Media Accountability: From Western Concept to Global Models
Summary of the Results of The Global Handbook of Media Accountability[1]

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Abstract

The concept of media accountability has originally been developed *vis-à-vis* Western democracies. Yet, democratization has opened spaces for media self-regulation in countries formerly characterized by rigid press control, while even in the Global North journalists have been facing increasingly hostile political environments attacking their freedoms. This paper sets out to provide the first comparative analysis of media accountability from a worldwide perspective, covering developments across world regions and political regime types. Based on a set of desk studies in 44 countries, the paper suggests a global model of media accountability.

[1] Fengler, S., Eberwein, T., & Karmasin, M. (2022). The Global Handbook of Media Accountability. London, New York: Routledge. This summarizing paper was presented at the 2022 ICA Conference in Paris, France.

Introduction

The concept of media accountability is rooted in the conviction that media and journalism fulfill an important function in modern societies by observing the behavior of actors from various social systems (politics, economy, law, but also art, science, sports, and so on) and making it transparent and understandable for the public at large, in order to serve the public interest (McQuail, 1992). This function seems to be even more important in the digital age, despite an abundance of information available in a variety of forms. Alongside a variety of non-professional communicators, journalists continue to act as gatekeepers and sense-makers, serving their audiences by selecting and explaining the news that is necessary for an active and self-determined participation in social life (Vos & Heinderyckx, 2015). Therefore, the idea of accountable journalism is closely connected to the concept of democracy (Nieminen, 2016). However, the democratic function of media and journalism can only unfold if journalistic actors are willing and able to accept their social mandate and act responsibly. As McQuail (2003, p. 19) points out:

> "accountable communication exists where authors (originators, sources, or gatekeepers) take responsibility for the quality and consequences of their publication, orient themselves to audiences and others affected, and respond to their expectations and those of the wider society".

Yet, such an aim only seems to be realistic if media actors are mostly free from external constraints – or at least find a strategy to co-exist with the political, economic, cultural, technological, and other context factors that influence journalistic practice in their respective situation.

Press councils, ombudspersons, media criticism in trade journals and mass media – as traditional MAIs – all have the task to monitor journalists' professional performance and follow up on journalistic malpractice in countries that guarantee freedom of the press and thus forbid state interference into journalism (Dennis, Gillmore, & Glasser, 1989). Furthermore, in the last decade, many MAIs have emerged online, offering new forums to discuss journalistic standards and media quality, such as various social media, specific journalists' and newsroom blogs, or online ombudspersons. In addition, new MAIs facilitating audience participation in holding the media to account have evolved, among them audience blogs, comment and complaint functions offered by news outlets, new online applications offered by traditional MAIs (like complaint

forms and occasional web-casts of meetings provided by press councils and media regulators), and of course audience media criticism voiced via Twitter and Facebook. The number of MAIs has certainly increased in the digital age with the advent of many forms of web-based media accountability processes (Heikkilä et al., 2012). In the light of recent trends towards algorithmic selection, there have been recurring claims for distributed control approaches with increasing user empowerment and responsibility, suggestions for technological approaches, in the form of accountability-by-design, and proposals to focus on the agentive role of designers and engineers, for example by responsible research and innovation (Saurwein, 2019).

Even in liberal democracies, however, journalists do not always live up to the high normative expectations that come along with their professional responsibility. Media scandals, such as the watershed phone hacking scandal at the now-defunct U.K. tabloid *News of the World* (Ramsay & Moore, 2019) or the more recent controversy around the frauds of reporter Claas Relotius at the German news magazine *Der Spiegel* (Eberwein, 2021), regularly trigger outraged public discussions and raise doubts about the accountability of many actors in the field. In the light of such cases, the necessity of establishing effective means for assessing and safeguarding the quality of journalistic performance is largely undisputed, even among most members of the profession. However, the issue remains questionable as to which kinds of instruments and mechanisms promise to offer the most sustainable impact in the pursuit of this aim – not only in the context of Western media systems and journalism cultures.

In media and communication research, various terms and concepts are used to describe the processes of quality management within and beyond the journalistic profession. The terms *media self-control* or *media self-regulation* (Puppis, 2009a) are commonly used to denote those practices which members of the profession initiate to motivate responsible media performance and monitor journalistic output, building on the absence of state interference (Hans-Bredow-Institut, 2006, p. 35). The broader concept of *media accountability*, on the other hand, discusses "any non-State means of making media responsible towards the public" (Bertrand, 2000, p. 108) and consequently does not only include journalists, but also media users and other stakeholders in the process of quality management. In the course of the last decade, the concept of *media transparency* (Meier & Reimer, 2011; Fengler et al., 2014) has gained increasing academic attention. This concept focuses on a variety of instruments, particularly at the level of the media organization, that can contribute to preserve or regain trust in journalism by providing information about newsroom processes and the participating actors (e.g., through online profiles of journalists, public mission statements, links to original sources, or newsroom blogs). Media accountability can also be part of the concept of *co-regulation* or *regulated self-*

regulation (Puppis, 2007; Hans-Bredow-Institut, 2006), implying that media laws require the media industry to implement self-control bodies, which are thus operating on the basis of a legal framework. The broader concept of *media governance* (e.g., Kleinsteuber, 2004; Puppis & Künzler, 2007; Puppis, 2009a; 2010) partly overlaps with media accountability, as it implies that a diverse set of actors from across civil society, the economy, and politics participate in the processes of holding the media to account.

Bardoel and d'Haenens (2004) have specified the various fields potentially involved in the accountability process: Besides the profession of journalists, they mention the market, the political sphere, and the public. This framework facilitates a debate about the role of media accountability beyond Western democracies. Von Krogh (2012) has further amended their model by pointing towards the impact of the media system and of technology on media accountability. Puppis (2007) also points towards the process character of media governance and media accountability, with the establishment of self-regulation as a continuing process.

