



Finansira Evropska unija



***Project: Free media for free society***

***SURVEY AND RESEARCH ON WORK CONDITIONS AND JOURNALISTS' RIGHTS /  
LEGAL FRAMEWORK AND MANAGING LOCAL MEDIA IN BiH***

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## SUMMARY

This survey and research is focused on work conditions and journalists' labour rights; including legal framework, regarding local media houses operating and managing processes. Common goal of this survey and research is to provide information regarding work conditions and journalists' rights, concerning journalists that work in local media houses and also to estimate information regarding legal framework that regulates local media activities and work, including local media houses managing.

Survey and research were implemented through the analysis of relevant legal framework; poll survey on sample taken from 157 journalists and focus – group - based survey and research with 10 editors and journalists coming from local media houses, Survey and research were also conducted with local media houses that work and operate throughout entire territory of Bosnia and Herzegovina during the period between 26 October and 31 December 2020.

### **Crucial test analysis of legislative framework includes the following:**

Legislative framework provides solid basis for local media work and operations, but also provides laws and associated legal provisions that regulate the work and operations of local media houses that should strengthen and reinforce their work by being balanced throughout the entire territory of Bosnia and Herzegovina and by eliminating the deficiencies confirmed in practice and reality, and also through the process of following most recent international standards, particularly EU standards in this specific field.

Media freedoms and liberties have constitutional guarantees in Bosnia and Herzegovina, but there are neither adequate legal solutions nor other commonly – accepted guidelines (such as Press Code) that would outline and emphasize the concepts of media freedoms and liberties, including their self – sufficiency and independence.

Required mechanisms that enable local media self – sufficiency and independence have, to some extent, been established and developed and mostly relate to legal provisions that define procedures regarding the appointing of management members within local media houses. The existing legal provisions are often insufficient and undefined and also often passed – over in practice and reality.

Serving public interests, as one of the key principles of journalism by which journalists ensure their credibility in their society, were understated in the documents that regulated the work of local media houses.

Labour legislation in BiH is vastly conformed with relevant international conventions, however, certain provisions, such as, the provisions on employment contract cancelling remain unclear and in reality and practice, they enable arbitrary dismissing employees from their work.

### **Main analysis of poll survey and research shall include the following:**

#### **Work conditions and labour rights**

Over 40% of examinees stated that during the period of last three years, they had been attacked or verbally assaulted. This included physical attacks, verbal assaults, threats via social media sources or live “launching of discrediting campaign”, sacking (dismissing) from work, mobbing at work, obstructing reports from certain locations, hackers’ attacks, spreading of hate speech Etc.

When it comes to violation of journalists’ rights, the examinees reckoned that reactions by journalists’ community and non – governmental sector appeared most adequate and, on the other hand, they were least satisfied with the politicians.

Examinees have identified politicians as the group that had been imposing most pressure directed against journalists. Even three quarters of examinees (75%) outlined that the politicians had, at certain period of time, been imposing pressure on journalist. Opposition politicians and commercial advertisers followed this sequence.

Both female and male journalists have vastly been forced to work overtime. Over 40% of examinees claimed that they had to work over 40 hours per week.

Low wages have been common occurrence for both female and male journalists working for local media houses. Almost half the examinees’ net wages were lower than average net wages in BiH (48%). As far as work conditions were concerned, the examined female and male journalists had on one hand expressed least satisfaction in terms of special trainings and financial issue, and, on the other hand, they had expressed biggest satisfaction with the autonomy and independency they had in their work, followed by the support of media houses they worked for, as far as the outer pressures and assaults were concerned.

Largest number of examines have identified auto censure as common occurrence in their work (70%) and censure and inappropriate requests, (although in smaller proportions) imposed by their employers also existed in their work.

#### **Perception of media credibility and integrity in local communities**

Female and male journalists (being subject to this research) have in large numbers outlined high level of credibility and integrity of local community media houses they had been engaged with. There have been a limited number of journalists that expressed criticism towards media role in their local communities.

### **Main tests of research focused – group include the following:**

#### **Common state of work conditions and labour rights in local media houses**

Financial situation of local media houses has been on a lower level than those on national levels, so consequently and in financial terms, their wages have been on a lower level than those working on national levels. Work conditions and labour rights in national media houses were better than those in private local media. The problem of unpaid overtime was particularly outlined with private local media houses.

#### **Assaults on journalists**

Few participants of focus – group have identified pressures and assaults imposed on journalists as one of the most crucial problems that local media journalists have been facing. Other participants did not reply to this issue.

#### **Local media houses credibility: Serving public interests or political instrumentalism**

Opinions and attitudes provided by the examinees, regarding local media houses credibility, have been diverse. Some believed that local media houses served public interests, while others claimed that any critics directed towards local media houses was considered as an assault on governing officials and media houses have thus been often silenced.

#### **Local media houses future: Privatization?**

Most participants stated that certain changes must emerge and that they shall happen with or without their consent. Opinions, as far as privatization model was concerned, has been notably negative and non - affirmative. As oppose to this, there has been a general opinion that media should serve public interests, however it has never been defined how this should be obtained.

#### **Advancing work conditions and labour rights: Suggestions and recommendations**

Strategic suggestion and recommendation claimed that local media should be liberated from pressures imposed by political structures and that they (media houses) should began to operate as autonomous entities that should serve public interests. One of the suggestions and recommendations included the creation of legal regulation that would ensure larges scope of autonomy for journalists.

Few participants of focus – group pointed out and outlined the necessity of solidarity and journalists' organizing models (including both, female and male journalists) based on professional basis, including public displaying on problems journalists have been facing.

**Key recommendations of this study include the following:**

- Reinforce and strengthen the existing mechanism and initiatives that would be used in order to reduce assaults and attacks on journalists
- Launch strategic activities that would reduce the impact and influence of politics on local media houses
- Commence serious discussions regarding the future of local media houses

## INTRODUCTORY REMARKS

Private local media houses have in Bosnia and Herzegovina been representing a significant part of media scene. At the same time, this applied to local public media houses (those formed by municipal, communal, city, town or cantonal (regional) governing official authorities and those that have mostly been financed and supported from sources they have been receiving from these governing levels) and local commercial media houses (those without national frequency or larger coverage than region or canton, or, in case of printed media and online media sources – those that consider and define themselves as local and their programs and contents, were primarily focused on local current affairs.

Despite the fact that there have been a significant number of media houses, these have not been in a position to shape media trends in the country. Instead, they have mostly been concerned with mere survival and sustainability, including the developing of their work and operation that has had very little in common with modern journalism. In terms of commercial media, key accent has been on creating and disseminating profitable programs while all issues that have been considered as primary public interest, would be left with very limited or, in most cases, no media space at all. As far as public local media houses were concerned, the main threat has come from satisfying the interest of dominant political powers that control financial flows for these media houses.

Inappropriate and very unwanted practices have tended to develop in this kind of environment and these would obstruct the development of free and independent journalism that should be serving general public. Poor working conditions, lack of mechanisms required for journalists' protection, including lack of mechanism required for editing and journalists' autonomy, corruption, bribery, inadequate and insufficient skills and knowledge have been some of many elements that would define and shape local journalism. On the other hand, being exposed to outer pressure in certain segments would appear more devastating than it would affect journalism on national levels. Although both female and male journalists of local medial houses have rarely initiated and launched issues that would provoke political and economic powerful figures, when they have done so, journalists would often face rather unwanted and difficult consequences. Removed from public sight, journalists in small communities have hardly managed to succeed in alarming the public requiring their help as far as facing the threats and pressures they had been imposed with were concerned.

Having in mind that local media houses have notably and potentially been required to advance and improve democratic processes in local communities by providing information regarding local issues; allow discussion between local figures covering important local questions, increase transparency and responsibility of local governing authorities, interaction with citizens regarding social issues and problems Etc, it would be necessary to dedicate and direct special attention to work conditions under which female and male journalists would have to perform their duties in local media houses, as well as in wider environment under which these media houses would have to operate and work.

Journalists in local media houses have been facing increasing restrictions in the field of freedom of expression and media liberties. Unlike that, there has not been systematic approach that would be used to reduce misuses in media houses, including different types of pressures being imposed against journalists and media houses that derive from governing officials and their institutions, as well as other political and economic powerful centres. During the present period, the state has demonstrated a limited capacity in terms of providing guaranteed safety and security for female and male journalists. Although, legislative framework for free media operating has to some extent displayed a development stage, in practice and reality, formal guarantees of media freedoms and liberties have not been fully implemented.

## **RESEARCH AND SURVEY METHODOLOGY**

### **Research and survey subject**

Research and survey subject in its wider sense has represented media liberties and freedoms, including the possibility of general public to have access to information through local media sources, as well as overall media integrity in local communities in Bosnia and Herzegovina. In more narrow sense, research and survey subject has represented work conditions and journalists' labour rights including legal framework required for local media functionality and local media managing as well. Specifically, research and survey subject has also represented legal and policy documents that would regulate this particular field, as well as perceptions of media staff and their position in an environment in which they have been working.

### **Research and survey question**

Research and survey question have been designed to identify basic challenges and opportunities from two fundamental fields that have been subjects to research and survey. First field has related to legislative framework defining local media houses and local media houses managing process. Second field would relate to both female and male work conditions, including their labour rights as well.

As far as legislative framework within media scope is concerned the following shall be subject to thorough analysis:

- Identification of legislative framework (laws, and subordinate regulations, self – regulating mechanisms) that would regulate the establishing process and media functioning (including both public and private media houses), within the field of printed media, radio stations, television programs and online media sources
- Identification and analysis of provisions that would guarantee independence, media free work and media operation in public interests

- Evaluation and assessment regarding to what extent the existing provisions have been conformed to EU standards (that have been relevant to media independence field), including media freedoms and liberties

In terms of questioning about work conditions and journalists' labour rights, special attention shall be directed to the following issues:

- Identification of legislative framework relevant to journalists' labour rights, as well as relevant provisions that would regulate work conditions and journalists' labour rights (including both female and male journalists)
- Identification of challenges and opportunities, risks and encouragements that journalists face in local media houses that would also relate to work conditions and journalists' labour rights?
- Examining and testing journalists' perception and institutions in terms of how to overcome challenges and risks in order to create democracy – tailored society based on respecting freedom of expression and media freedoms and journalists' rights?
- Examining and testing female and male journalists' perceptions in regard with local courts in terms of media freedoms and liberties, free informing for general public and media integrity in local communities.

### **Research and survey aim and goals**

General aim and goal of research and survey was to collect information regarding work conditions and journalists' rights (working for local media houses), as well as to evaluate the information covering the issue of legislative framework that should define local media houses and their operational functioning, including their managing processes too. Finally, research and survey were aimed to provide a set of recommendations to various entities (legislators, executive governing level, judiciary system authorities, civil sector representatives, international organisations Etc); all with the purpose of advancing the situation in the field that was subject to research and survey.

### **Specific aims of this research and survey include the following:**

- a) Research and survey were aimed to identify key problems in practice and reality: weather the existing practice was in harmony with existing laws and international standards in terms of media freedoms, freedom of information for citizens and media integrity in local community or; weather certain legal regulations have been omitted and weather certain fields have been over – regulated which eventually may reduce their efficiency.



- b) Research and survey shall tend to display the scope of work conditions regarding media professionals in local media houses, whether we refer to public or private media houses and type of problems they (media professionals) face while they perform their professional duties and tasks.
- c) Research and survey also tended to demonstrate whether and to what extent journalists' rights in local media communities have been violated and how official institutions usually reacted and responded to these (their reaction on assaults and attacks against journalists, including pressures and threats imposed against journalists or violation of journalists' labour rights).

### **Research and survey methods and sample**

Research and survey has been implemented and conducted by using quantitative and quality - tailored methods. During research and survey process, information was collected, including the opinions deriving from both primary and secondary information sources. During the analysis of collected data, a statistic tools (SPSS) were collected and considered as useful and appropriate for descriptive statistics.

