions Suisses Holding (ESH) and Gruppo Corriere del Ticino, are only prominent regionally, namely in the Cantons of Ticino, Neuchâtel and Valais, and Grisons. Since all major media in Switzerland are considered corporate media, centralisation has become even more pronounced. All media genres listed reinforce tendencies of media concentration and in no way constitute a corrective, even though the latter would be absolutely necessary from a federal perspective. This renders a lack of structural diversity and alternatives in the various media arenas in the language regions and cantons acutely problematic.

Table 6 Private corporate media in the language regions

Company	Media
German-speaking Switzerland	
TX Group HQ: Zurich CN: Zurich	<i>Daily newspapers with impact on language region:</i> 20Minuten (DS); Tages-Anzeiger (ZH) <i>Daily newspapers with impact on region:</i> Berner Ztg (BE); Der Bund (BE); Basler Ztg. (BS/BL) <i>Weekly newspapers & magazines:</i> Sonntagszeitung (DS); Finanz und Wirtschaft (DS) <i>Online media:</i> 20minuten.ch (DS); tagesanzeiger.ch (DS)
Ringier HQ: Zurich CN: Zurich	<i>Daily newspapers with impact on language region:</i> Blick (DS) <i>Weekly newspapers & magazines:</i> Sonntagsblick (DS); Schweizer Illustrierte; Handelszeitung (DS) <i>Online media:</i> Blick.ch (DS) <i>Regional radio stations:</i> Radio Energy (BE); Radio Energy (ZH) <i>Regional TV stations:</i> Blick TV (DS)
CH Media HQ: Aarau CN: Aarau	<i>Daily newspapers with impact on language region:</i> Aargauer Zeitung (AG); St.Galler Tagblatt (SG); Luzerner Zeitung (LU) <i>Daily newspapers with impact on region:</i> Baselland. Ztg. (BL); Solothurner Ztg (SO); Thurgauer Ztg. (TG); Urner Zeitung (UR) <i>Weekly newspapers & magazines:</i> Schweiz am Wochenende (DS) <i>Online media:</i> watson.ch (DS) <i>Regional radio stations:</i> Radio 24 (ZH); Radio Argovia (AG); Radio Pilatus; Radio FM1 <i>Regional TV stations:</i> Tele Züri (ZH); Tele 1 (LU); TVO (SG); TeleBärn (BE); Tele M1 (AG)
NZZ-Group HQ: Zurich CN: Zurich	<i>Daily newspapers with impact on language region:</i> NZZ (DS) <i>Weekly newspapers & magazines:</i> NZZ am Sonntag (DS)
Somedia HQ: Chur CN: Chur	<i>Daily newspapers with impact on language region:</i> Südostschweiz (GR); La Quotidiana (GR) <i>Daily newspapers with impact on region:</i> Südostschweiz (GL); Bündner Tagblatt. (GR) <i>Online media:</i> Suedostschweiz.ch <i>Regional radio stations:</i> Radio Südostschweiz <i>Regional TV stations:</i> TV Südostschweiz
French-speaking Switzerland	
TX Group CN: Lausanne	<i>Daily newspapers with impact on language region:</i> 20Minutes (VD); 24 heures (VD) ; Tribune de Genève (GE) <i>Weekly newspapers & magazines:</i> Le Matin Dimanche (WS) <i>Online media:</i> lematin.ch
ESH Médias HQ: Neuchâtel	<i>Daily newspapers with impact on language region:</i> Le Nouvelliste (VS); Arcinfo (NE) <i>Daily newspapers with impact on region:</i> La Côte (VD)
Ringier CN: Lausanne	<i>Daily newspapers with impact on language region:</i> Le Temps (VD) <i>Weekly newspapers & magazines:</i> L'illustré
Italian-speaking Switzerland	
Gruppo C. del Ticino HQ: Neggio	<i>Daily newspapers with impact on language region:</i> Corriere del Ticino <i>Online media:</i> ticinonews.ch <i>Regional radio stations:</i> Radio 3i <i>Regional TV stations:</i> Teleticino
TX Group	<i>Daily newspapers with impact on language region:</i> 20Minuti

Comments: HQ = headquarters, CN = central newsroom.

The 2019 Yearbook *Quality of the Media* speaks of an increase in structural and content-related media concentration, caused by editorial cooperation within and between the remaining media houses. With declining revenues, media groups are looking to achieve economies of scale and scope, as well as efficiency gains. Increased cooperation is also intended to reduce the economies of scale of the globally active tech platforms in the advertising market (fög, 2019). Consequently, media concentration is increasing in all language regions. Specifically, the market shares of the leading media houses are growing, the number and significance of independent providers is declining, and the number of titles is decreasing (fög, 2019).

In the press market of German-speaking Switzerland, media concentration (CR3) grew by 27 percentage points from 2001 to 2018 to a market share of 83 per cent. In French-speaking Switzerland, it grew by 10 percentage points to 90 per cent (CR3) from 2001. The dominant players are Tamedia Publications (TX Group) with 69 per cent, the ESH with 12 per cent, and Imprimerie Saint-Paul with 8 per cent market share. In Ticino, the CR3 concentration rate in 2017 was around 61 per cent (fög, 2019).

Due to the widespread establishment of centralised newsrooms, concentration of media content, measured in terms of the share of independent media contributions (one-offs), is also declining. In the German-speaking media arena, the share of one-offs has fallen by 7 percentage points within one year and still amounted to 74 per cent in 2018 (fög, 2019). Particularly problematic from a Swiss perspective is the result that, of all the subject areas examined, political reporting is the least diverse.

According to the 2019 Yearbook, the quality of media content will remain stable over the years as media content changes, namely with regard to a factually balanced reporting style, editorial input, and transparency of sources. In contrast, however, daily titles lose quality in terms of relevance and also, especially, diversity. Soft news are gaining in importance, the variety of reporting is significantly decreasing, and the “provision of context” is decreasing. Above all, explanatory, background information on politics has decreased significantly over the years, while opinion journalism has increased (fög, 2019). The authors of the Yearbook argue that the ongoing cost-cutting measures increases the danger of opinion journalism, which is cheaper and quicker to produce, being expanded within the media arena and that tedious, time-consuming journalistic research will diminish. This assessment also coincides with the *Tamedia Quality Report*, where Strehle writes that resources are at a critical point in the entire media industry (Strehle, 2018).

Although different in methodology, the Media Monitor Switzerland (Thommen et al., 2019) attempts to capture key consequences of media concentration: Is the free formation of opinion in Switzerland under (increasing) pressure? Which media offerings and which media groups have a particularly strong influ-

ence on the formation of opinion among Swiss citizens (Publicom, 2019)? The press release of Federal Office of Communications (OFCOM) results show that television continues to dominate opinion formation in Switzerland, followed by radio, print, online, and social media. The dominance of television is particularly pronounced in French- and Italian-speaking Switzerland, where television has a much greater power of opinion than radio and the press. In German-speaking Switzerland too, television is the most important medium; in comparison with Latin Switzerland, however, radio and the press play a greater role. However, the study itself contradicts this interpretation of the results. In the Media Monitor Switzerland, opinion power is understood merely as an auxiliary construction that does not claim to measure the intended or unintended influence of all 176 media brands on individual opinion formation comprehensively and precisely. It is merely an approximation of opinion power as an estimate of the opinion-forming potential of media offerings and providers (Publicom, 2019). In this sense, the study lacks quantifiable and verifiable credibility and allows no more than a rough estimate of a controversial and highly diffuse impact potential of media brands on opinion formation.

Werner A. Meier

(E2) Media ownership concentration regional (local) level 1 POINT

The strong concentration of newspapers at regional level has increased significantly. Moreover, almost all private regional radio and television stations are owned by the dominant media groups.

IN 2011
1 POINT

There is a strong concentration of newspapers at the regional level. The publishing houses have divided regional markets among themselves, and there is hardly any competition. Only in the Italian-speaking part and in the greater Zurich area do several publishing houses compete with each other. The SRG SSR is legally not permitted to promote competition in regional and local journalism. The region belongs to the commercial media companies. While politics continues to be organised at the three levels of the confederation, canton, and communes and more or less successfully evades centralisation by the confederation, a majority of the cantonal capitals no longer have their own local newspaper, let alone several independent journalistic offerings to develop a cantonal perspective. The central editorial offices of the leading regional group newspapers are located in Zurich or in Aarau. The eleven cantons of Argovia, Fribourg, Geneva, Grisons, Jura, Neuchâtel, Schaffhausen, Ticino, Vaud, Valais, and Zurich have a daily newspaper on site, while the remaining 15 (half) cantons of the two Appenzell, the two Basel, Bern, Glarus, Nidwalden, Obwalden, Lucerne, Zug, Schwyz, Solothurn, St. Gall, Thurgovia, and Uri have to be satisfied with a small regional newsroom on site.

Since Switzerland is quadrilingual (German, French, Italian, and Romansh), regional and linguistic markets play prominent roles. The comparatively large number of regional newspaper titles, regional television stations, and radio stations conceals the fact that most daily newspapers are owned by two to three media houses.

In German-speaking Switzerland, TX Group publishes the daily commuter newspaper *20Minuten*, financed by advertising money and distributed free of charge. This commuter free-sheet is by far the newspaper with the highest circulation in Switzerland. Moreover, in the three most-populous cantons, Zurich, Bern, and Vaud, its regional newspapers *Tages-Anzeiger*, *Berner Zeitung*, and *24heures* dominate. Ringier publishes the daily tabloid *Blick* and on Sundays, *Sonntagsblick*. The CH Media publishes a large number of regional newspapers in the Swiss Mittelland (Swiss midlands) (including the *Aargauer Zeitung*, *Luzerner Zeitung*, and *St. Galler Tagblatt*). The NZZ Media Group focuses on the publication of the elite and quality newspapers *NZZ* and *NZZ am Sonntag*. The publishing house Editions Suisses Holding dominates cantons of Valais and Neuchâtel with its titles *Le Nouvelliste* and *Arcinfo*.

In the broadcasting sector, the degree of concentration can be calculated on the basis of reach for the three language regions (audience market shares). In general, the audiovisual media market in Switzerland is dominated by the programmes of the public broadcaster SRG SSR. The combined market share of the public service radio stations in German-speaking Switzerland is 61 per cent, a number identical to western Switzerland, and in Italian-speaking Switzerland, almost 74 per cent (SRG SSR, 2019). In contrast to the television sector, foreign radio stations are of little relevance.

SRG SSR's television programmes compete with numerous foreign stations that share one of Switzerland's national languages. Around 31 per cent of total airtime (24 hours) is attributable to Switzerland's public service channels, while 61 per cent is broadcast by foreign channels (SRG SSR, 2020a). However, the advantage of SRG SSR lies in its Swiss perspective and provision of domestic information. In addition, there are no private-commercial television channels at national level. Over the past 20 years, private-commercial television channels have only been able to establish themselves at regional level with limited commercial success.

In German-speaking Switzerland, the two leading public television channels SRF1 and SRF2 achieve an audience share of 28 per cent (for 24 hours). The private-commercial regional stations achieve 8 per cent, while foreign stations have a share of 61 per cent (SRG SSR, 2020a). The two leading SRG SSR television channels also have the highest reach in French- and Italian-speaking regions (RTS 26% and RSI 24%). Foreign stations from France and Italy follow in the next place (SRG SSR, 2020a).

Taken together, citizens in the three language areas considered at the national level in Switzerland can choose from newspapers, public and private radio and television programmes, and a number of freely accessible online media. However, the decentralised mode of production and the different sensibilities of the respective language groups prevent a comprehensive homogenisation of content and programmes at national level. This also applies, in a limited manner, to the free commuter paper *20Minuten*, which dominates the respective newspaper and online market in two of three language regions.

Nevertheless, from the point of view of the Federal Council, indirect funding is necessary on the basis of the current media development in the regional and local area. Thus, the Federal Council has proposed an expansion of indirect press subsidies for regional and local newspapers, from CHF 30 million to CHF 50 million. This will also subsidise the distribution of titles with a circulation of 40,000 copies or with a header of more than 100,000 copies. This is where the TX Group and the CH Media benefit most. This is compounded by the fact that emerging online media will find it difficult to transcend an absent legal framework, for which changes will be difficult to manage. In this regard, backward-looking but well-established measures may well be easier to adopt than new and promising ones. Such a press subsidy is also controversial insofar as both the TX Group and the NZZ Media Group are concerned. Both have simultaneously paid dividends to their exclusive shareholders and received state funds for short-time work. According to a press release by the union Syndicom (2020), it is therefore “absolutely irresponsible and cynical of a company to simultaneously pay CHF 37 million in dividends to shareholders, introduce short-time working to maintain jobs and to impose redundancies [translated]”.

These incidents have also caused irritation among publishers. The conflict of objectives is most obvious at the TX Group, because this diversified group has been making high profits for decades but has concurrently implemented staff cuts and centralisation towards its newsrooms. The message to politicians and the public is: we are only prepared to continue the newspaper business if politicians and newspaper readers are prepared to co-finance the publication of a newspaper in such a way that corporate profits are secured for the TX Group in the long term. With the bridging aid for the media provided by the Swiss parliament as support during the Covid-19 crisis, this should be even easier to achieve.

Werner A. Meier

(E3) Diversity of news formats

2 POINTS

IN 2011
2 POINTS

The diversity of different media products as well as different formats of news presentation is still sufficient. But there are clear tendencies towards a stronger orientation on reader interests, with more tabloidisation of news, especially in the print media.

The Swiss news media landscape is still rich in news formats, especially in the press, but as well in the public and commercial broadcast programmes, and new with the increased diversity of online media formats. Besides the multiple types of news media, there are different forms of news presentations as well. So, at first glance, Switzerland's media landscape still is diverse with its public and private television channels and radio stations as well as still many newspapers (daily, tabloid, and weekly). However, a closer look reveals several dysfunctional tendencies, both in the press and in the private broadcast sector.

The format structures and content of the public and private broadcast channels has been observed and analysed in a regular way by research studies executed for the Federal Office of Communication BAKOM (Brändli et al., 2019; Göfak, 2018; Grossenbacher et al., 2018, 2019). And the fög – Forschungszentrum Öffentlichkeit und Gesellschaft [Research Center for the Public Sphere and Society] (fög, 2019) analyses and provides accounts of the quality of the Swiss media regularly in its yearbook *Quality of the Media*.

In comparison with the situation about ten years ago (e.g., Kradolfer et al., 2010), we must state that the diversity of news formats and news content has decreased significantly, not least because the traditional quality press has come under heavy pressure. But together with public radio and – with some distance – public television, the traditional newspapers provide the public with all relevant information required for a democracy. They continue to try and sustain their public service to politics, economy, and culture. But, in this endeavour, they struggle to compete against the solely commercially aligned free-sheets, tabloids, and commercial radio, television, or online media, which all focus on individual interests, sports, human-interest, and showbiz. Furthermore, they very successfully reprocess issues from politics, economy, and culture in a personal and emotional way (Kamber & Imhof, 2010). The abolishment of the traditional news sectors leads to an “all-round journalism” that very often neglects quality criteria. The core sectors such as politics and economy have lost importance in favour of human-interest topics.

On the one hand, the share and significance of news compared with non-news content varies between the different media, and on the other, the news is also presented in a variety of formats like neutral information, reportages, features, and interviews. In addition, new online editions of most Swiss newspapers are available, and most public and private broadcasters disseminate their content online. Online news coverage, thus, occurs in various formats: news articles

can be read on websites, live radio streams can be listened to, and television programmes can be viewed online – or downloaded as podcasts.

Conversely, certain news-related online media have entered the Swiss news market, like *watson.ch* with news and entertainment for young people, the non-profit Internet-papers *infosperber.ch* or *JOURNAL21*, locally oriented *Tsiiri.ch* started in January 2015, or *higgs.ch*, a non-profit independent website with science-topics, founded by the science journalist Beat Glogger in January 2018, financed by crowdfunding.

Table 7 presents the structure of topics in different types of newspapers in the three language regions. The significance of the topics from politics, economy, and culture is highest in the elite and quality press with an amount of 60 per cent and 50 per cent, respectively, and lowest in the boulevard and free press with about 25 per cent, whereas sports and human interest with amounts between 40 per cent and 50 per cent have the highest priority in the popular and free press. But there are differences between the three language regions.

Table 7 Topics in newspapers of the three language regions, 2016–2018 (per cent)

Newspaper	Politics	Economy	Culture	Sport	Human Interest
Elite Press: NZZ	38	11	13	26	13
Quality Press: Tages-Anzeiger	33	10	6	28	23
Tabloid Press: Blick	13	11	4	54	17
Free-sheet: 20Minuten	12	9	2	44	32
Elite Press: Le Temps	48	19	11	12	9
Quality Press: 24heures	31	15	9	31	14
Free-sheet: 20Minutes	22	11	5	19	43
Regional Paper: Corriere del Ticino	23	13	8	44	13

Comments: n = 48,257.

Source: fög, 2019: 81

Besides these differences in topics between media and regions, pressures towards presenting news in personalised and emotionalised story formats to attract reader interest has considerably increased in the last years (Vogler et al., 2019). While factual and objective news reporting and transparency of sources remain almost stable at a high level, there is a loss concerning societal relevance and diversity of topics (Vogler et al., 2019). Traditional “media sections”, observing and discussing media quality from a critical stance, have been increasingly eliminated. In addition, content media concentration occurs as articles in regional newspapers are taken over from the central news-office: only 62 per cent of articles dealing with politics in the newspapers of the German part of Switzer-

land have been unique in 2018 (Häuptli & Vogler, 2019b). Further, there is a strong tendency of the press, especially in the German part of Switzerland, to focus on events in the same language region: 82 per cent of the articles therein are region-specific. This tendency is relatively weaker in the French-speaking part at 63 per cent, and significantly lower in the Italian-speaking part at 49 per cent (Häuptli & Vogler, 2019a). To summarise these tendencies, decrease in the quality of news provided by Swiss newspapers in the last decade has been, at best, moderate.

Table 8 *Public television programme formats in the three language regions, 2017 (per cent)*

SRG TV programme content 24 hours	German		French		Italian		SRF info
	SRF 1	SRF 2	RTS 1	RTS 2	RSI 1	RSI 2	
Journalistic content	49	12	33	40	45	27	78
Thereof news	6	1	18	14	26	12	39
Fictional entertainment	18	53	44	15	34	19	0
Nonfictional entertainment	10	2	4	2	7	5	0
Sport	0.5	18	4	19	2	26	16
Diverse: children, religion, etc.	1	0	0	17	3	6	1
Trailers	14	11	9	3	4	14	3
Advertising & sponsoring	8	4	6	4	5	3	2

Source: Göfak Medienforschung, 2018

Table 8 presents the structure of the programme content of the six television programmes of the Public Service Broadcaster SRG SSR in the three language regions (German, French, Italian) and the information channel SRF Info in German language only. About a third of the programmes consist of journalistic content, but the share of news varies in the three language regions between 6 per cent in the German part and about 35 per cent in the French and Italian region. SF info in German language consists mostly of information (78%) and news (39%), whereas the other main programmes deliver fictional and nonfictional content as well. The share of journalistic content with about 70 per cent and 40 per cent news during evening prime times are provided by the 14 regional television programmes. This seems to be significantly higher in comparison to the public television programme, but with many repetitions (Brändli et al., 2019).

Regarding the public radio programmes, *SRF1* transmits in the German language its first channel: 27 per cent information, including, for example, the programme ECHO DER ZEIT with background information and analysis on current topics, 39 per cent is regular news several times a day, and 53 per

cent is music, of which 32 per cent comprise Swiss titles (Grossenbacher et al., 2018). In addition, the 33 private local radio stations broadcast during prime time mainly music (67%) and short local and regional news (16% by service mandate, 12% by commercial radio) (Grossenbacher et al., 2019).

Heinz Bonfadelli

(E4) Minority/Alternative media

2 POINTS

Swiss linguistic minorities are well served by the Swiss mass media. The public broadcaster SRG SSR guarantees that all official languages and cultures are covered with information. And some alternative media exist as well. But there is still almost no special media for minorities with migrant backgrounds.

IN 2011
2 POINTS

An essential feature of Switzerland is its ethnic and linguistic diversity. Multilingualism dominates and determines the media landscape. Daily and weekly newspapers, magazines, radio, and television programmes are available not only for the dominant German-language region, but for the small French, Italian, and Romansh parts of Switzerland as well. The national broadcaster SRG SSR (2020a) is obliged by law to provide programmes that reflect and preserve the linguistic and cultural diversity of the country, and radio and television programmes are produced in all four official languages. Its six studios in Zurich, Bern, Basel, Geneva, Lausanne, and Lugano and four regional studios in Aarau, Chur, Lucerne, and St. Gall produce 16 radio and 7 television channels.

In order to finance radio and television in the four language regions, SRG has to compensate for costs so that equivalent and high-quality programmes can be broadcast in all parts of the country. 73 per cent of the fee revenue comes from German-speaking Switzerland, which receives only 43 per cent of it. French Switzerland receives 33 per cent, Italian Switzerland 22 per cent and Rhaeto-Romance Switzerland 2 per cent of the revenues. All language groups benefit by the financial compensation, except the German-speaking Switzerland, which acts as a donor region.

In contrast to the plentiful news offerings for its language communities, Switzerland still does not have a policy on how to provide media services to its significant community of immigrants. SRG SSR is making some efforts in this regard. However, the importance this leading media conglomerate attaches to this issue is quite inadequate. A recent study shows that only 6.4 per cent of all media contributions (SRG SSR radio and television programmes as well as private-commercial radio programmes) deal with minorities with a migrant background (Bonfadelli, 2017).

Minority, alternative, and community media, non-commercial and participatory, comprise a heterogeneous field of public service from the bottom. They are

important as platforms for the expression, discussion, and exchange of generally marginalised segments of a society (Retis, 2019). There are alternative, non-profit-oriented media products in Switzerland, for example the left-wing weekly WOZ, with a paid circulation of around 18,000 copies, or radio stations such as the non-commercial *Radio LORA* or *Radio RaBe*. Journalists working for such alternative media do so for deep (uniform) wages. Alternative media will struggle even harder if it is not subsidised in the current Covid-19 crisis. In January 2018, the digital magazine *Republik*, which deals with reports from politics, business, culture, and society, was founded by six former press journalists and financed by crowdfunding. The journalistically demanding and elite platform is financed by around 18,650 subscribers (January 2020) and crowdfunding. Just one to three posts are posted online at 5 o'clock in the morning.

Although people with a migrant background make up almost 35 per cent of the Swiss population, there is almost no print media in their languages of origin (e.g., *La pagina* in Italian or *Arkada* in Turkish), but only several Internet platforms, such as *africalink.ch* for migrants from African countries, *albinfo.ch* for migrants from Albania, *arkadas.ch*, a platform combined with a newspaper for migrants from Turkey, *www.espanoles.ch* in Spanish, *www.brasilflashtv.com* in Portuguese, and *www.chevere.ch* in Spanish, for migrants from South America. The Internet platform *migesmedia.ch* of the Swiss Red Cross connects and lists the migrant media in Switzerland. Several empirical studies on migrants and the media in Switzerland document how migration and migrants are only a peripheral issue in the Swiss media (Bellardi, 2016). It is, therefore, not surprising that migrants do not get involved in the mainstream media.

From an international perspective, it can be said that there are print and radio offerings for minorities to varying dimensions in almost all European countries, but hardly in Iceland, Belgium (Flanders), Italy, or Portugal, and is usually only a niche phenomenon with a limited reach, as in Switzerland, which occupies a medium position. Finally, public service broadcasting is obliged to offer programmes for (linguistic) minorities in all countries as well as in Switzerland. There are also media platforms for minorities on the Internet. But minorities, and especially immigrants, tend to have little presence in mainstream media coverage, except in the context of elections or political conflicts.

Heinz Bonfadelli

(E5) Affordable public and private news media

3 POINTS

IN 2011
3 POINTS

Switzerland is one of the richest countries in the world, and its mass media is relatively cheap and affordable for almost everybody. But "over-information" on the Internet is a factor for certain people, who don't want to pay anymore for journalistic media products.

According to the Federal Statistical Office, Swiss households spent an average of CHF 254 per month in 2008 to meet their information and communication needs, CHF 183 for content and CHF 71 for devices (4.8% of total consumer spending). In 2016, media spending rose only slightly to CHF 300 (263 for content and 37 for devices), adding up to 5.6 per cent of consumer spending. Low-income households proportionately spend more on communication and information than higher-income households.