Media accountability is a rather holistic concept, potentially including a variety of stakeholders involved in holding the media to account. Consequently, numerous media-related, political, socioeconomic, and cultural factors need to be considered. For instance, the establishment of co- or self-regulatory institutions and other MAIs in many Western countries may be interpreted against the background of what Keane (2009) has called "monitory democracy". This term encapsulates the vast networks of organizations, agencies, groups, institutions, or social movements scrutinizing government, businesses, or civil society bodies in pluralist democratic societies, ranging from human rights organizations to expert councils or consumer testing agencies (Keane, 2011, pp. 215–216). These actors are described as monitory mechanisms,

> "geared […] to the definition, scrutiny and enforcement of public standards and ethical rules for preventing corruption or the improper behaviour of those responsible for making decisions, not only in the field of elected government but in a wide variety of power settings" (Keane, 2011, p. 216).

Schudson (2015) points to "the rise of the right to know", describing how a "culture of transparency", ranging from product labelling in supermarkets to freedom of information legislation, has become crucial in American society after World War 2. In that sense, the establishment of MAIs could be seen as part of a societal trend to develop complex monitory infrastructures and to ensure greater accountability through greater transparency. Referring to

power settings, (media) accountability and transparency instruments can also serve as means to reduce information asymmetries between media makers and media users (see Fengler & Speck, 2019).

However, such models developed against the background of flourishing post-war Western economies and the heyday of liberal democracy may not help to properly capture the situation of media accountability elsewhere. Fengler et al. (2021) pose the question of how great are public expectations about the media to be 'transparent' in countries where a 'right to know' has never been implemented and major information asymmetries between a small elite and most citizens persist. Other queries in the same vein are: Is it adequate to demand 'greater transparency' from the news media if the government continues to act opaquely, and when press freedom is by no means ensured? The involvement of civil society in the process of holding the media to account is certainly desirable, but how much involvement is possible in countries with no strong tradition of civil society?

Literature review

In the past two decades, a growing body of research on MAIs and practices has emerged for Europe as well as the U.S., Canada, Australia, and New Zealand. A comprehensive overview is provided by Eberwein et al. (2019). Summarizing this research, we observe that the characteristics discussed by Hallin and Mancini (2004) as key factors shaping media systems and journalism cultures also have a fundamental impact on the development of media accountability structures, namely the degree of state intervention, and the degree of professionalism in journalism. Adding media pluralism, media audiences, and media technology, as well as cultural norms and values and developments at the transnational level as additional characteristics, we argue that a variety of factors encourage viable structures of media accountability practices and instruments.

However, research about media accountability beyond the Western world has been rare and spotty. Few studies so far emphasize media accountability in transition countries, which has been criticized by scholars from the Global South (Akoje & Rahim, 2014). In general, it may be hard to judge the efficacy of existing structures without local expertise, as UNESCO emphasizes in its document on Media Development Indicators:

> "Effective self-regulation is a matter of both form and culture. National media cultures may have the apparatus of self-regulation – codes of ethics, ombudsmen, complaints

> commissions, the printing or broadcasting of retractions and corrections, etc. – but these may be ineffective without a prevailing culture of public and peer scrutiny. Conversely, self-regulation can sometimes be effectively achieved without formal national structures or bodies but by local and internal vigilance, responsiveness and transparency on questions of news ethics and accuracy." (UNESCO, 2008, p. 58)

A few (also comparative) studies exist regarding media self-regulation in Sub-Saharan Africa countries such as Ghana, Tanzania, South Africa, and Botswana (e.g., Mfumbusa, 2006; Tettey, 2006; Bussiek, 2008; Krüger, 2009; Berger, 2010; Gadzekpo, 2010; Rioba, 2012; Wasserman et al., 2012; Duncan, 2014; Akpabio & Mosanako, 2018). A comprehensive study on media accountability in Latin America (Bastian, 2019) analyzes the development of media accountability after the demise of military dictatorships in Brazil, Argentina, and Uruguay. In a pilot study, Paulino and Gomes (2019) analyze how journalists in Brazil perceive the concept and impact of media accountability.

The accountability infrastructure of Asian countries has not been subject to systematic comparative research – accessible in the English language – so far, and research at the national level also seems rare. Sawant (2003) addresses media self-regulation in India. Nugroho, Siregar, and Laksmi (2012) analyze the development and impact of self-regulation in Indonesia. Prapawong (2018) studies media ethics and self-regulation in Thailand. Speck (2017) explores the development of media accountability infrastructures during the short interim period of political transition in Myanmar before the military coup. For the Arab world, case studies for Tunisia and Jordan (Pies, 2014) show the contrasting notions of media accountability in these countries in comparison to the European states. While Hafez (2002) compares ethics codes across MENA countries and Muslim Asia, Al-Zubaidi, Fischer, and Abu-Fadil (2012) compare infrastructures of media accountability across the MENA region, and Fengler, Lengauer, and Kurkowski (2021) provide up-to-date reports on media accountability in nine MENA countries.

Tettey (2006) was the first scholar from the Global South to suggest a decisively de-Westernized model of media accountability. Drawing on an analysis of several media accountability systems in sub-Sahara Africa, he discusses also *assigned accountability* specific for many transformation countries. Tettey (2006, p. 237) states that

> "[s]everal African countries have established media commissions or press councils that are authorized to monitor the media's performance, and to address complaints filed against them. These bodies have applied their mandate in a variety of ways […] In spite

> of the good work being done by these regulatory bodies, there are concerns that they could be inimical to the repression of free speech, thereby silencing critical voices, if they are not fair and impartial judges of media activities”

and some of these bodies have turned out to be “yet another tool designed to curb freedom of expression”, “particularly the independent press” (Tettey, 2006, p. 237). This is especially problematic in transformation countries, where

> “separation of powers has not been firmly established and the executive will still tend to hold sway over other institutions of the state [using] their control over the instruments of coercion and compliance to impose and interpret laws in their favour, thereby intimidating and punishing their critics” (Tettey, 2006, p. 236).

Similarly, Prapawong (2018) describes the example of Thailand, where the press council has primarily served in various forms of autocratic rule as a state instrument of control, albeit with a limited degree of leeway to negotiate the interests of the profession.