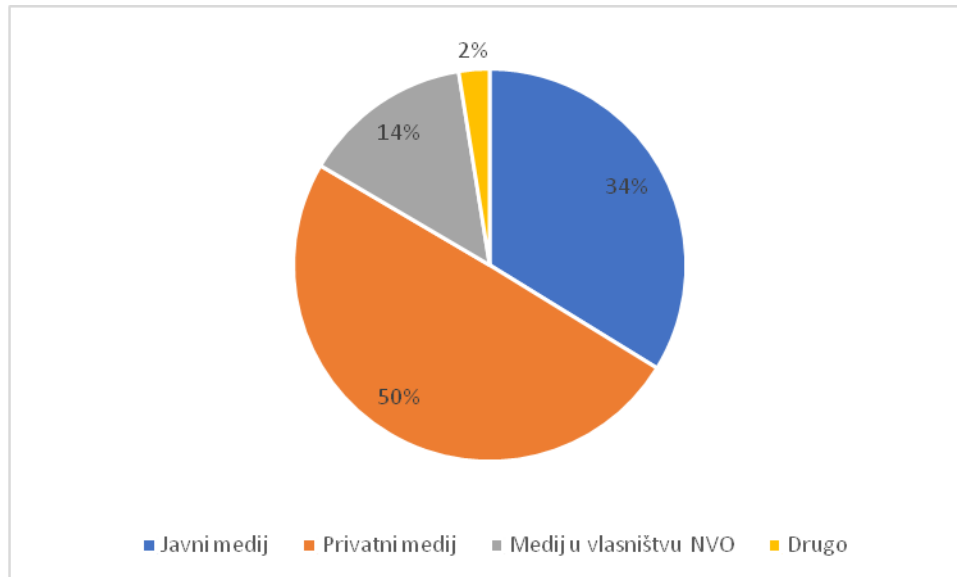
Basic collection of information and opinions techniques included the following:

- a) *Analysis of documents*, including laws, subordinate legal regulations, reports, statutes, internal documents and other studies that have addressed all issues and questions relevant to this particular research and survey
- b) Questionnaire and poll research and survey have been implemented through online system. The poll was created by using available online service – Google forms and link for poll (questionnaire) were distributed for further use. The sample was made out of BH Journalists head office which included a significant number of female and male journalists from BiH. The sample included 440 journalists that have been working for local printed media houses, TV and online media houses in BiH. 157 answers were provided by female and male journalists (the ratio complied with the figure of 35.9%). Largest number of examinees answered to all poll questions however, although not all questions received 157 answers, basic characteristic of samples included the following:

Half the examinees had been employed in local media houses; one – third in public media and others, on the other hand, worked for media whose owners included non – governmental organisation or some other type of ownership.

	Frequency	Percentage
<b>Public media</b>	53	33.8
<b>Private media</b>	78	49.7
<b>NGO</b>	22	14.0
<b>Other</b>	4	2.5
<b>Total</b>	157	100.0

**Table 1: Type of media ownership where examinees work**

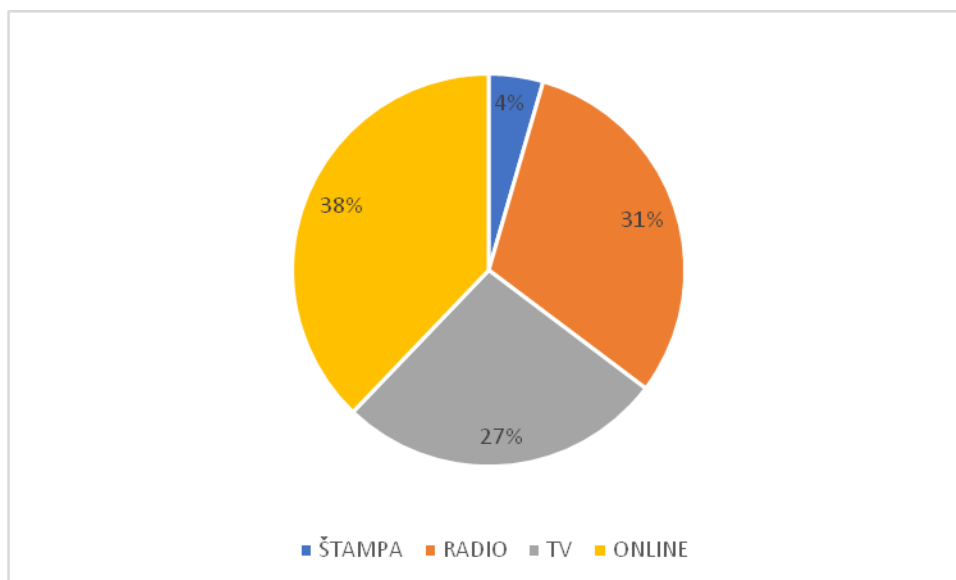


**Graph 1: Type of media ownership where examinees work**

Largest number of examinees came from an online media. Furthermore, a significant number of them worked in radio and television stations. Smallest number of examinees worked in printed media houses.

	Frequency	Percentage
<b>PRINTED MEDIA</b>	7	4.5
<b>RADIO</b>	48	30.8
<b>TV</b>	42	26.9
<b>ONLINE</b>	59	37.8
<b>Total</b>	156	100.0

**Table 2: Type of media where examinees worked**

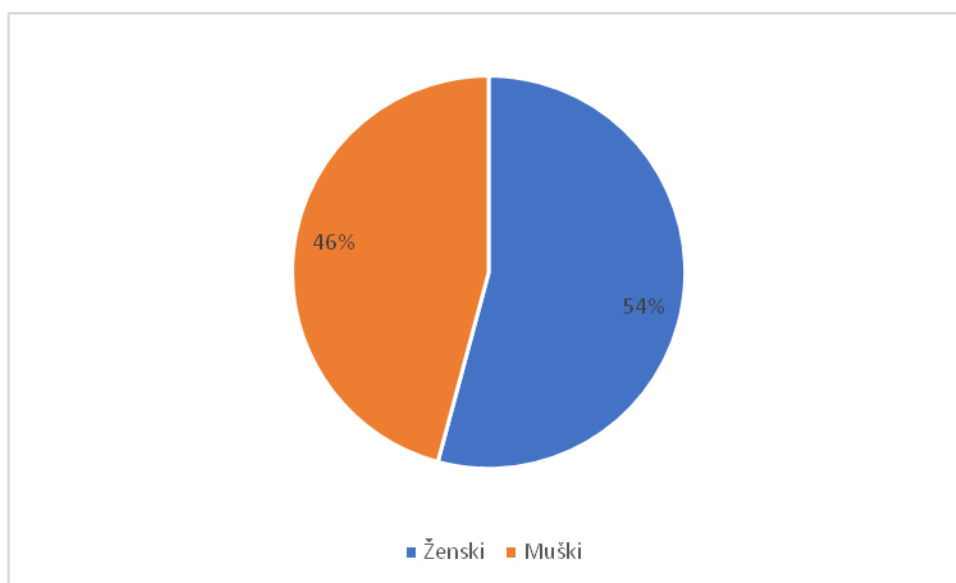


**Graph 2: Type of media where examinees worked**

In examinees structure, more than half of total figures were women while the rest were men

	Frequency	Percentage
Female	84	54.2
Male	71	45.8
Total	155	100.0

**Table 3: Examinees by gender**

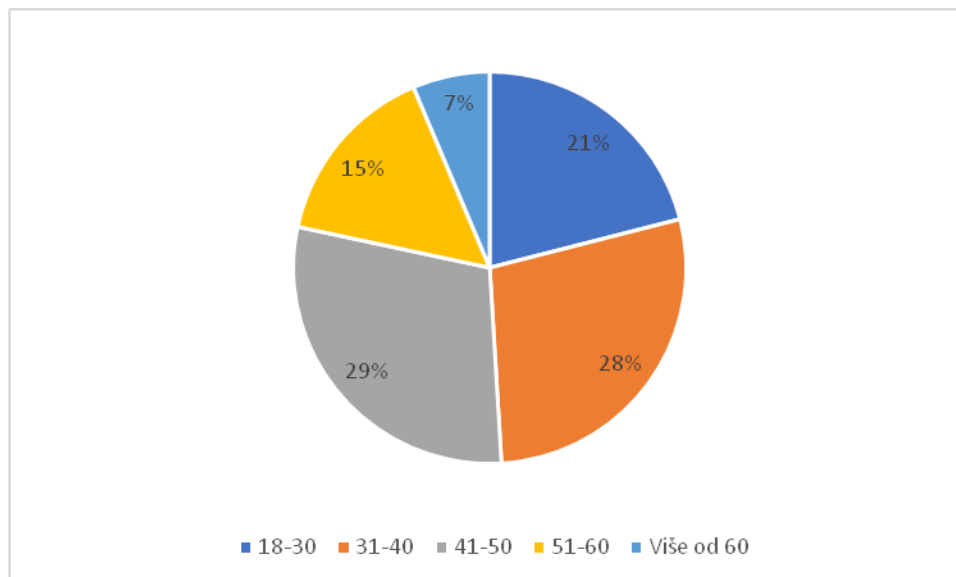


**Graph 3: Examinees by gender**

As far as the age of examinees was concerned, more than three quarters were under 50. Most common group consisted of examinees aged between 41 and 50.

	Frequency	Percentage
<b>18-30</b>	33	21.0
<b>31-40</b>	44	28.0
<b>41-50</b>	46	29.3
<b>51-60</b>	24	15.3
<b>Over 60</b>	10	6.4
<b>Total</b>	157	100.0

**Table 4: Examinee age**

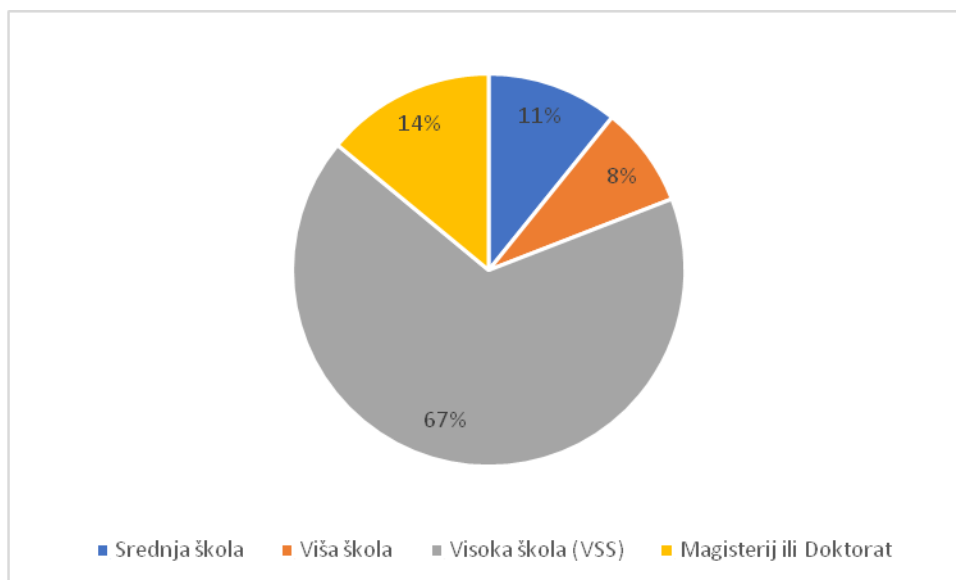


**Graph 4: Examinee age**

Two thirds of examinees were highly educated, while similar percentage covered those with higher or lower education level

	Frequency	Percentage
<b>Secondary Education</b>	17	10.8
<b>High / Tertiary Education</b>	13	8.3
<b>University Level</b>	105	66.9
<b>Master or PhD</b>	22	14.0
<b>Total</b>	157	100.0

**Table 5: Educational level of examinees**

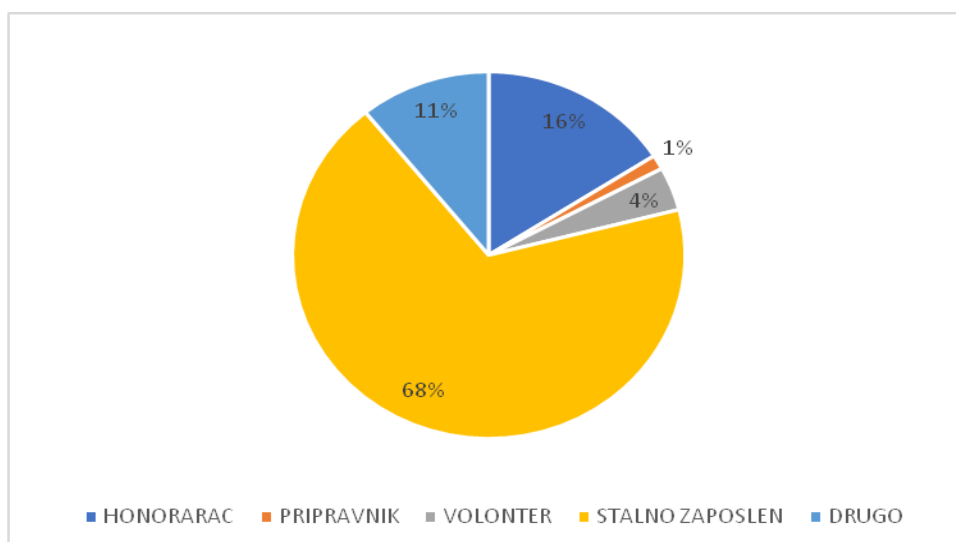


**Graph 5: Educational level of examinees**

Over two third of examinees had full time jobs, while there was a significant number of casual staff