An annual subscription to a daily newspaper costs about CHF 570. And the Swiss billing company Serafe AG collects the obligatory licence fees for public service radio and television, which amounts to CHF 365 per year per household (combined fee). The monthly subscription fee for cable television costs about CHF 40, depending on the provider (e.g., UPC or Swisscom). Moreover, depending on the provider as well as capacity, the monthly cost for access to broadband Internet is about CHF 60. According to this, a full supply including radio, television, Internet, and cable television costs approximately CHF 120 per month.

Taken together, in 2017, private households in Switzerland spent CHF 15.8 billion for culture, including media. 13.5 milliards of the total costs fall upon content and services (print & audiovisual content, Internet, museums, libraries, theatre, concerts) and CHF 2.2 billion for equipment. And the biggest share with CHF 7.4 billion were the costs for the Internet, mostly subscriptions including television and telephone.

To conclude, the news media in Switzerland – press, television, and radio – as in most European countries, are still affordable for a majority of their consumers.

Heinz Bonfadelli

(E6) Content monitoring instruments

1 POINT

IN 2011
1 POINT

Efforts to monitor the media in Switzerland on a regular basis are institutionalised in OFCOM. Supervision is carried out on a regular basis, but of the broadcasting media.

The media industry itself has a news archive in which all published newspaper articles are accessible online for a fee. This documentation makes it possible to quantitatively record thematic focuses of the media at certain points in time.

As far as daily newspapers are concerned, there is no publicly accessible data that might allow monitoring. The media industry focuses almost exclusively on usage, reach data, and circulation data according to Verband Schweizer Markt- und Sozialforschung [Association of Swiss Market and Social Research].

Tamedia (TX-Group) has additionally published a quality report on its media in 2017 and 2018. For reasons of feasibility, according to the author and former editor-in-chief of the *Tages-Anzeiger* Res Strehle, monitoring was limited to “a deep drilling in the journalistic offering of individual deadlines” (Strehle, 2018).

The Federal Office of Communications OFCOM may only deal with radio and television programme services. It commissions long-term programme analyses and studies on the power of opinion (including Publicom, 2019).

SRG SSR publishes statistics on its radio and television programme services in its annual report, which provide an overview of the programme content broadcast during the reporting year, represented in hours. It documents the diversity of content and shows the main focus areas of the respective radio programme services (66% music, 15% current affairs and information, 5% culture and education, 1% sport, 7% moderation, and 5% other). In the case of television, 37 per cent constituted current affairs and information, 23 per cent films and series, 14 per cent culture and education, 12 per cent sport, 3 per cent children’s programmes, and 11 per cent entertainment and other programmes. The categories are published in great detail in the annual report, broken down by individual radio and television stations. The online programme statistics only show reach figures. SRG SSR’s audience councils also monitor individual programmes and public debates. These are more or less independent advisory bodies which – in the individual language regions – focus on protecting values laid down by the political, legal, and social structures of a democratic society. In fact, the Audience Council in German-speaking Switzerland, comprising a total of 26 members divided into individual working groups, conducted 21 programme observations – mostly of specific programmes – in the past reporting year (SRG SSR, 2019).

The fög – Research Center for the Public Sphere and Society at the University of Zurich was set up with the aim of systematically observing and analysing communication events. Communication events are topics that vie for attention in public communication. Such communication events are investigated because fög considers public communication to be the most important medium for both steering and integrating our society. Since 2010, fög has been producing a yearbook entitled *Qualität der Medien* [Media quality]. According to its own statements, the aim of the yearbooks is to strengthen quality awareness on the part of the audience, media professionals, publishing management, and publishers (Imhof, 2010). Specifically, the reporting quality of professional information media and their resources, the journalistic diversity or media concentration, and the changed media consumption are key areas of analyses (fög, 2019).

Expectedly, all large companies, associations, and administrative units monitor the coverage of daily and specialist media in order to proactively influence the media coverage or to counteract undesired media publicity. There are a number of specialised firms which, by means of strategic consulting and public relations work, try to achieve the sovereignty of interpretation in specific problem areas and decision-making powers in the interest of wealthy clients. The aim is to create such content and messages in fragmented sub-publics with which their clients are heard and associated. This media work is, above all, about attracting the attention of media professionals: what exactly does the strategic consultant as an intermediary mean by this, Andrés Luther recently explained in an interview in the *Neue Zürcher Zeitung NZZ* (Scheu & Schoenenberger, 2020: 14):

We absorb the momentum, react and achieve impact with controlled explosions. [And] if a situation develops and it has a certain relevance, if it is clear that journalists are interested and if, in addition, there is a possibility that they lose control of the sovereignty of interpretation – then I have a chance. I am in contact with journalists, I know who is interested in what, what the positions are. At the right moment, I give them the topic.

Werner A. Meier

(E7) Code of ethics at the national level

1 POINT

Although there is a code of ethics formulated by the Swiss Press Council, it has only a limited effect in the everyday life of journalists.

IN 2011
1 POINT

The Swiss Press Council monitors compliance with the code of ethics applicable to all media professionals, specifically the “Declaration of the Duties and Rights of Journalists”. The Press Council comments on questions of journalistic professional ethics, either on its own initiative or in response to complaints. The barriers to entry are low: any person can lodge a complaint; the procedure is free of charge. The Press Council judges these through the code of ethics drawn up by the professional associations themselves. In its decision, the Press Council assesses and justifies whether and why a journalistic report in the press, radio, television, or Internet has violated the journalist’s code of ethics – or not. The decision can be taken note of – or ignored. No sanctions are provided for.

In addition, the Press Council drafts protocol statements and guidelines for the “Declaration of the Duties and Rights of Journalists”. The code consists merely of ethically binding “shall” norms and is not a legal norm. Compliance with these rights and obligations is voluntary for media professionals and publishers and cannot be enforced by any legal means.

At company level, there are also editorial statutes and publishing guidelines that are set by media companies. Compliance with these guidelines is legally binding as part of the employment contract. In practice, therefore, there are significant differences in form and content between the code of ethics, editorial statutes, and publishing guidelines. For example, media professionals can neither demand a collective agreement or the fulfilment of working conditions from media companies that enable or at least facilitate media-ethical action, nor can they claim demands that impinge on individual employment relationships. This voluntary self-organisation of the media industry seems to have little effect in day-to-day business, even though the code has been in force for over 40 years.

In a longer academic article, Silke Fürst and Philomen Schönhagen (2018) conclude that the self-regulation of the Swiss media is incomplete and does not meet the current challenges. This assessment comes as no surprise, because this is what the industry wants. Press codex, editorial statutes, and journalistic guidelines are primarily a business management and control instrument.

Against the background of the freedom of the press and economic freedom granted to the media, binding management, and control measures in the interest of the public and democracy are not binding on media companies. Self-organisation measures predominantly aim to protect the company's own business interests and optimise internal management. To speak of self-regulation in this context is inappropriate because the rules are developed under the company's own direction, are voluntary and non-binding – and compliance or non-compliance is largely without consequences. Readers and media consumers are promised compliance with certain media-ethical standards and journalistic quality, but citizens cannot participate in the negotiation processes and are left out. Participation and pluralism also fall by the wayside. Press codex cannot fulfil many goals and expectations at all, not least those that communication science brings to the media. This raises questions on why an undemocratically established public sphere should be able and willing to provide media and infrastructures that are appropriate for democracies.

In any case, the press codex has not played an important role in the looming financing crisis of journalism; it has barely strengthened the social legitimacy and credibility of the media or promoted the independence of journalism, or even improved the business model of commercial media. Further, it is unclear whether the press codex is capable of fulfilling an alibi function or is suitable as a public relations instrument. Currently and in the past, the press codex has always been, and continues to be, helpless in the face of business challenges. For Fürst and Schönhagen, therefore, the press codex is far from suited to provide answers to problems that have arisen in the course of the growing media concentration since the 1970s (Fürst & Schönhagen, 2018).

Werner A. Meier

(E8) Level of self-regulation

2 POINTS

Although there are many measures and instruments for corporate and editorial self-organisation, they contribute little to media accountability of companies and journalists.

IN 2011
2 POINTS

As already stated in the previous section, there is an ethical code, editorial statutes, and publishing guidelines, but in practice, these elements of self-organisation primarily serve the interests of the industry and the concerned company. Nevertheless, they provide direct and indirect information about the status of accountability of media companies and journalism.

According to the 2011 publication *Mapping Media Accountability* (Fengler et al., 2011), media accountability to society is primarily based on measures and instruments that are initiated and accounted for by the industry and individual publishing houses themselves. In the Swiss context, these include:

- Press Council and Code of Ethics of the industry
- editorial statutes in media organisations and on news platforms
- journalistic guidelines of editorial offices and media organisations (Code of Conduct)
- readership reactions in the media and on platforms
- industry and corporate communications: media releases, in-house magazines, organisational charts, quality reporting, portfolio, annual reports, annual reports, letters to shareholders, et cetera
- ombudsperson offices of media organisations and news platforms
- media journalism (including media and journalism criticism) in daily news media
- industry magazines (e.g., “Schweizer Journalist”) and industry newsletters (e.g., newsletter of the VSM)
- news archives
- fact-checking organisations in media organisations and on news platforms

All these corporate measures and professional arrangements enable media organisations to articulate and justify their privileges and claims to power in business, politics, and society. The extent to which these activities not only promote self-organisation but also strengthen the accountability of media and journalism would need further examination in detail. In any case, the accountability of the media is not a matter of course and cannot be left to the industry. Civil society and the state are also called upon to do the same.

Werner A. Meier

(E9) Participation

2 POINTS

As a consequence of social media, the leading Swiss news media created possibilities for feedback, but still hesitate to incorporate the participation of media users actively in the news process.

IN 2011
1 POINT

The newspaper section “Letters to the Editors” has existed for a long time and served as a feedback tool by readers. This traditional way of giving feedback still has weight, although it is subject to newsroom selection. But today, most letters to the editor are actually “e-mails to the editor” and this feedback possibility exists on most online sites of newspapers. But journalists often complain about the bulk of emails or online comments, which are very often written in a sloppy, non-reflexive way. With it, letters to the editor have experienced degradation. And today, the Internet, and especially the possibilities offered by Web 2.0, intensifies the interactivities with the audience and transforms the contours of participation. Social media platforms are used more and more as a “loudspeaker”, mostly by dissatisfied news users, and are – quite often – a form of journalistic harassment. But journalists observe it, use it as a source, and collect comments on popular topics to re-use in new articles. The audience – in rare cases – may thus influence the news selection (Keel et al., 2010).

But further reaching participation of the public in the process of journalism is still quite rare: a frequently employed possibility is the print of pictures or videos of so-called reader reporters by newspapers, for instance, in how the weather report of the Public Broadcasting SRG SSR is curated. The free paper *20Minuten* is an exception, where feedback of the public to controversial topics is often actively asked for and integrated in its news stories.

Nevertheless, a bulk of journalists express the importance of getting feedback and having civil society (or at least their audience) involved, but without possible interference. So, usually in the morning, the editorial staff is deciding, for example which reader stories, often emerging from strokes of fate, would be presented. Besides, further possibilities are used by media corporations today like invitations for readers or pupils to visit the editorial office, lectures by experts for the readership – for example used regularly by the *NZZ* – reader conferences, street interrogations, or online surveys about reader opinions towards controversial topics – often used by *20Minuten*. But public involvement still has low priority, and a so-called open newsroom still does not exist in the Swiss media. At least, in the *Handbook of Quality in the Media* by Pietro Supino and Res Strehle, published by Tamedia in 2017, “interactivity with readership” is a topic that is regarded to be of value by digitalisation. They emphasise, in an idealistic way, that the roles of journalists and readers would move towards being defined in a new way, and journalism would then change from didactic to dialogic communication. Therefore, the significance of the readers as suppliers of topics might potentially increase in future.

Heinz Bonfadelli

(E10) Rules and practices on internal pluralism

2 POINTS

Media organisations strive for pluralism. Their editorial statutes should ensure that different views are brought to bear and reported from different perspectives. However, the diversity in newsrooms leaves much to be desired.

IN 2011
2 POINTS

The concept of media pluralism encompasses many aspects, namely defining editorial freedoms and ensuring that measures are taken to give citizens access to different sources of information and references, so they can form their own judgement without the unfair influence of opinion-forming and opinion-determining organisations and service providers. In particular, public broadcasting is obliged to reflect a broad and diverse spectrum of political views and opinions and take into account interests of social minorities. While, in the second half of the last century, pluralism was guaranteed by a large number of economically and politically independent newspapers, their numbers sometimes dwindled into diversity. This is no longer guaranteed today due to the centralisation of media production. In addition, omnipresent social media offers little independent and enlightened journalism. The process of concentration of ownership makes a need for internal pluralism more pressing. Rules and practices of internal pluralism show the extent to which newsrooms are aware of the democratic value of internal pluralism and how leading news media operates with, and for, internal pluralism. From the perspective of democratic equality, different views and opinions should be represented, generally irrespective of the requirement for the newsroom to follow a particular editorial mission statement. The question of representation of all residents and citizens in media and journalism is primarily a question of democracy, especially direct and indirect equality of access. The lack of diversity in sources, perspectives, gender, and origin is particularly evident in Switzerland, where there has been a long period of labour and refugee migration. The high proportion of inhabitants with a migration background and the growing pluralisation of life courses are in stark contrast to media workers in leading positions, who appear as extraordinarily homogeneous. In addition, journalistic work in newsrooms also tends to have a homogenising effect. Professional success and advancement primarily result from adaptation. In any case, the diversity debate does not yet seem to have really arrived in journalism and the media industry.

It is clear from the interviews that media organisations willing to address a population as broadly based as possible are striving for pluralism. Conversely, the editorial staff is also willing to link this internal pluralism with a certain profile. However, editorial offices barely possess the instruments, measures, and routines to instrumentally ensure such diversity. Here too, daily pragmatism dominates. The extent to which diversity can spread depends very much on the entrepreneurial will to take it into account in personnel decisions.

Diversity, then, should not only be pursued in terms of personnel but also sources of information. Media professionals, with the exception of specialists designated as part of the editorial team, are generally not in a position to judge the positions of experts and other persons providing valid information. The experts are not independent, but, due to their epistemological backgrounds, hold certain positions and interests in their professional, scientific communities, even if they do not like to admit it. Anyone who has been an expert once has a good chance of being asked to be an expert again. As a rule, media professionals are happy if they have found someone willing to distinguish themselves as an expert. With those willing to be designated as such, despite not possessing diverse epistemological exposures, a problematic role of “expert bureaucracy” is complicated for the media workers by the Covid-19 crisis. Although media professionals in Switzerland are well trained in their profession, the socio-cultural and socio-structural homogeneity of specialists and experts in newsrooms precludes a holistic view in adequate scientific coverage of current topics and issues.

Werner A. Meier

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog “control of the controllers” 1 POINT

There is no external “control of the controllers”; at most there is individual ethical self-control in newsrooms. The judgements of the Press Council in this regard on the basis of the Code of Ethics are generally without consequence at both the corporate and editorial levels. Media criticism and media journalism barely take place anymore.

IN 2011
2 POINTS

Institutions in Switzerland that monitor and analyse the performance and role of the news media are the Federal Department of Environment, Transport, Energy, and Communications and the OFCOM, also responsible for monitoring the performance of Swiss radio and television. As an external supervisory body, OFCOM accompanies the development of radio and television in Switzerland on the basis of the law on radio and television. It does not carry out any research of its own, as it is not allowed to systematically observe or directly control media content. Therefore, OFCOM regularly awards research contracts worth millions of euros to commercial and public research institutes in order to survey and examine current media developments in radio and television.

SRG SSR is legally obliged to outsource audience research to the independent research foundation Mediapulse, which is responsible for what is ultimately unbiased and neutral audience research. This also includes the measurement of television audience figures, regardless of the broadcasting technology used.

There has been a sharp reduction in media criticism. In contrast to the printed press, SRG SSR continues to strive to address current events in the media landscape on its radio and television channels. This is all the more in the public interest as the Federal Council seeks to increase financial support for the commercial daily press. Although the publishers also regard subsidiary media funding as a problematic encroachment on entrepreneurial freedom of the media and the press, they do not oppose the Federal Council's funding programme in view of the promised financial support.

Corporate and editorial self-control as a form of quality control is a little more than a crutch for the lack of "control of the controllers". The self-organisation of the media's ethical responsibility or journalistic quality control in everyday work is divided into two levels. In editorial offices and publishing houses, internal guidelines are issued by the company, for example, in the form of editorial statutes. At the industry level, a press codex "Declaration of the Duties and Rights of Journalists" has existed since the 1970s.

The Swiss Press Council is responsible for self-regulation of professional ethical standards. According to its own information, the Press Council has made 83 decisions in 2019 – more than ever before in its over forty-year history. However, a record of 127 complaints were received in 2017, 115 in 2018, and 126 in 2019. Of these, six complaints were fully upheld in 2019.

By joining sponsorship of the "Swiss Press Council" foundation, both publishers and radio and television broadcasters, including SRG, as well as professional associations and trade unions recognise the Swiss Press Council as a "body of self-regulation for the editorial section of the media" (Schweizer Presserat, 2020). The competence of the Swiss Press Council extends to all forms of distribution, all media, and also to journalistic content published individually, for example, in the form of a blog, an online platform, or when media professionals express their professional opinions via Twitter or Facebook.

Markus Spillmann, former editor-in-chief of the *NZZ* and current president of the "Swiss Press Council" foundation board, addresses at least three fundamental problems in the 2019 issue, namely a structural deficit in the financing of the Press Council, a gap between aspirations and reality, and incomplete self-regulation. He also notes that the Press Council's judgments and rulings are hardly taken into account in everyday editorial work and that the Press Council is not present in the general public (Schweizer Presserat, 2019). The President of the Press Council, also a former editor-in-chief from Geneva, criticises the unwillingness of media professionals to admit their own mistakes and errors. In addition, a majority of editors usually footnote their guilty verdict at the bottom of the column or leave it out altogether.

Probably the biggest problem of the Code of Ethics and the Press Council is that its regulations are not legally binding. For example, a journalist can be dismissed for an article not complying with internal rules, even if they did not

violate the Code of Ethics. Furthermore, the personal and institutional proximity of representatives of leading media to elites from politics and business is not problematised (e.g., Krüger, 2013). Some time ago, Federal Councillor Ueli Maurer described the media as courtesans who would always move close to power (Maurer, 2013). In addition to power-centred and elitist journalism, even simple-minded, fondness-serving, uncritical, trivialising, or missing contributions are unenforceable or media ethically reprehensible.

Werner A. Meier

(C2) Independence of the news media from powerholders

2 POINTS

IN 2011
2 POINTS

For the leading media, pressure from external interest groups is part of their daily business. But regional and local media also have to cope with this challenge.

Our current findings and statements from interviews show that media professionals try to play down or justify the influence of external stakeholders. According to their statements, they feel pressured by both politics and business. At the same time, they confirm they can successfully resist this pressure and underline their independence and autonomy. However, a critical look at the interaction between media organisations and powerful stakeholders does reveal some dependencies. Even seemingly powerful and independent media organisations are instrumentalised by stakeholders, or can be instrumentalised from outside out of self-interest. Moreover, the question remains open as to the role and status of the media in Swiss society in general and Swiss democracy in particular: whether, or to what extent, media organisations and media professionals themselves represent a power factor – possibly illegitimate.

The attitude of journalists is contradictory and unclear. On the one hand, they complain about the intrusive attempts of political personnel to gain the attention of the media. On the other hand, they also report a dependence on “good stories” from representatives and decision-makers in politics and business. They are even prepared, on a case-by-case basis, to engage in campaign journalism or to jump on such campaigns as free riders. Such actions cause a stir, promise controversy, and, moreover, are well received by the public. Furthermore, media professionals often seem to have a close relationship with certain power circles. At any rate, the president of the Swiss Press Council criticises this in the current annual report and states that proximity to the economic and state power centres is not conducive to the credibility of journalism (Schweizer Presserat, 2019).

Ideally, powerful stakeholder groups in the close and wide environment of editorial offices such as business enterprises, political parties, business asso-

ciations, trade unions, the national churches, and so on, have no influence on editorial decisions that are made on a daily basis. From the perspective of media professionals, any representatives who are on the board of directors of public and private media organisations will be wary of interfering in the day-to-day business of publishing. However, this division of labour is dissolved, where private-commercial media companies such as Ringier, NZZ Media Group, TX Group, and CH Media are concerned. Individual board members, including the executive committee as publisher, co-owner, or consultant, indeed do exert influence on journalistic decisions. Mr. Wanner and Mr. Supino are chairmen of the Board of Directors and CEOs in their respective media groups and exert a strong influence on the editorial departments. Both are also active in leading positions in the VSM. While the NZZ Media Group and CH Media are almost exclusively active in publishing, the TX Group and Ringier are actual digital groups and realise their profits primarily outside of journalistic media. Moreover, the Ringier Group and the newspaper *La Liberté* have well-known owners or business partners from other economic sectors such as insurance companies, banks, infrastructure facilities, and so on. In addition to pressures built into them, external influence on editorial offices, and media content from stakeholders – for example, from corporate communications and public affairs activities – is also part of everyday experiences of business. Nevertheless, the determined silence of companies and service providers often has an effect. Even scandalous stories can often be thwarted without major reputational damage. Additionally, disrupted communication between stakeholders and media organisations can easily be absorbed by another media organisation. The former editor-in-chief of the *NZZ am Sonntag*, for example, complains in his media-critical column that an incumbent member of the cantonal government has succeeded in bringing about an image correction in several of Zurich’s leading media, even though she has recently come under considerable pressure as cantonal health director (Müller, 2020). In any case, the *Schweizer Illustrierte* was close at hand when the magistrate brought out the yoga mat in the cafeteria and, in the wake of her teacher, threw herself into the warrior-2 pose (Ogul, 2020). *Sonntagsblick* from the same media company doubled one day later and the editor-in-charge described the government councillor as a “media professional” and a “media whisperer”. For political journalist Reza Faki (2020), these “awards” are proof that she possessed the necessary strength to hold the highest political office of a Federal Councillor.

The problematic aspects of this mutual instrumentalisation are usually played down or considered “courant normal” by both the media professionals themselves and political staff. Manifest attempts at influence from outside – in whatever form – can draw attention to an already existing “embedding” and “accompaniment” and at the same time strengthen the position of the medium itself in the struggle for attention and power. This kind of “coopera-

tion” of mutually coordinated interventions in everyday work is constitutive to all intermediary organisations. For commercial and public media companies, business models are based to varying degrees on advertising and sponsoring is an additional factor, and accordingly entails more-or-less drastic guidelines and dependencies that significantly structure the “embedding”. It is not the journalistic independence of the newsrooms that ensures the media companies’ sustainability, but their finely balanced economic and political integration into society with its many and varied mutual contacts, controls, and dependencies.

All leading public and commercial media groups are economically and politically embedded. All major media groups are part of the Swiss economy and politically close to the economic liberal policy of the political party FDP. During the loosening of the Covid-19 crisis, the chief editors of all leading media outlets, from the *Tages-Anzeiger*, *Blick*, and *NZZ* to the CH Media, argued for the economy and against restraints by the federal authorities.

Media professionals not only work and interact in a private environment, but are primarily embedded in a media organisation, in political, economic, and sociopolitical structures. In the course of their professional activities, they must face – even fulfil – the often-contradictory demands of information sources, their editorial management, and colleagues, or the business and production conditions of their specific media organisation. Media workers move between autonomy, influences, and dependencies, both on the cognitive and the acting level in the role of the wage-earners. The autonomy of media workers is estimated to be highest for the specific presentation of a story, with 86 per cent. However, the setting of topics is also determined by the editorial management, and full autonomy falls to 78 per cent (Lauener & Keel, 2019). Depending on the type of media and hierarchy level, the perceived autonomy can decrease. And what about the perceived influences from outside?

At the individual level, more than half of the media professionals surveyed attributed the greatest importance to journalistic ethics (61%), time pressure (54%), access to information (51%), personal values and convictions (50%), and available resources (50%). Editorial guidelines and superiors were still considered to be very strong influences by 31 per cent and 27 per cent, respectively, among those surveyed. Colleagues in the company (20%), management (11%), and owners (7%) were even less likely to be organisation-related influences. Business influences with regard to audience research and market data were rated as very strong by only 13 per cent of those surveyed. The influence of entrepreneurial profit expectations was rated as extreme and very strong by only 9 per cent of the respondents (Lauener & Keel, 2019). The influence of public relations, political, and economic interest groups is relatively a lot less than the business influences. Influences of private and professional reference groups amounted to 13 per cent for feedback from the public, 12 per cent for

competing media, 10 per cent for friends, acquaintances, and relatives, and 4 per cent for colleagues from other media (Lauener & Keel, 2019).