However, Tettey (2006) argues that assigned accountability must not necessarily be detrimental to press freedom in transitory democracies, if their – relative – autonomy is ensured. Tettey points to the Ghana National Media Council as an example for assigned accountability, which is still “an independent, constitutionally mandated statutory body” (Tettey, 2006, p. 238). Sawant (2003), analyzing practices of self-regulation in India in the pre-Modi era, also concludes that media councils established by statute may be in sum as independent as media councils voluntarily established by the media industry as long as key criteria are ensured – among them the “absence of any government nominees or nominees of any government body in all mechanisms”, consensual selection of council members, inclusion the representatives of the public, and independence of funding.

Tettey (2006) as well as Akpabio and Mosanako (2018) hold a skeptical perspective on the viability of the self-regulation concept in the recently deregulated media markets of transitory countries. They collect many examples where local media ignored or boycotted press council decisions detrimental to their business interests, which leads to a loss of credibility of these young institutions (see also Mathews, 2016, for India). Also, in many transitory countries, media have reportedly failed to educate the public about the existence and services of a self-regulatory press or media council. In the context of efforts to establish a self-regulatory press council in Kenya, Obuya (2012) critically notes inefficiency, dramatic lack of industry funding,

and extremely bureaucratic and user-unfriendly complaints procedures. Akpabio and Mosanako (2018) as well as Berger (2010) provide examples of African countries where government reacted to the lack of compliance with self-regulatory mechanisms with the implementation of a statutory council – if self-regulation is not effective, it provides government an excuse to step in. Political transformation also does not necessarily protect media from renewed government interference, as emerging political actors may be as prone to curb media freedom as predecessors. Berger (2010) reports the case of the post-apartheid attempt of leading ANC party members trying to establish a "media tribunal" in South Africa to counter critical-media reporting. Also Rioba (2012, pp. 19–20) reports that, in 2008, governments in Kenya, Uganda, and Botswana "formed the notion that self-regulatory [councils] existed already. Governments on their part want to form statutory councils on grounds that self-regulatory councils are weak and ineffective in addressing falling journalism standards as well as in taming reckless media outlets".

The short literature overview provides many hints towards the ambiguity of actors and processes of media accountability in countries not belonging to the rather small cluster of 'Western democracies'. Yet, it needs to be noted that we can observe similar challenges to more effective self-regulation in many Western democracies as a well – such as lack of acceptance of institutions of media accountability in parts of the media industry, sanctions considered ineffective, and some news outlets not even accepting them, or governmental threats to intervene such as after the 2011 U.K. *News of the World* phone hacking scandal (see, e.g., Bardoel & d'Haenens, 2004; Reinemann, 2010; Vike-Freiberga et al., 2013; Fengler et al., 2014).

Methodology

In order to facilitate a qualitative comparative analysis of media accountability worldwide, the international research consortium collected country studies that describe and evaluate the status quo of media accountability (and media accountability research) in 44 countries from all regions of the world. The country studies are based on desk research analyzing a variety of secondary data and existing literature; in few cases, authors have also drawn on interview or survey data. For the selection of sample countries, we have drawn on the V-Dem Index model of regional clustering – which differentiates between six groups of countries worldwide: Western Europe and North America, Eastern Europe and Central Asia, MENA, Sub-Saharan Africa, Latin America and the Caribbean, and Asia/Pacific (V-Dem Institute, 2020) – as well as the data

provided by such diverse comparative studies as, for example, the Economist Intelligence Unit Democracy Index (EIU), the Corruption Perceptions Index (CPI) by Transparency International, the World Press Freedom Index by Reporters Without Borders (Reporters Sans Frontières – RSF), the Freedom of the Press Index by Freedom House, and the Worlds of Journalism Study (WJS).

Combining these approaches makes it possible to realize a "most different systems" design (Przeworski & Teune, 1970; Landman, 2008) which takes account of different types of political and media systems, journalism cultures, media markets, media audiences and culturally influenced value systems. In a slight variation of the V-Dem Index model, the project covers seven world regions. Our systematization tries to avoid to some extent regionalism and thus places Australia and New Zealand into the group of Anglo-Saxon countries, as the Worlds of Journalism Study did as well. Especially with regard to the MENA region, we are aware of the extreme complexity of the region (for a discussion, see also Hanusch & Hanitzsch, 2019, p. 295).

- *Anglo-Saxon countries* are represented in this research project by the United Kingdom, the United States, Canada, Australia, and New Zealand. Most countries in this cluster are in the top score of democracy and media freedom indices.
- *Western Europe* is represented by Sweden, Germany, Italy, and Spain. For this region, we composed a country sample with notable differences with regard to their score in all democracy and media freedom indices.
- *Central and Eastern Europe and the Post-Soviet space* is represented by Poland, Hungary, Estonia, Bosnia and Herzegovina, Ukraine, Russia, and Kyrgyzstan. This country cluster contains both flawed democracies, hybrid regimes, and an authoritarian regime (Russia). Apart from Estonia, the other countries rank considerably lower on all democracy and media freedom indices.
- The cluster with a focus on the *MENA Region* includes a highly heterogeneous list of countries, namely: Turkey, Israel, Morocco, Tunisia, Egypt, Jordan, Iraq, and Iran. In terms of democracy and media freedom, Israel and Tunisia stand out. Otherwise, this cluster is dominated by autocratic governments and characterized by very low degrees of press freedom.
- *Sub-Saharan Africa* is represented by Kenya, Nigeria, Ghana, South Africa, Namibia, Uganda, and Zimbabwe. South Africa, Namibia, and Ghana are all considered to be flawed democracies by the EIU and described as "free" by Freedom House. In contrast,

Kenya, Nigeria, Uganda, and Zimbabwe are characterized as either hybrid or authoritarian regimes in the EIU index. All four countries end up in the lower range of both the CPI and the RSF ranking.