	Frequency	Percentage
<b>CASUAL</b>	25	15.9
<b>APPRENTICE / TRAINEE</b>	2	1.3
<b>VOLOUNTEER</b>	6	3.8
<b>FULL TIME</b>	107	68.2
<b>OTHER</b>	17	10.8
<b>Total</b>	157	100.0

**Table 6: Examinee's employment status**

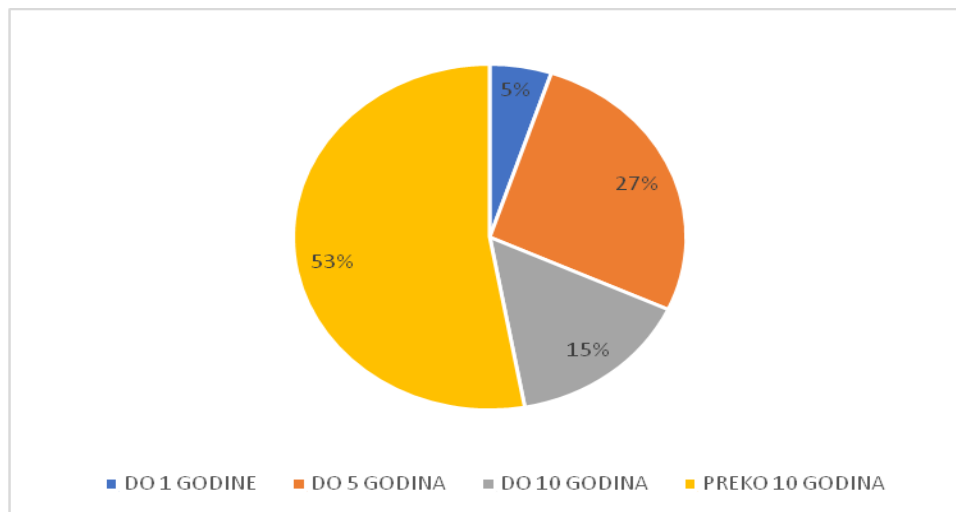


### Graph 6: Examinee's employment status

More than half the examinees have been employed in media for over 10 years. One quarter of examinees is female and male journalists that have been working for up to 5 years.

	Frequency	Percentage
UP TO 1 YEAR	8	5.1
UP TO 5 YEARS	42	26.8
UP TO 10 YEARS	24	15.3
OVER 10 YEARS	83	52.9
Total	157	100.0

Table 7: Examinees employment period



Graph 7: Examinee's employment period

- c) *Research and survey for focus – group* has also been implemented online. Google Meet online platform was used in order to enable efficient online communication and recording of group discussions. Basic criteria for selecting the participants in this research and survey included the following: a) media type (TV, radio, printed media, online media); b) geographical disparity (FBiH, RS, BD); c) gender diversity, age (beginners, experienced journalists, senior journalists). Sample also included female and male journalists from local media houses (printed media, radio, TV, online) from various parts of BiH (for instance Gacko, Zvornik, Brčko, Konjic, Sarajevo) where gender and age diversity was best illustrated through this process. 10 participants took place in this poll altogether.

## Variables

Variables used in *document analysis* process included the following:

- Which legal acts (in its wider sense) are relevant for local media functionality and their managing?
- Which legal acts are relevant in regard with employment status regulations and journalists' labour rights in local media houses?
- To what extent the existing legal regulations have been conformed with EU standards in terms of media freedoms, free information for general public and media integrity in local communities
- Is there a gap between formal legal provisions and practices in reality? If so, in which field this is most notable?
- What recommendations as far as overcoming current situation have already been formulated?

Variables used in *questionnaire form for online interview* include the following:

- Perception regarding female and male independence and autonomy
- Labour organization within media house
- Participation in bringing decisions within media houses
- Employment status
- Outer pressures
- Assaults, attacks and threats
- Journalists' solidarity
- Reactions and responds by outer entities regarding the violation of journalists' rights (courts, police, prosecutor's office, politics, business, non – governmental sector).
- Perception of legislative framework for local media
- Perception of quality regarding media managing
- Perception of media integrity in local community

Variables used in **focused – group research and survey** include four fields:

- Perception of main challenges and opportunities related to work conditions and journalists' rights in local media houses;
- Perception regarding operations within media houses (ownership, media position economy, labour and legal status of journalists, human and material resources, education and motivation of personnel), and outer entities (courts, local governing officials, political parties, economy and business powerful figures, civil society, citizens) on work conditions and journalists' labour rights (both female and male journalists)
- Perception of participants regarding freedom and media integrity in local communities
- Recommendation concerning main and key difficulties and advancement of female and male journalists' positions

**Research and survey time and place**

Research and survey were conducted and implemented in local media houses throughout the entire territory of Bosnia and Herzegovina (Federation of BiH and Republic of Srpska and Brcko District) during the period between 26 October and 31 December 2020



## **ANALYTICAL REPORT**

Detailed research and survey tests, starting from the questions and issues related to legislative framework, including analysis of questionnaires and polls results to report provided by focus – group were displayed and represented in this part of the report.

### **a) Legislative framework**

There is a vast number of legal acts that have been relevant to media houses establishing and operating. Some of these regulations have been bound to all media houses in Bosnia and Herzegovina while others are specific to particular media houses and some have relevancy only at local levels. Besides, certain set of laws, which we colloquially refer to as media laws, are aimed to directly regulate particular media issues, including media freedom issues, media independence, media autonomy Etc. On the other hand, other laws commonly regulate other fields and branches that have been relevant to local media houses and their work, including work conditions and labour rights regulations, provision on preventing conflict of interest Etc.

For instance, laws that regulate issues and questions regarding the protection from defamation and libelling are not related to specific media in which the disputable contents had been posted, published or broadcasted; instead, they rather focus on “releasing, revealing and sharing untrue content”. This particular type of content may be revealed or released at certain gatherings; but could also be posted in printed press, announced in local radio, broadcasted on television or posted in online source. In all of these cases, legal provisions regarding the protection from defamation or libelling have been implemented.

On the other hand, Law on Communications in BiH regulates communication field and communications, according to this particular law, include telecommunications, radio, broadcasting (including cable television) and all related services and other means accordingly. Therefore, this law does not relate to printed press or online media only.

In third case, the rule by Regulatory Communication Agency in regard with providing audio and visual media services clearly defines the provisions that directly relate to public television stations and these provisions do not relate to other media sources.

Basically, in this work, we shall disregard these laws as this would not even be possible having in mind the nature of this work. This task could not even be considered as necessary and required, because several qualities – based analysis had already been completed in regard with legislative framework relating to local media work, including research and survey as far as work conditions and labour rights are concerned.

In this part and pursuant to previously completed research and survey and analysis, we shall attempt to reply, answer and respond to significant questions and issues regarding the competence and adequacy of legislative framework related to local media, particularly paying attention to issues concerning freedom and media independence, media functionality and operating in public interest, including labour rights as well.

First question is how can we generally assess legislative media framework? So far and according to completed analysis, several things had been underlined. Firstly, this framework emerged during the period when the international community presence was influential in BiH and whole set of laws was passed and implemented in BiH in conformance with international standards based on direct impact imposed international community factors. This included laws on protection against defamation (libelling), laws on free access to information, law on communication Etc. However, two things have been consecutively repeating as a result of estimate of these laws. First of all, there has been a discrepancy between the passing of laws and their implementation on practice. Although, the second conclusion often tend to appear rather naive, we have noticed that pre – drafted and pre – planned alterations and changes in media field that should have been conducted with assistance within legislative framework, had both been followed by reforms in other social branches, particularly in the field of politics that fundamentally determine and define media operating dynamics. Third aspect, also important to outline, included the fact that 20 years had passed since the time of passing of these laws until present period and that certain and additional standard, regarding media activities that in the meantime had been established and developed. However, due to almost completely obstructed process of passing these new laws in this field, local laws remained intact as in the beginning of 21<sup>st</sup> Century. What does this mean as far as media houses are concerned? We could generally say that the existing legislative framework does provide a solid and decent foundation for their implementations and that many solutions, to some extent, represent and display an orientation in situations where media houses and their employees may face and encounter certain circumstances that have been considered far from the above-described statutory laws.

Second question concerns freedom and media independence. In Bosnia and Herzegovina, there are constitutional guarantees concerning freedom of expression<sup>1</sup>, that, according to relevant interpretations, comprise media freedoms<sup>2</sup>. Apart from that, Entity laws particularly include freedom of press<sup>3</sup>, and Constitution of RS precisely defines that censure is legally forbidden but it also defines printed press duties and obligations (including the duty of providing timely, correct, accurate and objective information, including the correction and mending of corrections.<sup>4</sup> In relevant laws concerning media operations, there are also guidelines that guarantee freedom of expression and same laws even refer to media freedoms, even though these laws, due to a variety of reasons, do not have certain and particular values.

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<sup>1</sup> Article II 3 h of the Constitution of Bosnia and Herzegovina.

<sup>2</sup> Srdić, M (2012) “Međunarodne konvencije i ugovori u pravnom sistemu BiH” u: M. Halilović i A. Džihana *Medijsko pravo u BiH*, Sarajevo: Internews. str.50

<sup>3</sup> Article II A 2 1 of the Constitution of Federation of Bosnia and Herzegovina; Official Gazette of the FBiH 1/94.

<sup>4</sup> Article 26 of the Constitution of the Republic of Srpska; Official Gazette of the RS 28/94.

Law on Communication of BiH, in its Article 4 insufficiently refers to freedom of expression. It states that “regulatory principles of broadcasting comprise the following: a) protection of freedom of expression and diversity of opinion respecting commonly – accepted standards of manner, non – discrimination, righteousness and non – biased reporting”. Law on protection from defamation (libelling) consists of guideline interpreting the law “in a way so the implementation of its provisions mostly enables the principles of freedom of expression”<sup>5</sup>.

Besides, there are laws on Entity levels that relate to issues and questions concerning freedom and media independence. In the RS it is the Law on Public Informing<sup>6</sup>, and in the FBiH it is Cantonal laws on public informing or laws on media that regulate this particular field, but having taken into consideration that not all cantons passed these laws. Basically, the statutes of these laws remained unclear, as there is a vast discrepancy between them<sup>7</sup>, and also, some of these laws contain provisions that oppose legal provisions passed after. Communication Regulatory Agency Code to some extent deals with this, rather sensitive issue; similar to Law on Communication of BiH. Code, in its Article 1 states:” In audio and visual media services and media services on radio stations human dignity shall be respected, including other fundamental human rights and it shall encourage free expression shaping and opinions”.<sup>8</sup> In similar way, the question of freedom of expression is similarly treated in Press and Online Media Code in BiH. In Common Provision section the following is stated:” The duty of journalists, printed press and online media is to obey public needs for being provided with useful, timely and relevant information as well as defending the principles of free informing and rights to righteous comments, including critics imposed against journalism”. In neither of these codes the term independence was mentioned. Based on this, rather summarised and short review, we may conclude that there are rather surprisingly limited number of legal provisions that would explicitly define media freedoms and their independence. Although, freedom of expression and media liberties are guaranteed by the constitution, there are no adequate and competent legal provisions or some other commonly – accepted guidelines (such as Press Code) that would eventually outline, highlight, reinforce and strengthen the concepts of free media and their independence. On one hand, we can understand that the concept of freedom of expression does include media freedom and from the moment when media or journalists confront in legal proceedings, in European Court Guidelines are implemented, the interpretation by which freedom of expression include free media shall emerge respectively.

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<sup>5</sup> *Defamation Law of FBiH* (Sarajevo, 2002), Službene novine FBiH broj 59/02, coming into force in 2002; Article 3.

<sup>6</sup> *Law on Public Informing of RS* (Banja Luka, 21 April 1997), Official Gazette of RS, number 10/97, coming into force in 1997,

<sup>7</sup> Nadaždin-Defterdarević, M (2012) “Normativni okvir prava na informiranje u BiH” u: M. Halilović i A. Džihana *Medijsko pravo u BiH*, Sarajevo: Internews. str.99-102

<sup>8</sup> Article 3 (Fundamental Principles)

However, we should not neglect that the “concept of *media freedom*, actually goes furthermore from mere freedom of expression and comprises rights that cannot be withdrawn from the “*freedom of expression*”.”<sup>9</sup>

Oster claimed that media had not been provided with numerous privileges in different jurisdictions including the protection of journalists’ distribution network; protection against measures that may have *discouraging effect* on journalism; liberating journalists from the obligation to witness about sensitive, confidential and classified information or sources, even in cases when materials were collected illegally; exemptions from certain regulations related to protection of information and author’s rights; state duty to enable and ensure media pluralism, protection of journalists from violence while they perform their duties; protection of journalists from excessive impact and influence imposed by mighty and powerful financial groups and lobbies, including the government and privileged access to government information, particularly to press conferences<sup>10</sup>. This is why it appears uncommon that concept of free media has not been adequately reinforced and strengthened through legal definitions and through other documents that regulate media work in general.

