

THE MISSING LINK: ONLINE MEDIA ACCOUNTABILITY PRACTICES AND THEIR IMPLICATIONS FOR EUROPEAN MEDIA POLICY

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Can online media criticism form a robust basis for media accountability? The authors report that the perceived impact of such criticism illustrates notable national differences. Based on a survey of journalists from twelve European and two Arab countries, they find online participatory accountability models to be least influential in countries with well-developed media accountability practices, and most valued in countries without a long tradition of media self-regulation. However, they find that the former are gradually losing control of such practices, and suggest that the practices be institutionalized under the form of “regulated self-regulation” to provide a clear framework.

INTRODUCTION

In 2009, the Pew Research Center for the People and the Press published a study entitled “Press Accuracy Hits Two Decade Low” which revealed that in the United States, “the public’s assessment of the accuracy of news stories is now at its lowest level.”¹ But the groundbreaking inaccuracy rate was not the only worrisome result of the study. The authors also found that American citizens generally think that reporting is politically biased and no longer independent from political pressures as well as economic pressures. As a consequence, the overall trust in the news media has decreased. Yet, news media and journalism are often claimed to be essential for a sound democracy, because they offer orientation in a complex world, and they are significant for information gathering, monitoring, and holding the powerful to account.² In other words, journalism, as a social system, enables a society to observe and to synchronize itself, “as it provides the public independently and periodically with information and issues that are considered newsworthy, relevant, and fact-based.”³

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¹ Pew Research Center for the People and the Press, “Press Accuracy Rating Hits Two Decade Low – Public Evaluations of the News Media: 1985-2009,” report, Sept. 13, 2009, accessed Aug. 11, 2014, <http://www.people-press.org/2009/09/13/press-accuracy-rating-hits-two-decade-low/>.

² Natalie Fenton, “Drowning or Waving? New Media, Journalism and Democracy,” in *New Media, Old News: Journalism and Democracy in the Digital Age*, ed. Natalie Fenton (London: Sage Publications Ltd., 2010), 3-16.

³ Siegfried Weischenberg, Maja Malik, and Armin Scholl, *Die Souffleure der Mediengesellschaft: Report über die Journalisten in Deutschland* (Konstanz, Germany: UVK, 2006). See also Alexander Görke and Armin Scholl, “Niklas Luhmann’s Theory of Social Systems and Journalism Research,” *Journalism Studies* 7 (2006): 644-655.

However, technological innovations as well as a general economic downturn are disrupting journalism and undermining the commercial basis of news organizations. Not only are advertising income and, particularly in the newspaper industry, circulation numbers continuously falling, but the fact that the Internet allows many new voices to enter the public sphere is challenging the gatekeeping function of the traditional mass media.⁴ These developments undermine the traditional and advertising-based business models of media organizations, causing the established journalistic ecosystem to slowly disintegrate or, as a reaction, to adapt to the requests of the advertisers,⁵ with the outcome being what British journalist Nick Davies calls “churnalism.”⁶

Due to these changes, the media regulation framework is facing various challenges, increasing the “policy makers’ demand for insights on how to reform media regulation.”⁷ The ongoing discussion in Britain about press regulation proposals in the aftermath of the *News of the World* phone hacking scandal and the subsequent Leveson Inquiry is proof of the difficulties of establishing effective media regulation.

Regulatory agendas are noticeably lagging behind actual social, technological, and economic developments. Besides, traditional organs of media accountability such as press councils seem to lose legitimacy. They appear to be outdated institutions, whereas web-based accountability practices, particularly those instruments that enable the participation of the recipients (e.g. media watchblogs or platforms like Facebook or Twitter), gain more and more attention. However, while the audience is becoming gradually more aware of online media accountability practices, the professional attitudes of *journalists* towards transparency and responsiveness still range from ambiguous to skeptical.⁸

This raises the question of how effective such web-based media accountability practices actually are when it comes to media self-regulation and what role they should play in shaping a European media policy. This article seeks to shed light on the perception and the impact of online and participatory media accountability practices compared to traditional regulatory approaches in different journalistic cultures. It focuses on the question of whether online accountability systems are a true alternative in media self-regulation and identifies central regulatory governance challenges in Europe and for European Union media policymakers. This article therefore aims to close some gaps with regard to accountability practices in the online realm, given that so far they have not been studied systematically.

⁴ George Brock, *Out of Print: Newspapers, Journalism and the Business of News in the Digital Age* (London: Kogan Page, 2013).

⁵ Colin Porlezza, *Gefährdete journalistische Unabhängigkeit* (Konstanz, Germany: UVK, 2014).

⁶ Nick Davies, *Flat Earth News: An Award-Winning Reporter Exposes Falsehood, Distortion and Propaganda in the Global Media* (London: Chatto & Windus, 2008), 59.

⁷ Manuel Puppis and Matthias Künzler, “Reforming or Conforming? The Contribution of Communication Science to Media Policy in Switzerland,” paper presented at the International Conference on Strategies for Media Reform, Goldsmiths University of London, June 17, 2013, accessed Aug. 11, 2014, <http://strategiesformediareform.com/wp-content/uploads/2013/01/Reforming-or-Conforming-The-Contribution-of-Communication-Science-to-Media-Policy-in-Switzerland-Abstract.pdf> (abstract only); see also Evangelia Psychogiopoulou and Dia Anagnostou, “Recasting the Contours of Media Policy in a Political Context: An Introduction,” in *Understanding Media Policies: A European Perspective*, ed. Evangelia Psychogiopoulou (Basingstoke, UK: Palgrave Macmillan, 2012), 1-20.

⁸ Heikki Heikkilä, David Domingo, Judith Pies, Michal Glowacki, Michal Kuś, and Olivier Baisnée, “Media Accountability Goes Online: A Transnational Study on Emerging Practices and Innovations,” Working Paper No. 14/2012, MediaAcT, Jan. 2012, accessed Aug. 11, 2014, http://www.mediaact.eu/fileadmin/user_upload/WP4_Outcomes/WP4_Report.pdf.