Overall, the current survey results show that a clear majority of media professionals in Switzerland enjoy a high degree of autonomy according to their own perceptions. They feel they are guided above all by professional and personal convictions, and are influenced by editorial structures, time, and financial resources, and challenges in accessing information.

This individual, subjective view of journalists, thus, is in contrast to the results of scientific research and parts of the public debates, especially in the times of Covid-19. It can be assumed that neither all influences were perceived, nor all perceived influences were articulated, by the media workers. Many perceived influences are also seen as coherent, legitimate, and constitutive for everyday work; these are by no means only problematic as regards autonomy. In many cases, media workers are not only employed as henchmen, they also see themselves as henchmen in the service of their own interests and those of third parties.

There are also political actors – as one editor-in-chief in public radio experienced – who assume that they have a “right to an antenna”. Ironically, in times of the currently raging pandemic, the Swiss Federal Council does indeed have the right, in a state of emergency, to make announcements and recommendations in public broadcast under its own direction, albeit separately from SRG SSR programming.

Werner A. Meier

(C3) Transparency of data on leading news media

1 POINT

Detailed information on the ownership structure and decision-making processes of private commercial media organisations is not available. Only listed companies must meet minimum transparency requirements.

IN 2011
1 POINT

Although media professionals constantly demand transparency from authorities, administrations, and corporations, media organisations themselves are very reluctant to disclose documents and data on key aspects regarding themselves. These concern ownership, key business figures, competitive conditions, wage structures, quality management and quality controls, compliance with media ethical standards, editorial statutes, equal wage and equality of opportunity, forms of advertising and advertising partnerships, jobs, corporate governance, offer or page and programme statistics, judgments of the press council, and so on. A somewhat exaggerated formulation can be observed: everything we know about media is from the media corporations and their associations. All public data sources such as usage data from radio, television, newspapers, and online portals, circulation, and reach figures for newspapers are developed and

produced by industry representatives. The preparation and modification of key figures is carried out in print or in consultation with dominant industry interests.

Not just media journalism, but also media politics as well as communication and media science, rely in their publications and recommendations primarily on data produced and authorised by media companies. The Federal Council's advisory body, the Federal Media Commission (FMEC), consists mainly of members of media organisations and their associations, whose knowledge, views, and insights tend to put industry interests first. In addition, communication and media studies, in particular, attempts to expand the publicly accessible knowledge that can be viewed and collected by means of content analyses, structural data, or audience surveys. However, this can only be achieved selectively since representatives of media groups are themselves usually the information providers, and lack of transparency is part of the business model. The *Medienmonitor Schweiz*, a research project commissioned by OFCOM to assess the Swiss media landscape with regard to free formation of opinion, for example, does not record the ownership structure and the composition of the board of directors (Publicom, 2019).

Questions from the scientific community or media professionals whose answers are considered problematic from an entrepreneurial point of view remain unanswered or must, at best, be judged cautiously and critically. Although media professionals complain daily about companies and state administrations unwilling to provide information, the industry itself practices a rigorously restrained disclosure policy. Conversely, the few stocks of knowledge that are generated outside of corporate control are also prone to errors and, from an entrepreneurial and journalistic insider's point of view, can easily be criticised and delegitimised. After all, since 2010, the *fög* has succeeded in publishing a yearbook on the quality of media, which has been criticised by the industry in recent years. However, research with a social science orientation is usually only taken note of by the industry if its results do not contradict the interests of the media industry or can be exploited in a journalistic way. The editor-in-chief of the high-reach commuter newspaper, for example, emphasises that his paper *20Minuten* has not only become the largest private medium, "but according to a study by the Federal Office of Communications, has also become the most important for the formation of opinion in Switzerland" (Looser, 2020).

Knowledge about the media controls the industry and not politics or science. For example, both the Federal Council and the Parliament are currently putting together a package of measures to benefit newspaper publishers worth CHF 220 million without first clarifying the market and competitive situation. This obscures which regions have sufficient, insufficient, or even no journalistic coverage by classic daily newspapers or advertising-financed free-sheets, not to mention the journalistic performance of digital news media in the region. The media journalist Nick Lüthi (2020) commented sceptically on the project:

In general, there seems to be a lack of relevant expertise in Parliament. This also became apparent during the debate on emergency aid for the radio industry. Even proven and self-proclaimed media politicians are not sufficiently aware of the market reality. It is, therefore, not surprising that, in cases of doubt, politicians rely on the tried and tested – in other words, on those media that regularly report on them. This is not a media policy suitable for the future.

Werner A. Meier

(C4) Journalism professionalism

2 POINTS

IN 2011
2 POINTS

Journalists have a high level of education and professional skills, but many do not have enough direct experience, for example, of (local) politics. Journalism professionalism is being challenged as well by increased working pressure and decreased resources, for example, for investigations.

Although journalism in Switzerland is an “open” profession with no formal requirements, the educational background of Swiss journalists has improved steadily. Almost 70 per cent of the journalists surveyed in 2015 had an academic degree, of which half had received their degree in journalism, communications, or a related field (Dingerkus et al., 2018). They had taken advantage of educational opportunities in journalism, such as those at the Institute for Applied Linguistics at the Zurich University of Applied Sciences ZHAW in Winterthur, the HTW Chur with a BA in Multimedia Production, or the Media Education Centre MAZ in Lucerne, with its diploma course in journalism. Still, journalists themselves complained about their colleagues, not least because experienced and older journalists had to leave their job in their last years, or more journalists switched to better-paid jobs in corporate communication. Several journalists in our study complained that there existed no conceptions, incentives, or obligations for further journalistic education in most editorial offices. At least, in the 2012–2016 Worlds of Journalism Study, Swiss journalists had a mean of 16.6 years of professional experience, and 58 per cent of surveyed Swiss journalists reported that “Journalism Education” has become stronger in the past five years.

In 2019, there was a short controversial public discourse about a possible future certification of journalists in Switzerland, initiated by the Federal Media Commission EMEK under guidance of former university professor Otfried Jarren (Altwegg, 2019). The underlying idea was to create a quality label for journalistic texts, largely because a loss of monopoly in producing and disseminating media texts based on journalistic quality is under severe threat by the new social media. Of many discussed problems, a main question was: who would decide over the award of this label? As an alternative, it was suggested that it would be better if the media itself would inform its public actively and

in a more transparent way about how their journalists work, as a guarantee of the quality of its journalistic products. Thus, the discussion ended as abruptly as it had started.

Yet, journalists cannot be made the only ones to blame. Under constraints caused by today's media crisis, the quality of journalism inevitably suffers. As a consequence of increased economic pressures in editorial offices of most newspapers, journalistic staff and budgets have been shortened; there is less time for investigations production of journalistic contributions, competitions between media houses have increased, and the significance of so-called click-rates have progressively gotten stronger (Puppis et al., 2017). But despite these negative tendencies, job satisfaction of journalists remained stable at a reasonably high level (Dingerkus et al., 2018). To conclude: professionalism can be better safeguarded if resources are assured.

Heinz Bonfadelli

(C5) Journalists' job security

1 POINT

IN 2011
2 POINTS

In the wake of the general media crisis and the Covid-19 crisis in spring 2020, job security was not guaranteed, and journalists lost their jobs. Such uncertainties are greater in commercial media than in public broadcasting.

Job security in journalism is not an issue that the Association of Swiss Media (VSM) deals with. In the wake of a media crisis that has been making itself felt for more than a decade, with a steady decline in advertising revenues, job security for media workers has also declined. In 2010, the union Comedia reported 1,465 media workers as unemployed. Reorganisations, job cuts, and centralisation of reporting are decimating both employed and freelance media workers. The latter, in particular, receive fewer orders and lower compensation. But even the trade union has no current data on the length of time spent in the profession. In German-speaking Switzerland and Ticino, there are no regulations on dismissals at sectoral level, as there has been no collective labour agreement since 2004.

In the opinion of the interview participants, the situation at the public broadcaster SRG SSR is still satisfactory with regard to job security. However, the days of people having a secure job at SRG until retirement are over. There is, however, a collective labour agreement [Gesamtarbeitsvertrag] which provides a certain degree of protection for all employees. In any case, the SRG also carries out redundancies, or forces employees over 60 to take early retirement, or even leave the profession.

Some time ago, Vinzenz Wyss surveyed the job security of media workers in an essay on the how Swiss journalism was becoming precarious. While SRG

SSR employees overall scored 2.3 in 2008 (1 = satisfied; 6 = dissatisfied), print journalists represented a figure of 3.5, and online media 4.2, both significantly less favourable (Wyss, 2012). Looking at the current industry reports, job security is likely to decline even further in the future. The long-standing problem of financing journalism has prompted much of daily media to reduce its output. The industry itself assumes that the number of media companies in Switzerland will fall or stagnate over the next five years and that media offerings produced by these companies will decline (UVEK, 2020). Overall, the majority of respondents assume that the number of employed media workers will “decrease slightly or sharply” (UVEK, 2020: 10). UVEK also sees strongly disruptive tendencies towards the Swiss media system and especially daily newspapers. These include a sharp decline in advertising revenues and print circulation. As a result, further title mergers, editorial mergers, and job cuts are likely to occur, from which the diversity of content and journalistic opinion is likely to suffer (EMEK, 2020).

Werner A. Meier

(C6) Practice of access to information

2 POINTS

Journalists in Switzerland generally have free access to most public information held by government and administration, but not to companies and associations. There are still restrictions and obstacles.

IN 2011
3 POINTS

Media workers inclined to conduct research or slip into the role of a “watchdog” must have free access to state sources in order to, if need be, exercise proper and independent control and criticism of the government and administration. Federal law on the principle of publicity in the administration has been in force since 1 July 2006. In principle, this gives media professionals, but also private individuals and industrial and service companies, access to all documents of the federal administration under the heading of “good governance”. The purpose of the Public Disclosure Act [Öffentlichkeitsgesetz] is to promote transparency with regard to the mandate, organisation, and activities of the administration. The focus is on access to official documents. In 2019, a total of 916 requests for access were submitted or assessed to authorities and administrative bodies, 44 per cent more than in 2018. Of these, 542 cases (59%) were granted full access to files, and 171 cases (19%) partial access. In 86 instances (9%), access was refused (Lobsiger, 2020: 65). In 36 cases, according to the administration, there were no available documents.

According to the current annual report of the Federal Data Protection and Information Commissioner (FDPIC) for the period from 1 April 2019 to 31 March 2020, a paradigm shift is clearly visible, insofar as the principle of public access being implemented successfully by most federal authorities: “Complete

access to the desired documents prevails, and the number of requests for access is increasing significantly”. In addition, verbal mediation negotiations have proven to be successful, as 61 per cent of cases were concluded amicably (Lobsiger, 2020: 64). However, the number of pending cases also increased, which indicates sluggish conciliation negotiations (Lobsiger, 2020). In 31 cases, those seeking access were charged a fee. The total of all fees amounted to CHF 18,185, which represents an increase of 15 per cent over the previous year and amounts to about CHF 586 per request (Lobsiger, 2020). Since the National Council’s State Policy Commission has decided to waive fees in future and to make access to documents free of charge for media professionals, a successful revision of the law should remove another obstacle to the desired transparency.

Even if it can generally be stated that the federal departments and administrations have opened up their communication channels in recent years and are less inclined to take a defensive stance, there are still major differences among the media representatives surveyed regarding their current assessment of the accessibility of information. For one group of media professionals, it has become more difficult, cumbersome, bureaucratic, expensive, and legally complex to obtain information. The other group of media professionals considers the situation to be more comfortable and less restrictive than in the past, especially when the position and interests of the administration in terms of transparency or secrecy are also taken into account in the assessment.

In mid-2020, two cases that became public indicate there were still major obstacles for media professionals in research in specific instances. In 2015, journalists of the weekly newspaper *WOZ* wanted to receive the names of all arms exporters from the State Secretariat for Economic Affairs (Seco). Seco refused to hand over the requested documents as a defensive reflex and did not even clarify whether the arms companies concerned had even claimed an interest in secrecy with regard to the requested documents. With the help of a lawyer, *WOZ* had to go through all instances, which made the proceedings extremely lengthy. In the meantime, Seco argued that this would not only endanger Switzerland’s international relations, but would also annoy many affected countries who wanted to keep their arms procurement secret. This also applied to Sweden, claimed Seco (Susan Boos, 2020). All data relating to Sweden were generally accessible on an Internet platform of the Swedish administration and were anything but secret. After the Federal Supreme Court finally ruled in favour of the *WOZ* in 2019, the documents arrived at the editorial office in June 2020, with a delay of five years, so to speak. In addition, the newspaper had to pay a fee of CHF 5’458.00

In the second example, in November 2018, the Zurich cantonal social welfare office had awarded contracts of almost CHF 120 million to external service providers for the care of asylum seekers. A few weeks later, the online magazine *Republik* submitted a request for a review. The social welfare office was to

disclose all newly concluded as well as expired service contracts with external service providers (Hanimann, 2020). After the social welfare office refused to grant access, *Republik* went to the administrative court and was proved right in essential points. Nothing in the Administrative Court's ruling is yet final, as the Federal Supreme Court will be called upon if necessary.

From a democratic political perspective, these examples are problematic in several respects. They make it clear that administrations occasionally succeed in precluding “unpopular” stories from appearing, or at least delay them in such a way that they can only appear at great cost to media companies. Weighing the merits, this suggests that the administration tries to favour private-sector interests over public interests, which leads to a problematic dilution of the Public Disclosure Act. In the opinion of the FDPIC, the Federal Administration attempts to circumvent the Public Information Act by means of exception regulations. Specifically, the Federal Council wants to keep a list of companies that are excluded from public contracts due to corruption or cartel agreements under lock and key. The administration argues that the access applications would only aim to obtain sensitive economic data from third parties and would not focus on the activities of the administration (Lobsiger, 2020). The Federal Office of Public Health also wants to keep public law on the negotiation of price and reimbursement models between pharmaceutical companies and health insurance companies in compulsory health insurance secret in future. Here, too, the Federal Council argues that if the actual prices were disclosed, the pharmaceutical companies would no longer be prepared to negotiate such pricing models. In addition, the Council points out that the majority of applications are not submitted by citizens but by pharmaceutical companies, in order to gain access to business information of competing groups (Lobsiger, 2020).

The handling of the Public Disclosure Act by authorities, the media, and corporations thus continues to remain controversial. In exceptional cases, the administration continues to exercise secrecy and dispute it in elaborate arbitration proceedings. Sometimes, the duration of resolving such disputes makes the withheld information lose significance. The increasing juridification, too, does not represent a relief for media professionals. Indirectly, however, the application of the Public Disclosure Act also draws attention to the fact that democratically relevant economic organisations such as media, technology, infrastructure, or pharmaceutical companies are able to keep their “business secrets” under lock and key in order to exploit their market power in an unregulated, uncontrolled, and non-transparent manner.

Werner A. Meier

(C7) The watchdog and the news media's mission statement

2 POINTS
IN 2011
2 POINTS

The mission statements or editorial statutes of the media contain hardly any reference to the role of the media as democratic “watchdogs” in the interests of civil society and are of little importance in the everyday work of media professionals.

In his book on the development of journalism in liberal, deliberative, and participatory democracy, the American communications scientist Seong Jae Min distinguishes three journalism models, each with a dominant objective (Min, 2018). Of these, in the “trustee” model of liberal democracy, information is at the centre. The professional journalist primarily provides the inhabitants with information on self-organisation and self-management and works on behalf of civil society. Such a focused role of journalism is controversial in Switzerland.

According to Drüeke (2018), the “guardian role” of media is emphasised, since control is seen as central to the media, along with information and transparency and thus legitimisation of political processes. Publicity is produced in different ways: from “below” –from the perspective of the governed, in which the attitudes and opinions of citizens are presented – or from “above”, in other words, the fulfilment of the provision of information from the perspective of the governed. In these production mechanisms of publicity, the media are central as critical observers (Drüeke, 2018). To put it bluntly, this means that media professionals act as watchdogs who warn civil society as soon as important decisions are pending, or something gets out of hand. The concept of watchdogs in the form of investigative journalism, and at the same time as a central public task of media, is not based on a uniform understanding of what functions and forms such watchdog media have and what is meant by them (Drüeke, 2018).

The role of the press as a permanent observer of the state executive, legislative, and judicial branches is also a widespread notion in Switzerland as the stronghold of an economic liberal democracy. It is based on the assumption that the media and media professionals are autonomous and have sufficiently institutionalised and legitimised powers to act as a quasi, fourth power in the state, keeping the other three powerholders in check in certain areas with regard to their accountability and their potential for abuse of power. This takes the form of neutral and systematic reporting and discussion of democracy-relevant issues, events, procedures, and trends, so that civil society can deal with all risks and damage that has occurred in good time. As attractive as this narrative may be, the fact is that the self-proclaimed journalistic watchdogs exercise their autonomy in very different ways. There are watchdogs who observe from places where there is little to see and observe. Other watchdogs, on the other hand, reject this role because they neither want to do investigative work nor “bark” or “bite”. There are also media organisations that do without expen-

sive watchdogs altogether or use them as “attack dogs”, not always in the interest of civil society but also in their own corporate and political interests, or even, in the interests of third parties. In which or whose interest watchdogs are renounced and where the watchdogs are used observe, bark, attack, or bite often remains in the dark.

If one dares to compare these role models with the understanding of the roles of privately organised newspaper journalists and SRG radio journalists in Switzerland, the majority of media professionals here favour the following role models: “Reporting things as they are” (94% and 91%), “being an impartial observer” (82% and 86%) and “classifying and analysing current events” (83% and 95%). “Communicating political information” as a role perception is affirmed by 71 per cent of newspaper journalists and 79 per cent of radio journalists. 58 and 55 per cent, respectively, want to “give people the opportunity to articulate their views” and also pursue participatory objectives. 53 and 60 per cent want to “communicate the world in stories as storytellers”.

Taking note of these results of a relatively recent survey of media professionals, one finds that the role of observation, depiction, mediation, analysis, and classification continues to dominate in Switzerland. Discursive and participatory understanding of roles follows at a distance. In contrast, only 52 per cent of newspaper journalists want to “control the government”, compared to 45 per cent of SRG radio journalists (Hanitzsch et al., 2019: 312). Only a minority of press journalists (39%) and radio journalists (37%) want to “control the economy”. The watchdog model mentioned at the beginning only enjoys support among a minority of the media professionals surveyed. The investigative, power-critical watchdog function, as a professional role model, does not seem to show promise in gaining a majority.

Werner A. Meier

(C8) Professional training

2 POINTS

Supply of professional training offerings in journalism is not a problem in Switzerland, but there are no specified or even obligatory strategies and concepts in most media and editorial offices. As a consequence, professional training is a discretionary matter and its attendant demand seems to be quite moderate.

IN 2011
2 POINTS

Today, there is no longer a general lack of professional (in-service) training opportunities, for example, in investigative skills or data journalism, for Swiss journalists, as was stated in the 2011 MDM report (Meier et al., 2011). Instead, there are many professional training possibilities provided, for instance, by the Media Education Centre MAZ in Lucerne or the Zurich University of Applied Sciences ZHAW in Winterthur (see also Indicator C4 – Journalism profes-

sionalism). The main problem seems to be that professional further education for working journalists is not required or encouraged in most editorial offices. Education and advanced training in journalism is, therefore, left to individual discretion.

Only the public broadcaster SRG SSR runs an in-house training centre. SRG SSR puts effort into their professional training programme and calls upon its employees to benefit from internal and external programmes during their whole careers. Big publishing companies like Ringier AG also offered internal courses for their employees, but these have been cut back due to either lack of resources or need (see Meier et al., 2011). TX Media at least provides expert tools dealing with journalistic practices like interviewing, computerised data analysis, and investigative or data journalism. Furthermore, it offers an attractive three-week in-service training at the Columbia University, New York. But among the journalists interviewed, one was severely critical of this and stated the possibility of more men than women receiving this opportunity, and also that the selection criteria was not transparent.

Taken together, there exists in most media or editorial offices no concrete management policy or institutionalised concepts for further professional education or advanced training in journalism, even though there exists an abundance of possibilities and offerings. Therefore, here to, individual motivation is more crucial and instrumental.

Heinz Bonfadelli

(C9) Watchdog function and financial resources

1 POINT

IN 2011
1 POINT

For a long time, leading daily media were financially successful. For some time now, there has generally been less staff available for traditional reporting, but with the creation of research desks, there are now slightly more resources available for research and investigative journalism.

A central issue in this examination is to assess the extent to which media professionals are able and willing to assume their role as a “fourth power”: criticism and control of illegitimate power by means of appropriate research. The perception of the media as watchdogs or “attack dogs” fighting against abuse of power and corruption has long been a part of journalistic self-image. However, there is no distinct culture of investigative journalism in Switzerland.

It seems undisputed, though, that sustaining journalistic quality is predicated on meticulous research and requires careful and elaborate work. This places limits on research in everyday professional life. Every newsroom must think carefully about how to use the scarce resources available. It is true that research techniques have been developed and furthered in newsrooms. How-

ever, the companies, associations, and administrative offices with important information at their disposal also make efforts to preclude journalistic access and possible scandal in the event of unpleasant or problematic incidents. In addition, state institutions and private-sector organisations try to develop and maintain a positive public image by means of media monitoring and continuous public relations. Due to the growing importance of social media, not only business enterprises, associations, and administrations, but also civil society groups have begun to communicate more directly with their customers instead of maintaining a dialogue via the daily news media.

On the basis of our discussions with media professionals, investigative and research journalism in Switzerland did not reflect a daily struggle against the illegitimate exercise of power by outstanding institutions and organisations in a liberal society. Investigative journalism critical of power cannot be seen as the measure of an average standard, but has a permanent, if not prominent, place in newsrooms. Daily journalism in particular focuses on topics that are on the agenda of political, economic, cultural, and social institutions and organisations and are usually produced about, through, and even within them. Additional research by media professionals often does not always serve as checks of power, but also maintains and asserts it. Economically and socially well-established institutions and organisations often find allies in newsrooms who willingly and uncritically convey messages to their “clients”, as they are not able or willing to take their own journalistic or foreign view of the topic. However, since editorial offices are only occasionally able to present or critically address all stakeholders with their objectives and interests, the challenges for less-prominent groups having a voice or receiving attention have become even more acute. In other words, the growing organisation of civil society means that less journalistic personnel and less journalistic spaces are available.

It is true there is a certain journalistic and entrepreneurial desire to do more investigative work, devote more time and professional resources to important stories that can become scandals, and make big impacts in the public eye. However, most editorial offices have neither sufficient personnel nor financial resources for long-term and sustainable investigative journalism. After all, the *Tages-Anzeiger* and SRG SSR have permanently established research teams, while the CH Media dispenses with this measure. Overall, however, availability of reporters with the necessary resources and indispensable know-how over time, and who also enjoy the institutional backing to carry out investigative journalism effectively and efficiently, is likely to decline.

Werner A. Meier

Conclusions

Our interviews, together with the existing communication research and media data from Switzerland, show a mixed picture. Compared to the 2011 MDM report, the existing Swiss quality media still seem to be only “a reduced protective forest” for democracy in Switzerland (Meier et al., 2011). Most indicators remained stable between 2011 and 2021: eleven with 2 points, five with 1 point, and only two with 3 points. But five indicators worsened: patterns of news media use (F2), diversity of news sources (F3), and practice of access to information (C6) went from three to two points; and supervising the watchdogs (C1) and journalists’ job security (C5) went from two points to one. Only two indicators improved: internal rules for practice in newsroom democracy (F4) and participation (E9), but these too only slightly – from one to two points.

To conclude, Swiss news media in 2021 faces manifold threats and challenges. Besides the already existing strong press concentration in 2011, one of the unsolved questions is how to ensure quality journalism for the future (Ruoff, 2019) in the face of advertising flowing to the big digital platforms like Google, Facebook, and YouTube as giant international competitors on the one hand, and former print media subscribers getting information in the social media more and more on the other. But there seem to be at least some rays of hope: gender balance in newsrooms has increased somewhat, and investigative reporting together with the control function of the media has been evaluated highly by the interviewed Swiss journalists. Measured by the MDM indicators, the Swiss newsprint media, and especially the Public Broadcasting SRG SSR, perform still important functions for the participatory democracy of Switzerland.