- *Asia* is represented by India, Pakistan, Myanmar, Japan, China, Hong Kong, and Indonesia – a country selection that is supposed to reflect the large variety of media systems and journalism cultures in this world region. Japan is the only full democracy in this sample, while India and Indonesia and are classified as flawed democracies by the EIU index. Pakistan and Hong Kong are described as hybrid, Myanmar and China as authoritarian regimes.
- *Latin America* is represented by Argentina, Brazil, Chile, Mexico, Colombia, and Costa Rica. In this country cluster, Chile and Costa Rica are classified as full democracies by the EIU; Colombia, Argentina, Brazil, and Mexico are flawed democracies, with Brazil being one of the ten countries with a notable decline in democracy in the past decade, according to V-Dem.

As media accountability has not been the subject of (internationally visible) scholarly literature in many countries, we have contacted prospective country report authors based upon a comprehensive literature review. For a number of researchers in our consortium, this has been the first study on media accountability they have been involved in. In order to build expertise, we provided these colleagues with comprehensive literature on media accountability as well as prior comparative studies.

Preliminary Results

Result 1: Development over time: institutionalization of press councils

The press council is the instrument of self-regulation or co-regulation most widespread across sample countries, with a clear and comparable date of establishment, and often precedes the development of other MAIs. Therefore, we have chosen press councils here for an exemplary comparative analysis of the development of MAIs across sample countries over time.

Our study observes several 'waves of media accountability' following political transformation, as described by Huntington (1991), and ensuing media transformation (Voltmer, 2013). Gunitsky (2018) has added the 'color revolutions' between 2000 and 2007 as well as the Arab Spring movement of 2011/12 to the list of recent democratization movements, which is helpful to structure our observations. We can identify five 'waves of media accountability':

- after World War 2;
- after the social movements in many Western countries associated with '1968';
- before and after 1989 in the context of the 'third wave of democracy', spanning from Central and Eastern Europe to Latin America, Africa, and Asia;
- after the 'color revolutions' in the Post-Soviet space 2000; and
- after the largely unsuccessful Arab Spring of 2011.

There is clear indication that media accountability develops in line with political transformation. However, we can see as well that since 2000, the number of 'mimicry media councils' (see further below) and statutory councils has increased, notably in many Muslim Arab countries (MENA and Pakistan). This might in turn foreshadow the current "third wave of autocratization" (Lührmann & Lindberg, 2019). At the same time, we see a diminishing number of self-regulatory press councils in the liberal study countries. The last press council in the U.S.A. closed in 2014, and the Canadian system currently undergoes reform to make the system sustainable for a media system in fundamental change. The media accountability system in the U.K. remains in a fragile state after the *News of the World* scandal and the ensuing Leveson Inquiry. On the bright side, a self-regulatory press council was at least formally established for Tunisia in early 2021, following years of discussion.

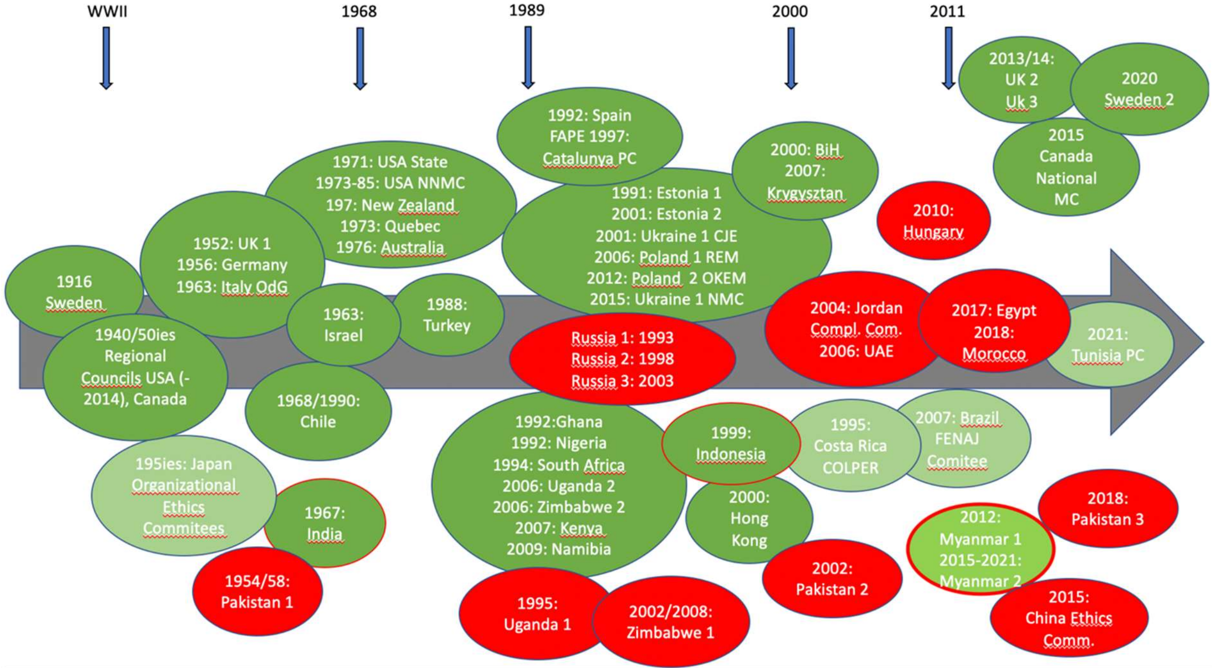
Mass communication research has insinuated a global convergence towards the liberal model, also in the field of media accountability. However, according to our data, this is only partly true. Marked as red ovals, our global analysis has shown that MAIs initiated and (to varying degrees) controlled (and financed) by government are widespread in many study countries. Statutory media 'councils' that are labeled as councils – but are actually *de facto* regulatory agencies, with the authority to control access to the profession – have been established in Egypt, Pakistan, Uganda, Jordan, and Morocco. It is striking to see that these 'mimicry media councils' (see further below) all have been established in recent years. Obviously, they have been created in the wake of efforts to counter democratization movements in many Muslim Arab countries, striving for more participation and transparency; but governments seek to suppress opposition movements even more strictly since the 'Arab Uprisings' of 2011/12.