In order to do so, it presents empirical findings of the EU-funded research project “Media Accountability and Transparency in Europe” (MediaAcT) which compared media accountability practices in twelve European and two Arab countries, by trying to identify different strategies of media self-regulation and accountability and their (expected) effects on journalistic behavior in varying journalism cultures.⁹

BASIC CONCEPTS: MEDIA SELF-REGULATION, ACCOUNTABILITY, AND TRANSPARENCY

During the last few decades, most Western democracies have developed a complex legal framework that is supposed to safeguard a free and pluralistic media landscape.¹⁰ However, while media laws usually regulate the structures of media practices in the respective areas of application, journalistic content is protected almost entirely from state interference.¹¹ Therefore, it is even more important that journalists treat their various stakeholders responsibly, so that they can fulfil their manifold social functions without external control.¹²

Media researchers have used a most diverse terminology to describe the processes that journalistic actors – i.e. all of those professionals that earn a living with the collection, description, and publication of topical, fact-oriented, and relevant information in journalistic media¹³ – trigger in order to ensure responsible behavior. The terms *media self-control*¹⁴ or *media self-regulation*¹⁵ are commonly used to denote those practices that members of the journalistic profession initiate to guarantee the quality of their coverage. The broader concept of *media accountability*, on the other hand, adds “any non-State means of making media responsible towards the public”¹⁶ – and thus not only recognizes journalists, but also

⁹ Further information on the concept and the findings of the MediaAcT study are available on the project website at <http://www.mediaact.eu>. For two expanded studies that serve as a starting point for the research in this article, see Tobias Eberwein, Susanne Fengler, Epp Lauk, and Tanja Leppik-Bork, eds., *Mapping Media Accountability – In Europe and Beyond* (Köln, Germany: Herbert von Halem Verlag, 2011); Susanne Fengler, Tobias Eberwein, Gianpietro Mazzoleni, Colin Porlezza, and Stephan Russ-Mohl, eds., *Journalists and Media Accountability: An International Study of News People in the Digital Age* (New York: Peter Lang, 2014). See also Susanne Fengler, Tobias Eberwein, Matthias Karmasin, and Stephan Russ-Mohl, “Grenzenlose Journalismusethik? Medienselbstkontrolle und Media Accountability im internationalen Vergleich,” in *Von der Gutenberg-Galaxis zur Google-Galaxis*, ed. Birgit Stark, Oliver Quiring, and Nikolaus Jakob (Konstanz, Germany: UVK, 2014), 271-288. Disclaimer: Both authors of this article were actively involved in the MediaAcT research project.

¹⁰ Evangelia Psychogiopoulou, ed., *Understanding Media Policies: A European Perspective* (Basingstoke, UK: Palgrave Macmillan, 2012).

¹¹ Manuel Puppis, *Organisationen der Medienselbstregulierung: Europäische Presseräte im Vergleich* (Köln, Germany: Herbert von Halem Verlag, 2009), 57, 61.

¹² Denis McQuail, *Journalism and Society* (London: Sage Publications Ltd, 2013).

¹³ Weischenberg, Malik, and Scholl, 227.

¹⁴ See for example Achim Baum, Wolfgang R. Langenbucher, Horst Pöttker, and Christian Schicha, eds. *Handbuch Medienselbstkontrolle* (Wiesbaden, Germany: VS Verlag für Sozialwissenschaften, 2005); Ingrid Stapf, *Medien-Selbstkontrolle. Ethik und Institutionalisierung* (Konstanz, Germany: UVK, 2006).

¹⁵ See for example Puppis, *Organisationen der Medienselbstregulierung*.

¹⁶ Claude-Jean Bertrand, *Media Ethics and Accountability Systems* (London: Transaction Publishers, 2000), 108.

media users and other stakeholders of the media, as relevant actors in the process of journalistic quality management.

In recent years, the concept of *media transparency*¹⁷ has gained increasing scholarly attention. It focuses on a variety of instruments, particularly on the level of the media organization, that can contribute to preserving or regaining trust in journalism by providing information about newsroom processes and the participating actors (with the help of, for example, online profiles of journalists, public mission statements, links to original sources, newsroom blogs, etc.). Partly, the concepts of media accountability and media transparency seem to overlap. A review of the existing literature in the field, however, shows that they represent diverging strands of research that build on different theoretical backgrounds and pursue different research goals.¹⁸

In the MediaAcT project, we have combined the perspectives of media accountability and transparency, because they promise to provide a most comprehensive picture of the potential benefits and problems of journalistic quality management under the conditions of digital communication.¹⁹ In this approach, media accountability instruments (MAIs) are not only traditional institutions within the journalistic profession (such as press and media councils, codes of ethics, ombudspersons, or media journalism), but also external institutions like media research centers, NGOs, or viewer/user associations of any kind. If (non-journalistic) actors from civil society contribute to the aim of governing media performance, their commitment is often referred to as *participatory media regulation*.²⁰ The participatory approach to media regulation and accountability has gained considerable prominence in recent years, with the breakthrough of digital communications and its potential communicative benefits.

Consequently, in addition to the aforementioned institutionalized MAIs, we also analyze various innovative instruments of media observation that are currently flourishing on the Internet, both inside and outside of the journalistic profession – e.g. journalist and citizen blogs, cyber-ombudspersons, or media criticism via Twitter and Facebook. First empirical studies²¹ have shown that these online participatory MAIs in particular may be a valuable asset to correct some of the well-documented deficits of traditional media self-regulation, although their number is (still) small and their scope limited. However, as qualitative studies show, there are also instances in which media blogs and media criticism via social networks can create questionable effects (such as flaming or hate speech), which

¹⁷ See for example Klaus Meier and Julius Reimer, “Transparenz im Journalismus. Instrumente, Konfliktpotentiale, Wirkung,” *Publizistik* 56 (2011): 133-135.

¹⁸ For a comprehensive literature review, see Susanne Fengler, Tobias Eberwein, and Tanja Leppik-Bork, “Mapping Media Accountability – in Europe and Beyond,” in *Mapping Media Accountability – in Europe and Beyond*, ed. Tobias Eberwein, Susanne Fengler, Epp Lauk, and Tanja Leppik-Bork (Köln: Herbert von Halem Verlag, 2011), 7-20.

¹⁹ Susanne Fengler, “From Media Self-Regulation to ‘Crowd-Criticism’: Media Accountability in the Digital Age,” *Central European Journal of Communication* 2 (2012): 175-189.

²⁰ Tobias Eberwein, Tanja Leppik-Bork, and Julia Lönnendonker, “Participatory Media Regulation: International Perspectives on the Structural Deficits of Media Self-Regulation and the Potentials of Web-Based Accountability Processes,” in *Media Structures and Media Performance*, ed. Manuel Puppis, Matthias Künzler, and Otfried Jarren (Wien, Austria: Verlag der Österreichischen Akademie der Wissenschaften, 2013), 135-158.

²¹ See for example Heikkilä, Domingo, Pies, Glowacki, Kuś, and Baisnée.

are counterproductive to their original aim of contributing to journalistic quality management.²² Such observations make it necessary to cast a closer look at the effects of online MAIs, which is one of the key aims of this article.

