

Chapter 11

Media accountability

A cross-country comparison of content monitoring instruments and institutionalised mechanisms to control news media performance

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Abstract

This chapter focuses on media accountability. Because of the fundamental role that news media play in a democratic society, it is of high relevance for citizens that the performance of the news media is scrutinised, which is the overall goal of the Media for Democracy Monitor (MDM) research project. In this chapter, we investigate whether there are institutional mechanisms in place that hold the news media accountable to standards of performance. Following two MDM indicators, we look for the existence of content monitoring instruments and institutionalised mechanisms to control the performance of news media. We find that the use of content monitoring instruments is weak in many countries, while the use of institutionalised mechanisms fares better in most.

Keywords: media accountability, media performance, journalism and democracy, media monitoring, watchdog function

Introduction

Public and political interest in the content and inner workings of the news media has increased dramatically in recent years. High-profile lapses in journalism ethics – such as the 2011 *News of the World* scandal in the United Kingdom where the tabloid performed large-scale telephone hacking, or the 2018 *Der Spiegel* scandal in Germany where a prominent journalist faked a series of reportages – set the agenda worldwide. At the same time, debates about fake news and political criticism of journalistic biases are part of everyday public discourse. In this context, greater transparency and accountability in media outlets is desirable in order to repair journalism's reputation. Unfortunately, the 2021 Media for Democracy Monitor (MDM) data shows that few media systems demonstrate a comprehensive commitment to the ideals of accountability and transparency. Based on a discussion of the concept of media accountability systems, we ana-

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lyse the state of two established means of ensuring media accountability in the participating countries: the existence of content monitoring instruments and the presence of institutionalised mechanisms to control the performance of news media. Teams of researchers in 18 countries investigated the performance of leading news media regarding media accountability for the 2021 MDM project (Trappel & Tomaz, 2021b, 2021c). This chapter goes beyond these national assessments as we compare performance across countries. Our comparative analysis finds evidence of effective practices in some cases, but we conclude that the overall picture still leaves a lot to be desired.

MDM Indicators and related research questions addressed in this chapter:

(E6) Content monitoring instruments

Is there a regular and publicly available content monitoring instrument for news media? (Trappel & Tomaz, 2021a: 37)

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

Are there any institutionalised mechanisms to control the performance and role of the news media? (Trappel & Tomaz, 2021a: 43)

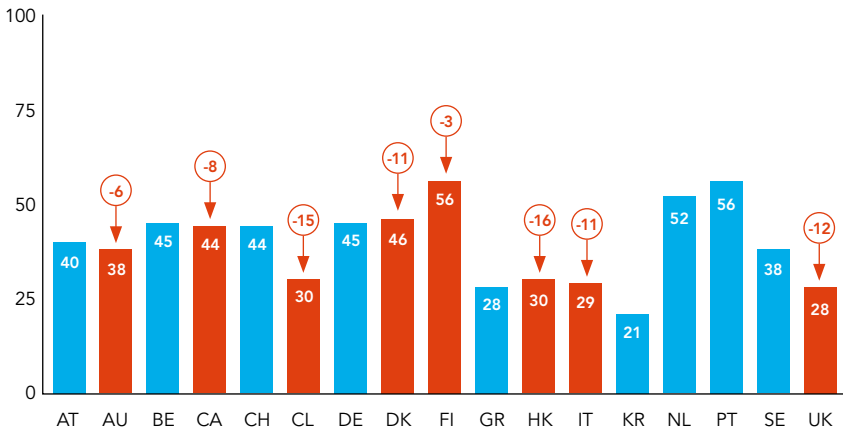
The central role of media accountability in democracy

At a time when the role of news media and journalism is high on the public agenda and media criticism is in abundance, the question of media accountability seems more relevant than ever (Eberwein et al., 2017). In theory, a high level of media accountability would lead to a high degree of citizens trusting the news media. Thus, an indicator of the need for a focus on media accountability in a country is the level of trust people have in news and news media. The 2020 *Reuters Institute Digital News Report* (Newman et al., 2020) shows that 38 per cent of respondents in 40 countries trust news generally, whereas 43 per cent trust the news that they themselves use. Overall, this is a rather low number, but trust also varies a great deal between countries.

As Figure 11.1 shows, there are clear differences between countries. The Reuters study also shows that the willingness to pay for news is increasing in many countries, and other studies indicate that the Covid-19 pandemic has led to an increase in news consumption across media systems. In this context, the question of how the news media can preserve, expand, and continue to legitimise their role as a central arena for trustworthy information and public debate remains crucial.

To hold news media accountable is important for democracy, as journalism is unable to perform its central role as a democratic watchdog (see Karadimitriou et al., Chapter 5), unless news media themselves are held accountable.

Figure 11.1 Overall trust in news, 2020 (per cent)



Comments: A direct comparison with 2019 data. The orange bars indicate a decrease in trust, with the negative numbers indicating the percentage point change. Sample: 2000 in each market. Iceland not included in the Reuters data. Question given to respondents: "Please indicate your level of agreement with the following statement: I think you can trust most news most of the time". The decrease of trust in Chile was influenced by regular street protests and demonstrations about inequality; in Hong Kong by violent street protests over a proposed extradition law; and in the UK by a divisive election, Brexit, and attacks on the media. Decreases in trust were also found in Australia, Canada, Denmark, Finland, and Italy (Newman et al., 2020).