There are other countries currently undergoing a process of transformation, like Myanmar (until the military coup of February 2021) and Indonesia, as well as the African countries Nigeria, Kenya, Ghana, South Africa, and Namibia. In these cases, the media councils are also

statutory, but the direct or indirect influence of government representatives (e.g., via the parliament, Minister of Information, Exchequer, President) is – to differing degrees – counter-balanced by the involvement of local professionals and international donors, confirming Tettey's observation about the ambiguity of local statutory practices (Tettey, 2006).

In the figure below, we have depicted press councils clearly serving as instruments of media self-regulation as green ovals. We have also added institutions that can be considered as equivalents to self-regulatory press councils (e.g., the ethics committees FAPE in Spain, FENAJ in Brazil, CME in Poland, company ethics commissions in Japan). Press councils which are clearly captured by government or other state actors are depicted as red ovals.

Figure 1: Diffusion of press councils in a global comparison



Source: the author

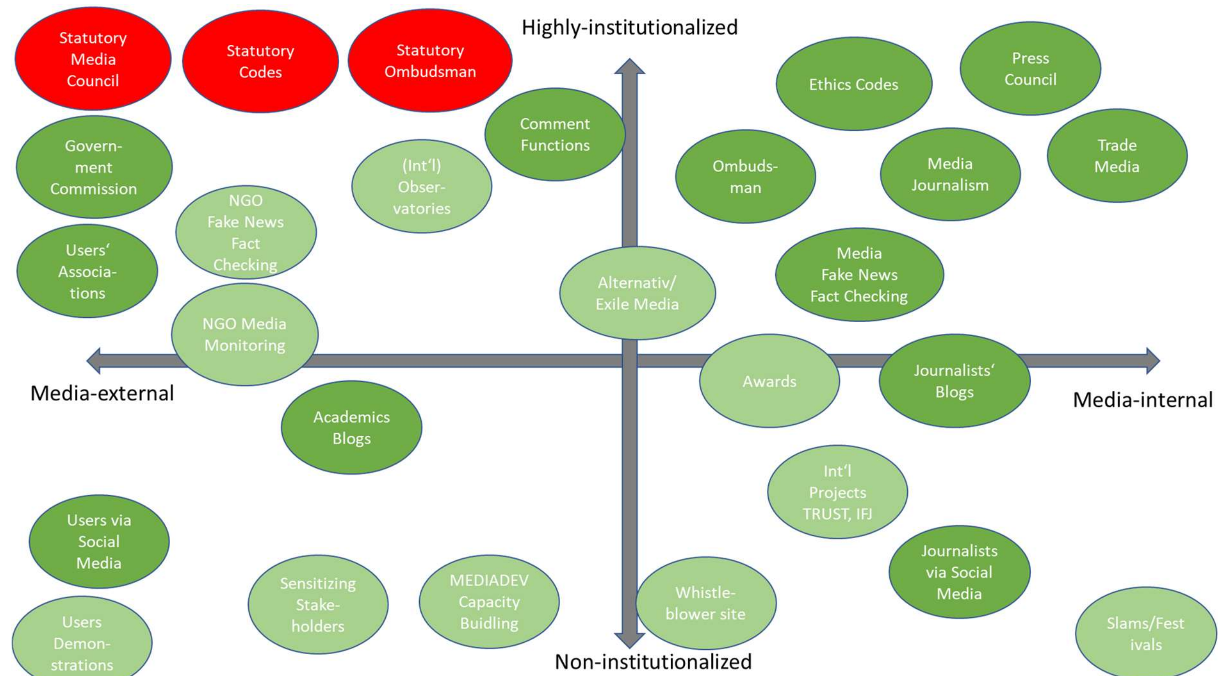
Our study also includes an analysis of the development of broadcasting councils as well as cross-media councils. With the exception of the countries belonging to the group of established liberal democracies in our sample (U.S.A., Canada, Australia, U.K., Sweden, Germany, Israel, Japan; Spain after the end of the Franco regime), the development of accountability mechanisms in broadcasting began much later in many countries, often in the context of the "third wave of democracy" around 1989 (Huntington, 1991; see also Gunitsky, 2018). This reflects that broadcasting emerged as a mass medium much later especially in the formerly so-called 'developing' countries. The mass-mobilizing power of broadcast media was strictly

instrumentalized for political purposes by many governments beyond the small cluster of liberal democracies, and institutional change was only brought with the start of the transformation process around 1989/1990, as well as the technological progress in countries in the Global South. The notion of broadcasting as a public service, providing a forum for debate for different groups in society, is a concept only recently introduced in some Latin American countries like Mexico. The MENA region stands out with the smallest number of independent accountability mechanisms for broadcasting.

Result 2: A global 'model of media accountability instruments

Our global overview adds to the existing literature by highlighting numerous additional – even though in many cases less-institutionalized – MAIs reported from the sample countries. Our study retrieves the various – highly institutionalized or non-institutionalized – instruments that enable, shape, and structure a systematic discourse (Lindekamp, 2019) about (sometimes competing) journalistic norms and values. However, this global analysis will require a somewhat more fluid definition of MAIs. For example, ethics committees established by journalists' federations in Brazil will be subsumed with press councils due to their functionality, even though they lack participation of the media industry. Also, statutory media councils can be organized with or without participation of government representatives, as our global analysis has shown. Ombudspersons can be representatives of the public on the company level, on the professional level, or installed by statue. The figure below summarizes the variety of MAIs this global study has retrieved:

Figure 2: Axis model of media accountability instruments



Source: the author, based on previous publications

Depicted in light green, complementing to MAIs established in the well-studied Western countries, we find in the field of media-internal instruments:

- journalism awards, described as a relevant tool to trigger a debate about journalism standards in Russia and in several African countries;
- alternative and exile media, serving as an accountability tool to 'correct' the state-controlled media agenda in countries like Russia, Iran, Turkey, and to some extent the MENA countries;
- international accountability projects like the Trust Project, or projects run by the Ethical Journalism Network, making up for organizational weaknesses of the profession in countries like Pakistan, but also highly relevant in Europe (e.g. in Italy and Spain);
- discussions among professional journalists taking pace digitally, in WhatsApp or other (closed) groups (e.g., Signal), which is especially relevant in highly restricted regimes;
- festivals, slams, and other live events, reported from Russia, but also Italy, where such informal events partly make up for state pressure or professional weakness;

- whistleblower websites supporting journalists, which are reported from Nigeria.