Otherwise, research on the effectiveness of different instruments of media accountability and transparency in the international context is still in a fledgling stage. For example, after an analysis of the US media sector, Campbell concluded that the examples of self-regulation she studied “do not provide a great deal of support for the claimed advantages of self-regulation.”²³ European scholars come to a similarly skeptical conclusion.²⁴ Qualitative studies with media journalists in the US and European countries have shown that even journalists who cover media issues for quality outlets shy away from criticizing their colleagues and supervisors.²⁵ Studies dealing with ombudsmen reveal similar self-imposed restrictions.²⁶ Content analyses come to the conclusion that media outlets frequently use media journalism – in the sense of journalistic reporting about journalism and the media – to voice their specific media policy interests.²⁷

However, systematic comparative analyses of the impact of media accountability are still missing. How effective are the various non-state means of making the media responsible as opposed to state-controlled instruments of media regulation? Are participatory media accountability processes on the Internet a serious alternative to conventional regulatory approaches? How does the situation differ in the journalism cultures within Europe and beyond? And what are the possible implications for European media policymakers? These are some of the research questions that have been tackled by the multinational MediaAcT research consortium, which constitutes the point of origin for the findings presented in this article.

MEDIA ACCOUNTABILITY AND TRANSPARENCY IN EUROPE – A COMPARATIVE RESEARCH CONCEPT

With the help of a comparative survey among journalists in 14 different countries, the MediaAcT project wanted to find out how journalistic attitudes towards media self-regulation and accountability

²² Huub Evers and Tobias Eberwein, “Can a Million Toothless Tigers Make a Difference? Potentials and Pitfalls of Web-Based Accountability Processes in German Journalism,” Working Paper No. 4/2011, MediaAcT, June 2011, accessed Aug. 11, 2014, http://www.mediaact.eu/fileadmin/user_upload/WP4/WP4_Germany.pdf.

²³ Angela J. Campbell, “Self-Regulation and the Media,” *Federal Communications Law Journal* 51 (1999): 755.

²⁴ Horst Pöttker, “Balance of Powers: Medienräte zwischen Selbst- und Fremdkontrolle,” *Communicatio Socialis* 43 (2010): 282-298.

²⁵ Susanne Fengler, “Holding the News Media Accountable. A Study of Media Reporters and Media Critics in the United States,” *Journalism & Mass Communication Quarterly* 80 (2003): 818-832; Colin Porlezza, “Bashing the Competition, Indulging in Self-Adulation,” in *Media Journalism in the Attention Cycle: Problems, Perspectives, Visions*, ed. Silvia Egli von Matt, Cristina Elia, and Stephan Russ-Mohl (Lugano, Switzerland: Giampiero Casagrande, 2006), 47-52.

²⁶ Huub Evers, Harmen Groenhart, and Jan van Groesen, eds., *The Newsombudsman: Watchdog or Decoy?* (Diemen, Netherlands: AMB Publishing, 2010).

²⁷ Stefan Weinacht, *Medienmarketing im Redaktionellen. Medienthematisierungen als Instrument der Unternehmenskommunikation von Medienorganisationen* (Baden-Baden, Germany: Nomos, 2009).

resemble or differ from each other in varying media systems and journalism cultures.²⁸ We examined Western media systems in line with the classical typology of Hallin and Mancini, who differentiate between “liberal” (in our study: the United Kingdom), “democratic corporatist” (Finland, the Netherlands, Germany, Austria, Switzerland), and “polarised pluralist” (Italy, France, Spain) system types.²⁹ Additionally, and in contrast to Hallin and Mancini, we included three Central and Eastern European media systems (Estonia, Poland, Romania) in different phases of political transformation. Moreover, two states from the Arab world, Jordan and Tunisia, moved into the focus of our study. Those countries have had only limited experience with press freedom and media self-regulation, thus constituting interesting objects of comparison which could be contrasted with current developments on the European continent. This selection constitutes a so-called “most different systems design”³⁰ which aims to compare populations as diverse as possible in order to generate universally valid conclusions – in our case, different strategies of media self-regulation and accountability and their (expected) effects on journalistic behavior in varying journalism cultures.

All in all, from May 2011 to March 2012, we questioned 1,762 journalists from the project’s 14 countries about their perspectives on and assessments of media accountability. As a starting point, the project teams in each country of analysis designed a stratified national sample that (depending on the availability of reliable statistical data) should represent the basic populations of journalistic actors as precisely as possible. The stratification step took into account nine different media segments: daily newspapers, weekly newspapers, magazines, public service radio, private commercial radio, public service television, private commercial television, online news media, and news agencies. A second step in the sampling process distinguished between five different hierarchical positions in the newsroom: editor-in-chief, leading editor, reporter, freelancer, and trainee. This procedure was meant to do justice to the heterogeneity of the basic populations of journalists in the countries studied.

In order to calculate the sample sizes for each of the participating countries, it was necessary to determine the total sample size first. For this, we evaluated the response behavior in the pre-tests and defined the maximally estimated standard error as 0.05. With these data, it was possible to calculate a minimum total sample size of 1,762, which was distributed proportionally among the participating countries according to their respective basic populations. In order to be able to evaluate the data, the minimum individual sample size was fixed at 100; the biggest sample sizes, in those countries with larger basic populations, were as high as 237.

To reach these target values, the national project teams investigated the contact data of randomly chosen journalists – mostly with the help of disposable address databases (like the Austrian “Journalisten-Index” or the German “Zimpel”) – and invited these journalists via e-mail to participate

²⁸ For other findings from the project, see Tobias Eberwein, Susanne Fengler, Susan Philipp, and Maryam Ille, “Counting Media Accountability – The Concept and Methodology of the MediaAcT Survey,” in *Journalists and Media Accountability: An International Study of News People in the Digital Age*, ed. Susanne Fengler, Tobias Eberwein, Gianpietro Mazzoleni, Colin Porlezza, and Stephan Russ-Mohl (New York: Peter Lang, 2014), 65-79.

²⁹ Daniel C. Hallin and Paolo Mancini, *Comparing Media Systems: Three Models of Media and Politics* (Cambridge, UK: Cambridge University Press, 2004).

³⁰ Adam Przeworski and Henry J. Teune, *The Logic of Comparative Social Inquiry* (New York: Wiley, 1970).

in the survey. This procedure was repeated as long as it took to recruit national samples that completely matched the respective quota criteria. Altogether, almost 8,000 contacts were necessary. The average response rate of the MediaAcT survey was 23%, which is more or less in line with the turnout that can generally be expected in web-based surveys among well-researched populations like journalists.³¹

The standardized survey was conducted online with the help of EFS Survey (Unipark) software, which allowed for a flexible and cost-efficient configuration and distribution of the questionnaire as well as a convenient graphic user interface to stimulate participation in the best possible way. In addition to the relevant social statistical data, the participants were questioned about their individual experiences with (traditional and web-based) instruments of media self-regulation, their evaluation of the culture of criticism in journalistic newsrooms, the influence of media managers and other professional actors on processes of media accountability, and the societal relevance of the topic. The questionnaire,³² consisting of 25 sub-questions, reprocessed the results of a comprehensive desk study on the status quo of media accountability in Europe and the Arab world,³³ as well as a qualitative pre-study for which 98 international experts were interviewed about the prevalence and possibilities of web-based media accountability processes.³⁴ Therewith, the survey by the MediaAcT consortium may be classified as the first comparative communicator study that has systematically and extensively collected data about the attitudes towards and the potential effectiveness of different instruments of media accountability.