Still, it would be incorrect to conclude that, due to the fact media freedom concepts and independent journalism are not explicitly defined; there are no mechanisms that would enable and ensure free and independent media work. Kovo (2018)<sup>11</sup> identify different and various provisions that define procedures regarding the appointing of managing structures in public local media houses and that should ensure the dissenting of politics from managing structures in public local media houses. However, Kovo outlined the incompleteness and non-precised existing provisions, as well as practices that mark innovative solutions that ensure political taking of managing structures in public local media houses.

Third question and issue relate to the question should public insist to the context by which local media houses is defined. In the *Code of audio and visual media services and media radio services* by the Communication Regulatory Agency (CRA) and which is relevant to local radio and TV stations, public interests are referred to in several acts. Public interest is thus defined as “public interest which should dispose of information regarding questions and events considered as general public interest, including, but not being limited to the protection of common health and safety, revealing or releasing criminal offences (deeds), preventing public deceiving, including disclosure of incompetence or cooption in public service Etc.”.<sup>12</sup>

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<sup>9</sup> Džihana, A (2015) *Sloboda medija i sloboda izražavanja*, Sarajevo: CJP (Media Freedom and Freedom of Expression, Sarajevo - CJP)

<sup>10</sup> J. Oster, Theory and Doctrine of ‘Media Freedom’ as a Legal Concept, *Journal of Media Law*, 5/2013, s. (57 i dalje) 65 according to A. Džihana (2015) *Sloboda medija i sloboda izražavanja*, Sarajevo: CJP CJP (Media Freedom and Freedom of Expression, Sarajevo - CJP)

<sup>11</sup> Kovo, J (2018) „Politička kontrola i slaba regulacija: imenovanja upravljačkih struktura i urednika“ (Political control and poor regulation: appointing managing structures and editors) in: S. Hodžić i A. Sokol, *Javni lokalni mediji: između javnog interesa i finansijske neovisnosti*. (Public local media between public interest and financial independence, Sarajevo: Mediacentar.

<sup>12</sup> Kodeks o audiovizuelnim medijskim uslugama i medijskim uslugama radija, član 2. (Code on audio and visual media service and media radio service, Article 2)

By this way media must justify every privacy violation by referring to as public interest and they can thus reveal the identity of protected witnesses if this proved to be general public interest.

Consequently, media do not have to contact this entity or organizations that are subject to revealing nor releasing of negative and non-affirmative connotations should public interest require different. Despite frequent referring to public interest, there are no strict rules by which journalists ensure the credibility in their society. First devotion of journalism according to Kovach and Rosentiel (2007:52) is loyalty to citizens, rather than loyalty to their employers: “News people collecting news are not like employees of other companies. They have social responsibility that occasionally overcome immediate interests of their employers. At the same time, this duty is the source of financial achievement of their employers. Loyalty to public is the core meaning of what we refer to as journalists’ independence “.<sup>13</sup>

During the analysis of relevant provisions for local media houses, Vukojevic (2018) outlines to numerous deficiencies in this particular segment had noticed that “the role of public local media, on regulatory level, is poorly and insufficiently defined and program requirements are not defined in more precise way comparing to common requests for certain ration of informative and educational contents and programs. The role of these media houses is not precisely defined in accordance with requirements of a particular and concrete local community and that there are no specific requests demanding that certain program contents should be targeted to local community affairs. Defining the roles and decisions regarding the program contents of these media houses is left to discretion decisions of actual media management”.<sup>14</sup> It is a common sense to conclude that inadequate defining of public interest in case of local public media could mean that it is even less defined as far as local private and other media houses are concerned.

It is similar situation with printed press and online media. In Code of Printed Press and online media there is a part refereeing to public interest which is defined as “procedure and/or information aimed to aid general public in providing personal opinion and decisions regarding issues or questions (events), including the efforts of revealing criminal offences and/or criminal deeds (felonies) and to prevent misleading of public by providing or releasing certain statement or individual or organization act”.<sup>15</sup> However, this particular definition does not appear powerful and has not such enormous impact on printed press or online media that have decided to exclude themselves from the self – regulation system,

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<sup>13</sup> Kovach, B. i Rosentiel, T. (2007) *Elements of Journalism: What Newspeople Should Know and the Public Should Expect*. New York: Three Rivers Press. pg.53

<sup>14</sup> Vukojević, B (2018) „Sadržaji od značaja za lokalne zajednice: slabi programski zahtjevi i upitan udio u programima lokalnih emitera“ u: S. Hodžić i A. Sokol, Javni lokalni mediji: između javnog interesa i finansijske neovisnosti. Sarajevo: Mediacentar / “Content significant to local communities; poor program requirements and questionable share of local broadcasting programmes”, in S. Hodžić and A. Sokol Public local media: between public interest and financial independence: Sarajevo: Mediacentar

<sup>15</sup> Code for Printed Press and online media of BiH, Article 1.

Finally, in terms of legislative that regulates work and labour relations in media, Hodžić (2008)<sup>16</sup> emphasized that there was no law on state level but instead, the jurisdiction in this specific field is split on Entity levels and Brčko District.

Key documents that regulate this field include labour laws and collective agreements (contracts), as well as internal statutes if these exist in media. Laws define issues and questions such as work contracts, working hours, wages/salaries, termination (cancelling) of contracts, rights and duties in work relationships and similar. Therefore, for instance, according to provisions that are relevant to labour law<sup>17</sup>, full time of employees should not exceed 40 hours per week. In situations when these hours exceed 40 hours per week in certain periods, the average working hours during a single calendar year cannot be longer than 40 hours per week.

Collective agreement (contract) defines work relationships, wages/salaries, union work conditions, right of collective negotiations and signing of collective agreements (contracts), issues related to strikes Etc. Hodžić (2008), claimed that labour legislative system in BiH is vastly in disproportion with relevant international conventions, but he also underlined that there were critics like the one where the existing laws were inconsistent, not précised and inaccurate and subject to different interpretations. For instance, it is outlined that the procedures of contract cancelling are not adequately formulated in neither laws or in collective agreements (contracts). Employer should, pursuant to the above, should cancel employees' contract with notice period signed by both parties (sides), should this dismissing (sacking) be justified by economic, technical or organizational reasons; or when an employee simply fails to fulfil and complete his tasks and duties given. However, it neither is nor precisely defined what justified sacking might exactly mean or, on the other hand, who is authorised to estimate and assess someone's capability in terms of performing work duties and tasks in acceptable way. Therefore, in reality, employers often sack and dismiss their workers routinely refereeing to these provisions. Consequently Hodžić (2008) suggested that the existing laws should be amended with more précised definitions of these rights, protective mechanism and standards as well. Concretely, mechanisms that would disable and prevent arbitrary cancellation of work contracts based on economic, technical or organizations reasons, should be installed into the system.

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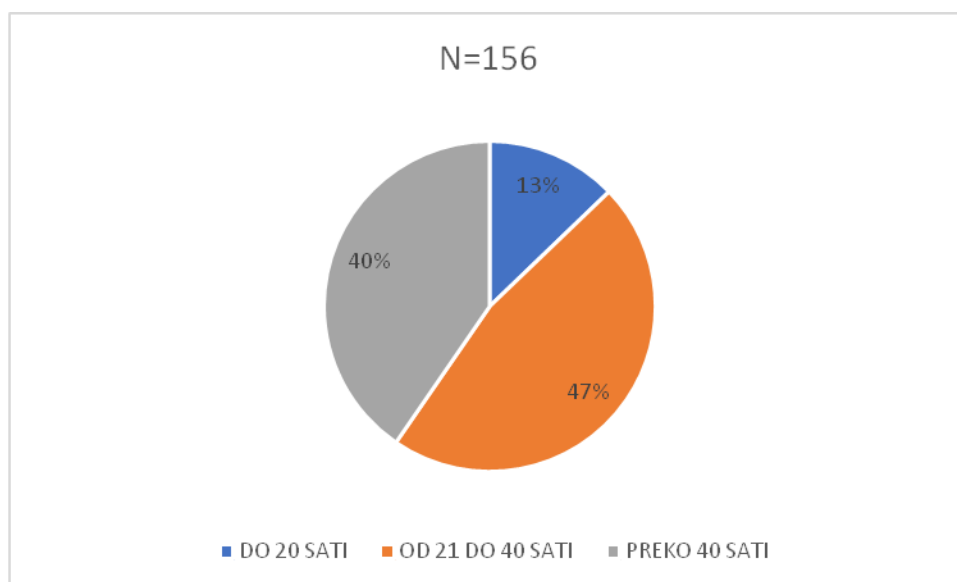
<sup>16</sup> Hodžić, S. (2008) „Bosnia and Herzegovina“, in Labour Relation and Media, Moldova: Informational Policy Institute. pg. 92 – 130.

<sup>17</sup> Article 30 to 36. Labour law of FBiH, „Official Gazette of the Federation of BiH" number: 43/99, 32/00 and 29/03; Labour Law of the RS, Article 57. and 69., „Official Gazzette of the Republic of Srpska, number: 1/16 and 66/2018")

## b) Results of poll research and survey

### Work conditions and labour rights

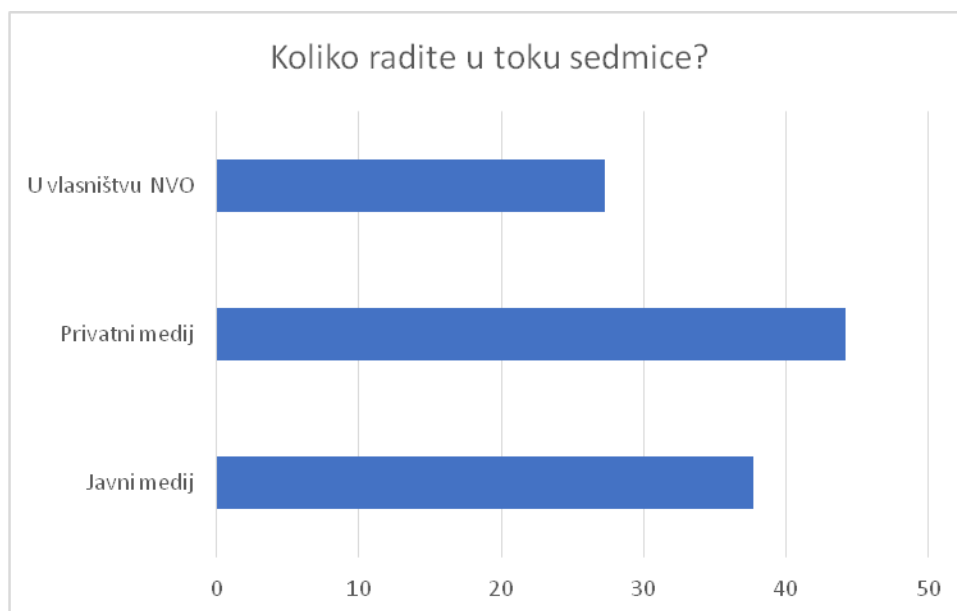
Greatest number of examinees, almost half of them, stated that their working hours ranged between 21 and 40 hours per week. However, almost 40 per cent of them said that they worked over 40 hours per week. These kinds of practices were not in accordance with Labour Law<sup>18</sup>, by which full time of an employee should last no more than 40 hours per week, and in case of an increased number of working hours during certain periods, average working hours during a calendar year must not exceed 40 hours per week.