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UNITED KINGDOM

Economic challenges, market consolidation and increasing professional insecurity

Martin Moore & Gordon Ramsay

Introduction

The UK is one of Europe's most populous countries, with 66.7 million inhabitants. The country is composed of four nations – England, Northern Ireland, Scotland, and Wales – of which England is by far the largest, with over 80 per cent of the country's total population. Scottish Gaelic and Welsh are the largest minority languages and receive significant coverage in the media, although Scots, Ulster-Scots, Irish, Manx, and Cornish are considered minority languages by the European Charter for Regional and Minority Languages. The UK has a large and diverse media landscape, with national media almost entirely based in the largest metropolitan area, London; however, there are distinct media markets in each of the four nations and a widespread local news industry. Politically, the UK is considered a constitutional monarchy and a parliamentary democracy.

Freedom in the World 2021: status "free" (Score: 93/100 in 2020) (Freedom House, 2021).

Liberal Democracy Index 2020: the UK is placed in the Top 10% bracket – rank 14 of measured countries (Varieties of Democracy Institute, 2021).

Freedom of Expression Index 2018: rank 12 of measured countries, down from 8 in 2016 (Varieties of Democracy Institute, 2017, 2019).

2020 World Press Freedom Index: rank 35 of 180 countries (Reporters Without Borders, 2020).

Since World War II, the UK has generally been a two-and-a-half-party system, with the Labour Party and the Conservative Party enjoying spells in government, and the Liberal Democrats (Liberal Party until 1981, SDP-Liberal Alliance between 1981 and 1988) playing a significant role as a third force. The

first-past-the-post electoral system traditionally favours the two largest parties. A different set of parties contests elections in Northern Ireland, and Scotland and Wales have nationalist parties in the Scottish National Party (SNP) and Plaid Cymru, respectively. After referendums in 1997, powers were devolved to national legislatures in Northern Ireland, Scotland, and Wales. In the twenty-first century, the party system has partially fragmented, with fluctuations in support for eurosceptic parties such as the United Kingdom Independence Party (UKIP) and the almost total replacement of Labour in Scotland by the SNP in 2015, making the latter a significant presence in Westminster. Governments in the second decade of the twenty-first century have been less stable than in recent history, with a coalition government in place between 2010 and 2015 and a minority Conservative government propped up by an agreement with the Northern Irish Democratic Unionist Party (DUP) between 2017 and 2019. The 2019 Conservative election victory delivered the first significant government majority in a decade. The UK's political landscape has been convulsed by the 2016 referendum on the UK's membership of the EU. A bitterly fought and divisive campaign marked by allegations of campaign irregularities and dishonesty by leading political figures delivered a narrow victory in favour of leaving the EU. This issue has defined political and social relations in the intervening years.

The UK has a hybrid media landscape, with a heavily-regulated broadcasting sector dominated by the publicly owned British Broadcasting Corporation (BBC), which is the largest domestic content provider and commands the largest audiences across television, radio, and online news. Commercial broadcasters and the BBC are regulated by the Office of Communications (Ofcom), which imposes strict rules on accuracy and impartiality in news programming. The UK's press is wholly commercial and partisan, though many newspapers profess an independence from centres of power, and journalists have traditionally adhered to a "fourth estate" role conception of independence and objectivity. Both institutional and individual independence are not always as evident in practice as they are in theory.

Cross-platform ownership of the media is restricted by legislation, though within certain sectors there has been recent market concentration. Around 80 per cent of the UK's 1000+ local newspapers are owned by five companies, and recent takeovers in the national press mean that three companies now publish two-thirds of all titles, accounting for 72 per cent of revenue and 87 per cent of print circulation. The national press and broadcasters are all headquartered in London, though the BBC has significant presence elsewhere.

The UK has a thriving hyperlocal and community media sector, with hundreds of community radio stations and online news sites. However, despite increasing professionalisation among hyperlocal news providers, the sector continues to be fragile financially. A network of digital local television stations, introduced from 2014 onwards, has failed to meet expectations and commands

negligible audiences. Combined, however, local media and the wider availability of information online has increased the availability of information to citizens at the community level at the same time as legacy local newspapers have been in sharp economic decline.

Over the last two decades, news consumption habits have altered significantly, especially amongst young people, with the population increasingly consuming news online and via mobile (62% access news via smartphone). Almost 40 per cent of the population use social media as a source of news, though this figure is highly differentiated by age. As a consequence, American technology platforms – most notably Facebook and Instagram, Google, and YouTube – have become significant gatekeepers for news.

In 2017, the *Media Pluralism Monitor* by the Centre for Media Pluralism and Media Freedom ranked the UK as high risk for three indicators (on commercial and owner influence over editorial content, editorial autonomy, and access to media for minorities), medium risk on four indicators, and low risk on the remaining thirteen.

Covid-19

In response to the Covid-19 pandemic, the UK government imposed significant restrictions on movement, travel, and public gatherings as well as the closure of non-essential businesses and industries in late March 2020. Although journalists reporting on the pandemic were classified as “key workers”, and news audiences – particularly on broadcast platforms – rose sharply, the negative effect on the newspaper industry was initially profound and is expected to remain so for some time. The abrupt loss of advertising revenue – expenditure across all UK advertising was forecast to decline by 50 per cent – has resulted in publishers ceasing print distribution of some or all titles, the furloughing of a significant proportion of staff (20% at the national and regional newspaper publisher Reach PLC), and the temporary suspension of some local newspaper titles completely. On 17 April 2020, the UK government announced a three-month GBP 35 million advertising partnership with the majority of the newspaper industry to offset some of the lost advertising revenue, although none of the funding has been allocated to independent news providers.

Leading news media sample

Our media sample for the Media for Democracy Monitor (MDM) 2021 (for previous report, see Humphreys, 2011) consists of three out of four public service broadcasters (BBC, ITV, and Channel 4) and Sky News, which is not classed as a public service broadcaster but is subject to identical content regulation by

Ofcom. The heads of each news division were contacted via e-mail (news on ITV and Channel 4 is produced by a separate company, Independent Television News, which has separate divisions for the different channels that it serves), as were the editors-in-chief of nine of eleven national newspapers (excluding the *i* and the tabloid *Daily Star*). This may partly be a consequence of the severe disruption to newsrooms caused by the Covid-19 outbreak from the crucial research period of March onwards. Face-to-face interviews were not possible for the same reason.

Indicators

Dimension: Freedom / Information (F)

(F1) Geographic distribution of news media availability 3 POINTS

News media are widely available throughout the four nations of the United Kingdom in broadcast, print, and online form. While the local newspaper industry is under pressure, there are few areas where dedicated local coverage is not available to citizens.

IN 2011
3 POINTS

UK news media are widely accessible across all nations and regions. Superfast broadband provision reaches 95 per cent of UK homes and businesses, and while 4G mobile coverage is patchy in some rural areas, approximately 70 per cent of rural households receive 4G from at least one network (the figure for urban areas is between 90 and 100%). High-quality access to online news sources is therefore relatively widespread, excluding geographically remote and sparsely populated areas such as the Scottish Highlands (Ofcom, 2019a). Broadcast and print news coverage are both characterised by combined national, local, and regional coverage. On television, designated public service broadcasters (PSBs) in the UK provide a mix of national and regional news (BBC and the ITV network), national-only news coverage (Channel 4 and Channel 5), as well as minority-language news coverage in Wales and Scotland (via S4C and BBC Alba respectively) (Ofcom, 2018a). Digital terrestrial television channels (including local television channels with specific news provision obligations) and cable and satellite channels, licensed by Ofcom, are available nationwide and include a number of minority or international news channels, as well as 24-hour UK outlets such as Sky News and the BBC News Channel (Ofcom, n.d.). Radio news is provided nationally by the BBC and on commercial stations by Sky News Radio. Local commercial radio stations are obliged to provide local news content at peak times (Ofcom, 2019b).

The UK has a highly centralised national newspaper market based in London, with ten national daily newspapers and nine national Sunday newspapers (*The*

Independent and its Sunday stablemate *The Independent on Sunday* ceased print publication in 2016 and is now available online only). However, many of the national newspaper titles, including *The Sun*, *The Times* (and *The Sunday Times*), and the *Daily Mail* publish separate editions for publication in Scotland, and large regional titles in Wales, Scotland, and Northern Ireland cover those nations in their entirety or in large part. Below this tier of regional newspapers are approximately 1,000 local daily and weekly newspapers (Media Reform Coalition, 2019). While there are some isolated areas that lack local newspaper coverage, and concerns about the decline of daily local newspapers (Ramsay & Moore, 2016), the majority of the country is served by at least one local newspaper (and associated website). Hyperlocal news sites are accessible across the UK, but tend to be unevenly distributed across the country and concentrated in urban areas (Centre for Community Journalism, n.d.-a).

(F2) Patterns of news media use (consumption of news) 2 POINTS

IN 2011
 3 POINTS

News consumption remains high, with varied and diverging patterns of media use among different age groups. Decline in consumption of print journalism in the past decade has been significant, though the growth of online audiences offsets this to a degree.

News consumption in the UK remains high but is fragmenting as audiences for traditional sources of news (print and broadcast) decline and audiences – particularly younger audiences – seek a more varied mix of news, increasingly accessed online and via mobile. Data from the telecommunications regulator Ofcom’s 2019 annual survey of news consumption demonstrates the present generational split, replicated in Table 1 (Ofcom, 2019c: 15).

Table 1 Ofcom: Use of main platforms for use by demographic group, 2019 (age 16+, per cent)

Platform	Total	16–24	65+
Television	75	51	94
Internet (any device)	66	83	40
Radio	43	26	49
Newspapers (print only)	38	20	58
Newspapers (print or websites or apps)	49	35	64

The top three sources of news for all UK adults in 2019 were the television channel BBC One (used by 58% of all adults over the age of 16), the commercial terrestrial television channel ITV (including its regional franchises, 40%),

and Facebook (35%). While older audiences (aged 65+) are more likely to use BBC One (78%) and ITV (52%), only one in ten reported using Facebook, with the BBC's 24-hour News Channel the third most popular source. Younger audiences again diverge from the average, with only one-third using BBC One and one-quarter using ITV. Instead, they were considerably more likely to use social media to access news, with Facebook (49%), Instagram (38%), and Twitter (33%) the three most commonly used sources of news for those aged 16–24 (Ofcom, 2019c: 21). Adults of all ages, however, use a wide variety of sources to make up their news diet, with an average of 6.7 individual news sources across all platforms being accessed. There is little deviation between age groups, with both 16–34-year-olds and 35–54-year-olds reporting using an average of 7 news sources, and those aged 55 and older using 6.2 sources on average (Ofcom, 2019c: 66).

Within traditional platforms, the age divide is pronounced. Figures from the Broadcast Audience Research Board shows that flagship evening television news bulletins still reach audiences comparable to those reached ten years ago: the BBC's *News at Six* has an approximate average audience of five million viewers (compared with approximately 4.9 million in 2010) while ITV's early evening news bulletin reaches 3.6 million people on average, slightly down from 3.9 million a decade ago. The main news bulletins of Channel 4 and Channel 5 reach 0.75 million and 0.3 million respectively (Mediatel, 2020a). Demographic breakdowns of audience profiles for the respective timeslots show that younger viewers only account for a tiny percentage of the audience (3% of BBC One's 17:30–20:00 audience; 3% of ITV audience; and 6% and 3% of Channel 4 and Channel 5 audiences, respectively). Radio news continues to reach significant audiences, with 72 per cent of UK adults using BBC Radio and 59 per cent using commercial radio for news; younger audiences obtained news from BBC Radio 1 (53% of adults 16–24) and commercial stations Heart (28%) and Capital (38%) (Ofcom, 2019c: 32).

National print newspaper circulation has declined by over half since 2010 (Ofcom, 2019c: 34), though total brand reach (print and online) figures show that some news brands now reach larger audiences within the UK than they have for some time (Media Reform Coalition, 2019: 7). Publishers Audience Measurement Company data on the proportion of print audiences from younger demographic groups (aged 15–24) shows that the quality (broadsheet) national press only receives between 2 per cent (*Daily Telegraph*) and 6 per cent (*The Guardian*) of their readership from this age group, though this is on average higher than the popular press (1.5% for the *Daily Mail* and 3.0% for *The Sun*), if lower in terms of absolute numbers (Mediatel, 2020a). Younger audiences are, however, more likely to access certain legacy print news brands than older audiences when print and digital audiences are combined (Ofcom, 2019c: 39). Lower brand loyalties among younger audiences are confirmed by their increased

tendency to access online news via social media posts (56% of 16–24-year-olds versus 41% of all adults) than directly from news organisations’ websites or apps (22% versus 30%).

The habits of news consumers in the UK have been affected by the country’s prolonged exit from the EU (Brexit) and associated political upheavals. The 2019 *Reuters Digital News Report* noted that 35 per cent of Britons sometimes or often deliberately avoid domestic news, with Brexit being the primary reason; this has played into declining news audiences for certain – particularly legacy print and broadcast – news outlets (Reuters Institute, 2019: 68).

(F3) Diversity of news sources

2 POINTS

IN 2011
2 POINTS

News agencies are widely used by UK journalists, and there has been consistent evidence of the infiltration of public relations material into journalism, but journalists and editors have a high degree of autonomy in the pursuit of stories and sources.

There is no centralised national news agency in the UK. The Press Association (renamed PA Media in 2019) is over 150 years old and is owned mostly by a consortium of national and regional newspaper publishers. Other national and international news agencies are also frequently used, including Reuters, Associated Press, Agence France-Presse, and Australian Associate Press. Some news outlets make extensive use of agency copy in their online output, particularly *MailOnline*.

Journalists tend to have a significant degree of freedom to pursue sources and stories (though newsroom roles differ and local newspaper journalists are more likely to be reliant on external sources of information due to pressures on time and resources, with agency copy and public relations (PR) material; see, e.g., Indicator C4 – Journalism professionalism). Face-to-face and telephone interviewing is still regarded as the main method of interacting with sources and obtaining information (Spilsbury, 2018: 34). Investigative journalism and the use of foreign reporting continue to be central to UK news organisations, though economic pressures have reduced the capacity of newspapers to engage in both (e.g., Indicator C9 – Watchdog function and financial resources).

The problem of “churnalism” – the recycling of PR material as news – has been well documented in the UK print media and has been detected in both national and local news content (see Indicator F5 – Company rules against *internal* influence on newsroom/editorial staff). Syndication of content (that has not been produced by a news agency) is rare, although anecdotal evidence is beginning to emerge of replicated stories within the local newspaper portfolios of some regional publishers responsible for large numbers of titles. The recent Local Democracy Reporter Scheme – a partnership between the BBC

and local newspapers – results in a central repository of stories to be accessed by members of the scheme, though this is produced by a network of reporters embedded in local newspapers, rather than a centralised agency or syndication network (Tobitt, 2019).

Studies of news media content at the time of elections has often found that institutional and elite political sources dominate news coverage (Moore & Ramsay, 2015), though broadcasters routinely use members of the public as proxy sources for public opinion in political stories (Cushion, 2018). News media typically do not omit sources on political grounds; the practice is prohibited to a degree on television due to impartiality rules (though the qualifier of “due” impartiality means that all views need not be included in news reporting; for more details on internal pluralism in newsrooms, see Indicator E10 – Rules and practices on internal pluralism).

(F4) Internal rules for practice of newsroom democracy 1 POINT

Newsrooms in the UK continue, on average, to be hierarchical, with editorial coordination concentrated among senior roles at the expense of ordinary journalists. The appointments of editors-in-chief rarely involve journalists.

IN 2011
1 POINT

UK newsrooms, particularly at newspapers, have traditionally been hierarchical, with editorial control largely in the hands of departmental editors and editors-in-chief, with some instances of direct proprietorial interference in editorial positions. Representatives of the British press are also notably reticent to discuss newsroom decision-making, and ethnographic studies of UK newsrooms in recent years are rare. Reviews of governance and editorial policies in major UK newspapers by the Leveson Inquiry (2011–2012) found newsrooms to be generally hierarchical, with ultimate responsibility for editorial decisions in the hands of top editorial roles (Leveson Inquiry, 2012a: 99–156).

More recently, a Reuters Institute survey of UK journalists across all sectors found that over half of respondents reported “always” or “very often” participating in editorial and newsroom coordination (such as attending editorial meetings or assigning reporters). However, the level of participation varied significantly depending on the role and seniority of journalists: while 71 per cent of senior managers and 65 per cent of junior managers “always” or “very often” participated, only 27 per cent of rank-and-file journalists and 16 per cent of freelance journalists felt the same. In contrast, 65 per cent of freelance journalists and 47 per cent of rank-and-file journalists reported that they “almost never” or “rarely” participated in editorial coordination (Thurman et al., 2016: 28). This indicates that control over newsrooms continues to be concentrated more in editorial staff than in ordinary journalists.

The Guardian operates a staff ballot for the appointment of editors, with a vote in 2015 installing Katharine Viner as the editor-in-chief (The Guardian, 2015). This is, however, an unusual case, and editors are traditionally appointed by proprietors, as with the recent appointment of a new editor at the *Daily Mail* (Waterson, 2018).

There has been a significant increase in the number of women appointed to senior editorial and management positions in UK news organisations. In addition to Katharine Viner's appointment at *The Guardian* in 2015, women now edit several UK national newspapers: *The Sunday Times* and *The Sun* appointed women editors in 2020; Roula Khalaf became editor of *The Financial Times* in 2019; and Alison Phillips began editing the *Daily Mirror* in 2018. In broadcasting, Fran Unsworth became Director of News and Current Affairs at the BBC in 2018, and Louisa Compton was appointed Head of News and Current Affairs and Sport at Channel 4 in March 2020 (succeeding Dorothy Byrne). The BBC has internal targets for women in leadership roles (the 2020 target is 50%; as of March 2019, the figure was 43.8%) (BBC, 2019a: 81). Sky, owner of Sky News, operates a Women in Leadership programme, encompassing sponsorship and training, with an aim of 50 per cent of leadership roles to be filled with women and a current balance of 39 per cent. Specific figures for Sky News are not included (Sky, n.d.).

(F5) Company rules against *internal* influence on newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

Newsrooms and management are generally separate, though changing business practices in UK newspapers is leading to a more porous boundary between the editorial and commercial arms of media companies.

Internal interference, in the sense of the leveraging of managerial power to pursue political or commercial ends, is generally not an issue in broadcast newsrooms in the UK. The BBC's public ownership means that these incentives do not exist within the organisation, and the remaining public service broadcasters have news produced by a separate company, Independent Television News (ITN). There have been no allegations of, or Ofcom investigations into, issues of internal influence within the remaining domestic news provider, Sky News.

During the 2011–2012 Leveson Inquiry, newspaper editors, managers, and proprietors were questioned extensively on the interplay of different interests in the news-making process. While Rupert Murdoch – owner of the publishers of *The Times*, *The Sunday Times*, and *The Sun* – did admit to an active interest in the editorial direction of *The Sun* (Leveson Inquiry, 2012a: 108), other editors and managers testified to the Leveson Inquiry that their organisations

fully respected the insulation of editorial processes from commercial or political influence. The Guardian Media Group, for example, cited the constitutional separation of editorial and commercial arms of their organisation (Singer, 2011). The editor of *The Times* stated, “There have never been any commercial pressures placed upon me that would undermine in any way the ethical, professional or legal conduct of journalists” (Harding, 2011). Responses of this kind from senior staff may be expected; unfortunately, the voices of ordinary journalists below the rank of editor were not heard at the inquiry.

Research conducted on business practices at commercial news organisations across a range of countries including the UK has found that the traditional norm of separation between the editorial and commercial arms is in decline, resulting in,

[a] new norm [...] based on combining established editorial values with values such as collaboration, adaptation, and business thinking, and it is already playing an important role in legitimising new practices that are based on frequent exchanges between editorial and the commercial teams. (Cornia et al., 2020: 173)

This ties in with interviews with representatives of local newspapers in the UK which found that some titles were strategically developing in-house relationships between editorial and advertising departments to cope with economic pressures (Jenkins & Nielsen, 2020).

Movements such as this have accompanied some high-profile scandals involving UK media, in particular the public resignation of veteran reporter Peter Osborne from *The Telegraph* in 2015. He resigned amid allegations that the newspaper management had consistently intervened in journalists’ reporting on alleged wrongdoing at a major advertising partner of the newspaper, the international bank HSBC, with senior editors refusing to publish certain critical stories about the bank (Osborne, 2015). The journalist’s account was backed up by an analysis of *The Telegraph*’s reporting on the HSBC scandal (G. Ramsay, 2015). Osborne claimed that this was one of several episodes where the newspaper had published unusually favourable coverage of advertising partners.

Less dramatic, but also indicative of a merging of editorial and commercial imperatives in the newsroom, is the growth of sponsored content in the digital editions of UK newspapers. Research has shown that online newspapers in the UK, along with their counterparts in the US, were more likely to include sponsored content in their output (Conill, 2016: 912). In a similar vein, the problem of “churnalism” – the substitution of original written news output for PR copy – has been a significant problem in British print journalism for over a decade (Lewis et al., 2008).

(F6) Company rules against *external* influence on
newsroom/editorial staff

2 POINTS
IN 2011
2 POINTS

Broadcast news in the UK is largely insulated from commercial pressures, although political interference in public service broadcasters has grown in the past decade. Commercial news outlets have a wide range of advertising partners, though there is some evidence of editorial favourability to certain industries.

The UK has a mixed media landscape, with news organisations being funded by a mix of public money (the BBC) and traditional advertising, as well as subscription and membership models. Commercial newspapers deal with a wide range of advertisers across many industry sectors, though there is some evidence that coordinated lobbying from certain industries can have an effect on editorial positions. Broadcast news is largely insulated from commercial influence due to the contracting out of news production by most commercial television and radio broadcasters, and the BBC is intended to be insulated from direct political pressure due to its incorporation by Royal Charter. However, consistent government pressure has been exerted on the BBC over the past decade.

As the incident involving *The Telegraph* and reporting on major advertising partners (described in Indicator F5 – Company rules against *internal* influence on newsroom/editorial staff above) shows, internal and external influence on newsrooms can be combined under certain circumstances. While individual news organisations may have significant and lasting partnerships with advertisers, there is little evidence that commercial media depend on a small number of large advertisers. Conversely, the media data and analytics platform Mediatel compiles Nielsen data for advertising spend by platform, and found that the UK television, radio, national, and regional press each attract hundreds of advertisers grouped across 13 sectors (Mediatel compiles the top 25 advertisers in each sector for each platform). For example, in December 2019, the most lucrative advertising sector for the UK national press was “Entertainment and Leisure”; the top 25 companies bought advertising space totalling GBP 5.4 million. The largest single advertiser in this group accounted for just 14 per cent of the total (Mediatel, 2020b).

Investigative reporting has uncovered some instances, however, of business lobbying infiltrating news content either through traditional paid advertising – often in the form of native advertising – the juxtaposition of industry advertising alongside relevant editorial content or the use of intermediary organisations such as affiliated think-tanks to influence reporting on specific industries. Research has found evidence that fossil fuel and energy companies have been able to penetrate newspaper coverage of climate change using these techniques (A. Ramsay, 2015; Energy & Climate Intelligence Unit, 2015).

News in the commercial broadcasting sector is insulated against direct influence by advertisers, since broadcasters are obliged to outsource the production of news to a separate company. ITN produces news for ITV and Channel 3, Channel 4, and Channel 5, while Sky News Radio provides bulletins for the majority of commercial radio stations. In any case, Ofcom's Broadcasting Code has detailed guidelines and restrictions on the inclusion of commercial content in programming (Ofcom, 2019d).

The BBC's incorporation by Royal Charter is designed to protect the broadcaster from parliamentary interference. In practice, however, moments of charter renewal (typically every ten years) often involve a degree of political pressure being exerted on the corporation in the form of reductions in funding or changes to the BBC's remit. This is not new, but the past decade has seen an increase in governments – led by a Conservative Party that has traditionally been comparatively hostile to the BBC – imposing constraints: in 2010 the government imposed a licence fee freeze for six years plus additional funding obligations (BBC, 2010). In 2015 – prior to a new round of Royal Charter renewal negotiations – the Conservative government announced that the BBC would have to bear the cost of providing free television licences for over-75s, a subsidy historically provided by the state (BBC, 2015) – though implementation of this has, to date, proved politically difficult. In 2020, a new Conservative government launched a public consultation on decriminalising non-payment of the licence fee, potentially endangering BBC revenues further (BBC, 2020). The government's continued interventions around licence fee renewal are seen as compromising the independence of the BBC (Moore, 2016), and the imposition of budgetary constraints on the BBC indirectly impacts the resources available to the corporation's news departments.