Source: Data from Newman et al., 2020: 15

Content monitoring as a means for media accountability

Content monitoring plays an important role when considering the role and the place of media accountability systems (MAS) in the wider relationship between media freedom and media responsibility in democratic society. While there is a reciprocal relationship between government and citizens as well as between the media and government, this is not the case between media and citizens. The relationship between government and citizens is reciprocal, as citizens elect the government and must then adhere to laws made by the government. Accordingly, we can conceptualise the relationship between the media (consisting of owners, editors-in-chief, reporters, and journalists) and government as follows: The government produces the legal framework within which the media operate, while the media scrutinise the activities of government, which they report to citizens who have a limited capacity to hold the media accountable for their activities. This is where MAS have a role to play.

The very concept of media accountability systems was elaborated by the French communication scholar Claude-Jean Bertrand (1993, 1997, 2000, 2003), who, after outlining the concept in many publications, subsequently amended the original French acronym (MARS) to the English MAS.

In Bertrand's (2003: 17) understanding, MAS encompass "any means of improving media service to the public that function independently from the government", the "basic means" being training, evaluation, monitoring, and

feedback (Bertrand, 2000). Later on, the concept was enriched by emphasising accountability as a process between critics or victims and the media (McQuail, 2003, 2013; Pritchard, 2000). While the concept was initially rather static, it came to include a dynamic component with time. McQuail (2003) and Bardoel and d'Haenens (2004) elaborate on processes within or between four frames of accountability (market, professional, political, and public). In one of his first articles on the topic, Bertrand (1993: 22) wrote the following:

For the past twenty years or so, I have been studying media ethics issues. And it has become clear to me that the survival of humanity depends on it. More clearly: this survival depends on the generalization of democracy; there can be no democracy without freedom of the press; this freedom cannot survive without deontology. When media freedom is abused out of an exaggerated desire for profit and the public is then poorly served, user discontent can be used by governments to restrict freedom [translated].

Bertrand here points to the delicate balance of media freedom as a privilege as well as a responsibility. When the balance is disturbed, the capacity of media to support the political development of a country is at risk. This principle of freedom versus responsibility forms the basis of our conceptualisation of the MDM. The MDM project can in itself be understood as a means of media accountability through monitoring, by collecting data about whether media live up to the expectations of democratic theory (as outlined in Tomaz & Trappel, Chapter 1).

In the 2011 edition of *The Media for Democracy Monitor*, Trappel (2011) argues for the need to monitor news media in the context of the complex relationship of interdependency between news media and democratic societies. Because of the fundamental role that news media play in a democracy by bringing new and trustworthy information to citizens and scrutinising the activities of government, the performance of the news media themselves must also be subject to scrutiny. The concept of media accountability systems can be used to analyse media performance in terms of how this scrutiny is institutionalised and to compare accountability mechanisms across media systems. Bertrand (2003) had a rather broad understanding of how the observation of the media should take place and suggested the grouping of MAS according to their format, or – according to who is in charge – into internal, external, and cooperative MAS. Under these categories he listed a huge number of single means for which he had found examples from around the world. Some of them will appear later, when we discuss alternative classifications of MAS.

There has been some discussion about the pertinence of the wording media accountability *systems*. Bertrand (2008: 31) explained in one of his last articles that the MAS acronym was “derived by me from the famous sitcom M*A*S*H” (Mobile Army Surgical Hospital, a television series that aired 1972–1983). In his books and articles, Bertrand enjoyed using asterisks in the same manner

for M*A*S in English, and for M*A*R*S in French (Moyens d'Assurer la Responsabilité Social des medias [means to ensure that media will be socially responsible]). In French, the word “moyens” was handy; in English, it was the word “systems”. Eberwein and colleagues (2011: 8) wrote in a footnote about media accountability systems that Bertrand’s “use of the term ‘system’ seems inappropriate due to lack of theoretical foundation in systems theory”, and that their MediaAcT project (Media Accountability and Transparency in Europe) would refer to “media accountability instruments” instead. However, rather than listing single instruments, as Fengler and colleagues (2014) name them, the interaction between individual measures is more significant than just their aggregation. Bertrand (2000: 154) therefore used the term networks:

Why a network? The reason is that while every existing M*A*S is useful, none is sufficient. None can be expected to produce great direct effects. They supplement each other, as they function at different levels and in different time frames. This supplementation – and, even more, effects that can derive from interaction of different means – make it justifiable to stick with the notion of media accountability systems.

Thomaß (1998) proposes another systematisation of media accountability, focusing on which factors have the most influence on media ethics. In a model that conceives of media ethics as a tiered endeavour, Thomaß (1998: 31) differentiates between the following six levels and considers appropriate means for pursuing media accountability in each one of them:

- at the personal level, the creative possibilities available to both the individual journalist and the individual recipient when participating in media communication;
- at the professional level, the normative demands on journalistic action and their implementation;
- at the organisational level, the actions of individual media companies as beneficiaries of press freedom;
- at the media-political level, the framework within which media systems and media companies are organised;
- at the sociopolitical level, the relationship between these principles and the context of their historical and social origins;
- and at the meta-ethical level, the principles of media ethics.

At the personal level, accountability mechanisms consist of any activity relating to individual morality, from education to internal awareness programmes that, though uncommon, can be found within media organisations.

At the professional level, there can be many instruments that promote media accountability: codes of ethics; press councils enforcing compliance with

codes; regulatory bodies monitoring media performance; reviews of journalism; scholarship summarising the quality and performance of media; and research by media-oriented groups, such as industry bodies or NGOs.