**Graph 8: Number of working hours per week**

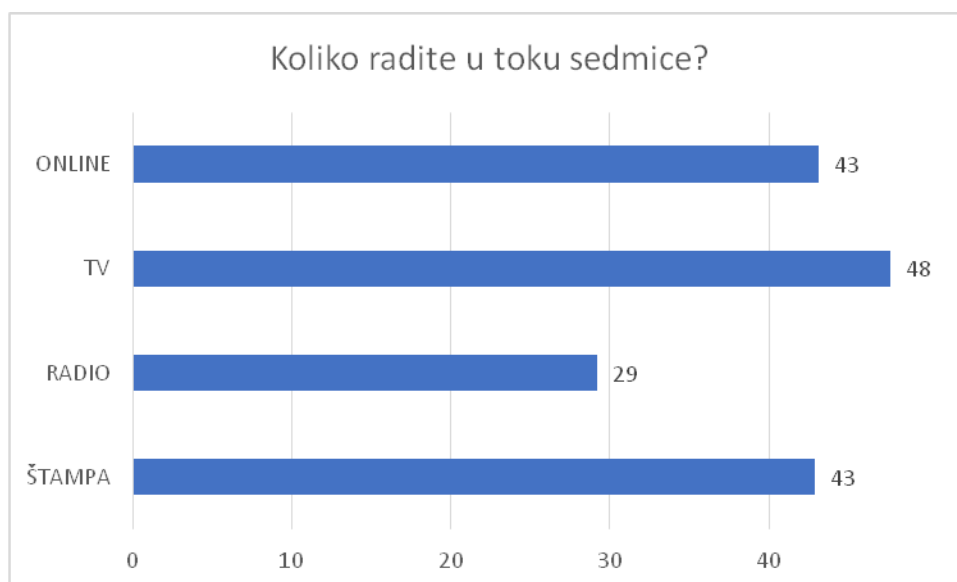
When comparing the number of working hours per week with the media ownership type, we could note that the problem of overtime working mostly affected staff working in private media houses. Even 44 per cent of examinees from these media houses worked over 40 hours per week, while 38 per cent of employees working in public media houses also worked over 40 hours per week. 27 per cent of those working in non – government media houses also worked over 40 hours per week.

<sup>18</sup> Article 30 to 36. of the Labour Law of FBiH, „Official Gazette of the Federation of BiH" number: 43/99, 32/00 and 29/03; Labor Law of the RS, Article 57 and 69., „Official Gazette of the Republic of Srpska number: 1/16 and 66/2018")



**Graph 9: Percentage of examinees that work over 40 working hours per week based on type of media ownership**

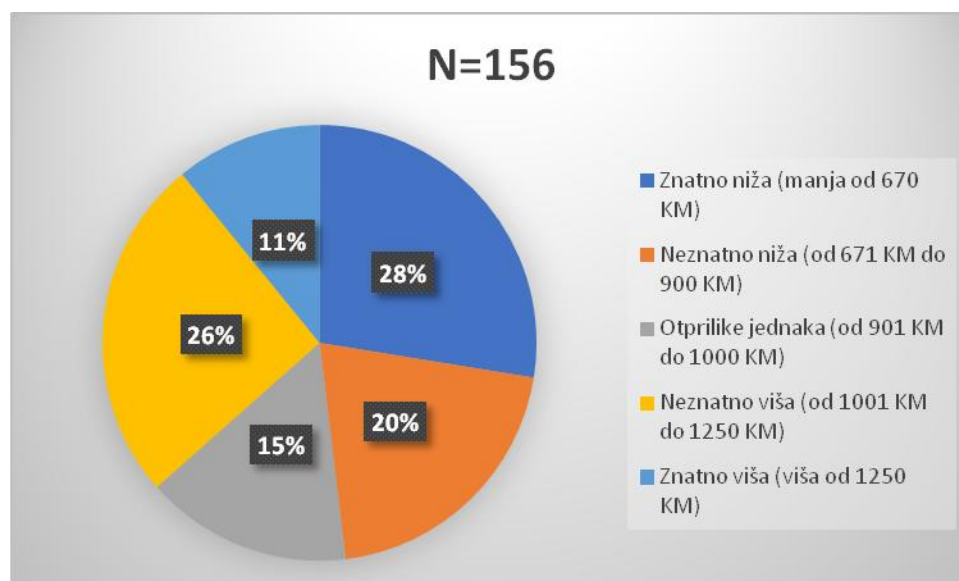
Based on media type where examinees work, the problem of overtime hours mostly impacted those working in television stations. Almost half the examined examinees working in TV stations (48%) said that they work over 40 hours per week. Best situation, as it seemed, was in radio stations, where 29% of examinees stated that they work over 40 hours per week.



**Graph 10: Percentage of examinees that work over 40 working hours per week based on type of media ownership**

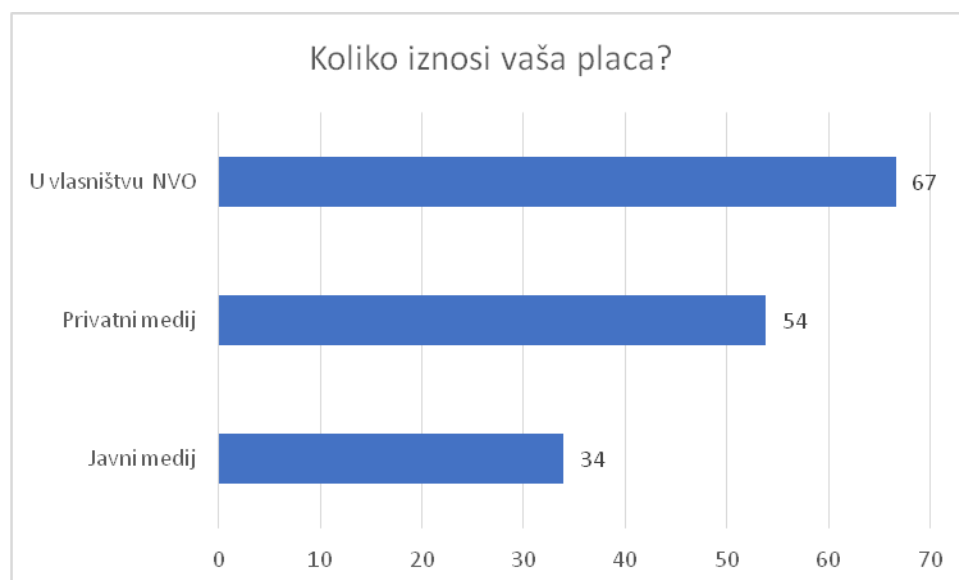


The average nett (after tax) monthly salary in Bosnia and Herzegovina in July 2020 was estimated to some BAM 965.00. Almost half the examinees claimed that their salary was lower than this (48%).



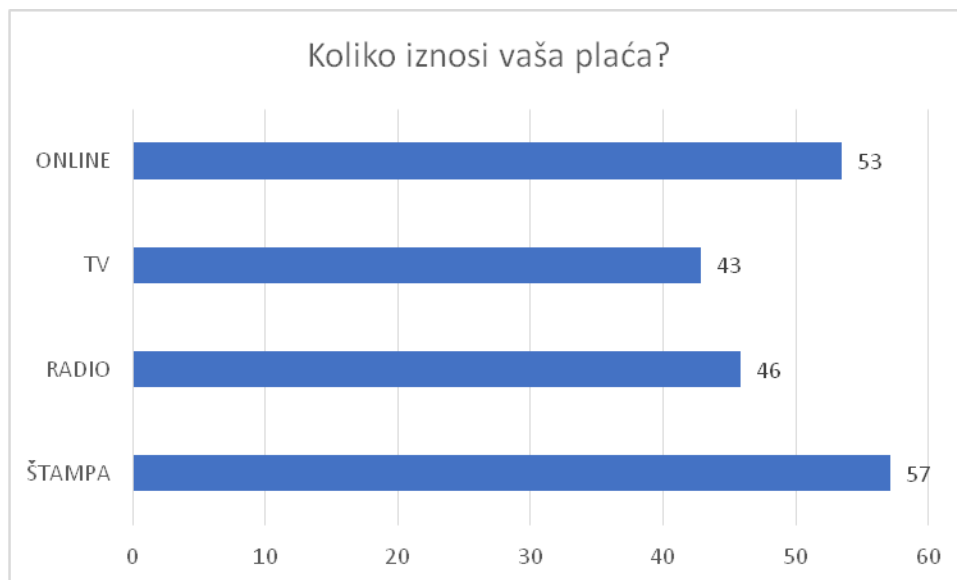
**Graph 11: Amount of nett salary comparing to nett average salary in July 2020 in BiH**

Looking from media ownership view, the worst situation was in media owned by non government organizations. Two thirds of examinees (67%) from this group said that their salaries were lower than average salaries in BiH. The situation in private media houses was somewhat better, despite the fact that over half the examinees (54%) said that their salaries were lower than average salary in BiH. In public media, one third of examinees (34%) have this salary.



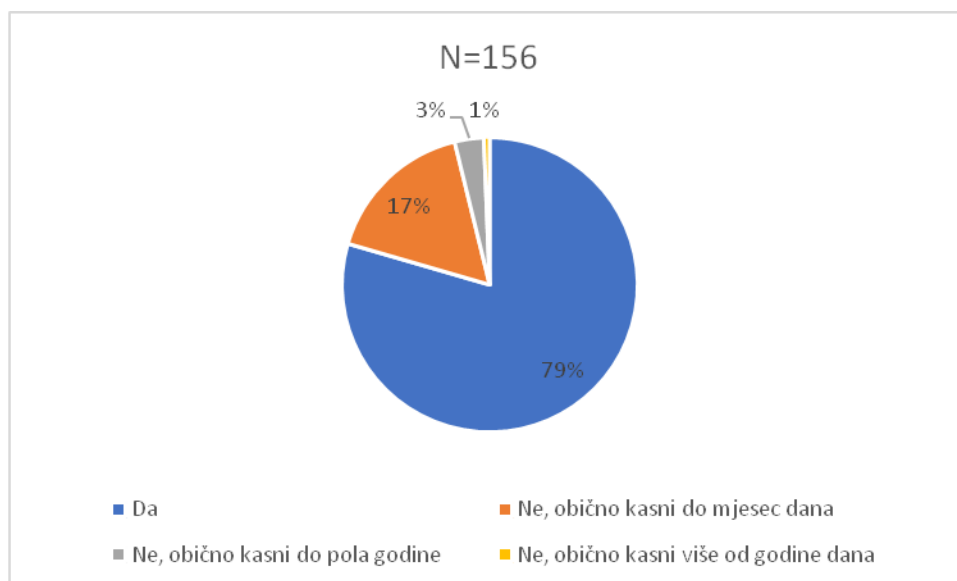
**Graph 12: Percentage of examinees that work over 40 working hours per week based on type of media ownership**

The comparisons, according to media type confirm that printed press was in worst possible situation, because 57% of examinees said that their salaries were lower than average salaries. Best situation, on the other hand, was in television stations. Examinees from this group stated that their salaries were lower comparing to average salary in 43 per cent of cases examined.



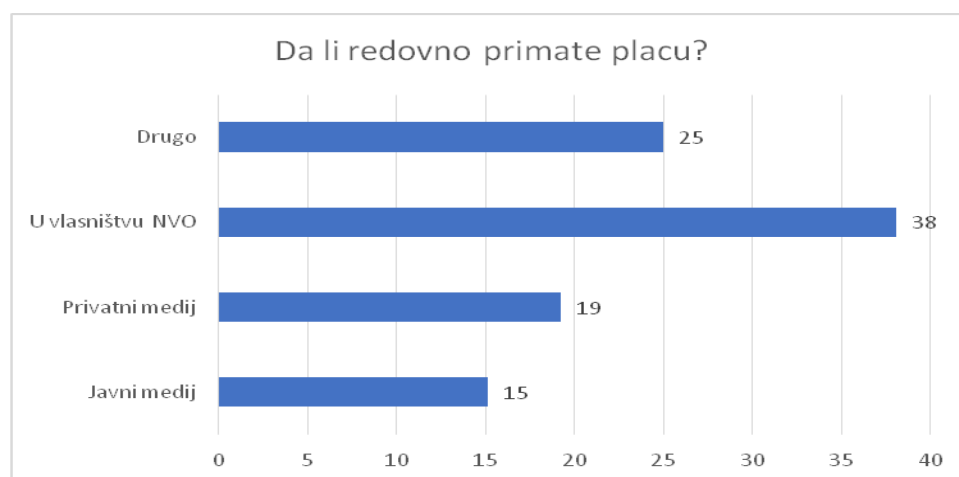
**Graph 13: Percentage of examinees that work over 40 working hours per week based on type of media ownership**

Biggest number of examines receive regular salaries (almost 80% of them). If their salaries were delayed, they were mostly late by maximum 30 days (81%), 16 per cent up to 6 months and in three per cent their salaries were delayed for more than one year.