It goes without saying that comparative research projects of this scope, irrespective of the given thematic focus, face various challenges that are often discussed as typical “problems of equivalence.”³⁵ As van de Vijver and Leung have pointed out, there are manifold levels of equivalence that need to be tested if comparative research is to produce valid and reliable results: construct equivalence (the basic concepts of the study must be understood in all of the analyzed populations), method equivalence (the methods of data collection must be identical in the countries studied), administration equivalence (the realization of data collection must be consistent), instrument equivalence (the survey items in multinational questionnaires must be congruent), and equivalence of the analyzed populations, samples, and periods of inquiry.³⁶

³¹ Duncan D. Nulty, “The Adequacy of Response Rates to Online and Paper Surveys: What Can Be Done?” *Assessment & Evaluation in Higher Education* 33 (2008): 301-314.

³² The complete questionnaire is available in Fengler, Eberwein, Mazzoleni, Porlezza, and Russ-Mohl, *Journalists and Media Accountability: An International Study of News People in the Digital Age*, 291-298. For this article, we have concentrated on the analysis of three questions that offer insights with regard to our specific research questions (see below).

³³ Eberwein, Fengler, Lauk, and Leppik-Bork.

³⁴ Heikkilä, Domingo, Pies, Glowacki, Kuś, and Baisnée.

³⁵ See for example Thomas Hanitzsch, “Problemzonen kulturvergleichender Kommunikatorforschung: Methodologische Fallstudien,” in *Medien & Kommunikationsforschung im Vergleich: Grundlagen, Gegenstandsbereiche, Verfahrensweisen*, ed. Gabriele Melischek, Josef Seethaler, and Jürgen Wilke (Wiesbaden, Germany: VS Verlag für Sozialwissenschaften, 2008), 253-270; Werner Wirth and Steffen Kolb, “Äquivalenz als Problem. Forschungsstrategien und Designs der komparativen Kommunikationswissenschaft,” in *Politische Kommunikation im internationalen Vergleich: Grundlagen, Anwendungen, Perspektiven*, ed. Frank Esser and Barbara Pfetsch (Wiesbaden, Germany: Westdeutscher Verlag, 2003), 104-131.

³⁶ Fons J. R. van de Vijver and Kwok Leung, *Methods and Data Analysis for Cross-Cultural Research* (Thousand Oaks, CA: Sage, 1997), 8-26.

The MediaAcT consortium has tried to react to the specific challenges of comparative research from the earliest stages of project planning. For example, construct equivalence was secured with the help of a series of preparatory project meetings that helped to clarify the theoretical foundations of the project and thus paved the way for the conception of the survey. It was mainly during these meetings that the project partners agreed on a methodological agenda and developed equivalent instruments to realize the aim of inquiring into the status of journalists' evaluations of media accountability processes. The project's complex sampling procedure, in particular, can be regarded as the outcome of a long process of deliberation, which made sure that the specific cultural peculiarities that characterize journalistic populations in the countries studied were taken into account. Although the responsibility for implementing the national surveys lay in the hands of decentralized research teams in the respective countries, the coordination of the investigation was supervised by a German project management team from beginning to end, to guarantee administration equivalence at all stages of the research process. However, the conception and adaptation of the survey methodology would not have been possible without the expertise and the knowledge of the cultural conditions that was brought in by the national project teams. Thus, despite all challenges, the specific composition of the MediaAcT consortium exemplifies the advantages of international research networks: they can offer ideal frameworks to realize large comparative projects.

FINDINGS: CULTURES OF MEDIA ACCOUNTABILITY – OFFLINE AND ONLINE

The data from the MediaAcT study provide various hints that can be interpreted as indicators of the globalization and convergence of professional attitudes towards media accountability. For example, the survey results demonstrate that journalists from all over Europe and the Arab world have a rather high regard for the concept of media responsibility. When we confronted them with the statement "Journalistic responsibility is a prerequisite for press freedom" and asked them to rate this statement on a scale from 1 ("I totally disagree") to 5 ("I fully agree"), the degree of approval was almost equally high in all of the 14 countries studied (see Table 1 below). The total mean of 4.46 is evidence of a clear commitment to responsible journalism, or at least of the desire to state this commitment. The fact that the deviation of the country-specific means was not bigger than ± 0.22 in any of the national sub-samples makes it clear how much our respondents conform in the assessment of this item across very different journalism cultures.

Table 1: Attitudes towards media responsibility and audience criticism.

	Means	Finland	Netherlands	Germany	Austria	Switzerland	United Kingdom	France	Italy	Spain	Estonia	Poland	Romania	Jordan	Tunisia
Journalistic responsibility is a prerequisite for press freedom.	4.46	0.05	-0.22	-0.01	-0.15	0.05	-0.07	0.00	-0.19	0.12	0.21	-0.04	0.16	0.14	-0.03
Journalists are concerned about criticism they get from their audiences.	3.35	-0.38	0.02	-0.08	-0.20	0.13	0.28	-0.07	-0.72	0.13	0.65	0.05	-0.27	0.17	0.27

Another indicator for a convergence of journalistic attitudes towards media accountability is exemplified by a look at the contextual factors of responsible journalism. Here, it becomes evident that journalists in almost all of the countries analyzed regard economic pressure as the biggest challenge for their professional actions. In reaction to the question “What do you regard to be a problem about journalism in [country]?” our respondents most insistently highlighted the item “Economic pressure damages journalistic quality,” which they could again rate on a scale from 1 (“This is not a problem”) to 5 (“This is a major problem”) (see Table 2 below). On average, the responses added up to a total mean of 3.95, with only minimal deviations upwards and downwards in most of the countries studied. Only the Tunisian journalists rated the economic context factors to be a little less problematic (-0.62). Still, these factors must be regarded as a transculturally formative influence on the development of media accountability processes, which might be a token for an international assimilation of media systems as a result of an advancing economization of journalistic work processes.

Table 2: Contextual factors of responsible journalism.