In the field of media-external instruments, new ones with a relevant degree of institutionalization outnumber those traditionally discussed in the 'Western' media accountability literature:

- Among the institutionalized instruments, media observatories – established at the journalism departments of local universities, reaching out to larger parts of the public – are relevant in Latin America (e.g., Brazil, Colombia).
- In general, in many countries, journalism and mass communication scholarship provides a relevant share of media criticism (via publications in mass and trade media, blogs, public appearances, etc.).
- NGOs – financed by foreign donors – play an eminent role in countries undergoing political transformation or with restricted press freedom and, as a result, dysfunctional media markets. We find numerous examples, where foreign donor-funded initiatives and media NGOs – often teaming up with local journalists – make up for local deficits, in CEE countries and the Post-Soviet space (Poland, Hungary, Bosnia and Herzegovina, Ukraine), in all African countries (except for the economically more robust South Africa), in Asian countries undergoing transition (Myanmar until 2021) and experiencing tight restriction (Pakistan).

In addition, several instruments which have a lower degree of institutionalization can be observed in the study countries:

- Capacity building training projects – often provided by foreign donors and international media development organizations – promote media accountability as they make local journalists aware of professional standards. This is considered a prerequisite so that they can develop a sensitivity for the role of media and its responsibility towards the public, as well as the professional standards the local journalism culture deviates from. However, these projects are almost always temporary and lack institutionalization.
- Country report authors also describe initiatives aimed at sensitizing political actors, the audience, and other stakeholders about the media's role in society as relevant MAIs. We might also discuss media literacy initiatives in this context.

- While media users in many countries use social media to voice their – individual and collective – audience criticism, some country reports also mention demonstrations against newsrooms to protest against lack of journalistic objectivity, and professionalism, e.g., in Iraq.

Result 3: A global concept for media accountability – eight models

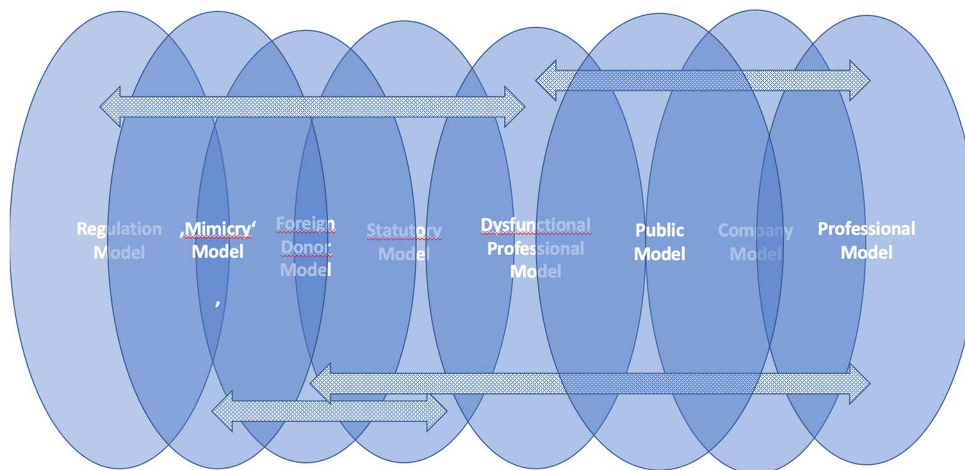
Our findings show that the concept of media accountability, and the idea of institutions serving to hold the media to account, indeed have a 'limited capability to travel', as suggested by Voltmer (2012). Despite considerable influence of global processes – cross-country transfer of knowledge and resources, as well as transnational dialogues about media accountability among media professionals, media audiences, and media policy-makers –, national policy-makers remain the decisive actors when it comes to shaping institutions of media accountability, as discussed in the introduction (see also Hafez, 2002; Voltmer, 2012). Besides, we also see some regional clusters, as suggested similarly by Voltmer (2012).

Existing literature (e.g., Puppis, 2007) has described media governance as a continuum, leading from media regulation, via co-regulation, to self-regulation. This model has been developed *vis-à-vis* Western democratic countries and can indeed describe the gradual process of media deregulation and the historical development of professional self-regulation against the backdrop of established press freedom we can observe in the majority of Anglo-Saxon and Western European countries. However, this model clearly does not accommodate the nuanced phenomena of media accountability our country reports have portrayed. Instead, we find 'media councils' in countries with the tightest media control – clearly examples of 'media capture' (Mungiu-Pippidi, 2013, Coskun, 2020). We find MAIs, which are however not maintained by media professionals or media companies, but other actors – in many cases even foreign actors, as local media markets are too weak to sustain local media accountability initiatives. Co-regulatory practices and statutory councils are more common, but place MAIs at risk of being exploited for political purposes in countries marked by patrimonialism and clientelism – and various other factors, which have not been considered in 'Western-centric' media accountability studies so far. Indeed, in the majority of our study countries, the political, economic, and sometimes technological context does not promote the development of a fully-fledged repertoire of MAIs. Also, the establishment of MAIs is not an irreversible process, as the example of Turkey demonstrates. Several country reports from the Post-Soviet space show that if media accountability systems do not mature, there is a considerable risk of falling back

into a state of media regulation. Traditional models may also no longer fit to explain changing media ecosystems in Western countries.