Pressure on broadcast news beyond the BBC has also increased to an extent. The public service broadcaster Channel 4 is also underpinned by legislation and run by the statutory corporation which is part of the UK government Department for Digital, Culture, Media and Sport (DCMS). During the December 2019 general election campaign, representatives of the Conservative Party (which would subsequently form the next government) accused the channel of partisan bias due to its coverage of election debates and suggested that the broadcasting remit of Channel 4 could be reviewed after the election (Waterson, 2019). This was generally interpreted as an implicit threat to the channel on the basis of its news and current affairs coverage. Ofcom subsequently ruled that the offending programme was not in breach of the Broadcasting Code; no further action has been taken (Ofcom, 2019e).

(F7) Procedures on news selection and news processing 3 POINTS

Broadcast news in the UK is governed by a series of regular procedures on news selection and processing. Newspapers also supply detailed guidelines to journalists on newsgathering and verification.

IN 2011
2 POINTS

The Leveson Inquiry in 2011–2012 investigated the governance structures in newspapers and their newsrooms, and in a series of hearings, editors were questioned on the editorial processes they oversaw. Some exchanges revealed relatively detailed processes of internal discussion and decision-making on story publication (Leveson Inquiry, 2012a: 99–155). Most UK national newspapers (and the larger publishers of regional newspapers) release details of detailed guidelines supplied to journalists for the provenance of stories before publication and of newsroom training (IPSO, 2019a). Others publish their editorial guidelines for journalists, detailing the newsgathering process (Financial Times, 2020). Academic quantitative content analysis research has demonstrated the news values that inform how UK newspapers build their news agendas (Harcup & O’Neill, 2016).

The UK’s broadcasters are guided by a series of rules and regulations on the approaches taken when conducting journalism and covering stories of political significance, via the Ofcom Broadcasting Code. The BBC is also obliged by the terms of its Royal Charter to produce a set of editorial guidelines, alongside which is also published a detailed list of guidance notes for all employees. A 2007 BBC document provides a detailed account of the procedures by which stories on the BBC made it onto air (Boaden, 2007). Studies of the BBC’s editorial processes have shown how the corporation employs detailed professional assessments in story selection, but in doing so can fail to achieve some of its journalistic functions (Wahl-Jorgensen et al., 2017). Additional research has shown that UK broadcasters as a whole are influenced by external factors when constructing news agendas around political stories, notably the published content of national newspapers (Cushion et al., 2016).

(F8) Rules and practices on internal gender equality 2 POINTS

Despite recent improvements in the representation of women in the very top editing and managerial roles, women continue to be underrepresented in managerial roles, and a substantial gender pay gap remains.

Women journalists in the UK are still faced with a significant gender pay gap and have been less likely to progress to senior management roles. However, news organisations have begun implementing policies and goals designed to

reduce pay inequality and promote parity in employment levels. Though there is still some way to go, there has been progress in this area in recent years.

Several studies have identified that women make up 45 per cent of UK journalists (Thurman et al., 2016; Spilsbury, 2018). However, while there has been a significant increase in the numbers of women in the very top editorial and managerial positions in newspaper and broadcast journalism (see Indicator F4 – Internal rules for practice of newsroom democracy), women are slightly more likely to be in more precarious part-time or freelance roles than men, and significantly less likely to progress to senior management roles during their careers. Whereas 37 per cent of men in journalism are in senior roles after 21–29 years of professional experience, only 18 per cent of women reach that level; instead, they are much more likely to be in junior managerial roles (55%) than men (41%) (Thurman et al., 2016: 10).

The BBC operates a series of policies intended to achieve greater equality and diversity across the Corporation. A report on career progression and culture for gender equality was commissioned and published in 2018, including the following main recommendations:

- embedding flexible working, mentoring, and sponsorship for women looking to apply for senior leadership roles, support for women returning to work after time off with children and the introduction of shared paternity leave;
- the removal of existing barriers to women joining the organisation and to provide opportunities for existing female employees, and revised recruitment processes to reduce gender bias;
- and greater training and accountability for team managers and revised processes to resolve challenges and problems in the workplace (BBC, 2018a: 5).

The Guardian committed, in a 2017–2018 working report, to reduce the organisation's gender pay gap, to achieve a 50:50 gender balance in the top half of the organisation, and to develop, promote, and recruit more women across the organisation as a whole (The Guardian, 2018).

The Telegraph, whose owner has the worst gender pay gap of the media organisations shown below, produced a roadmap in 2017 for achieving a zero gender pay gap by 2025, through introducing a series of policies to benefit women employees, including flexible working, maternity benefits, and support, and the use of 50:50 gender shortlists in recruitment (Telegraph Media Group, 2017: 5).

The UK's Equality Act 2010 was amended in 2017, making it compulsory for companies in Great Britain (excluding Northern Ireland) with more than

250 employees to publish information about gender pay gaps within their organisations. Table 2 shows the gender pay gaps for selected companies with print or broadcast news publishing activities (excluding the BBC and those commercial news organisations with complex and diffuse corporate structures, such as Reach PLC). The results show a significant continuing disparity between median hourly wages for women and men, with women receiving 22.7 per cent less than men at Telegraph Media Group. None of the selected companies have pay parity for women and men, though Guardian News and Media and Sky UK perform slightly better. The problem appears to be structural, as women are less likely to feature in the upper quartile of earners in these companies, ranging from 41.4 per cent at Independent Television News to just 17.5 per cent at News Group Newspapers, publisher of the tabloid newspaper *The Sun*. The BBC is obliged to publish gender pay gap information in its annual accounts, and its results are marginally better, with a deficit of 6.7 per cent in its gender pay gap in 2018 and 2019, lower than the other companies listed here and a reduction but still a significant difference (BBC, 2019a: 14).

Table 2 Gender pay gap information, selected UK news publishers, 2018–2019 (per cent)

Publisher	Median hourly wage difference (+/-)	Proportion of women, top pay quarter	Proportion of women, lower pay quarter
Telegraph Media Group (print)	-22.7	33.5	61.3
Financial Times (print)	-18.4	32.0	61.0
News Group Newspapers (print)	-18.0	17.5	52.3
Associated Newspapers (print)	-16.1	29.7	49.5
Express Newspapers (print)	-14.6	26.0	57.0
Independent Television News (broadcast)	-12.6	41.4	64.0
Guardian News and Media (print)	-8.4	35.0	61.0
Sky UK (Sky News) (broadcast)	-7.8	32.0	40.0

Source: Gov.uk, n.d.-b

For journalists themselves (rather than all employees at media organisations) the *Journalists at Work* survey noted an 18 per cent difference in average median salaries for men and women in 2018, with the median salary for men being GBP 27,500 and for women being GBP 22,500 (Spilsbury, 2018: 76).

(F9) Gender equality in media content

2 POINTS

There is an imbalance in the frequency of female voices as expert sources in UK news coverage, and in the portrayal of women in certain outlets, though several news organisations, particularly broadcasters, have engaged in policy reviews and have introduced new policies and procedures to address the problem.

While UK broadcasters responded to a 2015 House of Lords committee report about women in news and current affairs broadcasting (on-screen and off-screen) with a range of policy statements and reviews on diversity and inclusiveness within their operations, problems persist in the representation of women in many, but not all, UK national newspapers. Significant imbalances persist in the use of women as expert sources across the media landscape as a whole. While guidelines, policies, and monitoring of gender equality and diversity in content are applied by the UK's public service broadcasters, there is little evidence that this is practised by newspapers.

The 2015 report, by the House of Lords Select Committee on Communications, noted a significant imbalance of women experts in broadcast news coverage and urged broadcasters to take steps to ensure that they better reflected society by ensuring a gender balance (House of Lords, 2015: 5). A number of reviews and policy changes have been put in place by broadcasters in the interim. The BBC's Royal Charter (renewed in 2017) specifies one of the Corporation's public purposes as "to reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions" (DCMS, 2016a: 6). The Corporation has since developed a diversity commissioning code of practice to achieve this (BBC, 2019b) and run a series of "Expert Women" events as part of a campaign to increase the number of expert women presenters and contributors, particularly for topics in which women have been especially underrepresented. The campaign is run with support from other UK broadcasters, including Sky, which does not have defined public service broadcasting obligations set by Ofcom (BBC, 2017).

Other broadcasters have engaged in parallel reviews of on- and off-screen diversity and inclusion, such as ITV's *Social Purpose Impact Report* (ITV, 2019a) and Channel 4's *Fourteen Insights into Inclusion & Diversity* (Channel 4, 2019). Together, the BBC, ITV, Channel 4, Channel 5, and Sky use the online system Diamond to monitor consistent diversity data on programmes that they commission. Diamond reports contain breakdowns by broadcaster for the proportion of on-screen contributions for different groups: for example, 55.8 per cent of on-screen contributions in BBC programming were by women. This compares with 54.7 per cent for ITV, 49.5 per cent for Channel 4, 45.6 per cent for Sky, and 44.7 per cent for Channel 5 (Diamond, 2020: 13).

A 2018 study commissioned by the Global Institute for Women's Leadership at King's College London found that just 23 per cent of expert sources across

UK news outlets were women, with women especially unlikely to be cited as expert sources in stories about business and finance (14% of expert sources), foreign politics (13%), and considerably more likely to feature in stories about social policy (48%) (Centre for the Study of Media, Communication and Power, 2018: 2).

Research produced in 2017 by Women in Journalism – a network for women working in UK print, broadcast, and online media – found that print media were lagging behind broadcasters in redressing gender imbalances in content production and coverage. It also found that portrayals of women on the front pages of UK tabloid newspapers tended towards sexualised coverage and photographs, with women in newspapers “more likely to appear as victims or arm candy” (Mills et al., 2017: 13). Research on representations of women politicians in UK newspapers similarly found that stories tended to focus on aspects of their personal lives, appearance, and gender, rather than on their policies or expertise (Williams, 2018).

(F10) Misinformation and digital platforms
(alias social media)

2 POINTS

Journalists demonstrate a high regard for the need for social media verification in their work. While print media do not publicise guidelines for social media verification, broadcast newsrooms tend to have detailed procedures in place, particularly for international coverage.

The BBC’s Editorial Guidelines contain a series of guidance notes outlining the Corporation’s policies on online newsgathering, social media, and Internet research (BBC, n.d.-a). An ethnographic study of BBC newsrooms’ processing of user-generated content (UGC) in coverage of international conflict noted the evolution of policies and working practices within and between groups to minimise problems of verification (Johnston, 2016). Though other broadcast news providers are governed by Ofcom’s Broadcasting Code sections on due accuracy, they do not publish their social media verification policies in their editorial guidelines. The newspaper industry’s regulator IPSO (Independent Press Standards Organisation) requires all members to supply annual statements with information including internal policy on the verification of stories. Of the most recent set of annual statements, none of the national newspaper publisher members of IPSO provided evidence of dedicated policies or processes to protect journalism from digital misinformation (IPSO, 2019a).

Journalists as individuals have a high regard for the need for social media verification. A 2018 survey of journalists’ working practices suggests that journalists are wary of information obtained from social media when developing

stories, but that they have high confidence in their skills to verify information from social media sources (Spilsbury, 2018: 36) Table 3 shows the ways in which journalists check social media content.

Table 3 Verification of information on social media (per cent)

Method of verification	Proportion using
Contacts	80
Seeking multiple sources	78
More discussion with the original source	75
Emergency services (police, ambulance service, etc.)	69
Attending the scene in person	55
Use of online tools	45
Other	4

Source: Spilsbury, 2018: 36

The NCTJ (National Council for the Training of Journalists) offers training courses in social media reporting and verification, but, as with the information in Table 3, this denotes the individual skills and responsibilities of individual journalists, rather than sophisticated organisational policies to mitigate against the infiltration of misinformation or disinformation into news coverage.

Empirical research suggests there are some systemic problems in how certain UK news organisations protect themselves from mis- and disinformation. A 2019 study found evidence of disinformation and strategic narratives spread by Russian state-linked media were being picked up and republished by certain tabloid newspapers, indicating a lack of sophistication in detecting targeted messaging disguised as news by motivated political actors (Ramsay & Robertshaw, 2019).

(F11) Protection of journalists against (online) harassment 2 POINTS

UK journalists with formal contracts enjoy a range of support mechanisms relating to abuse and harassment online. Legal protections also apply in some cases. Freelance journalists, however, report little or no access to support networks.

A 2019 review of UK newsroom practices for protecting journalists from online abuse and harassment, covering broadcast, print organisations, and news agencies, found a range of established and developing policies. These included the implementation of detailed guidelines for journalists and editors in the event of harassment and procedures for the reporting of incidents to management. Some newsrooms employ voluntary trauma risk and mental health training,

peer monitoring of abusive communications, and regular meetings between social media editors and news teams to monitor the effects of potential abuse. Newsrooms were also found to implement guidelines for social media use by employees, including preventative measures and privacy protection, blocking policies, and threat reporting mechanisms. Some news organisations also utilised social media teams who liaise with platforms in cases of sustained online harassment campaigns (Trionfi & Luque, 2019: 55–58). Freelance journalists, however, reported that they had little or no access to these support networks (Trionfi & Luque, 2019: 54).

Journalists in England and Wales also have access to protections in law (different legal jurisdictions operate in Scotland and Northern Ireland, though similar legislation is in place there). The Malicious Communications Act 1988 specifies that it is an offense to send communication that is “indecent or grossly offensive, threatening or false, if the purpose of the communication is to cause distress or anxiety”. The Communications Act 2003 (Section 127) outlines the criminal offense of sending messages through a public communications network that is grossly offensive or of an indecent, obscene, or menacing character, or to send false information for the purpose of causing annoyance, inconvenience, or needless anxiety to another. The Protection from Harassment Act 1997 prohibits actions amounting to harassment. There is some lack of clarity in these pieces of legislation and their application to journalism, such as the definition of “grossly offensive” messages in the Malicious Communications Act 1988 and the inclusion of coordinated online “pile-on” behaviour under the definition of harassment (Feikert-Ahalt, 2019: 47–50). Other legislation, such as the Public Order Act 1986 and the Criminal Justice and Courts Act 2015, are relevant to protections from malicious communication.

Dimension: Equality / Interest Mediation (E)

(E1) Media ownership concentration national level 2 POINTS

Ownership concentration in the newspaper industry has increased in recent years, and commercial radio is dominated by a small number of companies. The BBC, while publicly owned, is dominant in broadcasting overall, and broadcast news provision is almost entirely provided by the BBC, ITN, and Sky News.

IN 2011
2 POINTS

National news media markets in the UK vary significantly in terms of their levels of concentration. The national press, based in London, is wholly commercial and highly concentrated. Broadcast markets have varying degrees of consolidation, but in the specific area of broadcast news, the public broadcaster – the British Broadcasting Corporation – dominates, with one major commercial competitor,

Independent Television News, providing national news for commercial radio and all terrestrial public service broadcasters. Domestic television news is also supplied on free-to-air digital terrestrial television as well as subscription cable and satellite channels on 24-hour news channel *Sky News*. Online news is naturally more fragmented, but legacy print and broadcast news brands make up the majority of most popular news sources, with the BBC in particular enjoying a dominant position among UK online news consumers. UK legislation limits media mergers under certain circumstances and prevents cross-ownership of broadcast licences by newspaper owners, but also to ensure that Channel 3 (ITV) licensees use a single news provider (Ofcom, 2018b).

In terms of national press, the UK has eleven mainstream national daily newspapers (including *The Independent*, which ceased publishing in print in 2016 and the *i*, originally a condensed version of *The Independent*, most recently purchased by DMG Media in November 2019), nine Sunday newspapers, and a weekend edition of *The Financial Times* (see Table 4). Consolidation in recent years has been driven by the exit of JPI Media, a major publisher of local and regional newspapers, from the market with the sale of the *i* to DMG Media in 2019 and the purchase of Express Newspapers (publisher of the *Daily Express* and *Daily Star* and their Sunday equivalents) by Trinity Mirror in March 2018 (Trinity Mirror rebranded as Reach PLC two months later).

The most recent revenue figures available for all owners of national newspapers are from 2018. Table 4 shows the state of the national newspaper landscape in 2020, with company revenue figures from each of the parent companies in 2018. The 2018 figures show that three companies – News Corp UK and Ireland, Reach PLC, and DMG Media Ltd – account for 72 per cent of all revenue for national newspaper publishers. The companies also publish two-thirds of all national newspapers and represent 87 per cent of all weekly print circulation (Media Reform Coalition, 2019: 5).

Terrestrial (DTT – or digital terrestrial television – and cable or satellite) television in the UK is supplied by a range of companies with substantially different corporate structures and ownership models. Within this ecosystem, however, television news at the national level is almost entirely produced by three organisations – the BBC, ITN, and Sky News.

~ UNITED KINGDOM ~
ECONOMIC CHALLENGES, MARKET CONSOLIDATION AND
INCREASING PROFESSIONAL INSECURITY

Table 4 UK national newspaper market, 2020

Company	Legacy national titles	Turnover, 2018 (GBP)	Cumulative share (%)
News Corp UK & Ireland Ltd	The Sun The Sun on Sunday The Times The Sunday Times	727,793,000	24.9
Reach PLC (formerly MGN Ltd)	Daily Mirror Sunday Mirror The Sunday People Daily Express Sunday Express Daily Star Daily Star Sunday	723,900,000	49.7
DMG Media Ltd	Daily Mail The Mail on Sunday i (from Nov 2019)	651,851,000	72.0
The Financial Times Ltd	The Financial Times FT Weekend	323,599,000	83.1
Telegraph Media Group Ltd	Daily Telegraph Sunday Telegraph	271,400,000	92.4
Guardian News & Media Ltd	The Guardian Observer	199,250,000	99.2
Independent Digital News and Media Ltd	The Independent (Digital since 2016)	24,803,000	100.0
Total	–	2,922,596,000	–

The six companies that produce UK terrestrial television have very different structures. The BBC, the nation's public broadcaster, is funded by a compulsory licence fee, which raises approximately GBP 3.6 billion each year, supplemented by additional income to a total of GBP 4.9 billion (2018 figures). The corporation spent around GBP 1.7 billion on all television services in 2018 (BBC, 2019a: 58). ITV, the traditional terrestrial commercial rival to the BBC, achieved external revenues of GBP 3.3 billion in 2019 (ITV, 2019b: 52), while Channel 4 – publicly owned but commercially funded – saw revenues of GBP 975 million (Channel Four Television Corporation, 2019: 156). The remaining terrestrial commercial broadcaster with public service broadcasting obligations, Channel 5,

is ultimately owned by US-based Viacom International (2018 revenues of USD 12.9 billion – approximately GBP 9.8 billion in 2018) (Viacom International, 2019: 34), yet Channel 5 Broadcasting Limited had revenue of only GBP 376 million (Channel 5 Broadcasting Limited, 2019: 10). The satellite broadcaster Sky Group had 2018 revenues of GBP 13.6 billion (Sky Group, 2019: 10) but since October 2018 has been ultimately owned by American group Comcast (2018 revenue: USD 94.5 billion respectively GBP 71.4 billion) (Comcast Corporation, 2019: 74). Finally, BT (British Telecommunications), traditionally a telecommunications infrastructure company, moved into subscription sports coverage in 2013. The parent company's 2018 revenue was GBP 23.7 billion (BT Group, 2019: 4). The overall concentration of the television news market is therefore complicated by the fact that for some companies (for example, BT) television content production is a minor aspect of a much larger corporate portfolio, while the American companies Viacom and Comcast dwarf the UK-based television market in which they have a stake. Table 5 accordingly shows the domestic revenue of those UK-based television broadcasters who provide news; BT is excluded since its broadcast output consists solely of sports, though it should be noted that BT's total group revenue is approximately equal to all other television broadcasters combined.

Table 5 UK television news broadcasters' revenue, 2018 (GBP million)

Broadcaster	Revenue
Sky Plc	13,585
BBC	4,889
ITV Plc	3,885
Channel Four Television Corporation	975
Channel 5 Broadcasting Ltd	376

The television news market is more consolidated. The BBC is responsible for all news published across its broadcast and online platforms, while the commercial public service broadcasters – ITV, Channel 4, and Channel 5 – receive news from a single supplier: Independent Television News. ITV consists of a series of regional licences with a degree of shared national programming and is obliged by law to use a single news provider for all licenses. ITN has supplied ITV with news since 1955. Channel 4 has used ITN since it launched in 1982, and though Channel 5's news bulletins were produced by Sky News between 2005 and 2012, it too has reverted to ITN. Sky provides its own 24-hour news channel Sky News, available on its own subscription platform as well as free to the public via DTT.

The BBC does not disaggregate its news spending across different platforms in its annual statements, but in 2018 the Corporation allocated GBP 355 million to news and current affairs (BBC, 2019a: 61), of which GBP 53 million was spent on the 24-hour BBC News Channel (BBC, 2019a: 58). ITN's total revenue was GBP 127 million, of which GBP 89 million was derived from its news operations (ITN, 2019: 53). Sky, unfortunately, also does not disaggregate the proportion of its business that is devoted to Sky News (also a problem when estimating the UK's radio news markets, given Sky News' prominent position in radio news provision), meaning that it is not possible to gain a clear picture of the proportion of the domestic UK television news market that is controlled by each company. However, the fact that three companies supply television news in the UK is an indicator of a consolidated market.

National radio in the UK is provided via both analogue and digital broadcasting. Regardless of the method of transmission, public broadcasting is handled solely by the BBC, and commercial national radio is dominated by three companies: Global Radio, Bauer Media, and Wireless Group. Analogue national radio broadcasting consists of five BBC stations covering music, live sport entertainment, and news, plus Classic FM (music; Global Radio); Absolute Radio (music; Bauer Media), and TalkSport (sport; Wireless Group). The BBC operates five stations that broadcast nationally in both analogue and digital (Radio 1; Radio 2; Radio 3; Radio 4, and Radio 5 Live) as well as a further six stations that are digital-only (including the World Service). There are 40 national digital commercial stations available via two multiplexes (Digital One and Sound Digital). Of these 40 stations, almost three-quarters are owned by Global Radio (14 stations), Bauer Media (nine stations), and Wireless Group (six stations) (Arqiva, n.d.).

BBC expenditure on its national radio stations (analogue and digital, excluding BBC World Service) in 2018 was GBP 304 million (BBC, 2019a: 59), roughly equal to Ofcom's estimate of GBP 302 million for national commercial radio revenue in the same year. Ofcom also records a figure of GBP 107 million for commercial radio sponsorship – as distinct from advertising revenue – but does not disaggregate this data for local or commercial markets (Ofcom, 2019f: slide 10). It is difficult to determine precise levels of concentration in the national commercial radio market: Wireless Group was purchased in 2016 by News Corp, and the parent company's accounts do not supply a specific revenue figure for the subsidiary. The other large commercial companies, Global Radio and Bauer Media, are also dominant in local radio, so it is difficult to ascertain which portions of their revenue are derived from national broadcasting, and which from local broadcasting. In addition, four smaller publishers (Folder Media, Sunrise Radio, A Spokesman Said Ltd, and Jack FM) fall below the “small company” legal definition in UK company law and therefore are not obliged to publish revenue figures. It can, however, be stated

with some confidence that the overall radio market is concentrated: the BBC accounts for around half the market, and three companies – Global, Bauer, and Wireless – dominate the commercial sector.

In terms of radio news provision, the UK is a duopoly: the BBC provides news and current affairs programming across all of its radio outlets, while all news programming on commercial radio is produced by Sky News Radio and supplied to stations by Independent Radio News. Since neither the BBC nor Sky disaggregate their news funding figures by platform, it is not possible to determine a definite figure for the national radio news market.

In addition to legacy print and broadcast, the UK has a range of digital-first news brands, some of which have national scope, such as *HuffPost UK* and *LadBible*, an entertainment site that has steadily increased its journalism output (*Buzzfeed* operated a respectable UK journalism operation that was abandoned unexpectedly in May 2020). These sites attract significant audiences: 11 per cent of UK news consumers report having used *HuffPost* for news in the previous week, with 8 per cent for *Buzzfeed* prior to its cutbacks and 6 per cent for *LadBible* (Reuters Institute, 2019: 69). The emergence of highly partisan right- and left-wing news sites in recent years has added an element of pluralism to the UK's online news market, though sites such as *Breitbart* (which has a dedicated *Breitbart London* subsite) and left-wing sites such as *Novara Media* or *The Canary* attract very small audiences, with none reaching over 2 per cent of UK news consumers (Reuters Institute, 2019: 69).

(E2) Media ownership concentration regional (local) level 2 POINTS

The UK local press has become more concentrated over the past 20 years, but a significant "long tail" of smaller publishers still exists. Broadcast news, as at the national level, is dominated by the BBC and Sky News, though the local radio and hyperlocal sector has a wide variety of providers.