	Means	Finland	Netherlands	Germany	Austria	Switzerland	United Kingdom	France	Italy	Spain	Estonia	Poland	Romania	Jordan	Tunisia
Economic pressure damages journalistic quality.	3.95	0.01	-0.08	0.06	0.15	-0.02	0.18	0.07	0.17	0.14	-0.18	-0.03	-0.06	-0.14	-0.62
Journalists follow the herd and produce media hype.	3.68	0.21	0.33	0.06	-0.01	0.07	-0.33	0.28	0.08	-0.11	-0.08	0.07	0.33	-0.48	-0.38
Journalists are inadequately paid.	3.59	-0.68	-0.65	-0.26	-0.11	-0.03	0.41	-0.28	-0.02	0.54	0.26	0.43	0.23	0.29	0.07
Journalists are inadequately trained.	3.01	-0.69	-0.05	-0.31	0.18	-0.08	-0.37	-0.59	0.33	0.15	0.15	0.70	0.89	0.59	0.33
Governmental pressure damages journalistic quality.	3.00	-0.87	-0.39	-0.41	0.58	-0.61	-0.42	-0.34	1.21	0.69	-0.83	0.33	0.62	0.71	0.59
Journalists don't adhere to professional ethical standards.	2.96	-0.64	-0.23	-0.01	0.41	-0.07	-0.29	-0.29	0.43	-0.10	-0.35	0.34	0.65	0.42	0.26

However, further answers to the question “What do you regard to be a problem about journalism?” clarify that the constraints for media accountability still differ enormously from country to country. Thus, the statement “Governmental pressure damages journalistic quality,” with a total mean of 3.00, was rated generally lower than the item regarding “economic pressure,” but the deviations between countries are considerably bigger. Conspicuously, political influences are judged to be problematic first and foremost in various countries in Southern and Eastern Europe – for example in Italy (+1.21), Spain (+0.69), Romania (+0.62), and Poland (+0.33), but also in our contrasting Arab countries Jordan (+0.71) and Tunisia (+0.59). In contrast, political interference is apparently much rarer in the Northern and Western European countries in our study. These findings mirror the diagnosis by Hallin and Mancini, according to which the polarized pluralist media systems are to be distinguished from the liberal and democratic corporatist systems mainly because of their high degree of political parallelism.³⁷ This result can, at least partially, be transferred to the Eastern European and Arab countries in the MediaAcT study as well. Consequently, the political contextual factors make it more than obvious that

³⁷ Hallin and Mancini.

the international media accountability landscape – despite transcultural similarities – is still exhibiting notable national differences.

Similarly, transcultural trends and contradictions can be identified in the assessments of different key instruments of media accountability. One of the transcultural commonalities is the insight that non-state means of media regulation are apparently less influential than state-related instruments. This was demonstrated in part by the responses to our question “Which of the following have the most impact on journalists’ behavior in [country]?”, which we complemented with a long list of traditional instruments of media self-regulation as well as innovative web-based media accountability instruments (MAIs). As before, the survey participants were invited to align their evaluation on a five-point Likert scale, in this case with the poles being 1 (No impact at all) and 5 (Very high impact) (see Table 3 below).

Table 3: Impact of selected media accountability instruments.

	Means	Finland	Netherlands	Germany	Austria	Switzerland	United Kingdom	France	Italy	Spain	Estonia	Poland	Romania	Jordan	Tunisia
Company editorial guidelines	3.74	-0.54	-0.05	-0.39	-0.56	-0.12	-0.06	0.33	0.70	-0.88	0.45	0.42	0.45	0.23	0.13
Laws regulating the media	3.70	0.58	-1.01	0.23	0.06	0.22	0.66	0.06	-0.65	-0.25	0.04	-0.04	-0.53	-0.02	-0.12
Professional codes of ethics	3.44	0.92	-0.09	-0.21	-0.21	0.39	0.52	0.20	-0.66	-0.32	0.56	-0.52	-0.61	-0.44	0.23
Press council	2.96	1.13	-0.27	0.10	-0.39	0.24	-0.06	-0.18	0.75	-0.15	0.18	-0.69	-0.68	-0.08	-0.18
User comments	2.84	0.67	-0.45	0.27	-0.02	0.14	0.12	-0.21	-0.48	0.35	-0.08	-0.06	-0.15	-0.12	-0.26
Media journalism	2.73	0.89	0.25	-0.10	-0.10	-0.21	0.13	-0.25	-0.52	0.08	-0.01	-0.20	-0.05	0.17	0.28
Criticism on social media	2.61	0.09	-0.11	0.13	0.20	0.07	-0.35	-0.23	-0.09	-0.10	0.14	-0.04	0.06	0.50	0.33
Ombudsman/Readers’ editor	2.32	-0.08	0.09	-0.04	-0.02	0.12	0.26	-0.06	-0.49	0.48	-0.50	-0.13	-0.23	0.21	-0.02
Citizen blogs	2.25	0.20	0.05	0.05	-0.08	-0.07	-0.15	-0.26	-0.32	0.50	-0.07	-0.08	-0.36	0.40	0.54

The data show that most of the discussed MAIs are ascribed a moderate or weak influence only. Press and media councils reach an average of 2.96, and are thus only a little more effective than media journalism in the daily news (2.73) or ombudspersons (2.32). Professional codes of ethics (3.44) and company editorial guidelines (3.74) are distinctly more influential. The latter is the only instrument of media accountability that reaches a higher rating than the item “Laws regulating the media” (3.70), which has been included for the sake of comparison. The results make it presumable that MAIs, across all the journalistic cultures that are covered by this study, are only perceived as effective if (in the case

of a breach of journalistic rules) they are associated with noticeable consequences for the liable actor. From the perspective of the respondents, these preconditions seem to be realized primarily in instances of normative instruments such as legal or editorial rules, but less in the case of traditional instruments of self-regulation, like press councils or ombudspersons, which lack the power of sanctions for the most part.

However, our survey also reveals notable differences among the analyzed countries, which seem to result, at least partially, from the varying degrees of journalistic professionalization. Thus, for instance, Finland (+1.13) and Switzerland (+0.24) have had press and media councils for decades, which are now well anchored within the profession and therefore received ratings clearly above the average. On the other hand, a lack of institutionalized media self-regulation is particularly evident in countries like Poland (-0.69) or Romania (-0.68), where journalists predict only little potential for this MAI. This is similar to their colleagues in Austria (-0.39), who saw their national press council incapacitated for a decade, after a 2002 conflict with the influential tabloid *Kronen-Zeitung*, because of dissensions regarding some of the council's verdicts.

A country-specific comparison of the acceptance of professional and organizational codes also displays interesting deviations: our survey data show quite clearly that journalists from Northern and Western European countries (e.g. Finland: +0.92; United Kingdom: +0.52; Switzerland: +0.39) ascribe a markedly higher impact on professional ethics codes, whereas their colleagues in the Mediterranean region (Italy: +0.70; France: +0.33) as well as in Central and Eastern Europe (Estonia: +0.45; Romania: +0.45; Poland: +0.42), where several journalists' associations with contrasting codes of ethics are competing for supremacy, have instead emphasized the efficacy of organizational and editorial guidelines. In these latter countries, the newsroom constitutes, at least potentially, the central space for the implementation of journalistic rules. Exemptions in this context are represented by the interrogated journalists from Germany and Spain, whose answer patterns distinctly differ from the results of neighboring countries in the same journalism culture. These deviations demonstrate that the cultural differences with regard to media accountability indeed seem to correlate at least in part with the system types described by Hallin and Mancini, but in some respects they also diverge.