Our comparative analysis retrieves eight models of media accountability, which will be briefly outlined in the next section:

Figure 3: Eight models of media accountability



Source: the author

- **Professional model:** Dominates in countries featuring many different MAIs on the professional level, including press councils, codes of ethics, broadcasting commissions, media journalism, media-critical blogs, and social media, completed by a variety of instruments on the media-organizational level.
- **Company model:** Prevalent in countries characterized by local media accountability dominated by MAI initiated by individual news outlets - ombudspersons, company codes, media journalism, and social media.
- **Public model:** Found in countries featuring elements of the professional model (journalists' federations, codes of ethics, and ethic committees), which however appear rather weak and less institutionalized. Country reports also describe the notion of public responsibility as not widespread among media owners, while journalists are challenged by political, economic, and, in many cases, physical pressure. Our country studies highlight the activities of NGOs, academics, and civil society to pressure for more media freedom, pluralism, and accountability – most notably media

observatories following up on media issues and thus ‘augmenting’ to some extent the deficits of self-regulation, and *public defensorias* of the audience.

- **Dysfunctional professional model:** Observed in countries following regime change and deregulation of media markets, when foreign investors bought considerable shares of these media market for commercial profit, but did not care for the sustainability of their investment in terms of journalistic professionalism and accountability. Journalistic organizations have adopted codes and established ethics councils or committees, but the professional model exists only on paper, as several competing journalism federations have emerged in the transition period following the collapse of communism, adopting different codes of ethics. As a result, there is no press council with broad acceptance across the profession. Also, before the transition period, journalists’ unions had taken over a propaganda function in most of these countries and were thus in many cases discredited or too ill-equipped to become motors for the establishment of sound media accountability structures. Also, a political divide became visible between representatives of the old system still in charge and reform-oriented members of the profession, opening the door widely for government actors to define and control what media ‘accountability’ means especially for broadcast journalism. In other cases, different business segments divide journalists working for oligarch media from their colleagues.
- **Foreign donor model:** In these countries, the establishment of media accountability instruments is largely dependent on foreign donor support. Political transition in the different “waves of democracy” led to a gradual opening and deregulation of media systems, and thus urgently required – at least from a normative point of view – the establishment of media accountability structures. However, during dictatorship, authoritarian, or communist rule, media professionals were tightly controlled, and in many cases poorly educated, as authoritarian governments sought to de-professionalize the journalistic work force, as another way to eliminate criticism. Following regime change and the end or gradual lifting of censorship, journalists and media companies were often ill-equipped to handle their new freedoms responsibly due to lack of professionalism or simply the economic struggle to stay afloat. Lack of research and use of rumors, sensationalism, and bribery are just a few of the emerging problems described by local observers. Professional associations pre-dating the transformation phase were often discredited because of co-operation with or propagandism for the former repressive political regime. Also, groups of journalists

working under repressive conditions may emphasize solidarity over self-criticism. After regime change, new – and more credible – associations have not been established timely enough in many countries to fill this void, and media companies did not exert sufficient commitment to media accountability. However, according to the country reports' authors, foreign intervention by international donors has produced mixed results.

- **Statutory model:** Statutory bodies have been initiated in these countries in the context of political transformation phases, which however have not resulted in full democracies or established press freedom yet. Statutory press/media councils are not the outcome of self-regulation, but established by government decree or by law, and their budget comes from public funds. In our sample countries, sources of revenue are the government, parliament, the exchequer, and the Ministry of Information. While the councils consist mainly of representatives of the media and civil society, some councils also include representatives of the government as members, or nominees of statutory councils have to be approved by the government or the Ministry of Information, which is only a formality in some countries.
- **'Mimicry' model:** Several countries in our sample have established statutory councils as well, but the label 'council' seems purposefully misleading, and we consider these institutions as examples of 'media capture' as practiced by 'competitive authoritarian regimes'. These councils clearly do not meet the normative criteria laid out by UNESCO (2008) or the Council of Europe (2008), but serve as government tools to control (access to) the profession and exert strict sanctions. In most of the aforementioned countries, press and media 'councils' can impose fines and have in some cases legal powers, also to close media entities, or even a wide array of sanction for breaches of 'standards', up to jail terms. In some countries, the 'councils' regulate access to public advertising spending, and they have regulatory powers in the field of competition law. Some 'councils' do even regulate access to the journalistic professions by issuing of press cards. While the constitution of these countries might on paper grant freedom of expression, journalists are tightly restricted by other laws on national security, decency, terrorism, or cybercrime. Self-censorship is widespread. Not few journalists consider their newsroom jobs as a first step towards a career in government institutions. The 'gardening' concept (Toepfl & Litvinenko, 2019) can help to explain the surprising amount of professional accountability tolerated by the restrictive regime in Russia – at least until 2021, when the government tightened its

grip on oppositional voices with the arrest of Alexej Nawalny. The country reports' authors interpret this considerably high leeway for media criticism on the internet as a deliberate and strategic balancing act of the Russian government, seeking to cater to the needs of a limited group of intellectuals and elite media segments.

- **Regulation model:** In our sample, Iran and China are examples for countries with *media regulation* in its 'purest' form, not allowing for any possible form of media accountability, and not even engaging in 'mimicry' or 'gardening' activities to cover-up and embellish to some extent authoritarian practices. Instead, media and journalism are under full government control, as outlined in the country reports, and no form of accountability practice is possible within the country apart from informal and non-public dialogue between trusted individuals. Otherwise, all media accountability activities can only be performed from exile, and even exile actors are confronted with repression of all forms.

We need to stress that these eight models of media accountability are descriptive categories, and we are well aware that many hybrid forms media accountability exist; however, the reductionist approach we have chosen will hopefully provide readers with more clarity for the moment. We are also aware of the fluidity of the concept, as political contexts in specific regions (especially in MENA, parts of Asia, and Latin America) shift quickly, with a sometimes immediate impact on the structures of media accountability. For example, just a few days after the February 2021 coup in Myanmar, the military junta also dissolved the Myanmar Press Council, established with the help of foreign donors to push for the autonomy of journalists in the transition era. Furthermore, among our sample countries, Sweden, Canada, U.K., and Germany best represent media systems with a dominant, well-funded and highly autonomous public broadcasting system. In line with their function as a major media accountability instrument, these public broadcasting systems have also established comprehensive accountability mechanisms on all levels to ensure journalistic, organizational, and financial responsibility and accountability. In some cases, accountability practices are voluntary, while many others are a legal obligation to public broadcasters (like the ombudsperson at the BBC, and for ERR in Estonia). This makes a strong case to discuss these countries as specific examples of company models of media accountability as well. Indeed, we have to be attentive to the specific accountability practices of types of media companies (public versus commercial), as a survey has already shown that employees of public broadcasting stations described themselves as more committed to media accountability as compared to their counterparts in the

commercial sector (Fengler et al., 2014). The table below provides an overview of context factors specific for the eight models, and develops clusters of study countries displaying characteristic features of the different models.