Media organisations themselves can assess and publicise their own accountability, through published corrections or retractions as well as the publication of letters of reply and the maintenance of online comments sections and fora. The publication of adjacent opposing viewpoints on contested public issues can illuminate public debate, while some media outlets use questionnaires on accuracy and fairness to survey how their performance is assessed by the public. Dedicated media sections in print publications or similar programmes on radio and television also scrutinise the performance of media, while critical depictions of the news media in film and television also represent a form of media scrutiny. Some media organisations employ personnel (such as readers, editors, or ombudspersons) who are responsible for the independent assessment of accountability and who monitor content and obligations to audiences, while newsroom employees, tasked with advising on ethics and the inclusion of citizen input at the editorial level, can help maintain accountability.

At the media-political level, media organisations operate within a framework of legal and financial constraints and incentives. Concrete examples of accountability mechanisms at this level include liaison committees set up by media and professional groups with whom they occasionally clash (e.g., the legal profession or the police), the promotion of consumer associations of media users, as well as the funding of non-commercial media research by NGOs.

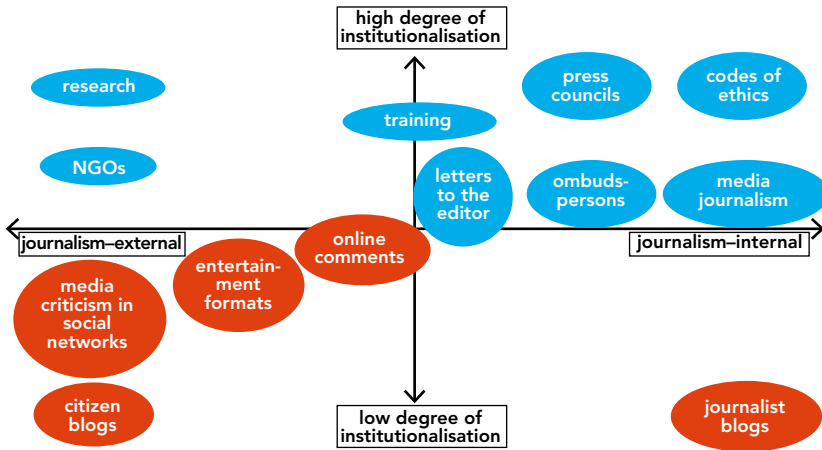
The sociopolitical level denotes specific political cultures that may influence the quality of information policy of officials, or levels of corruption, to determine the extent to which the media are held accountable.

Finally, on the meta-ethical level, scholarly analysis and debate interrogates the criteria, foundations, and justification for media accountability, both generally and in specific contexts.

The project consortium MediaAct (2012) systematises the manifold ways of institutionalising media accountability mechanisms according to a quadrant chart that locates media accountability mechanisms on two axes: the degree of institutionalisation and the location of the mechanism (internal or external to the media). Some of the aforementioned instruments are grouped in this chart (see Figure 11.2).

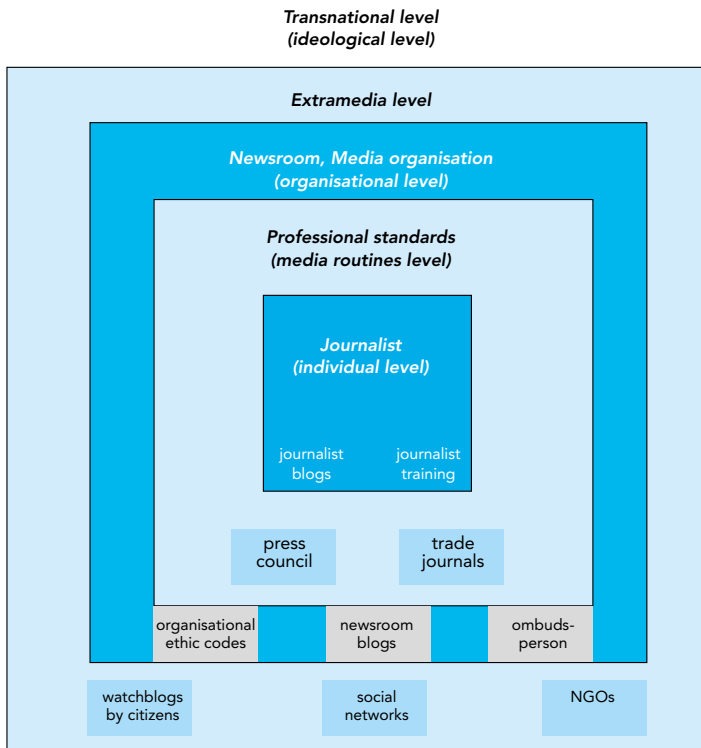
Fengler and colleagues (2014: 10) argue “that media accountability and the maturity of the media’s self-regulation infrastructures are another, so far neglected, key indicator of media freedom and pluralism”. They include in a further developed model (see Figure 11.3), which refers to Shoemaker and Reese (1996), new accountability instruments in online communication, including editorial blogs, websites monitoring news content, webcasts of internal critique sessions or team meetings online with ombudspersons, and criticism of media on Twitter and Facebook.