In comparison to these traditional instruments of media (self-)regulation, what significance do participatory online instruments of media accountability have? A first glimpse at our survey data (see Table 3 above) shows that these MAIs do not exert an overwhelming impact either. Web-based user comments reach an overall mean of 2.84, thus at least outflanking the influence of media journalism. However, media criticism on the various platforms of the social web (2.61) and citizen blogs as a means for media observation (2.25) already fall short of most of the other instruments. For this reason, it becomes clear very quickly that the highly-touted online communication is in no way the new miracle cure in the general struggle for more journalistic responsibility.

However, illuminating differences are detectable as well. For example, it is striking that citizen blogs and media criticism on the social web are judged to be more influential in those countries without a long tradition of media self-regulation. This applies most notably to our Arab countries, Jordan and Tunisia, where these two items stick out. One of the reasons for the high acceptance of participatory

MAIs in these countries might be that journalists perceive the audience as the most important entity of objective criticism, while institutions like “media councils” have often been (or still are) an instrument that the regimes have used to monitor disliked journalists. In the Arab countries, therefore, participatory MAIs could indeed become a motor for media accountability processes that would not unfold without the inclusion of the user perspective. In most of the other analyzed countries, however, the attitudes towards participatory MAIs hardly deviate from the overall average.

DISCUSSION: PERSPECTIVES FOR EUROPEAN MEDIA POLICY

One of the key questions connected to the Leveson Inquiry and the subsequent debates across different media sectors was the following: are established media accountability instruments still up-to-date in an increasingly convergent media system, in which the audience is playing a progressively more important and active role? It is therefore no surprise when Fengler et al. ask if “new accountability instruments emerging online – like newsroom blogs, online ombudsmen and media criticism on the social web – [can] successfully support, or even replace, these traditional instruments of media self-regulation? Aren’t participative models of media accountability a more promising and ‘healthy’ option than co-regulation models which foresee a greater role for the state?”³⁸ Previous studies in the field show contrasting findings with regard to the potential of media self-regulation.³⁹ The findings of our study show that there is no easy answer to these questions, because there are still huge differences between the analyzed countries. The specific economic, technological, cultural, and social backgrounds as well as the differently-evolved media systems cause diverging perspectives on (online) media accountability.

Online media accountability practices have been emerging unevenly across the analyzed countries. One of the main reasons for the unbalanced development of these instruments throughout Western democracies is the political frame. The findings of our study show that governmental pressure is perceived differently in the analyzed countries. Particularly in Eastern and Southern European countries, journalists still suffer from continuous interventions by the government or individual politicians – in line with what Hallin and Mancini define as one factor of political parallelism.⁴⁰ But the political frame is not the only factor in the slow development of media accountability instruments. Financial aspects play an even more central role – which is also reflected by the number of journalists complaining about their low salaries, particularly in Spain, the UK, and some Eastern European countries. Participants from all the analyzed countries agree on the dysfunctional impact of economic constraints on the quality of journalism. Media journalism is a good example of why self-regulation is inhibited by commercial interests – either news organizations do not want to publish negative

³⁸ Susanne Fengler, Tobias Eberwein, Gianpietro Mazzoleni, Colin Porlezza, and Stephan Russ-Mohl, “Summary: Perspectives for Newsrooms, Policy-Makers and Journalism Educators,” in *Journalists and Media Accountability: An International Study of News People in the Digital Age*, ed. Susanne Fengler, Tobias Eberwein, Gianpietro Mazzoleni, Colin Porlezza, and Stephan Russ-Mohl (New York: Peter Lang, 2014), 265-288.

³⁹ Pöttker; Fengler, “Holding the News Media Accountable. A Study of Media Reporters and Media Critics in the United States;” Evers, Groenhart, and van Groesen.

⁴⁰ Hallin and Mancini.

information about themselves because they fear a loss of credibility and thus advertisers might no longer be willing to pay for advertising space, or media outlets do not want to talk about the successes of their competitors (or do not want to criticize them because they are afraid of potential reactions). This might be one of the main reasons why media journalism or media criticism in general are moving away from traditional media outlets to online-based forms of critical media observation, often initiated by actors from outside journalism.⁴¹

It seems that political and economic factors prevent media organizations from establishing practices of media accountability, because journalists throughout all countries support the idea that journalistic responsibility is a prerequisite for media freedom. In other words, while journalists back the idea of journalistic responsibility – a central aspect of self-regulation and media accountability – news organizations and their managers tend to put the brakes on initiatives that are not essential for news production. Particularly in grim economic times, news organizations tend to be quite hesitant when it comes to changing their established production processes. Deuze is right when he asserts that “the routinization of news work becomes a crucial strategy in managing the accelerated newsflow.”⁴² This might be one of the main reasons why media organizations refuse to change the news flow with new accountability practices.

Since journalists, overall, have little confidence in traditional instruments of media accountability such as ombudsmen, media journalism, or press councils, it is very unlikely that media organizations are willing to invest resources into self-regulation – first of all you need the journalists to accept the idea of self-regulation. Then you have to implement the practices, and this happens to be more difficult in newsrooms where quality debates do not occur on a regular basis⁴³ or where highly institutionalized instruments such as press councils are not accepted due to historic circumstances, as in former Communist countries where press councils are often “(mis)judged as an illegitimate influence on the newly won journalistic independence.”⁴⁴ If journalists themselves are not eager to be held to account, it is very unlikely that newsrooms will get more transparent and more responsive, particularly if a great deal of journalists working in these newsrooms admit that they are not overly concerned about the criticism they get from their audiences.

Nonetheless, the appraisal of self-regulation instruments strongly depends on their implementation within a specific country. Where instruments are well-established and part of a broader infrastructure of media self-regulation, journalists tend to have more confidence in the instruments than in countries where such practices are only weakly institutionalized. Particularly in Northern countries such as Finland and Estonia, but also in Switzerland, long-established practices such as ethics codes are more

⁴¹ Eberwein, Leppik-Bork, and Lönnendonker.

⁴² Mark Deuze, “Understanding Journalism as Newswork: How It Changes, and How It Remains the Same,” *Westminster Papers in Communication and Culture* 5, no. 2 (2008): 20.

⁴³ See for example Vinzenz Wyss and Guido Keel, “Media Governance and Media Quality Management: Theoretical Concepts and an Empirical Example from Switzerland,” in *Press Freedom and Pluralism in Europe: Concepts and Conditions*, ed. Andrea Czepek, Melanie Hellwig, and Eva Nowak (Bristol: Intellect Books, 2009), 115-128.