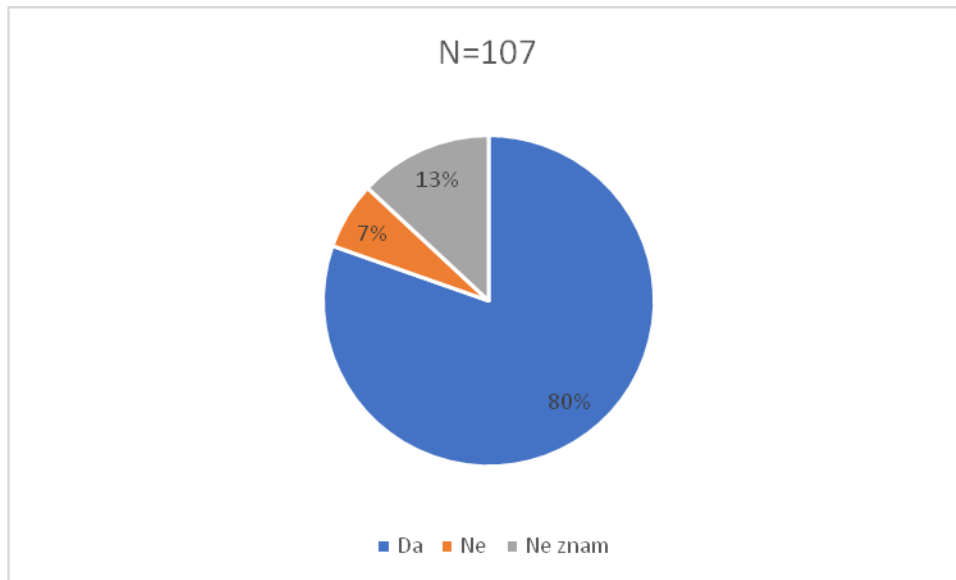
**Graph 14: Regular salaries in time**

Delayed salaries were most characteristic for media houses owned by non – government organizations. 38 per cent of examinees from these particular media houses reported their salaries to be late.



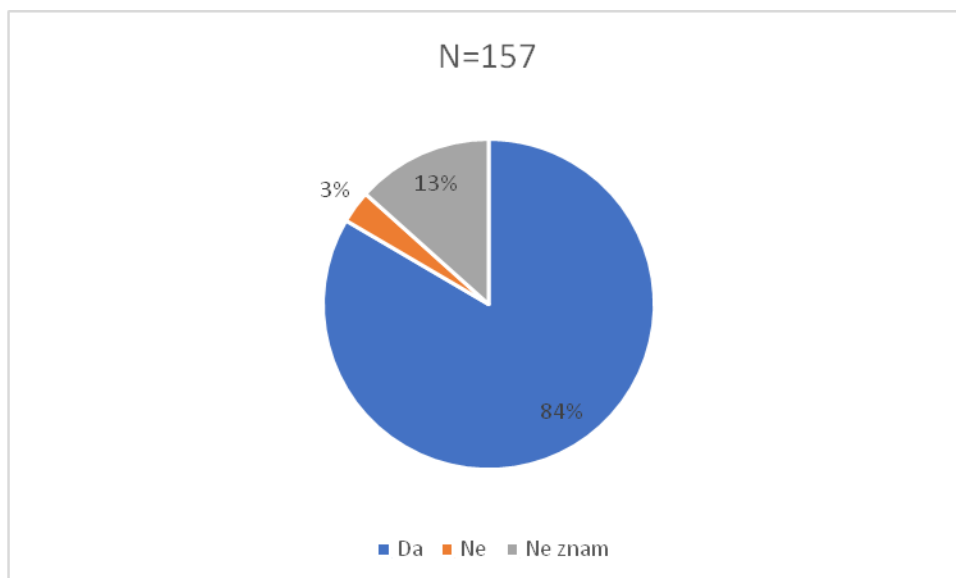
**Graph 15: Percentage of examinees with late salaries based on media ownership type**

There were no great differences in delays of salaries based on media where examinees work. Looking by percentage, the largest number of examinees were those that work in radio stations with delayed salaries (25%) and the least number include those that worked in printed press (14%). Out of 157 examinees, 107 of them had full time jobs. Four fifths of examinees (80%) said that health insurance, retirement fund and years of service were regularly paid according to the law. It was interesting that 13% of the examinees were unaware of whether their employers would pay for the above described contributions (health insurance, retirement fund and years of service). In most cases these included the examinees that change their jobs coming from public and private radio and TV stations. There are no significant differences whether they were employed in either public or private media houses.



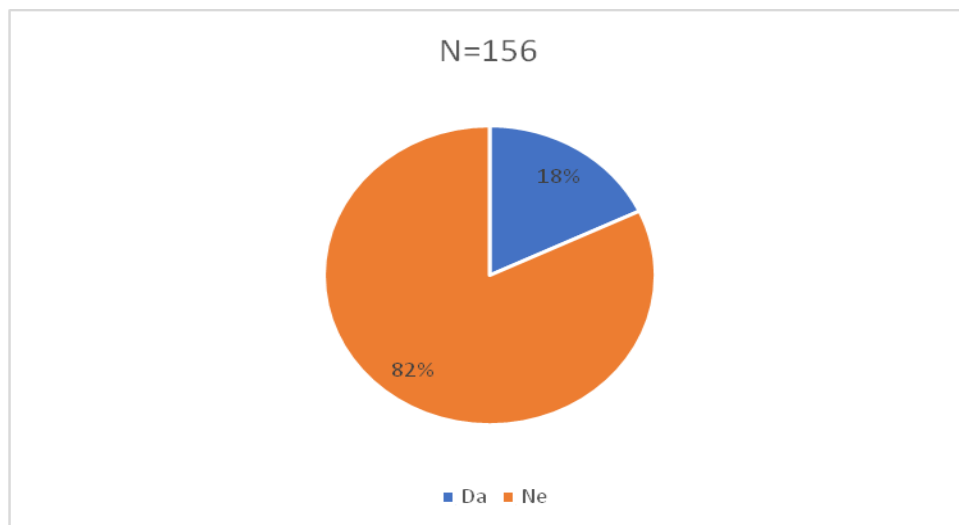
**Graph 16: Health insurance, retirement fund and years of service**

Greatest number of examinees (84%) stated that their media houses allowed joining of journalists with the purpose of providing legal protection (legal aid) regarding their rights and promotion of professional journalism (unions/syndicates, journalists' associations). Five examinees said that this type of associations was not allowed in their media houses. These answers came from employees in online media houses and radio stations and these media were not public media houses either.



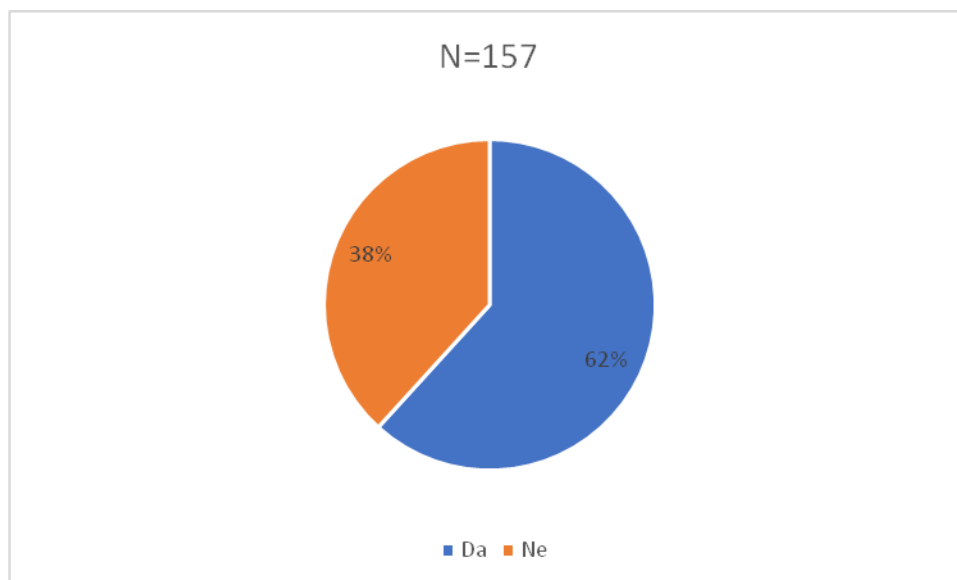
**Graph 17: Allowing employees to join unions/syndicates and journalists' associations**

In terms of joining, the largest numbers of examinees were members of journalists' associations rather than members of unions/syndicates. Only 18% of examinees were members of some unions/syndicates in BiH. Vast numbers of those come from public media (79%) from both, radio and television, while the number of examinees working in other media houses and other media ownership types was negligible.



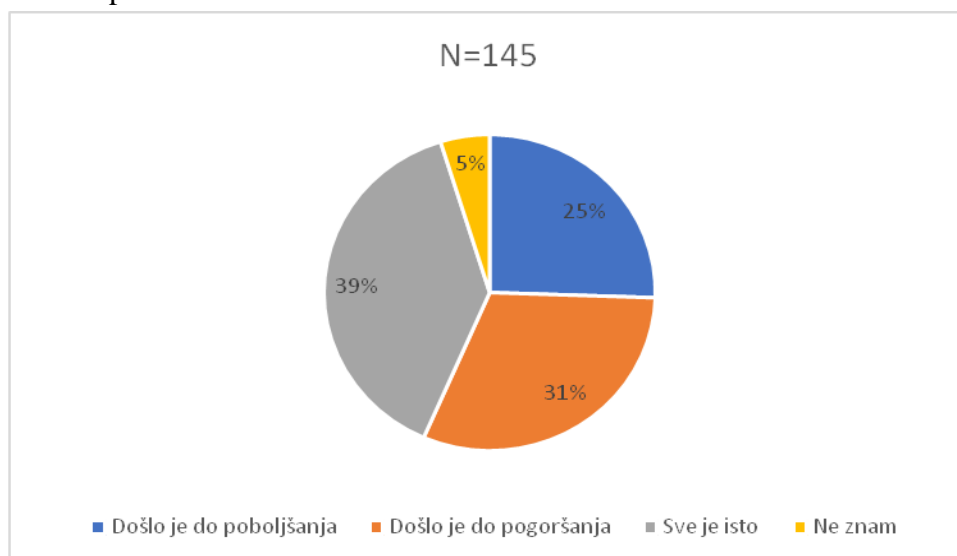
**Graph 18: Union / syndicate membership**

As oppose to this, 62 per cent of examinees were members of some journalists' association in BiH. Looking from ownership media type and based on media that examinees work for, we could note that each group has more than half examinees that were members of some sort of association.



**Graph 19: Journalists' associations' memberships**

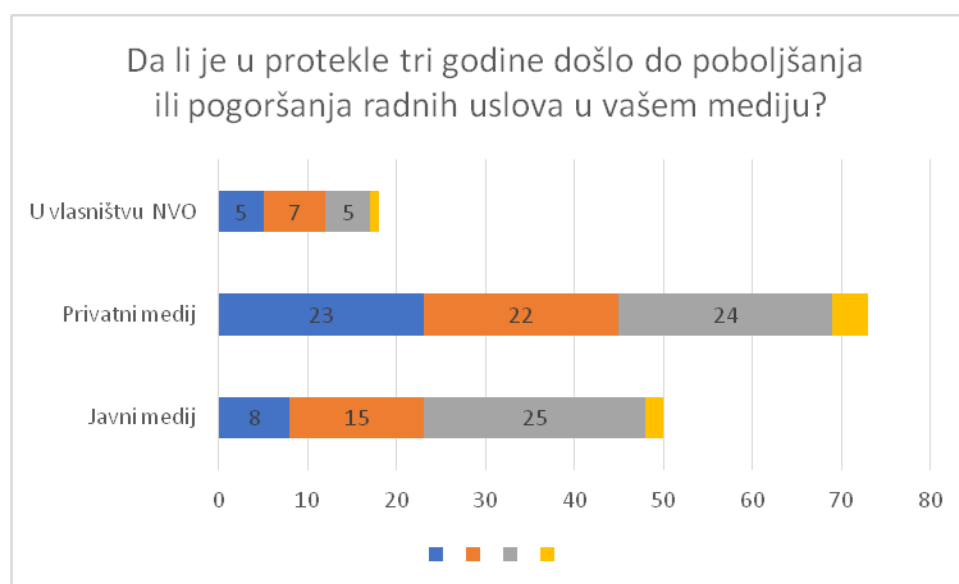
Examinees that have been working over three years in media houses provided an estimate whether there had been an improvement or worsening of working conditions in their media for the period of last three years. Largest number included those that thought that there had been no changes in either good or bad way (39%), while on the other hand, there have been those that believe (31%) that worsening was more notable. Still one forth of examinees thought that things have improved.