Figure 11.2 Typology of media accountability instruments



Source: Adapted from MediaAct, 2012

Figure 11.3 Classification of media accountability instruments



Source: Adapted from Fengler et al., 2014

They find that “the core aim of media accountability to stay independent from the state may well be undermined by the media industry serving their own rather than the public’s interests” (Lauk & Denton, 2011, as cited in Fengler et al., 2014: 11), and they indicate that media concentration poses a threat to the optimal functioning of media accountability. For this reason, the MDM project attributes high significance to media concentration (see Trappel & Meier, Chapter 7). Media monitoring as conceptualised in the MDM is an external mechanism, in the conceptualisation of Bertrand (2003), located on the meta-ethical level in the framework of Thomaß (1998), and within the quadrant between high institutionalisation and journalism-external (see Figure 11.2) or on the extra-media level (see Figure 11.3).

There is a great variety of means that in one way or another are associated with MAS. There are several MDM indicators that contain evaluations of accountability means like codes of ethics, media mission statements, self-regulation, press councils, journalistic professionalism, and professional training (Trappel & Tomaz, 2021b, 2021c). This chapter’s focus on the two MDM indicators related to content monitoring instruments (E6) and supervising the watchdog role of journalism (C1) to determine the quality of media accountability in a given media system is a conscious limitation.

The first indicator considered in this chapter is content monitoring instruments (E6) and relates to McQuail’s (2009) facilitative and collaborative roles of the media in democracy. McQuail (2009: 126) substantiates the facilitative role of the media with the prerogative that the media “promote inclusiveness, pluralism, and collective purpose [...] they help to develop a shared moral framework for community and society, rather than just looking after individual rights and interests”. In this conceptualisation, the consideration of minorities and marginalised groups and cultures promotes democratic equality. The collaborative role concerns the role of the media in supporting the state in times of crisis, and reflects media’s responsibility to provide information to the public. To fulfil this mission while staying independent and critical requires a delicate balance between independence and public obligation.

The facilitative and the collaborative roles translate into the dimension of *Equality / Interest Mediation (E)* in the MDM project, because media can fulfil these roles only when they serve society as a whole rather than audiences as customers. Only when news media are trusted across society as a whole can they fulfil their collaborative role. For both the facilitative and collaborative roles, the presence of regular and publicly available monitoring of news media – by independent institutions with a remit to ensure the maintenance of standards relating to content provision and the representation of women and minorities in news – is desirable.

The second indicator about supervising the watchdog role of journalism (C1) makes reference to McQuail’s (2009) monitorial and radical roles of the

media in democracy. While 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 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). We translate these roles into the *Control / Watchdog (C)* dimension and analyse control mechanisms that exercise a watchdog role with regard to the media themselves. In line with the concept of media accountability systems, the question is whether there are any institutional mechanisms in place that hold the news media accountable to standards of performance. This perspective is based on the assumption that external scrutiny leads to overall better performance (Foreman, 2010). It is important that not only the media scrutinise how they themselves perform their democratic duties, but also that news media engage in a wider debate on their role as democracy’s watchdogs. Independent observers play a key role in that process – news monitors, media blogs, professional journals, broadcasters, and newspapers – as does the openness of media to external evaluation.

The two MDM indicators regarding content monitoring instruments (E6) and supervision of the watchdog role of journalism (C1) show whether modern press in a specific country meet the democratic requirements for news media, adhere to key journalistic values, and are held accountable by external and internal monitoring instrument and oversight.

Commercial pressures are exerted on news media across the world, leading to “the ongoing economization of practical news work, manifesting itself in a transnational trend towards media concentration, an aggravated pressure for profits and, ultimately, an erosion of journalism’s financial basis” (Eberwein et al., 2017: 1). Scrutiny of media performance is hence more important than ever.

Comparing results

In the following sections, we group data from the MDM into three categories based on geography: western and northern Europe; central and southern Europe; and states outside mainland Europe and around the world.

Western and northern Europe

We start by looking at MDM countries in western and northern Europe (Austria, Belgium, Denmark, Finland, the Netherlands, Sweden, and Switzerland). These countries are traditionally grouped as part of the democratic corporatist media system in Hallin and Mancini’s (2004) media systems theory and are characterised by the development of an early written press, active state inter-

vention including media subsidies, and a mixture of private and public service television stations.

The content monitoring instruments indicator (E6) received a consistently low score of 1 point. The only exception is the Netherlands, which received 3 points. The stability of the scores over time is also remarkable: Austria, Sweden, and Switzerland have not improved between 2011 and 2021 and continue to receive a score of 1 point (performance is scored from 0 to 3 points for each indicator; see Tomaz & Trappel, Chapter 1, for a detailed explanation).

In 2011, the authors in the Netherlands rated content monitoring instruments as exemplary. Ten years later, the Netherlands still scores high on this indicator. The Dutch Media Authority [Commissariaat voor de Media] publishes an annual Media Monitor, which analyses ownership and pluralism in the news media, relying since 2018 primarily on the *Reuters Institute Digital News Report*. In addition, the Dutch Journalism Fund research and monitor news media, particularly focusing on local and regional news. In addition, the Journalism Fund provides continuously updated information on the Dutch news media under the heading “The State of the News Media” (Vandenberghé & d’Haenens, 2021).

The low scoring of indicator E6 for almost all European small states stems from the fact that, as a rule, there is no systematic external monitoring of content independent of the media industry. However, the low scores do not mean that there is no or little significant control. Media organisations themselves and stakeholders from business and government, including commercial agencies, continuously follow the reporting of leading news media. In other words, there is both corporate and political monitoring. In contrast to the activities of press councils, journalism associations, and academic institutions, such monitoring is not transparent and the activities of the stakeholders seem to have little or no influence on media policy and media practice.