⁴⁴ Eberwein, Leppik-Bork, and Lönnendonker.

likely to be accepted than in other countries like Italy which has a completely different media regulatory system based on the corporation-like “Ordine dei Giornalisti” (Association of Journalists).

With regard to online media accountability instruments, journalists tend to be even more skeptical. The low scores we found for the impact of online comments and feedback through social media and citizen blogs back this attitude. However, there is a discrepancy between supporting the idea of online media accountability and implementing such instruments. Journalists generally attach great value to innovative practices, which facilitate transparency and audience interaction, backing the idea that the opportunities to give a voice to public criticism have significantly increased due to the Internet.⁴⁵ Nevertheless, when it comes to the question of journalists’ assessment, “newsrooms do not seem to practice what they preach in terms of transparency and audience interaction.”⁴⁶ De Haan and Bardoel identified similar attitudes in two Dutch broadcast news organizations:

The need for more openness to and connection with the public is acknowledged, and among many journalists this is now even considered a necessity. However, when it comes to routinized daily application, there is a general resistance, as it does not live within their professional autonomy and authority. New online instruments have created opportunities with more platforms and possibilities for the public to participate. However, at this point the online instruments put new constraints on the social system of organization with unforeseen activities and costs.⁴⁷

Generally, newsrooms implement practices that are easy to apply, do not cost a lot of money, and do not conflict with customary news processes. The reason for this reticent behavior might well be that journalists do not want to externalize issues that came up in the media organization. Journalists shy away from discussing the quality of their output with recipients because they may lose their professional autonomy while being forced to explain often delicate editorial decision-making to their audiences.⁴⁸ As a consequence, mainstream media are gradually losing control of the various practices of media accountability. It is therefore no surprise that media critique practices (which are strongly correlated to issues of transparency and responsiveness) are increasingly covered by journalism-external media blogs or other participatory formats, while critical discourse within news organizations on the responsibilities of the media and journalism is often lacking.

Despite all the difficulties of implementing online media accountability practices in newsrooms and the reluctant attitude of journalists toward to such instruments, it nevertheless seems desirable that

⁴⁵ Huub Evers, Mike Jempson, and Wayne Powell, “Critical Citizens Online: Adding to or Subtracting from Conventional Media Regulation?” Working Paper 13/2011, MediaAcT, July 2011, accessed Aug. 12, 2014, http://www.mediaact.eu/fileadmin/user_upload/WP4/WP4_UK.pdf.

⁴⁶ Harmen Groenhart and Huub Evers, “Media Accountability and Transparency – What Newsrooms (Could) Do,” in *Journalists and Media Accountability: An International Study of News People in the Digital Age*, ed. Susanne Fengler, Tobias Eberwein, Gianpietro Mazzoleni, Colin Porlezza, and Stephan Russ-Mohl (New York: Peter Lang, 2014), 129-145.

⁴⁷ Yael de Haan and Jo Bardoel, “Accountability in the Newsroom: Reaching out to the Public or a Form of Window Dressing?” *Studies in Communication Sciences* 12 (2012): 17.

⁴⁸ For explanations from an economic perspective about why media organizations are not very likely to invest in quality management, see Stephan Russ-Mohl, “The Economics of Journalism and the Challenge to Improve Journalism Quality: A Research Manifesto,” *Studies in Communication Sciences* 6 (2006): 189-208.

MAIs should be anchored at the level of media organizations, since violations of journalistic principles could be reprimanded more directly and effectively. “Even though the audience makes increasing use of online feedback mechanisms, journalists are still reluctant to acknowledge the public’s role in holding the media to account. Thus, participatory accountability models cannot immediately replace the effect of a strong organizational commitment and a sophisticated system of incentives at all levels on promoting media accountability.”⁴⁹ Besides, in newsrooms, journalists are also more likely to be involved in discussions about the quality of their work with their superiors, colleagues, or (in exceptional cases) with their audience. Ultimately, the odds of a colleague or the audience criticizing a journalist’s work are higher than the risk of being targeted by media journalism or even a press council.

Often media organizations lack the *incentives* to implement practices of self-regulation. This is not only due to the difficult economic context for many news organizations, although in the digital age it should no longer be too expensive to put any accountability instrument into practice. This is also caused by the circumstances that media accountability practices have been – if they were mentioned at all – the responsibility of national media regulations.⁵⁰ Hence, proposals that called for changes within European media policy did not succeed and fell short of driving media reform very far. Only recently did the EU get involved in actions regarding media freedom and pluralism.⁵¹ In order to foster media accountability practices at all levels, but particularly to achieve a stronger organizational commitment, it is necessary not only for national media regulations to offer concrete incentives, but a clearer European strategy focused on holding news organizations to account is needed as well.

This article has tried to shed light on self-regulatory measures in terms of media accountability practices across Europe, with special regard to innovative practices that should improve transparency and responsiveness. Yet we found that frequently, incentives for news organizations to implement such practices are missing. “Reminding journalists and media companies of their normative duties ‘to behave well’ may be less successful than offering concrete rewards for accountability activities. These rewards can be both material and immaterial [...]. Creating incentives for media companies to invest in media accountability would be a strong political statement for a free and responsible press, while suggesting sanctions would probably inevitably result in protests by the industry.”⁵² The following recommendations should help to establish a stronger framework of self-regulation and create incentives for media organizations to become involved more actively in (online) media accountability, even if the actual deliberation has to be a political one.

⁴⁹ Fengler, Eberwein, Mazzoleni, Porlezza, and Russ-Mohl, “Summary: Perspectives for Newsrooms, Policy-Makers and Journalism Educators.”

⁵⁰ Werner A. Meier, “Demokratie und Media Governance in Europa,” in *Media Governance in Europa: Regulierung – Partizipation – Mitbestimmung*, ed. Hans J. Kleinstüber and Sabine Nehls (Wiesbaden, Germany: VS Verlag für Sozialwissenschaften, 2011), 52-53.

⁵¹ Vaira Viķe-Freiberga, Herta Däubler-Gmelin, Ben Hammersley, and Luís Miguel Póiares Pessoa Maduro, “A Free and Pluralistic Media to Sustain European Democracy,” report, High Level Group on Media Freedom and Media Pluralism, Jan. 2013, accessed Aug. 12, 2014, http://ec.europa.eu/information_society/media_taskforce/doc/pluralism/hlg/hlg_final_report.pdf.

⁵² Fengler, Eberwein, Mazzoleni, Porlezza, and Russ-Mohl, “Summary: Perspectives for Newsrooms, Policy-Makers and Journalism Educators,” 275.