**Graph 20: Perception of working conditions for the period of past three years**

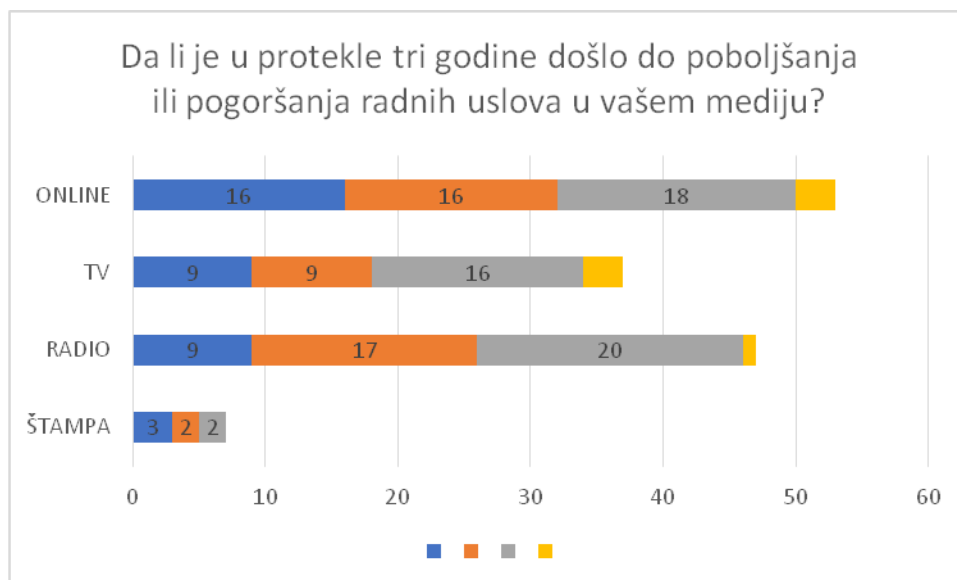
By observing perceptions of examinees based on the type of media ownership, there weren't significant differences. We could additionally note that examinees employed within public and NGO media somehow see the situation worse than it was the case with examinees working for private media houses.

Half the examinees from public media houses responded with “I don’t know” to this particular question. 30% of them believe that the situation has deteriorated and only 16% of them believed that the situation improved. Similar perception occurred with the examinees working for NGO media houses. 39% of these examinees believed that the situation has deteriorated, as oppose to 28% of those that do not know the answer and those that consider the improvement. The situation in private media is rather different. An equal number of examinees from that group replied with “I don-t know”, “the situation has improved” and “”the situation has deteriorated”.



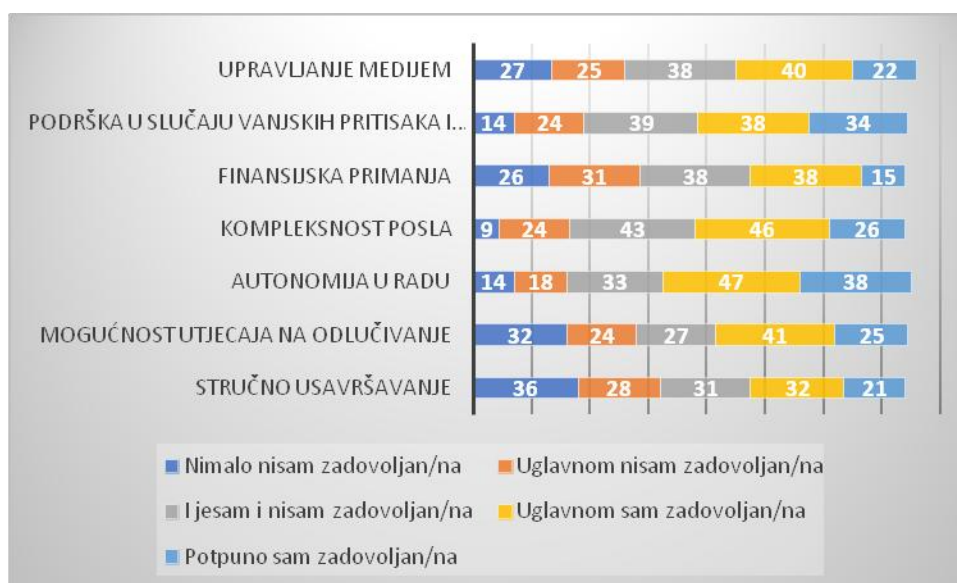
**Graph 21: Perception of working conditions for the period of past three years based on media type ownership**

Looking at the perception based on media ownership type, again there weren’t significant differences between the examinees, except that examinees working at radio stations saw the situation worse than other examinees.



**Graph 22: Perception of working conditions for the period of past three years based on media type**

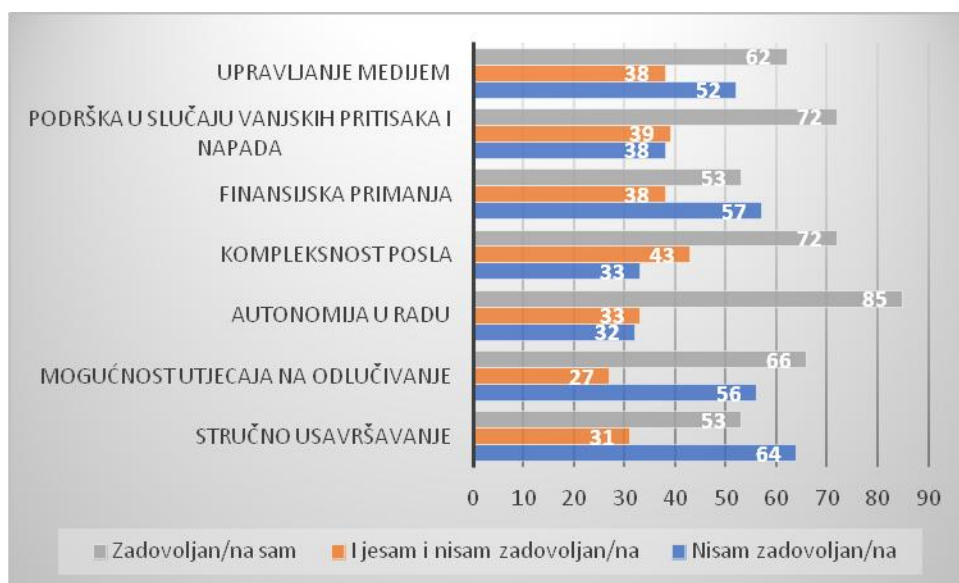
In terms of satisfaction with different inner – media factors that made an impact on working conditions and journalists' labour rights, the examinees demonstrated greatest satisfaction with the autonomy they had in their work, and then with media support in case of outer pressures and assaults. Least satisfaction was shown in terms of additional trainings and financial means.



**Graph 23: Satisfaction with different aspects of work in media**

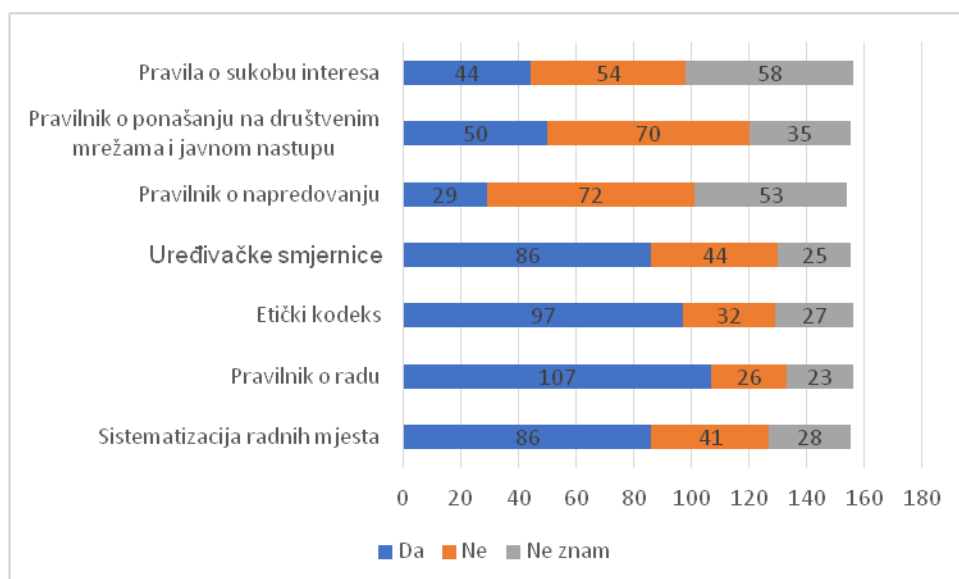


A number of examinees showing satisfaction with current situation was larger than those that weren't based on all categories, except for additional trainings.



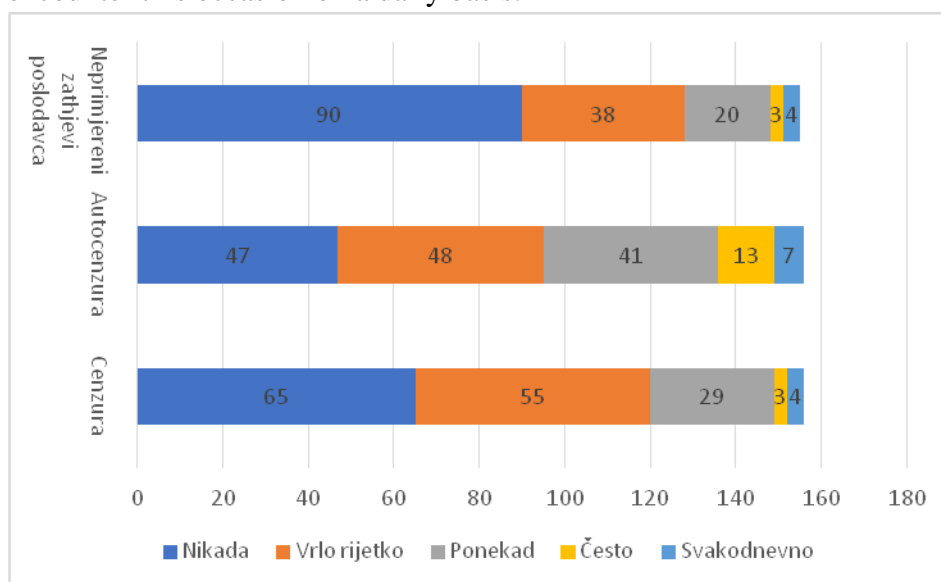
**Graph 24: Satisfaction with different aspects of work in media**

Examinees responded to the question whether the media they had worked for had various documents in their possession defining the work of employees in media houses and it made an influence and impact on their work, including their labour rights. Greatest number of affirmative answers related to Work Guideline, and least number of examinees confirmed that their media houses had Guideline on advancement. Still, these answers and replies should be comprehended as examinees perceptions, rather than real and actual situation and state in terms of possessing different types of documents.



**Graph 25: Perception of examinees on internal types of documents that regulate journalists' labour rights and media work**

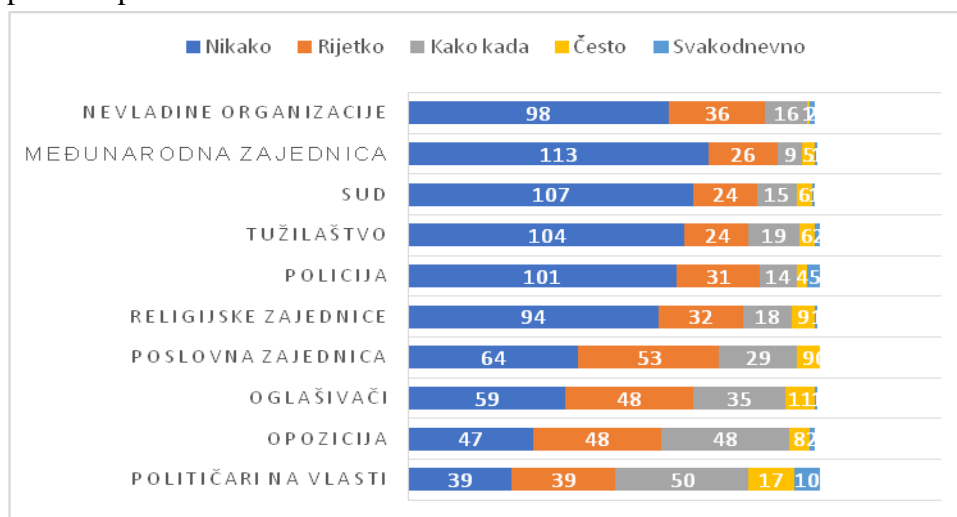
Examinees were asked to what extent they had been exposed or were subjects to censure (failing to post, publish or release the content) due to bans imposed by outer controlling entities and based on having such material considered as inappropriate, harmful, sensitive or “unsuited”, self (auto) censure (the decision not to talk or write about something due to outer or inner pressures imposed against journalists), including inappropriate requests to write or talk about certain issues, topics, themes or persons. Largest number of examinees has identified self (auto) censure as guise that they sometimes often encountered and faced. 70 per cent of examinees face and encounter self (auto) censure during certain time interval, with 31 per cent of them facing and encountering it in rare occasions; 26 per cent face and encounter it sometimes and eight per cent face and encounter self (auto) censure on a daily basis. According to examinees, out of all options, the *Inappropriate requests, requires and demands by the employers*, happen the least. 58 per cent of examinees claimed that they never happen; 24 per cent, on the other hand, said that they had happened in very rare occasions. Two percent of examinees face and encounter with this particular requires, requests and demands rather often while three per cent face and encounter this occasion on a daily basis.