When analysing the indicator for supervising the watchdog role of news media (C1), the focus is less on mechanisms of accountability that are internal to the industry than on external instruments of “control”. Incidentally, internal media control is diminished and distorted by ownership concentration, the frequent lack of institutional media scrutiny, and competition. Indicator C1 thus examines the existence of instruments that monitor the performance of news media. At the same time, it is based on the assumption that these instruments should lead to better media performance in favour of democracy. This can only happen if media workers and newsrooms are willing and able to act as watchdogs in favour of democracy and civil society and, if necessary, to challenge powerful political and economic interests.

In contrast to E6, the assessments for C1 are much higher. With the exception of Belgium and Switzerland, all small states scored 2 points in 2021, as they did ten years previously. The report from Austria mentions professional media

monitoring and the work of the Press Council, only listing internal industry mechanisms (Grünangerl et al., 2021). The report from Belgium mentions the regulatory authority VRM for Flemish audiovisual media and a number of institutions within the industry: the Council for Journalism (Press Council), GEP, and the Journalism Fund. In addition, the public broadcaster VRT and the quality newspaper *De Standaard* are mentioned as having institutionalised ombudspersons (Hendrickx et al., 2021). The report from Switzerland also focuses on the supervisory authority for public broadcasting and on the Press Council (Bonfadelli et al., 2021), while the report from Denmark shows that both broadcasters DR and TV2 are obliged to appoint ombudspersons (Blach-Ørsten et al., 2021). The report from Finland notes that “independent media criticism in Finland is weakly institutionalised” (Ala-Fossi et al., 2021: 181), although the performance of the media is subject to increased public scrutiny and criticism. Like almost all news media in small states, Finnish media enjoy a high degree of autonomy, successfully controlled and managed by the Council for Mass Media (Ala-Fossi et al., 2021). The Report from the Netherlands notes that there is no independent institution systematically monitoring or analysing the journalistic performance of the daily news media, and there is little openness to external evaluation. In general, experts, journalists, and the public trust the Dutch news media to fulfil their role as watchdogs (Vandenberghe & d’Haenens, 2021). The report from Sweden mentions the public broadcaster Sveriges Radio, which produces a daily programme on current affairs, including debates on media performance, and a weekly programme devoted exclusively to media issues. These debates generally involve only media professionals, academics, and other elite groups, rather than the general public (Nord & von Krogh, 2021).

Central and southern Europe

Germany, Greece, Italy, and Portugal are characterised by different media systems, with Germany representing the democratic-corporatist model and the latter three corresponding to the Mediterranean or polarised-pluralist model in Hallin & Mancini’s (2004) media systems theory.

The content monitoring instruments indicator (E6) received a high score in Germany, Italy, and Portugal (though many differences can be found between the organisations carrying out these activities in each of these countries) and a low score in Greece. For Germany and Portugal, the only two countries analysed in the 2011 MDM project, the scores remain stable.

In Germany, various actors across the media industries, in particular television broadcasters and specialised academic institutes or private agencies, sometimes working for the supervising bodies of commercial broadcasting or for broadcasters themselves, provide content monitoring. In addition, independent

monitoring instruments have been established by unions and NGOs. Monitoring activity by the television broadcasting industry includes the production of a report to justify the public value of their content by the public service media (the so-called Public Value Test) (Horz-Ishak & Thomass, 2021).

While in Germany the monitoring and control of the media take place primarily through the media industry and some specialised research institutes, content monitoring in Greece (Papathanassopoulos et al., 2021), Italy (Padovani et al., 2021), and Portugal (Fidalgo, 2021) is primarily carried out by independent media regulatory authorities. The Greek NCRTV, the Italian AGCOM, and the Portuguese ERC have a legal responsibility to monitor radio and television content, assessing compliance with legislative and regulatory requirements and, if necessary, enforcing sanctions. In contrast, in these countries, no institution, independent authority, or public body has similar authority over the press sector. Some other types of organisations with media monitoring capabilities, such as the Italian Osservatorio di Pavia and the Portuguese OBERCOM, comprise independent research institutes working with the main national broadcasters, including public service broadcasters, and with some public and international institutions. In the Greek context, the National Council for Radio and Television (NCRTV) is the monitoring body for broadcasting media. NCRTV is a regulatory institution independent from, but supervised by, the government. Apart from monitoring broadcast content, NCRTV supervises compliance with a journalistic code of ethics including programme variation, plurality of views, and the protection of minors and of human dignity. The NCRTV committee can issue financial or other penalties and, in extreme violations, revoke a media organisation's licence (Papathanassopoulos et al., 2021).

In comparison with independent media regulators in other Mediterranean countries considered in this chapter, and taking into account the different ratings for indicator E6, questions have been raised by academics and journalists about the relevance and effectiveness of NCRTV's content monitoring activities.

Since indicator C1 is primarily concerned with the presence of mechanisms to assess how well the media perform its watchdog role, and given the different media system models to which selected countries correspond, we expected ratings to differ between Germany and the Mediterranean countries. However, both received a medium-high rating. Again, Germany and Portugal received the same scores as in 2011, indicating no improvement in the institutional assessment of the watchdog performance of the news media or by improved capacities of existing accountability mechanisms.