1. Monitoring the Quality of Media Self-Regulation and Media Accountability. Given that the media industry has largely failed to monitor itself and its media accountability practices – as the Leveson Inquiry has shown in the case of the United Kingdom – an external monitoring process would be more promising. However, such an external monitoring process should not be carried out directly by the government, in order to maintain the media’s independence and freedom. Instead, it should be institutionalized under the form of “regulated self-regulation.”⁵³ This process can also be seen in the wider perspective of media governance, which takes into account the special function of the media within society. According to Jarren, media governance has to assure the independence and autonomy of the media, but at the same time make sure that the media assume their responsibility and be held to account.⁵⁴ This can be arranged, for instance, through a yearly report on the quality of the media like the one that the Forschungsinstitut Öffentlichkeit und Gesellschaft (fög), at the University of Zurich, is doing in Switzerland. This “Yearbook Quality of the Media” is an annual publication carried out by a research institute “designed to strengthen the awareness of media quality and to stimulate discussion on the transformation of our public sphere.”⁵⁵ Such initiatives could be bound to public funding, in order to create an incentive and to establish them in countries where they do not currently exist. In Switzerland, for instance, private broadcasters can get access to the TV license fee budget if they provide evidence that they meet certain quality requirements at the level of the organization defined in their licenses (e.g. setting standards like ethics codes or processes like institutionalized program feedback).⁵⁶ However, this might leave room for different interpretations and the question of who defines the appropriate quality or accountability practices – a rather delicate political query.

Besides, the MediaAcT project has developed a Media Accountability Index in order to set up an annual ranking for the quality of media self-regulation and accountability infrastructures. Obviously such an index does not replace empirical research, but it should at least improve public awareness and discussion about media self-regulation and accountability, particularly because the audience is increasingly involved in holding the media to account.

2. Implementing a Clear Framework for Incentives in Order to Encourage Media Accountability. On the level of European media policy initiatives, a suitable normative framework, which would offer the broadest range of initiatives together with compulsory aspects, would consist of co-regulated self-regulation. As media governance approaches often suggest, media organizations should be able to prove that they engage in media accountability practices. In turn, the state could either offer public subsidies or grant privileges such as VAT exemptions, reduced post taxes, or better positions in legal proceedings to those media organizations that “participate and accept basic ethical

⁵³ Manuel Puppis, “Media Governance as a Horizontal Extension of Media Regulation: The Importance of Self- and Co-Regulation,” *Communications* 32 (2007): 330-336.

⁵⁴ Otfried Jarren, “Die Regulierung der öffentlichen Kommunikation: Medienpolitik zwischen Government und Governance,” *Zeitschrift für Literaturwissenschaft und Linguistik* 37, no. 146 (2007): 131-154.

⁵⁵ Forschungsbereich Öffentlichkeit und Gesellschaft (fög), “Yearbook Quality of the Media,” accessed Aug. 12, 2014, http://www.foeg.uzh.ch/jahrbuch_en.html.

⁵⁶ Wyss and Keel.

guidelines.”⁵⁷ This seems to be the most promising way to combine statutory regulation and self-regulation, provided that press freedom is maintained. However, such a framework would require policymakers on the European as well as on the national level to set the specific criteria media organizations have to meet, in order to benefit from the privileges. A precondition for the success of this course of action – and this is another missing link – is the coordination of European and national co-regulatory systems. The main problem of defining specific requirements in regard to media accountability and transparency remains, and the problem of how to impose them on the media organizations also remains. This strongly depends upon the political discussion, which is often aggravated with highly normative beliefs and the (reasonable) fear of political interference in the media system. The new framework for press accountability and responsibility in the United Kingdom, following the Leveson Inquiry, can be seen as one possible outcome of such a political deliberation.⁵⁸

3. Offering Assistance to Media Systems in Transition to Create a System of Media Self-Regulation and Accountability. With regard to European media policy, it has to be taken into account that there are huge differences between the different member states at the levels of statutory regulation, media self-regulation, and practices that have actually been implemented in news organizations. Particularly in Eastern European states, accountability instruments are often underdeveloped or, due to historical circumstances, judged as limitations to press freedom. Offering specific incentives at a European level to those countries with less experience in media self-regulation could raise the awareness of journalists and media managers of the beneficial effects of media accountability practices. Financial incentives such as tax or VAT reductions could improve the implementation of MAIs according to different cultural needs, given that there is not a one-size-fits-all solution for every country. At the same time, journalists have to be convinced about the new practices, particularly in countries without a well-developed journalistic profession or solidly institutionalized infrastructures such as a press councils, ombudsmen, or media critics. This increases even more the importance of media managers establishing practices of online media accountability and transparency, given that the newsroom is the fundamental place to protect journalistic values and to secure journalistic quality. In order for this to happen, journalists have to be continuously motivated to act in accordance with these practices, not only in newsrooms but also in journalism education.⁵⁹ This is surely not an easy task, but “Only if the media-in-transition countries can position themselves as trustful, professional and independent players, they will gain the support that they need to encourage fruitful debate between all social groups and secure the press freedom they have recently gained.”⁶⁰

⁵⁷ Manuel Puppis, Sally Broughton Micova, and Damian Tambini, “Reforming the PCC: Lessons from Abroad,” Media Policy Brief 6, London School of Economics, June 2012, accessed Aug. 12, 2014, <http://www.lse.ac.uk/media@lse/documents/MPP/Policy-Brief-6-Replacing-the-PCC.pdf>.

⁵⁸ For further insights into the delicate balance between media freedom and regulation in the UK, see George Brock, “The Leveson Inquiry: There’s a Bargain to Be Struck over Media Freedom and Regulation,” *Journalism* 13 (2012): 519–528.

⁵⁹ Klaus Bichler, Halliki Harro-Loit, Matthias Karmasin, Daniela Kraus, Epp Lauk, Urmas Loit, Susanne Fengler, and Laura Schneider-Mombaur, “Best Practice Guidebook. Media Accountability and Transparency across Europe,” report, MediaAcT, Nov. 2012, accessed Aug. 12, 2014, http://www.mediaact.eu/fileadmin/user_upload/Guidebook/guidebook.pdf.

⁶⁰ Fengler, Eberwein, Mazzoleni, Porlezza, and Russ-Mohl, “Summary: Perspectives for Newsrooms, Policy-Makers and Journalism Educators,” 279.

As our findings show (particularly in Eastern European countries), the newsroom remains the central venue for practices of media accountability, given that there is still high reluctance toward external regulatory initiatives such as laws or press councils.

Overall, investing in (online) media accountability at a European, national, and (news) organizational level seems promising, particularly for media-in-transition countries to defend their recently-gained (press) freedom. But it might well be a good opportunity to boost public trust in the media, given that aspects such as responsiveness and audience interaction, especially in the online realm, play an increasingly important role in holding the news media to account.

However, in order to analyze the impact of MAIs, future research should focus on the actual impact of such practices within the newsroom. It should also take into account the willingness of the audience to participate in and use these services. Moreover, it would be useful to carry out longitudinal studies on the development of media accountability instruments in different journalistic cultures in order to understand which instruments work in which culture and policy framework.

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