IN 2011
1 POINT

The UK local and regional media landscape consists of a local newspaper market characterised by several large recent mergers, the concentration of ownership of the majority of titles among a small number of large publishers, and a relatively long tail of smaller and independent publishers; an independent community and hyperlocal news market that is fragile but becoming increasingly professionalised; regional television provided solely by the BBC and ITV, with a tier of local television stations underneath that has experienced a series of mergers and extremely low audience engagement since the programme was launched; and a local radio market that balances the BBC's dominance in public provision with a commercial sector characterised by three large players and a large number of small and independent broadcasters. While concentration in the

local press is problematic, and local television – particularly local television news provision – is effectively a duopoly, the local radio sector has a range of different providers, even if the market is dominated by a few companies.

In terms of the local press, the UK has over 1,000 daily and weekly local newspapers, including those that no longer publish in print form, but which developed out of legacy print titles (not including independent community and hyperlocal titles, discussed below). The sector has been subjected to intense economic pressure in the twenty-first century, as classified advertising revenue moved online and as audiences for news increasingly moved online, diminishing print revenue that has only partially been replaced by rising digital revenues. The shock to the local news business model has been such that government inquiries have been launched to try to solve the problem of local public interest news sustainability after the closure of over 300 local newspapers between 2010 and 2019 (DCMS, 2019a).

Apart from the significant closures, the larger local news publishers have embarked on a series of acquisitions of, and mergers with, smaller publishers. Research by the Media Reform Coalition has shown that, as of 2019, five publishers (Newsquest, JPI Media, Reach PLC, Tindle Newspapers, and Archant) were responsible for 80 per cent of all titles, with the remaining 20 per cent made up by a long tail of 57 smaller publishers, ranging from significant publishers with limited regional scope to single-title independent publishers (Media Reform Coalition, 2019: 8). The heavy consolidation among the largest publishers has also been found to have led to a situation where increasingly large portions of the UK are now essentially local newspaper monopolies, with a single publisher providing all local print news (and their online versions) in those areas (Ramsay & Moore, 2016).

Table 6 includes the number of titles as calculated by the Media Reform Coalition (2019: 8), with revenue figures calculated for the present report from the most recent available company accounts. The revenue list is not fully complete due to the fact that the remaining unnamed 48 publishers are not obliged to publish annual revenue figures, since they satisfy the definition of a “small company” in UK company law. Some publishers (those towards the bottom of the table, such as Newbury News Ltd) qualify as small companies but publish revenue figures by choice. The complexity of local newspaper companies varies significantly: Reach PLC consists of over 200 linked corporate entities and Newsquest has almost 50 subsidiaries in the UK. The revenue figures for these two companies in Table 6 are aggregates of the revenues of their subsidiaries engaged in local news publishing (not including their printing arms). The combined revenue of the top four publishers represents 79.8 per cent of the total available revenue figures in Table 6, though this high value would certainly be diluted if revenue information was available for the remaining 48 publishers.

Table 6 *Titles and revenue of UK local newspaper publishers*

Publisher	No. of titles (2019)	Revenue (2018, GBP)
Reach PLC (Regional)	215	313,794,000
DC Thomson & Company	5	207,315,000
Newsquest (Regional)	236	206,787,000
Johnston Press	224	171,016,000
Archant	71	87,275,000
Iliffe	40	36,054,349
Midland News Association	17	28,725,000
Independent News and Media Limited	4	27,732,000
Tindle Press Holdings Limited	112	27,473,174
Scottish Provincial Press Limited	15	9,565,000
Newbury News Limited	2	2,230,627
The Barnsley Chronicle Limited	2	3,707,224
Baylis Media Limited	2	2,922,280
One Media and Creative UK Limited	2	1,335,819
Remaining 48 Publishers	121	–

There are two tiers of regional and local television in the UK: the regional services provided by the BBC and the different Channel 3 licensees who comprise the ITV network; and a range of small local television stations launched after 2012 based largely in urban areas. Outside England, in the nations of the UK, the BBC provides localised versions of its flagship BBC One and BBC Two channels in Scotland, Wales, and Northern Ireland, including programming in Irish and Ulster Scots for the latter. The BBC launched a dedicated channel for Scotland (BBC Scotland) in 2019, which runs alongside the Gaelic-language BBC Alba service. While at the time of writing there are not yet any annual figures for BBC Scotland expenditure, the corporation spent GBP 9 million on BBC Alba in 2018 (BBC, 2019a: 43). The BBC also provides significant funding to the Welsh free-to-air channel S4C, spending GBP 22 million on the service annually (BBC, 2019a: 61). English regional services are also provided across twelve areas. Each of the regional and national subdivisions also receive dedicated online coverage. Channel 3 (ITV and STV) consists of 15 regional licence-holders providing a mix of shared national and unique local programming in each area (there is also a single licence-holder for the national breakfast-time service. In practice, ITV Broadcast Ltd owns all eleven licences in England and Wales, while UTV Limited holds the Northern Ireland licence, and STV Central and STV North own the Scottish licences. The remaining licence, for the Channel Islands, is owned by Channel Television Ltd.

News programming across these regional services is a duopoly: the BBC provides all news coverage to its regional services, while all Channel 3 and ITV licence holders have their news programming supplied by Independent Television News. The size of this market is difficult to determine. The BBC reports show that GBP 261 million was spent on local television content across the nations and regions in 2018, but does not disaggregate spending on news programming within this figure, or make clear whether this figure includes news content costs at all. ITN does not break down its revenue figures to show programming spending.

A network of local television stations (Local Digital Television Programme Services – L-DTPS – in legislation) was created by the UK government in 2012, and currently extends to 26 licence-holders located largely in urban areas in the UK (Ofcom, 2020a). This tier of broadcasters reaches very low audiences, and concerns about financial viability have prevented a further expansion of the scheme, and concerns about poor quality and the reduction of their obligations to supply news mean that local television stations do not play a substantial role in the UK’s media landscape (BBC, 2018b). Ownership of the stations has merged, with “That’s TV” group and “Made In” group each owning several stations. Aside from the company which owns the local television licence for London, none of the owners reached the UK’s thresholds for revenue reporting, and so very little data on the size of the market is available. The revenues of the company for 2018 were GBP 3.1 million.

As with national radio, local radio in the UK is split into public services supplied by the BBC, and a commercial sector dominated by Global Radio and Bauer Media. However, local radio in both analogue and digital form does include greater plurality than the national picture, and a significant amount of smaller and independent producers, though levels of concentration vary by region.

The BBC provides analogue and digital radio services across England and to the other nations of the UK, with GBP 200 million spent in total in this sector in 2018 (BBC, 2019a: 38–47). English local BBC radio consists of 40 stations, including coverage of the Channel Islands (GBP 124 million in 2018). Northern Ireland is covered by BBC Radio Ulster and BBC Radio Foyle, while Scotland and Wales receive national coverage in both English (BBC Radio Scotland and BBC Radio Wales) and in Gaelic and Welsh, respectively (BBC Radio Nan Gàidheal and BBC Radio Cymru).

According to telecommunications authority Ofcom’s list of analogue radio licences, commercial analogue radio in the UK consists of 283 stations across the UK provided by a total of 57 broadcasters, of which 40 are small and independent providers (Ofcom, 2020b). Research by the Media Reform Coalition has calculated that Global Radio (80 stations) and Bauer Media (50 stations) own 46 per cent of all analogue local commercial stations – strong market positions,

but considerably less than they enjoy in the national market (Media Reform Coalition, 2019: 20). Global Radio and Bauer Media are more dominant in the local digital radio market, however, with these companies owning 67 per cent of 370 local digital stations: 138 stations owned by Global Radio and 112 by Bauer Media. 62 companies (including 32 independents) own the remaining 120 stations (ukdigitalradio.com, n.d.). Concentration varies across regions, however, with Global and Bauer owning 87 per cent of local digital stations in Northern Ireland and 85 per cent in the North of England, but just 43 per cent in Greater London and 36 per cent in Wales (Media Reform Coalition, 2019: 21).

Market concentration in terms of revenue is difficult to determine in the UK radio sector at both the national and local level, due to the lack of revenue figures for smaller broadcasters and difficulties in disaggregating local and national revenues for the larger publishers, particularly Global Radio and Bauer Media. Ofcom estimates UK local commercial radio revenues for 2018 to be GBP 129 million, though this does not distinguish between analogue and digital services. Commercial sponsorship figures as reported by Ofcom do not disaggregate national or local portions of the GBP 107 million total (Ofcom, 2019f: slide 10; see also Indicator E1 – Media ownership concentration national level).

An additional tier of radio broadcasting is supplied by community radio stations. Ofcom records 296 community stations across the country (Ofcom 2020c). Most are very small enterprises run largely on voluntary labour, with a combined sector income of approximately GBP 12 million in 2018 and a median income per station of approximately GBP 30,000 (Ofcom 2019: slide 14).

The local radio news market consists of the same duopoly as national radio: the BBC provides news across its outlets, while commercial radio stations broadcast news produced by Sky News Radio. As with the national market, since Sky Plc does not report the portion of its expenditure on, or revenue derived from, radio operations. BBC funding figures for news provision also do not specify how much of the GBP 355 million total is allocated to radio. The most that can be said is that the local radio news market is concentrated, in the sense that it is almost entirely provided by two organisations.

Considering community and hyperlocal news media, the Independent Community News Network (ICNN), a support network for the sector, reports more than 300 community and hyperlocal news sites in the UK (Centre for Community Journalism, n.d.-b). It is, however, difficult to confirm the size of the market, since there is such variation in types of hyperlocal entity, and not all are profit-seeking enterprises. Previous estimates have put the number of hyperlocals in the UK at 550 (Ramsay & Moore, 2016: 40). A 2016 survey of hyperlocals found that one-third made money, but only one in ten reported generating more than GBP 500 per month in revenue (Williams, 2016). While this is a valuable addition to local news pluralism in the UK, the sector remains

small and financially precarious. It therefore only very partially offsets the concentration in the local newspaper sector.

(E3) Diversity of news formats

3 POINTS

The UK news landscape is characterised by a wide range of news formats across all platforms.

IN 2011
3 POINTS

There is a very diverse range of news formats across broadcast, print, and online news providers in the UK, spanning traditional platform-specific formats such as fixed-schedule television bulletins and print newspapers, to innovative interactive and long-form online journalism, to satirical news sources and podcasts.

Considering television news formats, fixed-schedule bulletins continue to be the mainstay of television news programming in the UK. The designated Public Service Broadcasters with statutory obligations to provide news programming on their channels – BBC One; ITV and Channel 3; and Channel 4 and Channel 5 – each broadcast several bulletins on weekdays, with reduced obligations at weekends. Bulletins on BBC One – including the channel’s flagship evening bulletin *News at Six* which commands the largest television news audience in the UK – ITV and Channel 5 are “general purpose” bulletins, covering a range of topics over a 20–30-minute bulletin. Channel 4’s nightly bulletin is an hour in length and includes longer segments, more international news and investigative content. BBC One and ITV also host regional and local television news bulletins, typically appended to the main scheduled national programmes. The BBC also broadcasts *Newsround*, a daily news bulletin for children shown on the CBBC Channel (until 2012 it was also broadcast on BBC One).

There is also a wide range of current affairs programming on the UK’s PSB channels. These consist of pre-recorded investigative journalism programmes, such as the BBC One’s *Panorama*, ITV’s *Tonight*, or Channel 4’s *Dispatches*, mixed live and recorded programmes like BBC Two’s weeknight show *Newsnight*, and panel discussion shows such as *The Andrew Neil Show* on BBC and *Peston* on ITV. Current affairs programming for Scottish, Welsh, and Northern Irish audiences is also broadcast.

24-hour news programming is also provided on the BBC News channel and BBC Parliament, and on the Sky News channel. In addition to reactive rolling news coverage, BBC News and Sky News provide a mix of bulletins (including simultaneous broadcasting of BBC One bulletins by BBC News) and pre-recorded programming, including international reporting, travel, and discussion shows. Both channels also host nightly discussion shows reviewing the following morning’s newspaper front pages, typically released in time for these programmes. Sky also operates a 24-hour sports news channel, Sky Sports News.

Finally, there are some popular satirical programmes that review news and current affairs, such as BBC One's long-running weekly news review panel show *Have I Got News For You* and Channel 4's combination talk-show and news review show *The Last Leg*.

Considering radio news formats, the BBC broadcasts a twice-daily fifteen-minute news flagship news bulletin, *Newsbeat*, tailored to younger audiences, on its main music-based radio station, Radio 1, and on the BBC Asian Network. The BBC's remaining music-based radio stations include short hourly news roundups, while Radio 2 has some news review and discussion programmes. BBC Radio 4 is the Corporation's main spoken-word station, which includes a large amount of news and current affairs programming, including the agenda-setting early-morning *Today* programme, the parliamentary review programme *Today in Parliament*, current-affairs shows like *File on 4*, and international news on programmes such as *From Our Own Correspondent*. BBC Radio 5 Live broadcasts news alongside other live coverage such as phone-ins, interviews, and sport. The BBC's radio news programming is replicated in its specialised Welsh, Scottish, and Northern Irish stations as well as its network of local stations in England. Commercial music radio stations in the UK run short news roundups supplied by Sky News, and several talk radio stations operate nationwide, including talkSPORT and LBC.

In terms of print news formats, the national press consists of a mix of tabloid, mid-market, and broadsheet newspapers, each of which presents news in different ways to different target audiences. Each newspaper also includes a range of news formats, from reportage to comment pieces and leader columns. Some significant news and current affairs magazines also circulate, such as *The Spectator* and the *New Statesman* as well as the satirical *Private Eye*, each of which contain commentary and current affairs reporting in their print editions. Local newspapers largely provide localised versions of the output of the national press, but a network of hyperlocal sites (skewing more online than persisting with print) has emerged over the past two decades, providing a varied range of different approaches to newsgathering and reporting.

Looking at online news formats, most legacy print and broadcast news providers also now provide a range of different news formats online, and "live" or rolling text-based and multimedia news articles are a popular new means of conveying news. Podcasts are now available from several newspapers (such as the *The Guardian*) and news magazines (such as *The Spectator*), and online news provision allows for multimedia news stories (typically a mix of text and video clips), though some providers, such as the BBC and *The Guardian*, experiment with more integrated multimedia and interactive storytelling. New types of news sites with significant resources have also emerged, including partisan or commentary sites, such as *The Canary* or *UnHerd*, respectively, campaigning

news sites such as *openDemocracy*, and long-form investigative journalism sites like *Tortoise*. All provide new versions of familiar news formats.

(E4) Minority/Alternative media

3 POINTS

IN 2011
3 POINTS

The BBC devotes significant funding to minority-language news in Scotland and Wales, and the BBC Asian Network is also aimed at minority audiences. Commercial minority media covering many language groups and communities are licensed by Ofcom and several are available in print and online.

The UK has a wide range of minority media across all platforms and serving many of the UK's minority groups, from South Asian diasporas to the Jewish community and smaller minority and language groups such as the traveller and Roma communities. The BBC also operates television and radio channels broadcasting in Welsh and Gaelic.

The BBC provides programming and news in Gaelic on television (BBC Alba) and radio (BBC Radio nan Gàidheal), and in Welsh through its contributions to the television channel S4C and the Welsh-language radio station BBC Radio Cymru. The Corporation also operates the BBC Asian Network on national analogue and digital radio for British Asians. The station broadcasts mostly in English, but also offers programming in other languages. Altogether, the BBC spent GBP 57 million on Welsh and Gaelic radio, S4C, and the BBC Asian Network in 2018 and 2019 (BBC, 2019a).

Minority and ethnic programming on commercial digital television is provided by a range of channels licensed by Ofcom. For example, Al Araby Television, based in London, broadcasts news, factual, and entertainment programming in Arabic, while Dunya TV offers a similar service in Urdu. Many commercial radio stations serve minority communities, including Gaelic broadcasting (Cuillin FM), South Asian communities (for example, Lyca Radio and Dilse Radio), and Polish-language broadcasting (Polski Radio Londyn).

A range of minority newspapers (and their online counterparts) is also available within the UK. *The Jewish Chronicle* is a weekly newspaper based in London, and has been publishing since 1841 (Jewish Chronicle, 2016). Some Polish-language newspapers have been in circulation for some time, such as *Dziennik Polski* and the *Polish Express*. These have been joined by more recent additions such as *Cooltura 24*, which publishes online and in print (and is regulated by Impress). The gypsy, traveller, and Roma communities are served by the *Travellers' Times*, a bi-annual publication regulated by IPSO, which also publishes online throughout the year. *Ashraq Al Awsat* is a London-based Arabic newspaper, while a range of newspapers in South Asian languages are available, including the *Urdu Times*.

(E5) Affordable public and private news media

3 POINTS

News in the UK (across all platforms) is generally affordable compared to average household income. Online output by several national and most regional outlets is free to access online.

IN 2011
3 POINTS

The affordability of mainstream news is not a problem in the UK. The average household income in the UK in 2019 was GBP 29,400 in 2019 (approx. EUR 32,600 or USD 36,600) (Office for National Statistics, 2019). All broadcast news in the UK is available for the cost of the television licence fee (GBP 157.20 and free to all over-75s at the time of writing), with commercial public service broadcasters funded by advertising and free to access. All public service channels plus Sky News are available on the digital Freeview service, usually built into modern televisions or accessible via a separate box and available for around GBP 20. National digital radio channels and BBC local radio stations are also available on Freeview.

Monthly unlimited broadband costs in the UK begin at around GBP 20 (Cable.co.uk, n.d.), and unlimited mobile data plans also begin at similar prices (Choose.co.uk, 2019). These are the basic minimum costs needed for household or individual access to news online. Once online, most broadcast news content can be accessed for free, though access to previously broadcast news on the BBC's catch-up *iPlayer* service requires users to have a television licence. National newspapers have gradually introduced paywalls for some or all of their content, but *The Sun* (which used a paywall between 2013 and 2015), *Mirror*, *Daily Mail*, *Daily Express*, *Daily Star*, the *i*, *The Independent*, and *The Guardian* are all free to access (though *The Guardian* requires registration and employs a voluntary membership payment scheme). The mobile apps for each of these titles is also free to access. Digital subscriptions are necessary to access *The Times* (GBP 26 per month for standard subscription, excluding introductory offers), *The Telegraph* (GBP 6 per week) and *The Financial Times* (GBP 33 per month). The leading news magazines also offer digital subscriptions: *The Spectator* at GBP 10 per month, the *New Statesman* at GBP 120 annually or GBP 10 per month, and *The Economist* at GBP 179 annually (approx. GBP 15 per month). Local and regional newspapers have traditionally been free to access online, although some publishers are preparing to introduce paywalls (Tobitt, 2020).

Cover prices for print newspapers range from under GBP 1 for weekday copies (all tabloid and mid-market titles) to GBP 2–3 for broadsheet newspapers. Saturday, Sunday, and weekend editions of each newspaper tend to be priced slightly higher than weekday copies. Publishers are less likely to offer print-only subscriptions now, with some instead offering print and digital subscription packages, for example *The Guardian's* multi-platform subscription for GBP 55 per month and *The Financial Times* offering print and digital subscriptions for GBP 63 per month. These are by far the most expensive routes to access news content.

(E6) Content monitoring instruments

1 POINT

IN 2011
2 POINTS

The UK has no public media monitor, though piecemeal monitoring is conducted by NGOs and academic units, some self-monitoring mechanisms are operated by broadcasters, and there are some transparency obligations on regulated media that comprise informal monitoring instruments.

The UK has no dedicated public news monitoring instrument. There are, however, a modest range of monitoring services conducted by some news organisations, some of which are explicitly for the benefit of the public, and the newspaper industry's self-regulatory bodies provide periodic information on standards compliance (so therefore only indirectly about content). There is a significant number of external organisations in academia and in civil society that operate different content monitoring instruments.

Content monitoring and accountability mechanisms are operated by some news organisations, though these tend to be reactive and based on audience feedback, or periodic releases of information. In broadcasting, the BBC produces a programme, *Newswatch*, broadcast weekly for most of the year, which addresses listener and viewer complaints about its news coverage, offering a right of reply for both audiences and BBC News personnel. *The Guardian* newspaper employs a readers' editor to address audience concerns and report on issues with news content. Members of IPSO, the self-regulatory body set up by several newspaper publishers, are obliged to publish data on the extent to which their reporting complies with an agreed standards code (IPSO, 2019a), in theory a process of continual – if periodic – oversight, but in practice the reporting criteria do not oblige them to publish sufficient data for audiences to obtain a clear picture of qualitative trends in news content (Media Standards Trust, 2019).

Various academic institutions conduct systematic media content monitoring. Some examples include the Cardiff University School of Journalism, Media and Culture, which collects and analyses audiovisual news content as well as online news, producing empirical content analyses of broadcasters' adherence to impartiality guidelines (Cushion et al., 2010) as well as analyses of media coverage of election campaigns (Cushion & Thomas, 2016). Election coverage monitoring is also regularly conducted at Loughborough University (Deacon et al., n.d.), the Reuters Institute for the Study of Journalism at Oxford University (Levy et al., 2016), the Centre for the Study of Media Communication and Power at King's College London (Moore & Ramsay, 2015), and elsewhere. These are, however, generally episodic analyses of news content at important political moments, rather than continual monitoring and health-checking of trends in coverage.

Various non-governmental organisations (NGOs) have provided episodic media monitoring. The Media Standards Trust is a media policy think-tank that

has, among other things, conducted content analyses of news media coverage of regulatory issues and during election campaigns (Media Standards Trust, 2015). The BBC is also subject to monitoring by an organisation called News-Watch, which is extremely critical of the Corporation and focuses on news and current affairs coverage of the EU. Other organisations focus their monitoring operations on the performance of media regulators, rather than on news content itself, though often publicise problematic trends in news coverage in the course of their advocacy work. Organisations of this type include Hacked Off, a campaigning organisation pushing for reform of press regulation, and Tell Mama, an organisation assisting victims of anti-Muslim hatred that addresses coverage of Muslims in the UK press.

Overall, therefore, there is a significant amount of news content monitoring that takes place in the UK, though it is decentralised and scattered across a number of organisations rather than provided by a dedicated public entity.

(E7) Code of ethics at the national level

3 POINTS

UK news media are variously covered by five separate codes of ethics that apply nationwide. Broadcast news provision is underpinned by legislation.

IN 2011
2 POINTS

There are five separate codes of ethics covering journalism in the UK. All operate at the national level among qualifying or member organisations and cover the vast majority of significant news organisations in broadcast, print, and online (with some significant exceptions). An additional code of practice issued by the National Union of Journalists (NUJ) covers the ethical conduct of journalists. The codes are as follows:

- the BBC's editorial guidelines, Royal Charter, and agreement (covering all of the BBC's news output as well as the rest of the Corporation's programming);
- Ofcom's Broadcasting Code (covering all holders of broadcasting licences issued by Ofcom);
- the Editor's Code of Practice (covering all members of the newspaper industry's regulator, IPSO);
- the IMPRESS Standards Code (covering all members of the independent regulator, the Independent Monitor for the Press);
- and the NUJ code of conduct (covering all journalists who are members of the Union).

The BBC's accountability mechanisms are covered by aspects of the Royal Charter and the Agreement that sits alongside each iteration of the Charter

(DCMS, 2016b). Schedule 3 of the Agreement includes the obligation that the BBC produce Editorial Guidelines, the current version of which is a 220-page document with 18 sections, of which 15 relate to the production of content. Some apply directly to journalism and news coverage, including sections on accuracy, impartiality, and the coverage of politics, public policy, and polls (BBC, 2019c). The BBC's Charter itself includes rules regarding the conduct of the BBC, including setting out the BBC's five public purposes which enshrine the Corporation's obligation to provide duly accurate and impartial news, current affairs, and factual programming (see Indicator C8 – Professional training) (DCMS, 2016a).