Despite receiving the same rating, Germany has a different media landscape than the Mediterranean countries with the same score. Media performance and content is publicly discussed in the media (for example, in *ZAPP* – the magazine of the regional public television broadcaster NDR – or in *@mediasres* from Deutschlandfunk), and during the last decade, initiatives like online fora and

critical journalism have emerged as additional monitors of the news media's watchdog function. In other words, there is widespread public debate about the role of the news media in Germany, involving actors from across media industries, media practitioners, regional authorities, and press councils. Public discourse on this topic has recently attracted populist and right-wing voices seeking not to constructively criticise and safeguard a pluralistic and democratic media system, but to criticise legacy news media (Horz-Ishak & Thomass, 2021).

In the Mediterranean countries, academic institutions are the most active in public debates about news media performance. For example, in Italy, one of the most relevant discussion fora for journalism and news media, the magazine *Problemi dell'Informazione* [*Information Problems*], has been recently characterised by a growing academic dimension, rising to the first tier in the national assessment of journals in a ranking made by the Italian National Research and University System Evaluation Agency (ANVUR) (Padovani et al., 2021). In Portugal, universities offering journalism courses (and hosting journalism and media research centres) have published, in recent years, extensive research and scholarship dealing with media issues (Fidalgo, 2021).

In accordance with a self-referential model of journalism typical of the polarised-pluralist media system (Hallin & Mancini, 2004), Mediterranean countries have no tradition of monitoring the watchdog function of journalism, and initiatives coming from journalists themselves are quite rare. Among those that do exist, the Italian association Article 21 (the name refers to the article of the Italian Constitution dedicated to freedom of expression) is one of the few organisations engaging in debates about the media's watchdog function in Italy. In addition, the journalistic association Oxygen for Information has established an "Observatory" for the monitoring of intimidations, threats, abuses, and undue pressures on journalists, as well as promoting the right of Italian citizens to be informed (Ossigeno per l'informazione, n.d.; Padovani et al., 2021). Another exception to the lack of monitoring is in Portugal, where the Portuguese Journalists' Club produces the bi-monthly magazine *Jornalismo e Jornalistas* focusing on the performance of the news media (Fidalgo, 2021).

Although the scores for indicator C1 in the four countries (Germany, Greece, Italy, and Portugal) is the same, there are significant differences between the media systems. In Germany, public debate about the role and performance of the news media is vivid, and its medium rating is based on the negative impact of interference by populist political movements. On the contrary, the medium rating assigned to this indicator in Greece, Italy, and Portugal is based on the demarcated reach of the discussion about the performance of news media, restricted to narrow academic channels rather than widely diffused across different groups in society.

Media accountability beyond mainland Europe

A number of country cases from beyond mainland Europe offer a range of media accountability mechanisms, with some similarities and many differences. These cases include three majority-English-language media systems that broadly correspond to Hallin and Mancini's (2004) North Atlantic model of media systems, albeit with significant public service broadcasting components (Australia, Canada, and the United Kingdom); two Asian media systems (Hong Kong and South Korea); a Nordic media system (Iceland); and a large South American media system (Chile). As such, a diverse selection of cases allows for an interesting series of comparisons between distinct media systems with tailored regulatory and accountability structures facing similar financial and technological pressures.

Five of the seven cases (Canada, Chile, Hong Kong, Iceland, and South Korea) are new additions to the MDM research project, leaving no scope for a trend analysis. In the cases of Australia and the United Kingdom, there have been some change in the scores for indicators E6 and C1, with the United Kingdom seeing a reduction in the scoring of its content monitoring instruments but an improvement in the scoring of the country's oversight of news media performance. Australia, in contrast, sees no change in scoring for content monitoring and a reduction in scoring for media performance oversight.

Despite the differences in the British and Australian media systems, the similarities allow for a comparison. Almost all cases score 1 point for indicator E6 – content monitoring instruments – signifying that content monitoring was present in the media system, but performed irregularly, by one or more organisations. This score was registered for systems as disparate as Chile, Hong Kong, and Iceland. The only outliers in the group were Australia with 2 points and Canada with 0. As the analysis below illustrates, the low scores are largely due to the absence of continuous external monitoring. Most countries have a significant difference between the extent of monitoring for broadcasting and for legacy print media. The picture is more mixed for indicator C1 – supervising the watchdog – with South Korea and the United Kingdom scoring the maximum of 3 points – although with substantially different news media monitoring regimes – Australia, Canada, and Chile scoring 2, and Hong Kong and Iceland scoring just 1.

For the content monitoring instruments indicator (E6), the best performing media system was Australia, scoring 2 points due to the operation of monitoring functions by the Australian Communications and Media Authority (ACMA) – which has jurisdiction over broadcasting – and by the Australian Press Council. There is no change from the 2011 MDM project, and the reasoning for the score is the same (Dwyer et al., 2021).

Canada also stands out due to its score of 0 points for indicator E6. This score is registered because of the absence of external monitoring of the media. While there are some industry-operated accountability mechanisms, such as the

ombudsperson at CBC/Radio-Canada, the NewsMedia Council, and Conseil de Press du Québec, these are neither separate from the industry, nor do they provide systematic monitoring of media content (Taylor & DeCillia, 2021).