Table 1: Context factors and country clusters

	Professional Model	*Company Model*	*Public Model*	*Dysfunctional Professional Model*	*Statutory Model*	*Foreign Donor Model*	*Mimicry / Gardening Model*	*Regulation Model*
Democratic quality and trust in institutions	Established democratic system or rather long democratic tradition Trust in institutions is high	Established democratic system or rather long democratic tradition, but ranked as 'flawed democracies' Trust in institutions is limited	Countries with recent history of transformation Trust in institutions is limited or low	Countries with recent history of transformation Trust in institutions is limited	Countries undergoing transformation processes Trust in institutions is low	Countries undergoing transformation processes, with considerable progress towards democracy Trust in institutions is low	Authoritarian practices	Authoritarian practices
Media pluralism and sustainability of media markets	Media markets highly sustainable and pluralistic	Media markets highly sustainable and pluralistic	Media markets to a considerable extent distorted and less pluralistic (political parallelism, oligarchs, crony media, etc.)	Media markets to a considerable extent distorted and less pluralistic (state media, political parallelism, oligarchs, crony media, etc.)	Media markets to a considerable extent distorted and less pluralistic (state media, political parallelism, oligarchs, crony media, etc.)	Media markets to a considerable extent distorted and less pluralistic (state media, political parallelism, oligarchs, crony media, etc.)	High degree of media capture Media markets to a considerable extent distorted and less pluralistic (state media, political parallelism, oligarchs, crony media, etc.)	Media under state control Exile media provide alternative voices
Autonomy of journalistic profession	High professional, legal, financial, and physical autonomy of journalists High quality of journalism education	High professional, legal, financial, and physical autonomy of journalists Limited impact of professional journalistic organizations High quality of journalism education	Limited professional, legal, financial, and physical autonomy of journalists High quality of journalism education	Limited professional, legal, financial, and physical autonomy of journalists 'Tribalism' in the journalistic field hinders successful collective action Limited quality of journalism education	Limited professional, legal, financial, and physical autonomy of journalists. Rather high quality of journalism education	Until recent media deregulation lack of professional, legal, financial, and physical autonomy of journalists Lack of journalism education	Lack of profession-al, legal, financial, and physical autonomy of journalists Self-censorship prevalent Limited quality of journalism education	Lack of professional, legal, financial, and physical autonomy of journalists Self-censorship prevalent Limited quality of journalism education
Audience involvement	Developed media technologies, high media use, rather high media literacy Active media criticism from academia, NGOs, broader society	Developed media technologies, high media use, rather high media literacy Varying degrees of media criticism from academia, NGOs, broader society	Developed media technologies, high media use, rather high media literacy Active media criticism from academia, NGOs, broader society	Developed media technologies, high media use, rather high media literacy Lack of local media criticism from academia, NGOs, broader society	Partly developed media technologies, limited media use, limited media literacy Lack of local media criticism from academia, NGOs, broader society	Partly developed media technologies, limited media use, limited media literacy Lack of local media criticism from academia, NGOs, broader society	Partly developed media technologies, limited media use, limited media literacy Lack of local media criticism from academia, NGOs, broader society	Developed media technologies, high media use, limited critical media literacy Lack of local media criticism from academia, NGOs, broader society
Media accountability structures	Multitude of MAIs at the professional and the organizational level	MAIs on the organizational level dominate, while MAIs at the professional level also exist	Professional and company MAIs exist, but are rather weak and less institutionalized Activities of local civil society actors, NGOs, and academia supply a substantial part of MA activities	Contested MAIs or lack of accepted institutionalized MAIs at the professional and company level	Statutory councils created and funded by state and public funds Varying degrees of co-operation between councils and professional organizations Lack of other MAIs at the professional and company level	(Few) professional and company MAIs are highly dependent on foreign donor support, but sustainability and acceptance remains unclear	Capture of key media accountability institutions Foreign actor sup-port restricted or prohibited Limited amount of less institutionalized MAIs and exile MAIs	Lack of any credible form of media self-regulation Widespread self-censorship Foreign media and media NGO activities highly restricted Media accountability only in the form of exile MAIs, to a very limited extent via audience MAIs
Countries	Canada, U.K., Australia, New Zealand, Sweden, Germany, Spain, Chile, Costa Rica, South Africa, Hong Kong	U.S., Japan, Italy	Argentine, Brazil, Colombia, Mexico	Poland, Ukraine	Ghana, Kenya, Namibia, Nigeria, India, Indonesia	Bosnia and Hercegovina, Kyrgyzstan, Iraq, Tunisia, (Myanmar)	Hungary, Turkey, Egypt, Jordan, Morocco, Pakistan, Russia, Uganda, Zimbabwe	China, Iran

Source: the author

Summary

Assessing insights from 44 study countries, this paper provides a comparative analysis of key developments in media accountability systems worldwide. It conceptualizes a framework of relevant actors and context factors which decisively shape media accountability. The paper argues to depart from existing "Western-centric" concept of media accountability, and suggests eight models of media accountability to reflect the diversity of political, historical, societal, cultural, media-economical, technological etc. context factors impacting the development of local media accountability systems. Introducing this typology, the paper is yet aware of the many hybrid forms that exist around the globe. The analysis thus presents a proposal to set out for a further globalization of journalism research, and to further address media accountability with a cross-continental team of scholars from a truly international angle.

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