While the Charter and Agreement are the main legal documents setting out the BBC's rules and guidelines, since 2017, regulation of BBC programming has been the responsibility of Ofcom. Ofcom licenses and regulates all other broadcast licence holders and is required by law to create and implement a Broadcasting Code that all broadcasters must adhere to. The Ofcom Broadcasting Code covers ten principles, organised into sections and a series of rules and clarifications:

1. Protecting the Under-Eighteens
2. Harm and Offence
3. Crime, Disorder, Hatred and Abuse
4. Religion
5. Due Impartiality and Due Accuracy and Undue Prominence of Views and Opinions
6. Elections and Referendums
7. Fairness
8. Privacy
9. Commercial References in Television Programming
10. Commercial Communications in Radio Programming

(Ofcom, 2019d)

Of these, sections five and six are of specific importance for news programming. Section five describes Ofcom's rules relating to duty of broadcasters "[to] ensure that news, in whatever form, is reported with due accuracy and presented with due impartiality" (Ofcom, 2019d: 28). Section five also outlines special impartiality guidelines for news and other programmes, relating to "matters of political or industrial controversy and matters relating to current public policy" (Ofcom, 2019d: 29). Section six is complementary to section five and governs news coverage during election campaigns and referendums, including how

candidates and constituencies may be covered and restrictions on broadcasting, for example, on coverage of opinion polls and campaigning on polling day.

Those newspapers (and their online components, where separate) that are members of IPSO are regulated on the basis of their compliance with the Editors' Code of Practice – a document created and maintained largely by editors and ultimately the property of a Regulatory Funding Company – the funding body for IPSO controlled by the newspaper industry. While there have been forensic analyses of the extent to which IPSO is able to enforce the Code (Media Standards Trust, 2019), the document itself is relatively uncontroversial, and the contractual agreement between the regulator and its members is predicated on their observance of the guidelines in the Code. The Code includes 16 clauses plus a definition of the public interest that can be invoked under exceptional circumstances if a journalist chooses to disregard the Code in pursuit of a story (Editors' Code of Practice Committee, 2019). IMPRESS (Independent Monitor for the Press) is an independent regulator created in order to fulfil the criteria for a new regulatory body set out in the 2012 Leveson Report. In 2016, it was given official recognition as meeting these criteria, one of which is the implementation of a standards code to serve as the basis for a self-regulatory system. The resulting code, the IMPRESS Standards Code, was produced with input from the general public, and covers many of the same broad areas as the Editors' Code of Practice, with some adjustments (IMPRESS, n.d.). Those journalists that are members of the National Union of Journalists are also obliged to adhere to the code of professional ethics in the NUJ code of conduct. While these relate more to the professional conduct of individual journalists, several of the clauses concern the ways in which news stories can be pursued and produced (NUJ, 2011). Finally, three national newspapers – *The Guardian*, *The Independent* (digital-only since 2016), and *The Financial Times* – have chosen not to join either IPSO or IMPRESS, and therefore do not subscribe to a nationwide code of conduct, though all three maintain their own editorial standards and internal complaints-handling mechanisms.

(E8) Level of self-regulation

2 POINTS

The UK print and online news media are subject to self-regulation. Broadcast regulation is managed by a statutory corporation that is not directly controlled by the state, though its guidelines are underpinned by statute.

IN 2011
2 POINTS

All major news organisations in the UK implement a code of practice in their newsgathering and reporting activities (see Indicator E7 – Code of ethics at the national level). Those significant news organisations that are not subject to regulation by an external body (*The Guardian*, *The Independent*, and *The Financial Times*) operate their own internal self-regulatory systems. Broadcast-

ers are bound by the Ofcom Broadcasting Code (and BBC News is additionally subject to the Corporation's Editorial Guidelines that build upon aspects of the Ofcom Code). The extent to which all self-regulatory systems operating in the UK's new media are effective is more debatable. Questions have been raised about the extent to which IPSO – the regulator set up by parts of the newspaper industry is able to police the compliance of its own members, but gaps in data collection by IPSO obscure any evidence of systemic failures in compliance.

The three national newspapers that have elected not to join IPSO, or its competitor the Independent Monitor for the Press (IMPRESS), now operate their own complaints and compliance systems. *The Guardian* has appointed a Readers' Editor as an internal ombudsperson since 1997, and the newspaper continues to apply a variant of the Editors' Code of Practice used by IPSO's members (The Guardian, 2014). On top of this standards code governing content, *The Guardian* also applies its own editorial guidelines covering professional practice and the personal behaviour of its journalists (The Guardian, 2020). The owner of *The Independent* applies a company-wide code of conduct to its print journalism that also covers the company's broadcast news content on local television news channel London Live (subject to the Ofcom Broadcasting Code). The code of conduct covers pre-publication issues (such as respect for privacy and discrimination) and post-publication complaints-handling and correction guidelines (Independent, n.d.). Finally, the self-regulatory system operated by the *The Financial Times* consists of an Editorial Code of Practice that incorporates the Editors' Code of Practice maintained by IPSO (Financial Times, 2020), with unresolved complaints being handled by a Complaints Commissioner, who is in turn overseen by an Appointments and Oversight Committee (Financial Times, n.d.-a).

The remaining national newspapers and the majority of the local newspaper industry are members of IPSO and are therefore contractually obliged to implement the Editors' Code of Practice and to specify in publicly available annual statements to IPSO the extent to which they comply with the regulator's rules and regulations (including adherence to the Code of Practice). Annex A of IPSO's Regulations (revised most recently in September 2019) specify the information that must be included in members' annual statements. Section 2 specifies that members must include copies of any internal manuals, codes, or guidance used by journalists, while section 3 requires members to include brief details of the compliance process, including "Compliance with the Editors' Code" (IPSO, 2019b: 17). In practice, however, IPSO does not effectively enforce this aspect of the regulations. The most recent annual statement by Associated Newspapers on the IPSO site shows that the publisher of the *Daily Mail*, *Mail on Sunday*, and *Mail Online* does include internal manuals for journalists (on the process of verifying stories), but does not contain any statistics on complaints handled internally by the Associated Newspapers titles, instead including only statistics

on complaints that had subsequently been escalated to IPSO's complaints-handling mechanism (Associated Newspapers, 2018). A review of the 2019 annual statements of all of IPSO's national newspaper publisher members has found that none provided evidence of their internal complaints-handling statistics, and that other large publishing groups such as News UK & Ireland (publisher of *The Times*, *The Sunday Times*, and *The Sun*) did not include their internal manuals for journalists (Ramsay & Barnett, in press).

The independent regulator, the Independent Monitor for the Press (IMPRESS), operates a regulatory system in line with the recommendations of the report issued following the 2011–2012 Inquiry into the Culture, Practice and Ethics of the Press (better known as the Leveson Inquiry, after its Chair, Lord Justice Brian Leveson), set up in the wake of the 2011 phone-hacking scandal (e.g., Ramsay & Moore, 2019). Like the IPSO system, IMPRESS requires that all members supply the regulator with information about their internal governance processes, including their adherence to the IMPRESS Standards Code, and periodically audits the internal compliance systems of each member through a system of annual compliance returns. IMPRESS publishes all complaints statistics for members (including internally handled complaints) online (IMPRESS, 2019: 26–29).

While broadcast regulation is not purely self-regulation, in the sense that the duties of Ofcom are set out broadly in the Communications Act 2003, and the BBC's Editorial Guidelines are set out in the Royal Charter and agreement, they do represent a set of compliance procedures integrated into the operations of broadcast news providers. Ofcom's licensing regime is based on licence holders adhering to the Broadcasting Code, which has detailed guidelines on news reporting. The regulator publishes weekly summaries of all programmes that receive ten or more complaints (Ofcom, 2020d). Despite the BBC ultimately being regulated by Ofcom, it is obliged to maintain its own complaints procedures and statistics, and publishes fortnightly complaints reports (BBC, n.d.-b). The BBC also publishes its compliance record with the Ofcom Broadcasting Code and its internal compliance with its own Editorial Guidelines (BBC, 2019a: 134–135).

(E9) Participation

2 POINTS

Different news organisations in the UK offer different avenues of participation for audiences. Many comments sections have been scaled back or removed due to difficulties in moderating abuse.

IN 2011
2 POINTS

Participation in UK news content is somewhat patchy and uneven. Some newspaper sites allow relatively free and unrestricted comments, while others limit

access to subscribers. The BBC allows online commentary on selected stories, while other broadcasters don't include comments sections alongside their online content. The BBC also broadcasts regular programming that allows direct reply to audiences about news coverage, or includes members of the public in live discussion of news and current affairs (on television and radio). Live phone-ins on commercial radio shows are common, with the expansion of dedicated talk radio stations in recent years.

The websites of the UK's tabloid and mid-market newspapers generally allow users to comment alongside articles. *Mail Online*, for example – the sister site for newspapers the *Daily Mail* and *Mail on Sunday* – offers unmoderated and moderated comments sections for different stories, although comments are disabled on some articles for legal reasons or due to the sensitivity of the content – a practice employed by other newspapers. Comments sections on the sites of broadsheet newspapers tend to be less open, either because comments have been restricted or because paywalls are in place, limiting comments to communities of subscribers rather than the public as a whole. *The Telegraph* in 2020 restricted comments on its news sites to subscribers only, matching sites like *The Times* and *The Financial Times*, which operate hard paywalls (Telegraph, 2020). *The Guardian* cut back its comment functions in 2016 due to difficulties in restricting abuse and disruption by users within comment threads (Hamilton, 2016).

Online, the BBC allows users to comment on selected news stories. Comments are moderated in accordance with a series of rules on acceptable content (BBC, 2018c). ITV News, Channel 4 News, and Sky News do not allow user comments on their websites, although – as with newspaper sites – stories and articles are routinely shared on social media.

In its broadcast output, the BBC produces several programmes featuring members of the public contributing to political discussion or responding to news or other programmes. *Newswatch*, aired on the BBC News channel, consists of audience complaints and views on the BBC's news coverage across all platforms and includes on-air responses from editors and decision-makers (BBC, n.d.-c). *Question Time* is a long-running panel discussion programme where political figures respond to questions about current events from a studio audience. The BBC's regional and local radio programming features regular phone-in shows, as does the national station BBC Radio 5 Live (for example, on the *5 Live Breakfast* programme).

Other broadcasters offer fewer opportunities for on-air feedback to news provision, though commercial talk radio stations such as LBC and talkSPORT make extensive use of phone-ins on political topics as well as (in the latter case) sports.

(E10) Rules and practices on internal pluralism

2 POINTS

IN 2011
2 POINTS

UK broadcast news is subject to strict rules on impartiality and the representation of views on any programming dealing with controversial or political matters. Newspapers are free to be partisan but usually provide at least some space for opposing voices or views.

British broadcasters are subject to strict guidelines on impartiality issued in the Ofcom Broadcasting Code, underpinned by legislation and, in the case of the BBC, also the Royal Charter (see Indicator E7 – Code of ethics at the national level). These rules govern the representation of a range of views in political news coverage across all broadcasters. Section Five of the Broadcasting Code, on “Due impartiality and due accuracy” contains the following rule:

In dealing with matters of major political and industrial controversy and major matters relating to current public policy an appropriately wide range of significant views must be included and given due weight in each programme or in clearly linked and timely programmes. Views and facts must not be misrepresented. (Ofcom, 2019d: 31)

Broadcasters are also not permitted to give “undue prominence of views and opinions”, defined as a significant imbalance of views within their news coverage. Section Six of the Code sets out additional rules on the representation of views in coverage of elections and referendums. The ways in which broadcasters have interpreted these rules have been subject to criticism, with the BBC in particular scrutinised for implementing a policy of “impartiality-as-balance”, leading to the distorting reduction of complex issues to two-sided arguments and the unnecessary reduction of issues to areas of zero-sum partisan conflict (Wahl-Jorgensen et al., 2017). Evidence also suggests that UK broadcasters can follow news agendas set by the more partisan press (Cushion et al., 2016).

The UK national press is subject to a more *laissez-faire* self-regulation regime and has traditionally been much more openly partisan (Bayram, 2013). During perhaps the most divisive issue of recent years, the 2016 referendum on the UK’s membership in the EU, the UK press focused heavily on a relatively narrow range of sources, with certain voices – such as those of immigrants – almost entirely absent from a large section of the press. Coverage was extremely partisan in certain titles, particularly those most in support of the campaign to leave the EU (Moore & Ramsay, 2017). Despite this partisanship, however, newspapers rarely exclude alternative voices entirely in their political coverage, with titles offering space for commentary by, or interviews with, politicians from parties other than those supported by the editorial line. Some news sources, such as the magazine *The Spectator*, offer space to a range of opposing voices. The regional and local press is also less openly partisan than national newspapers.

Dimension: Control / Watchdog (C)

(C1) Supervising the watchdog “control of the controllers”

3 POINTS

IN 2011
2 POINTS

Though UK news outlets have in the past been criticised for a reluctance to investigate or scrutinise their peers, several publications and broadcast channels have dedicated media beats, including indirect scrutiny through news review programmes. NGOs play a significant role in scrutinising the media industries and their regulatory structures.

Beyond the official regulatory bodies for broadcasters and self-regulatory bodies for newspapers and online journalism, a degree of media scrutiny and monitoring is conducted by a range of non-governmental organisations (NGOs), academic units, and online groups. Across news organisations themselves are examples of self-monitoring and correction, media “beats” within some titles, and indirect scrutiny of media behaviour. Though there has historically been a degree of reluctance among newspapers to closely scrutinise their peers, when high-profile media stories break, they tend to be covered with prominence.

Among NGOs, the National Union of Journalists plays a significant role in scrutinising and campaigning about the business practices of news organisations, while several campaigning organisations monitor media behaviour and campaign for regulatory reform of parts of the newspaper industry, and several units at academic institutions provide research, including dedicated content analysis of the news media (see Indicator E6 – Content monitoring instruments).

The news media themselves have in the past been accused of failing to report on wrongdoing at other titles, an accusation levelled at newspapers in the years before the 2011 phone-hacking scandal finally reached public attention (Leveson Inquiry, 2012b). Certain legacy print titles, such as *The Guardian* and *Private Eye*, have dedicated media correspondents and columns, though other similar units elsewhere have been discontinued in recent years (such as the closure of *Buzzfeed* UK’s political journalism department in 2020, which often scrutinised the news industry). The BBC engages in self-monitoring with its *Newswatch* programme, has a weekly *Media Show* on Radio 4 that scrutinises the industry, and an element of indirect scrutiny of news media is provided by late-night and early-morning newspaper review programmes on the BBC and Sky News.

(C2) Independence of the news media from powerholders

2 POINTS

IN 2011
3 POINTS

UK broadcasters are broadly insulated from interference, despite recent government pressure on the BBC. Commercial news organisations are owned by media companies, and there is no recent tradition of party, church, or industry-owned news organisations.

The UK's news organisations are owned by media companies; there is no significant ownership by powerful organisations, by political parties or movements, or by religious groups. While some “diagonal” or lateral cross-ownership has taken place in the wider media industries (for example, telecommunications infrastructure provider BT moving into subscription sports coverage), this has not been the case in news provision.

Ownership of UK news providers (see Indicators E1 & E2 – Media ownership concentration national and regional levels) is summarised by the Media Reform Coalition's media ownership reports (Media Reform Coalition, 2019). While some news publishers are ultimately owned by overseas companies, in all cases, these are primarily news and media companies: Channel 5 is owned by Viacom; regional publisher Newsquest by Gannett; and *The Financial Times* by Nikkei Inc. One anomaly is the ownership of *The Independent* and *London Evening Standard* by Russian businessman Alexander Lebedev; *The Independent* has also received significant investment from Saudi Arabia, prompting an investigation by the Competition and Markets Authority. The Secretary of State for Culture, Media, and Sport closed the investigation in September 2019, noting that there was greater need for clarity over the ultimate ownership of a 30 per cent stake in *The Independent's* parent company (DCMS, 2019b).

While Rupert Murdoch, ultimate owner of the publishers of *The Times* and *The Sun* national newspapers as well as – historically – various worldwide media interests, has been relatively open about his influence within his newsrooms (see Indicator F5 – Company rules against *internal* influence on newsroom/editorial staff), there is little direct evidence of owners or shareholders doing so systematically in other media organisations.

There is no formal party press in the UK, and while partisanship is relatively open at the organisational level, with the majority of newspapers tending to favour the Conservative Party but some high-profile changes of allegiances in the past, journalists (engaged in reporting, distinct from columnists engaging in punditry) rarely articulate their political leanings or loyalties. Broadcast journalists are prohibited from doing so in their work by the Ofcom Broadcasting Code; the impartiality guidelines implicit in the Code's sections about news programming also mitigate against political influence in broadcast news. Broadcasting legislation and the BBC Royal Charter are designed to ensure

arm's-length separation of the state and public service broadcasters, although there have been a number of recent cases where governments have been able to exert indirect pressure on the BBC and have threatened intervention in other PSBs (see also Indicator F6 – Company rules against *external* influence on newsroom/editorial staff).

(C3) Transparency of data on leading news media

3 POINTS

Information on media companies, including accounts, ownership, and board composition, is compiled by the government and available to view online. Publicly traded companies and some broadcasters publish detailed revenue information annually, and Ofcom provides several annual market reports.

IN 2011
2 POINTS

All UK legislation relating to the media industries is freely available online, as is company information, including annual accounts and details of owners and board members. Many media organisations publish more detailed annual reports including revenue breakdowns and other information. Overall, data on the industry is generally freely available and suitably detailed for the public to inform themselves about the state of the UK news media.

All companies, regardless of ownership, that operate in the UK are publicly registered with the UK's registrar of companies, Companies House. Companies must disclose basic information, including the identities of board members and other officers. Those companies that do not fulfil the criteria of "small company" or "micro-entity" (based on a combination of criteria including revenue, number of employees, and balance sheet) must also provide full, audited annual accounts. In practice, this covers most national media organisations and the larger local newspaper publishers. Some smaller companies, such as news magazine publishers, local papers, and smaller local radio and television stations, fall below the reporting threshold and may only supply abridged annual accounts. This information is publicly available and searchable at the UK government website's search portal for Companies House (Gov.uk, n.d-a). Publicly-traded corporations, including several news publishers such as Reach PLC, also publish detailed annual reports that are also widely available (Reach PLC, 2019).

In broadcasting, the BBC has various obligations to release data on its finances, expenditure, policies, and remuneration of high-salaried employees. All the constitutional documents underpinning the BBC are publicly available, and the corporation publishes the editorial guidelines that underpin its news reporting and other programming. Ofcom conducts several annual and one-off reports and reviews and makes the resulting reports available online. Ofcom also maintains public lists of all broadcast licence holders in the UK, as well as other information about the communications industry and infrastructure.

(C4) Journalism professionalism

2 POINTS

IN 2011
2 POINTS

Journalism qualifications are now widely held, and training, including ethics training, is freely available and used by a majority of journalists. Some journalists report increasing newsroom pressures as exerting a detrimental effect on their quality of work.

Ethics training in UK journalism is relatively widespread and, as demonstrated in recent surveys of working journalists, broadly viewed as satisfactory (for details on increased journalistic professionalism in the sense of formal qualifications and training, see Indicator C8 – Professional training). It is also directly supported by the National Union of Journalists, which operates an ethics council, an ethical code of conduct, and advice for journalists. However, the workload intensity of UK journalists and the need for an evolving skillset to cope with industry changes is seen as inhibiting the ability of editorial staff to maintain their desired quality of work, particularly among newspaper journalists. Several studies of UK journalism in recent years have highlighted the effect of economic pressures on the quality of journalistic output.

The National Council for the Training of Journalists (NCTJ), from which 65 per cent of UK journalists hold a qualification (Spilsbury, 2018: 18), lists “Essential journalism ethics and regulation” as one of the core skills of its Diploma in Journalism qualification. The BBC, which operates an extensive training programme for its journalists via the BBC Academy, is obliged to do so by constitutional documents, the Royal Charter (Clause 35), and Agreement (Clause 13) in ensuring that the corporation delivers its public purposes (DCMS, 2016a, 2016b).

The 2018 *Journalists at Work* survey found that 74 per cent of UK journalists across all sectors felt that they had received sufficient training in ethics, a substantial increase from 52 per cent from the previous survey in 2012. 85 per cent felt that their personal work in the workplace “reflects and respects” ethical boundaries, although 31 per cent claim that “business pressures in my workplace mean that ethical boundaries are sometimes not respected” (Spilsbury, 2018: 82–83). The National Union of Journalists – of which 35 per cent of journalists are members, according to the *Journalists at Work* survey (Spilsbury, 2018: 81) – operates an additional level of ethical training for member journalists. The Union operates an Ethics Council, which provides advice and information on journalistic ethics and produces the NUJ’s code of conduct, which sets out twelve professional principles that NUJ members are expected to observe (NUJ, 2011). Members also have access to the NUJ ethics hotline.

Increasing newsroom pressures on the working practices of UK journalists are having a significant depressing effect on the delivery of original journalism, particularly resource-intensive but socially important public-interest and investigative journalism. Table 7 shows the concerns of UK journalists regarding the

negative effects that industry changes are exerting on their ability to perform their jobs. Some concerns relate to the need for new skills and greater flexibility in producing journalism: 85 per cent of respondents to the 2018 Journalists at Work survey stated that they faced an increased need to widen the range of tasks they are obliged to perform as part of their day-to-day work, and 67 per cent had to produce content across multiple platforms. Alongside this, journalists raise concerns about their capacity to produce high-quality journalism: 70 per cent cite “increased work intensity” – the need to develop more stories (indirectly confirming that less time is available to develop each story); 35 per cent report a lower job satisfaction as a result of industry changes; while – of significant concern given the democratic and social function of journalism – 34 per cent felt that they were forced to engage in “de-skilled” research activities, necessitating a reliance on external copy, including from PR companies, while 34 per cent claimed that industry changes mean that they produce a lower quality of work.

Table 7 *Effect of industry changes in last ten years (per cent)*

Change	Impact on respondent's job
Increased need for multi-skilling – for example need to widen range of tasks	85
Increased work intensity – for example need to develop more stories	70
More diverse range of outlets – need to be able to write across different platforms	67
Lower job satisfaction	35
De-skilled research activities – for example more reliance on PR companies	34
Produce a lower quality of work	34

Source: Journalists at Work survey, 2018, cited in Spilsbury, 2018: 68

These impacts were found to be worse for journalists working in the newspaper sector. 77 per cent of newspaper journalists reported increased work intensity, 41 per cent felt they produced a lower quality of work, and 42 per cent reported a lower job satisfaction.

Research on the effects of newsroom cuts on the delivery of local news in the UK has found evidence of the reduced ability of journalists to cover local issues in depth (Franklin, 2011; Wahl-Jorgensen, 2018), the displacement of locally relevant journalism with non-local stories to build online audiences, and the coming together of editorial and advertising departments to monetise digital content (Jenkins & Nielsen, 2020). The problem of “churnalism” (the replace-

ment of original journalism with PR copy) has been observed for a long time in UK media research and continues to be a problem (Jackson & Moloney, 2015).

(C5) Journalists' job security

2 POINTS

IN 2011
1 POINT

Journalists are more likely than not to be in stable employment, but economic pressures, particularly at the local level, have led to recent cuts and made many jobs precarious. Journalists generally enjoy contractual protections and whistleblowing channels if pressured to breach professional ethics codes.

UK journalists are more likely to be in stable, permanent employment than engaged in temporary, part-time, or freelance work, but the latter, more precarious, positions still make up a significant part of employment in the sector and are likely to grow as economic pressures on traditional news organisations increase. Instability and precarity in employment is also worse for women, who are more likely to be in temporary or part-time employment. Labour law in the UK offers a range of employment rights and protections, and journalists have the same minimum rights as employees in any other sector. Following the Leveson Inquiry, the newspaper industry has also taken steps to ensure that journalists have a degree of protection if they refuse to engage in activity that is in breach of standards codes or the law.

In terms of protections for journalists in the UK newspaper industry, whistleblowing mechanisms and contractual protections have been put in place following the 2012 report of the Leveson Inquiry. In setting out 47 recommendations for a new self-regulatory system, the report recommended that “[a] regulatory body should establish a whistleblowing hotline for those who feel that they are being asked to do things which are contrary to the code” (Leveson Inquiry, 2012c: 1809). Although the industry’s regulator IPSO was largely created in order to circumvent the Leveson recommendations, this was incorporated into IPSO’s articles of association. A further recommendation of the Leveson report specified that regulated news organisations should ensure that employment contracts should include “a clause to the effect that no disciplinary action would be taken against a journalist as a result of a refusal to act in a manner which is contrary to the code of practice” (Leveson Inquiry, 2012c: 1809). This too was incorporated into the IPSO system. The independent regulator for print and online journalism, IMPRESS, includes the Leveson recommendations in its articles and regulations as a condition of its recognised status (e.g., Indicator E8 – Level of self-regulation).