In the remaining cases, there is a range of justifications for a recorded score of 1 point for indicator E6. Often, the role of a broadcast regulator with some statutory underpinning is significant, as in the case of the United Kingdom (through the Office of Communications, Ofcom; Moore & Ramsay, 2021) and in Hong Kong (Lo & Wong, 2021) and South Korea (Kim & Lee, 2021). In these cases, a body with significant power to collect information to assist in its regulatory duties also releases information on certain aspects of media performance, including the adherence of media output to predetermined criteria, with periodic reports and data releases serving as content monitoring by proxy. In Chile, there are multiple external bodies which respond to media output, such as the National Council for Television and the Ethics Council for the Media. However, these organisations tend to deal with content on a case-by-case basis, and no continuous monitoring of media content is available (Núñez-Mussa, 2021). Iceland also does not benefit from continuous content monitoring for the benefit of the public; instead, media content is gathered by at least one private enterprise for commercial purposes, with occasional releases of information in collaboration with academic institutions (Jóhannsdóttir, 2021).

Though none of the selected media systems are served by continuous, external, and publicly available media content monitoring, they have a range of mechanisms in place for scrutinising media content. The partial exception is Canada, which at a minimum is subject to academic research covering aspects of the media's behaviour and output (Taylor & DeCillia, 2021). Periodic academic research on media content was cited as a mechanism by most of the country reports in this group, notably Chile, Iceland, and the United Kingdom (such research is not available in Hong Kong). Alongside academic research, some countries reported networks of NGOs providing periodic or sporadic analysis of media content. The Citizens Coalition for Democratic Media in South Korea conducts content monitoring of print and broadcast media as well as YouTube (Kim & Lee, 2021). The United Kingdom has various NGOs, such as the Media Reform Coalition and the Media Standards Trust, which generate occasional in-depth studies of the news media and news content (Moore & Ramsay, 2021).

Six of the seven media systems outside the European context (excluding Canada) saw some role for statutory broadcast regulators in regularly producing research on the basis of collected media content; ACMA in Australia and Ofcom in the United Kingdom are relatively prolific in releasing statistics or narrative reports using information derived from media content. Similarly, some governmental or statutory bodies release statistical data on the media for public consumption, such as Ofcom in the United Kingdom, Statistics Iceland, the National Council of Television in Chile, and the Communications Standards

Commission in South Korea. Some public service broadcasters, such as RÚV in Iceland and the BBC in the United Kingdom, have internal oversight functions that rely on self-monitoring of content. Those countries with significant self-regulatory systems (Australia, Chile, South Korea, and the United Kingdom) also see the collection of information on media content as a way to inform the responses of regulators, although this falls short of formal, public, and systematic media content monitoring.

The sampled media systems show a quite mixed range of scores for the indicator for supervising the watchdog role (C1), relating to the extent to which the watchdog function of journalism is subject to scrutiny and reinforcement. Two of the selected cases (South Korea and the United Kingdom) attain the maximum score of 3 points, indicating that there is a permanent, ongoing debate about the news media's watchdog role. For interesting reasons discussed below, these maximum scores are achieved by significantly different means. Three countries (Australia, Canada, and Chile) received 2 points, indicating that media performance of the watchdog function is subject to public discussion in the media and online, with some degree of self-coverage by the news media as a whole. The remaining systems (Hong Kong and Iceland) received a score of 1 point, denoting that the watchdog function of news is debated only on occasion, and often in the context of partisan or vested interests.

The highest-scoring systems (South Korea and the United Kingdom) are characterised by a situation where the performance of the news media is a topic of continuous and open public discussion. In South Korea, historical ties between the news media and authoritarian regimes have resulted in a culture of close scrutiny of how well journalistic organisations perform the watchdog role. The interest of ensuring that journalism serves to uphold rather than undermine democratic values has brought about a range of official bodies tasked with monitoring the performance of the news media. This includes the Korea Communications Commission for broadcasting, and for legacy print and online news media, the Press Ethics Commission, the Internet Newspaper Committee, and the Press Arbitration Commission. These official bodies are supplemented by a range of NGOs devoted to monitoring and evaluating news media, such as the Coalition for Democratic Media and the National Union of Media Workers. In addition, there is some tradition of periodicals providing dedicated coverage of the operation of the media, for example, *Media Today* (Kim & Lee, 2021).

In the United Kingdom, the various entities involved in monitoring the watchdog function of journalism have developed partly due to journalistic tradition, particularly in the case of public service broadcasting, and partly due to high-profile examples of collapsed press ethics. Broadcast journalism in the United Kingdom is subject to strict regulation by Ofcom, while the press regulatory landscape is subject to self-regulation and various internal accountability mechanisms in certain newspapers. There is also a tradition of self-reflection

by news media, with the BBC offering *Newswatch* on the BBC News Channel, *The Media Show* on Radio 4, and print publications such as *Private Eye* and *The Guardian*, which contain regular critical coverage of British journalism. As in South Korea, there is a strong tradition of NGOs monitoring journalism, including the National Union of Journalists, and academic research centres that regularly produce studies of media performance. The United Kingdom is also the only case where there has been a change in the score for C1 between the 2011 and 2021 MDM research projects, with a previous score of 2 points rising to 3. This can be accounted for by improvements in press self-regulation, as the troubled Press Complaints Commission was replaced in 2014 by a combination of a new industry-led regulator and a new independent regulator covering a wide range of smaller independent and digital-first publications, as well as some significant titles (Moore & Ramsay, 2021).