Looking at employment conditions, the majority of UK journalists are in permanent employment: surveys of journalists in 2015 by the Reuters Institute and in 2018 by the NCTJ found 74 per cent of journalists across all sectors had

permanent contracts (Thurman et al., 2016: 15; Spilsbury, 2018: 31). 7 per cent of journalists surveyed in 2015 and 4 per cent in 2018 were on temporary fixed-term contracts, while the proportion working as freelancers was 17 per cent in 2015 and 12 per cent in 2018. Some caution should be maintained when interpreting these figures, however, due to different definitions of “freelance” work in different studies: for example, the UK Office of National Statistics Labour Force Survey (LFS) recorded 37 per cent of journalists as “self-employed”, more than double the proportion recorded as “freelance” by the Reuters Institute in the same year (cited in Thurman et al., 2016: 15). LFS data from 2018 was also found to differ significantly from the 2018 NCTJ survey in a similar manner: it is suggested that this is due to survey sampling skewing towards mainstream journalists (Spilsbury, 2018: 29–30). Regardless of the proportion, it can be said that permanent contracts are significantly more common in UK journalism employment than temporary or freelance work.

Employment conditions in UK journalism are not equal for women and men. The *Journalists at Work* survey found that men were more likely than women to have a permanent contract (78% compared with 71%), and that men are far less likely to work part-time (15%) than women (41%). The two outcomes are related, as only one-third of part-time workers were found to have a permanent contract, compared with 79 per cent of full-time employees (Spilsbury, 2018: 28–31).

In recent years, news organisations such as the *Telegraph* and *The Guardian*, as well as the BBC, have acknowledged the need for more appropriate employment and workplace policies to account for differences in working patterns for men and women and to reduce the barriers to full-time employment (see also Indicator F8 – Rules and practices on internal gender equality).

(C6) Practice of access to information

2 POINTS

IN 2011
2 POINTS

Detailed access to information legislation is in place in the UK and open to all citizens. There are some restrictions on availability and evidence showing that certain government departments in practice tend to withhold requested information, at least initially.

The UK has had legislation underpinning the public’s right to access information held by public authorities since 2000, when the Freedom of Information Act received Royal assent. It took five years for the right of access to come into force (on 1 January 2005), but since then, the UK public (and journalists) have had the right to submit Freedom of Information (FOI) requests, if certain conditions are met, to require public authorities to release any information they hold relating to the request. The Act covers central government, executive agencies, and

any public bodies they sponsor, as well as devolved administrations such as the Scottish Parliament (Scottish FOI legislation is different in some respects to the regime in England and Wales), local authorities, the National Health Service, schools, and universities, and the armed forces and police forces (Information Commissioner's Office, n.d.).

Requests can be refused if it would cost too much or take too much staff time, if the request is vexatious, or if the request repeats a previous request from the same person. However, there are also a relatively wide range of 23 absolute and qualified exemptions covering issues such as national security and personal information, whereby the public body can withhold the information that has been requested.

The legislation was not created explicitly to benefit journalists, as several government representatives clarified over the first years of operation of the FOI regime; it was intended to be of equal utility for any member of the public, regardless of their occupation (Hayes, 2009: 8). The process is relatively simple. As journalists experienced in UK FOI investigations put it:

If a public body holds the information, and doesn't already publish it, all you need to do is put your request down in writing, and give your name and details of where to send the response... and within 20 working days they must send you their reply. (Basnett & McNamara, 2018)

In practice, however, obtaining information (from central government at least) can be time-consuming or difficult. A review of the availability of information on decision-making at FOI regimes across Europe by Access Info Europe found the UK to be one of the least likely countries to disclose information in full and one of the most likely to refuse to disclose information (Access Info, n.d.). A UK think-tank, the Institute for Government, compiled extensive data on FOI request compliance by UK government departments and found that, of 6,171 resolvable requests received by government departments in the fourth quarter of 2019, just 2,706 – under half – were granted in full, with 865 partially withheld and 2,354 withheld in full. There are significant disparities between government departments, with some departments considerably more likely to withhold information or to miss deadlines for resolving requests (Freeguard, 2020). A BBC investigation in 2017 also found persistent delays and unhelpfulness from government departments in their handling of FOI requests (Rosenbaum, 2017).

Overall, the freedom of information regime in the UK is a very useful resource for citizens and for journalists. However, the formal restrictions on access in a relatively wide variety of circumstances, and the informal intransigence of certain government departments to comply with requests from journalists, means there is a gap between the promise of freedom of information in the UK and its practice.

(C7) The watchdog and the news media's mission statement

3 POINTS
IN 2011
2 POINTS

UK broadcasters are obliged to perform certain functions fulfilling the watchdog role of journalism and devote significant resources to investigative journalism. Many newspapers specify their watchdog functions in mission statements or adhere to standards codes that emphasise the importance of the public interest in their work.

News providers in the UK are generally committed to the watchdog function of journalism, although this commitment is often implicit rather than placed at the centre of public statements about organisational goals. Broadcast news, underpinned by legislation, enacts Parliament's definitions of, and criteria for, public service broadcasting, which includes a number of specific purposes that broadcast journalism should achieve. National newspapers don't all publish mission statements defining the obligations of their journalism in holding power to account, but all adhere to one or another standards code that promotes at least some aspects of the watchdog function.

The BBC's Object, as defined in the Royal Charter and Agreement, is the fulfilment of the corporation's mission and the promotion of its public purposes. The BBC's Mission is broad: "The Mission of the BBC is to act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain" (DCMS, 2016a: 5). The Public Purpose relating to news is then set out as follows:

To provide impartial news and information to help people understand and engage with the world around them: the BBC should provide duly accurate and impartial news, current affairs and factual programming to build people's understanding of all parts of the United Kingdom and of the wider world. Its content should be provided to the highest editorial standards. It should offer a range and depth of analysis and content not widely available from other United Kingdom news providers, using the highest calibre presenters and journalists, and championing freedom of expression, so that all audiences can engage fully with major local, regional, national, United Kingdom and global issues and participate in the democratic process, at all levels, as active and informed citizens [emphasis original]. (DCMS, 2016a: 5)

The watchdog function of journalism is therefore implicit, rather than explicitly set out in the BBC's constitutional documents. The corporation's editorial guidelines go further, however, describing the BBC's editorial values as operating "in the public interest – reporting stories of significance to our audiences and holding power to account" (BBC, 2019c: 13).

The news provision of all commercial broadcasters are provided by Independent Television News, with the exception of 24-hour news channel Sky News.

All are regulated by Ofcom, which is tasked by legislation with producing a Broadcasting Code that covers all programming but has special criteria for the provision of news and current affairs. The mission statements of ITN and Sky News do not in themselves include references to watchdog journalism, though ITN lists several examples of investigative journalism in its annual report to demonstrate the value of its news programming to audiences (ITN, 2019: 9–11). Sky News defines its mission in terms of audience trust, “dar[ing] to challenge”, and clarity (Sky News, 2020).

Ofcom’s Broadcasting Code does not in and of itself comprise a mission statement for broadcast journalism’s role in society. It transposes the aspects of the Communications Act 2003 and the Broadcasting Act 1996 where they relate to news programming and content, including on accuracy and impartiality in news programming. Ofcom is tasked with ensuring that the UK’s public service broadcasters (PSBs) fulfil their duties as defined by Parliament; while there is no single definition of public service broadcasting, impartial news provision that supports democracy is agreed to be crucial to the maintenance of PSB and central to broadcast news in the UK (House of Lords, 2019). There is therefore an implicit commitment throughout UK broadcasting for the provision of news that fulfils the watchdog function on journalism.

The UK’s national newspapers largely do engage in investigative journalism to varying degrees. Their mission statements differ significantly, and – perhaps reflecting the current circumstances facing journalism – place more focus on business sustainability than the watchdog function of journalism. For example, DMGT (Daily Mail and General Trust), ultimate owner of the *Daily Mail*, frames its publisher’s mission statement almost entirely in financial and business terms, and describes the performance of its journalism portfolio in similar terms. A single sentence in the corporation’s most recent annual report does, however, define the wider purpose of its journalism as “holding authority to account through high-quality journalism” (DMGT, 2019: 31).

News Corp UK & Ireland is the owner of three of the UK’s most prominent national newspapers: the tabloid *The Sun*, and the broadsheet *The Times* and its Sunday stablemate *The Sunday Times*. *The Times* titles are renowned for their investigative journalism, particularly via *The Sunday Times* insight team. The publisher, however, does not refer directly to watchdog functions in the descriptive summaries of its news brands (News UK, n.d.).

Reach PLC publishes the most national news brands, having taken over several newspapers in 2019. Its flagship title, the *Mirror*, defines its mission as “to make sense of a rapidly changing world for our readers. To challenge wrongs where we see them. To stand up for the underdog against authority. And to entertain” (Mirror, n.d.). The *Express*, encompassing both a daily and a Sunday newspaper, outlines its purpose as follows: “Every day we endeavour to provide our readers with the very best journalism, to inform and entertain.

We are committed to reporting the news accurately, fairly and vigorously and will always hold those in authority to account” (Express, n.d.). A third Reach title, tabloid newspaper the *Daily Star*, does not include a mission statement referring to its vision or principles.

The vision statement of *The Telegraph* is centred on business sustainability – perhaps not surprising, given the current economic pressures being exerted on commercial news organisations – but also contains references to exemplars of high-profile stories based on investigative journalism. Primarily, however, *The Telegraph* defines its purpose in political and economic terms:

The Telegraph is for everyone but *The Telegraph* has certain values. We are right of centre, in support of free markets and deregulation. We’re in favour of enterprise. *The Telegraph* supports fair-play, the rule of law and equality of opportunity. (Telegraph, n.d.)

The Guardian is owned by the Scott Trust, set up by the family of former owner and editor C. P. Scott; the corporation cites an essay article by Scott as a guiding document in the company’s mission (The Guardian, 2017a). While the essay does not explicitly define the watchdog role of the newspaper, it does describe the wider social purpose of a newspaper as a powerful force in society. More recently, the current editor of *The Guardian*, Katharine Viner, set out the values and principles for the title for the present day in another essay:

We will give people the facts, because they want and need information they can trust, and we will stick to the facts. We will find things out, reveal new information and challenge the powerful. This is the foundation of what we do. (The Guardian, 2017b)

The Independent (and its sister title the *London Evening Standard*) does not publish a mission statement online, although its code of editorial conduct (which covers the print and broadcast outlets operated by the owner) specifies public interest exemptions under certain circumstances for reporting that meets the definition of watchdog journalism, including “detecting or exposing crime or impropriety, protecting the security of the general public and preventing people and communities from being misled by the behaviour of another individual or organisation” (Independent, 2015).

The Financial Times does not explicitly refer to the fulfilment of a watchdog function in its editorial code of practice or in its brief website commitment to upholding “the highest possible standards of ethical and professional journalism” (Financial Times, n.d.-b). Despite this, the newspaper has a reputation for high-quality journalism, including investigative reporting on large businesses and organisations. The Code of Practice itself refers to ethical and professional standards in reporting, but the inclusion of the Editors’ Code of Practice as the standards code followed by *The Financial Times* (even though it is not a member

of IPSO) includes references to “the public’s right to know” and includes the public interest exemptions in the IPSO Code (Financial Times, 2020).

Though not specifically part of the mission statements of newspaper publishers, all members of the press regulators IPSO and IMPRESS are obliged to comply with their respective standards codes, and most members host statements online and in print notifying audiences of their observance of standards codes. IPSO members are obliged to adhere to the Editors’ Code of Practice, which allows journalists to disregard certain clauses when doing so can be demonstrated to be in the public interest. The Editors’ Code defines the first clause of the public interest definition as follows:

1. The public interest includes, but is not confined to:
 - i. Detecting or exposing crime, or the threat of crime, or serious impropriety.
 - ii. Protecting public health or safety.
 - iii. Protecting the public from being misled by an action or statement of an individual or organisation.
 - iv. Disclosing a person or organisation’s failure or likely failure to comply with any obligation to which they are subject.
 - v. Disclosing a miscarriage of justice.
 - vi. Raising or contributing to a matter of public debate, including serious cases of impropriety, unethical conduct or incompetence concerning the public.
 - vii. Disclosing concealment, or likely concealment, of any of the above.

(Editors’ Code of Practice Committee, 2019)

Clause One outlines the extent to which the public interest exemptions are designed to provide protections to journalists engaging in investigative journalism. The exemptions relate to code clauses on the following: privacy; harassment; children; children in sex cases; reporting of crime; clandestine devices and subterfuge; witness payments in criminal trials (excluding while proceedings are active); and payment to criminals. The Codebook accompanying the code clarifies that the public interest should be applied in such a way that it enables “investigative journalism, or exposure of serious wrongdoing” (Editors’ Code of Practice Committee, 2020: 120).

The IMPRESS Standards Code, with which all members of that regulator must comply, includes in its preamble the aim of IMPRESS to “ensure that journalists behave responsibly, while protecting their role to investigate and

report freely”, while the public interest exemptions listed underneath consist of the following:

- (a) The revelation or discussion of matters such as serious incompetence or unethical behaviour that affects the public;
- (b) Putting the record straight where an individual or organisation has misled the public on a matter of public importance;
- (c) Revealing that a person or organisation may be failing to comply with any legal obligation they have;
- (d) The proper administration of government;
- (e) Open, fair and effective justice;
- (f) Public health and safety;
- (g) National security;
- (h) The prevention and detection of crime; and
- (i) The discussion or analysis of artistic or cultural works.

(IMPRESS, n.d.: 3)

Some of these clauses represent core aspects of the watchdog function of journalism; they are endorsed by members of IMPRESS through their membership of that regulatory system and obligations to comply with the Code.

(C8) Professional training

3 POINTS

Professional training is generally available to UK journalists, and the majority who do undertake training are funded by their employers when doing so. Larger news organisations such as the BBC operate their own internal training schemes.

IN 2011
3 POINTS

Though journalism in the UK was traditionally viewed as a trade rather than as a profession, nationwide training schemes for journalists have been in place since the 1950s, and the professionalisation of journalism has increased significantly in recent years. Almost all new journalists in the UK are educated to at least bachelor’s degree level (Thurman et al., 2016), and the proportion of new entrants to the profession with journalism-specific degrees has grown substantially (Jackson et al., 2020: 107).

The National Council for the Training of Journalists has provided training for journalists in subjects such as ethics, media law, and regulation for over 70 years, and accredits journalism courses in the UK at academic institutions and

elsewhere that lead to the diploma in journalism qualification. 65 per cent of all journalists in the UK hold a qualification from the NCTJ (81% of journalists hold an accredited journalism qualification from any source) (Spilsbury, 2018: 8). According to the 2018 *Journalists at Work* survey, 70 per cent of respondents who received training in the previous year had their training funded by their employers, 18 per cent received training for free, and just 9 per cent paid for training personally. However, these proportions varied by sector, with broadcast and newspaper journalists more likely to receive employer-funded training than online or magazine journalists (Spilsbury, 2018: 56–57). The same survey found that journalists across all sectors were concerned about possible skills gaps due to the changing technological and employment context, and that attempts to address these gaps faced barriers due to time constraints and work commitments and potentially high fees. Overall, however, the majority of UK journalists (63%) felt that the volume of learning provision in the UK was “about right” (Spilsbury, 2018: 64–65).

Larger news organisations in the UK operate their own internal training schemes. The BBC Academy is an in-house training hub offering a mix of classroom-based and online training modules, with 90 per cent of staff completing one or more courses in 2018 to 2019 (BBC, 2019: 85). Some BBC Academy content is available to licence fee payers and journalists at other organisations. The corporation has also committed to the implementation of leadership development programmes to increase the proportion of women (including the “Expert Women” project) and staff from black and minority ethnic (BAME) and LGBTQ+ staff in leadership positions (BBC, 2019a: 77–81). Larger newspaper publishers also operate their own training and management programmes, such as Reach PLC (publisher of several national newspapers and over 200 local newspapers (Reach PLC, n.d.), and members of IPSO supply regulatory compliance training to staff (News Corp UK & Ireland, 2018). In the hyperlocal and community news sector, the Independent Community News Network offers training via Cardiff University’s School of Journalism, Media, and Cultural Studies (an accredited NCTJ training centre), as well as access to advice on issues of media law (Independent Community News Network, n.d.).

(C9) Watchdog function and financial resources

2 POINTS

While broadcast newsrooms continue to have significant resources to devote to investigative journalism, economic pressures are limiting the capacity of some – but not all – commercial news organisations to engage in costly investigative or international journalism.

IN 2011
2 POINTS

UK journalism has a longstanding reputation of producing in-depth investigative journalism and a commitment to international and conflict journalism. Both

activities have been affected by economic pressures (in the commercial sector), particularly in the local and regional press. However, there is still a commitment to in-depth investigative journalism across the British news media.

A House of Lords Communications Committee inquiry in 2012 investigated the state of investigative journalism in the UK and the effects of economic pressures on the ability of news organisations to devote resources to journalism of that type. The report concluded that economic pressures were having a direct negative impact on the capacity of newspapers to devote resources to investigative journalism, especially at the local and regional news level, but noted:

It is difficult to find reliable time-series data following the amount of investigative journalism in the printed press in order to be able to conduct a comprehensive analysis of whether the amount of investigative journalism has decline over the most recent decades. However, anecdotal evidence suggests that this is very much the case. (House of Lords, 2012: 19)

Unfortunately, this remains the case, given the fact that investigative journalism often does not result in the publication of stories. The UK government-commissioned report into the sustainability of local public-interest journalism found much anecdotal evidence of pressures on the delivery of investigative journalism in UK non-broadcast media, but did not produce empirical data on the decline (DCMS, 2019a: 18–21).

UK national print and online journalism continues to produce high-profile investigative journalism stories, such as *The Guardian's* 2016 investigation into offshore tax havens in conjunction with the International Consortium of Investigative Journalists, or the *The Sunday Times* Insight team of investigative journalists which has produced a series of high-profile investigations, including on corruption in sports. International reporting, however, has been in decline in print journalism for some time. A 2010 study monitored the decline at that stage of dedicated foreign coverage in the UK national press (Moore, 2010). Although digital convergence has made some aspects of foreign reporting more affordable, there is little evidence of increased spending in that area.

While economic pressures on the local press have been profound, the sector is still capable of conducting significant investigative journalism. Local newspapers have been shortlisted for the UK's main investigative journalism award – the Paul Foot Award – in seven of the eight occasions in the last decade that the award has been made, including a reporter for independent paper the *Hackney Gazette* winning the award in 2017 (Private Eye, 2017).

There have also been new entrants since 2010, with The Bureau of Investigative Journalism launching in that year, focusing specifically on detailed investigative journalism on selected topics, such as government use of personal data and tobacco lobbying. The Bureau is not-for-profit and funded by charitable donations and grants (Bureau of Investigative Journalism, n.d.).

On investigative journalism by public service broadcasters, the House of Lords report did not identify any significant concerns about commitments to investigative reporting (House of Lords, 2012: 21), and broadcast news organisations still have significant resources to devote to investigative journalism. BBC funding across all news and current affairs programming in 2018 and 2019 was GBP 355 million, and ITN's revenue from news at the same time was GBP 89 million (e.g., Indicator E1 – Media ownership concentration national level); both news providers also offer a range of news and current affairs formats, including investigative journalism (see Indicator E3 – Diversity of news formats). This combined expenditure is significantly higher than the GBP 307 million allocated to news and current affairs programming by all public service broadcasters in 2010 (Ofcom, 2011: 10). However, some former employees of the BBC have criticised the corporation's lack of clearly defined investigative news teams, as employed in certain national newspapers (Jones, 2016).

Conclusions

The UK has seen huge changes in the ways in which news is produced, distributed, and consumed over the last decade. Although this has chiefly been driven by technological developments, it has had a profound impact across all aspects of the news media. Not least since, amongst certain UK audiences, the legacy media have seen their role as the leading distributors of news usurped by large American technology platforms including Facebook, Twitter, and Google. The decade has also seen a fundamental shift in prioritisation, particularly amongst newspaper publishers, from analogue (print and broadcast) to digital-first.

Despite the extent of technological change, the leading news media institutions in the UK in 2011 remain the leading news media institutions in 2021 and consumption of news – though it has evolved – is high if not higher than in 2011 (see also Humphreys, 2011). News media is widely accessible across the UK's nations and regions, via broadcast television, print, or online (95% of the UK has access to high-speed broadband). Patterns of news consumption have altered significantly and diverged between different generations. Young people have deserted print publications and watch much less television news, preferring to find their news online and via mobile. Older people remain reliant on television news though increasingly supplement this with information obtained online. Print circulation has halved since 2011 (though the reach of many publications has risen thanks to online access).

Most commercial news organisations are still organised hierarchically, though staff journalists have regular opportunities to participate in editorial discussions (less so contract and freelance journalists). There has been an increase in the number of women in top editorial positions, with women

editors at five national newspapers as well as directing news at the BBC and Channel 4. The traditional separation of editorial and commercial decisions appears to be breaking down at commercial news organisations, particularly with the growth of sponsored content and native advertising, though there is limited evidence of major advertisers influencing editorial policy. The BBC, though non-commercial, has found its independence partly compromised by government intervention in provision of the licence fee. Most news organisations have detailed guidelines for newsgathering. The BBC has the most extensive editorial guidance which has, as of 2017, become overseen by the statutory communications regulator, Ofcom.

The news media has made progress on gender equality, and there is more transparency than there was around pay, though there is still a considerable way to go before the UK has gender pay parity or equality in senior management positions. There is also a strong imbalance in the use of women as expert sources in media content, something that broadcasters have sought to address. Outside the BBC there is little indication of dedicated internal policies for countering mis- or disinformation. Yet, there is widespread evidence of journalistic awareness of the increased need for social media verification. Staff journalists have higher levels of access to protection from harassment – on- and offline – as well as training in how to deal with harassment, though this is less accessible to contractors or freelance workers.

The UK national press is highly concentrated – with eleven mainstream national daily newspapers and nine Sunday newspapers, all based in London. Broadcast news is produced almost entirely by three organisations – the BBC, ITN, and Sky News – with the BBC dominating in both television and radio. The local newspaper industry has become even more highly consolidated in the last decade, with five publishers responsible for 80 per cent of all titles. Beyond this, there is a growing number of small, independent online news outlets spread around the country. There is a wide range of news formats available to the public, from fixed schedule television bulletins, to hourly radio news, to “live” or rolling text-based news online. Equally, there is a broad range of minority media, some publicly funded, though most commercial or non-profit. News is affordable, with many outlets providing free access online, and all the BBC’s news available for the cost of the annual licence fee (GBP 157.20 per household).

There is a modest amount of media monitoring and scrutiny. This is done sporadically by news outlets themselves, by university centres, and by civil society or campaigning organisations. There are five codes of journalism ethics in use in the UK – covering the BBC, other broadcasters, large commercial print and online news organisations, smaller independent online outlets, and members of the National Union of Journalists. All the major news organisations adhere to a code of practice, though the nature and extent of self-regulation varies. Involvement of the public in editorial or ethical decisions is patchy and

uneven. News outlets allow comments around news or opinion articles online, but few have any formal integration of the public in the news process. Some of the UK's commercial news organisations are owned or run by international organisations (such as News International, Channel 5, and the FT), though most are run nationally. Basic information about UK news organisations is available online, though more specific information – about expenditure or consumption – is more difficult to acquire.

A majority (65%) of UK journalists have a formal qualification (NCTJ), and ethics training is now widespread within the industry. The majority of journalists are employed by a news organisation, though the number of contract and freelance workers is rising. Government information can be accessed using the Freedom of Information Act (2000), though requests can be refused, a practice that appears to have become more common in the last decade. The major news organisations each make rhetorical commitments to the watchdog function of journalism, though this is not necessarily explicit in their mission statements. Similarly, many express their commitment to investigative journalism, though it is difficult to assess the resources put behind investigations, and evidence provided to parliamentary committees suggests that these resources are diminishing.

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THE MEDIA FOR DEMOCRACY MONITOR 2021

To what extent do structures and conduct of leading news media correspond with requirements of contemporary democracies? Based on a root concept of democracy and several empirical indicators, the Media for Democracy Monitor (MDM) delivers a panorama of the news media's performance regarding freedom, equality, and control across several countries. In 2011, the MDM analysed 10 democracies. Ten years later, it covers 18 countries worldwide and pinpoints essential strengths and weaknesses during this decade of digitalisation. Around the globe, news are highly attractive to users, and the journalistic ethos of watchdogs and investigators is paramount. On the downside, journalistic job security eroded over time, and gender gaps both in content and employment patterns remain strikingly excessive in most countries.

Volume one contains countries present in the 2011 MDM edition, allowing for longitudinal comparative analysis: Australia, Austria, Finland, Germany, the Netherlands, Portugal, Sweden, Switzerland, and the United Kingdom.

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