Of the media systems scoring 2 for C1, Australia is the only one with an unchanged score from 2011. A number of independent observing entities are listed in the Australia country report, including ACMA (overseeing broadcast standards) and the Australian Press Council (overseeing print). However, interview data suggest that these bodies are limited in their capacity to intervene, making the enforcement of standards unclear (Dwyer et al., 2021). Canada, too, has several significant bodies with some oversight of news media performance, such as the Canadian Broadcast Standards Council and the National NewsMedia Council, which oversee broadcast and print, respectively. Some major news organisations, such as the CBC/Radio-Canada and the Globe and Mail, have an internal ombudsperson or readers' editors to maintain standards (Taylor & DeCillia, 2021). In Chile, watchdog monitoring is best served by extensive work by academic institutions as well as publications and reports by the National Press Association and the National Council for Television (Núñez-Mussa, 2021).

Hong Kong scored a comparatively poor 1 point for C1 due to the lack of institutionalised mechanisms for watchdog monitoring. While there is a significant debate, including in public, on the role of the media – and universities, bloggers, and professional bodies scrutinise the news media – there is a lack of formal, systematic coverage of the performance of leading news media outlets (Lo & Wong, 2021). Iceland also scored 1 point, due to the episodic nature of self-observation by the media and a scarce public debate about the role of journalism. Debates usually occur in response to specific events or issues, and the main institutional mechanism for media oversight, the Media Commission, has limited scope and fails to command the full confidence of the main journalism union, the NUIJ (Jóhannsdóttir et al., 2021).

The higher scores for the selected media systems for indicator C1, in comparison with indicator E6, connote a relatively wide range of organisations that play some role in monitoring the watchdog role of the press. Broadcast regulators

play a varying role – Ofcom in the United Kingdom, ACMA in Australia, and the South Korean Communications Commission play a significant role, while the Icelandic Media Commission and Hong Kong Communication Authority have a more modest impact. In some cases, broadcasters themselves offer programming dedicated to evaluating media performance according to journalistic standards, such as the BBC's *Newswatch* (the United Kingdom) and ABC's *Media Watch* (Australia). Self-regulatory bodies tasked with maintaining standards are very active in Australia, Canada, South Korea, and the United Kingdom.

Internal accountability is ensured through mandates, which include journalistic standards in some cases: the Canadian CBC (Radio-Canada in Quebec) has an ombudsperson for this purpose, and newspapers in Canada (Taylor & DeCillia, 2021) and the United Kingdom (Moore & Ramsay, 2021) operate complaint-handling mechanisms. Outside the media outlets themselves, academia often takes an active role in monitoring media performance, and the role of NGOs focusing on media standards is acknowledged in most countries. The role of journalists' unions in Iceland, South Korea, and the United Kingdom is also noted as having a positive effect on watchdog monitoring.

Conclusion

In this chapter, we considered the MDM project's indicators E6 and C1 to be important determinants of the quality of media accountability in a given country. The first indicator, E6, refers to existence of content monitoring instruments. This indicator relates to the news media's facilitative role as the arena of a democratic debate that promotes inclusiveness and pluralism. To be successful in this role, media requires the presence of regular and publicly available monitoring of the news media by independent institutions with a mandate to ensure the maintenance of standards relating to content provision and the representation of women and minorities in and through the news. The second indicator, C1, covers the mechanisms in place to ensure that the news media fulfil their role as the watchdog of democracy. In line with the concept of media accountability systems, this chapter investigated whether there are any institutional mechanisms in place that hold the news media accountable.

We grouped countries into three geographical clusters. In relation to indicator E6, we found that most of the western and northern states have received a low score for this indicator (1 point). In the case of Austria, Sweden, and Switzerland, who also participated in the 2011 MDM project, the 2021 scores show no improvement for this indicator. New countries joining the MDM project, such as Denmark, receive a low score. The Netherlands, however, stands out with various institutions monitoring media content. In the group of central and southern European countries, Germany, Italy, and Portugal all have various in-

stitutions and organisations that carry out media monitoring, whereas the same does not apply to Greece. In Germany, monitoring is provided by broadcasters, universities, and private agencies, whereas monitoring in the southern European countries is carried out by independent media regulatory authorities. In the countries beyond mainland Europe, differences are bigger. Despite the many different countries grouped in this section, the MDM data reveals a common low score for indicator E6. All in all, the chapter highlights that except for a few countries, most notably Germany and the Netherlands, content monitoring is done irregularly, and – in most cases – by a varying number of actors.

Regarding the second indicator, C1, the chapter shows that across the three groups of countries, scores are generally higher than for indicator E6. Hence, there is a relatively wide range of organisations in all countries that – in one way or another – participate in monitoring the news media’s watchdog role. In some countries, monitoring is carried out by media ombudspersons, for instance, in Denmark and in Quebec, Canada. In other countries, the monitoring is carried out by broadcast regulators, such as Ofcom in the United Kingdom or ACMA in Australia. In other countries, yet again, the scrutiny of the news media is mostly left to different types of programmes that regularly investigate and discuss news, such as *Zapp* in Germany and *Newswatch* in the United Kingdom. In Italy, this debate is most covered by the magazine *Problemi dell’Informazione*.

In sum, we find that content monitoring (E6) is weak in many countries, while most countries have a better monitoring of the media’s watchdog role (C1). While there are clear differences between the two indicators, it is interesting that these two means of holding media accountable do not seem to exist in all of the participating countries. This is especially interesting to observe in the countries who participated in both the 2011 and 2021 MDM research projects. Despite a worldwide and vitalised debate on news media and trust and accountability, very little has changed regarding systematic media monitoring in the ten years between the two MDM projects.

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