**Graph 26: Perception of examinees regarding censorship, auto (self) censorship and self (auto) and inappropriate enquiries, requests and demands by their employers.**

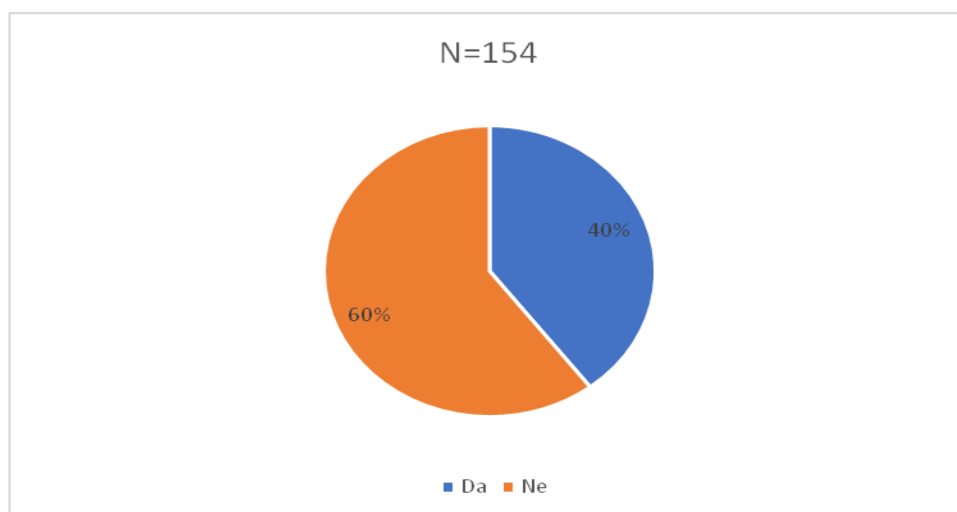
Regarding the questions about pressures by various social figures imposed against journalists during their daily duties, the examinees have identified the politicians that have pressurised them. Even three quarters of examinees (75%) stated that governing official politicians, during certain period, make pressure on journalists. As far as the opposition politicians are concerned, 69% of examinees confirmed the pressure imposed by those politicians and 62% of examinees confirmed the same pressure regarding commercial advertisers. Least number of examinees felt

pressure by the international community members, followed by court, prosecutor's office and police representatives.



**Graph 27: Pressures by public figure imposed on journalists during their daily work**

When asked whether they had been exposed to assaults, attacks or threats during the period of last three years, even 40 per cent of examinees responded affirmatively.

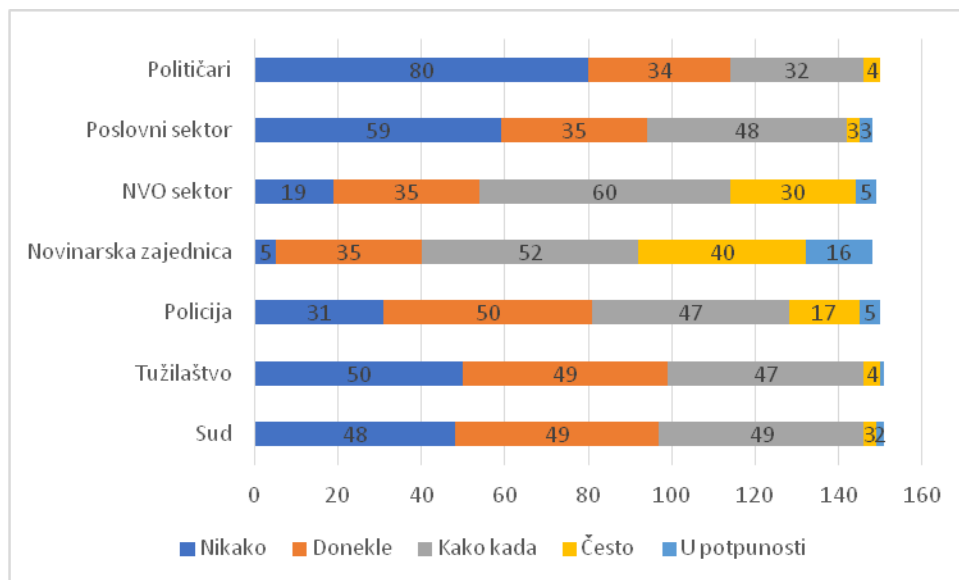


**Graph 28: Assaults and threats in past three year's period**

In most often cases, this issue has concerned threats directed via internet or threats directed alive (face to face) and by launching different campaign aimed to discredit both female and male journalists. But, these assaults and attacks include physical assaults, sacking (dismissing) from work, losing jobs, mobbing at work, disallowing the releasing and revealing of reports from certain locations, hacker attacks, spreading and sharing hate speech Etc.

The question, in regard with adequacy of negating and denying different when violation of law takes place and when journalists' labour rights are violated, examines (at least vast majority of them) identified the politicians as a group that most frequently reacts, responds and replies in most inappropriate way; while journalists' association and non – government sector have been

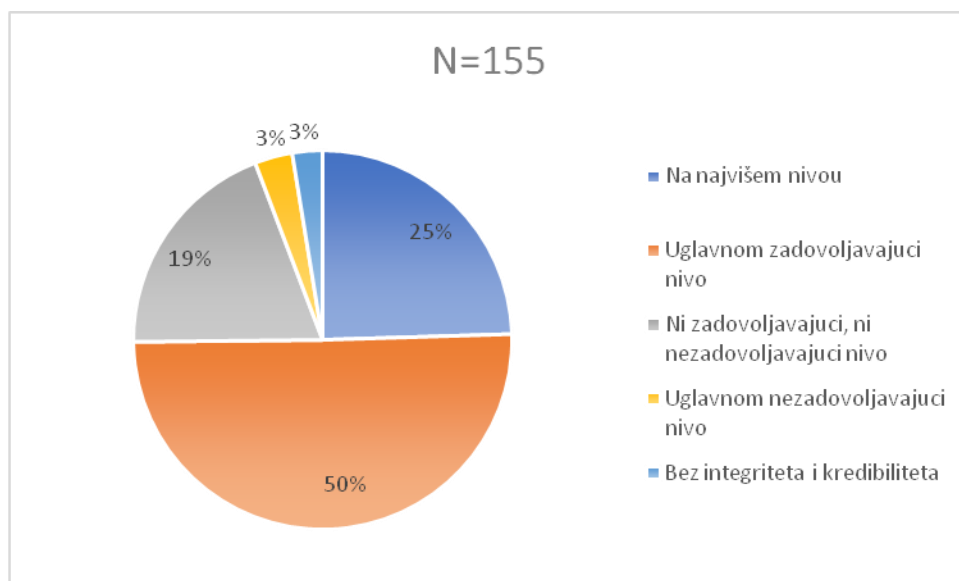
marked and described as those that very frequently and in fully adequate way react and respond when these situation occur.



**Graph 29: Perception of adequate reactions and replies to the violation of journalists' labour rights**

### Perception of credibility

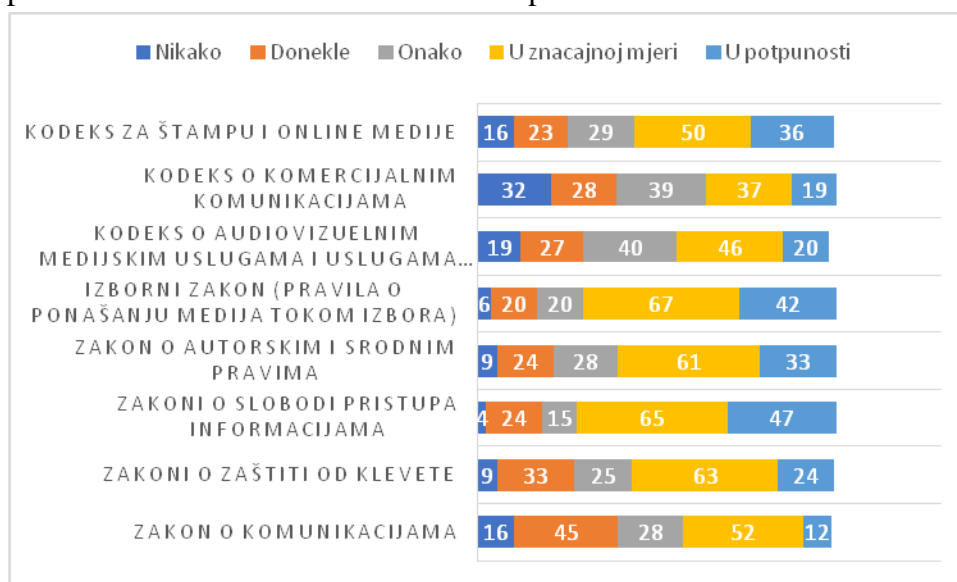
When asked about how they would assess credibility and integrity of media houses in their local communities, most examinees expressed satisfaction. Even three quarters of them believed that credibility and integrity had mostly been satisfactory or at the highest possible level. On the other hand, there are a very little number of those that believed that credibility and integrity of media houses in their local communities had been on dissatisfactory level or that they had lacked these characteristics (6%).



### Graph 30: Perception of credibility and integrity of media houses where examinees have worked

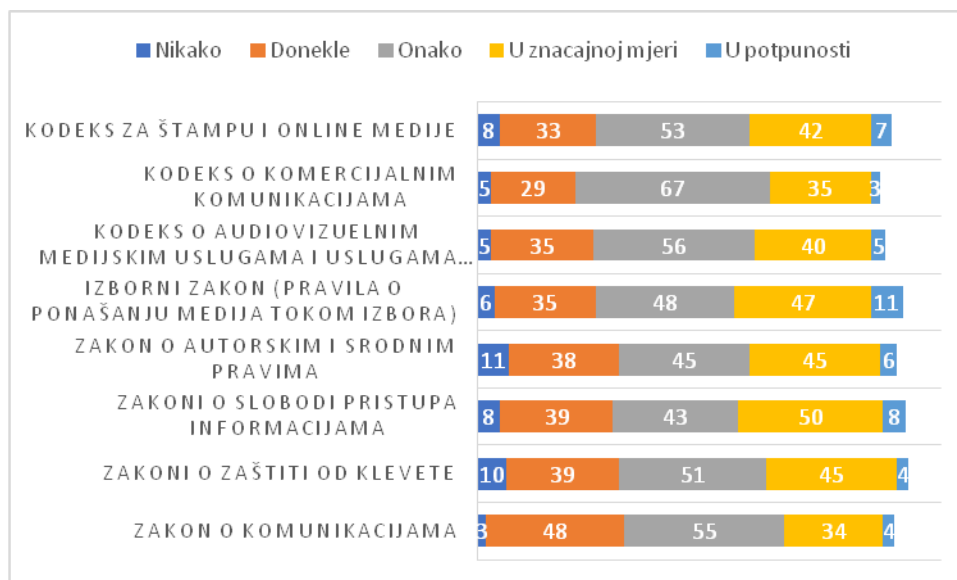
#### Environment where media and journalists have worked

While answering the question to what extent the examinees had been familiar with fundamental laws regulations and guidelines that altogether regulate the work of local media houses, the largest number of examinees have identified the laws concerning free access to information and rules and regulations in regard with media conduct during the selection and appointing processes, as well as those that they had significantly or fully been familiar with. Codes by Communication Regulatory Agency in commercial communications and audio and visual media services, including radio services, have been marked as documents that examinees had been least familiar. Nevertheless, having in mind that that sample comprehended 40 per cent of examinees working in media houses and online media houses and for whose work these Codes were irrelevant, this particular information has been rather expected.



### Graph 31: Familiarity with laws, regulations, rules and guidelines that regulate the work of local media houses

When asked to what extent laws, rules, and guidelines that regulate the work of local media houses are adequate and appropriate, the situation seemed similar with the issue of being familiar with these. Namely, largest number of examinees marked the rules regarding media conduct during the election period, followed by the laws concerning free access to information as the most adequate of all. Should we omit codes by the Communication Regulatory Agency that not everyone appeared to be familiar with, Law on Copyrights and Associated Rights was marked as least adequate of all?



**Graph 32: Perception of adequacy of laws, regulations, rules and guidelines that regulate the work of local media houses**

### **c) Focus-group research and survey**

#### **Common state of working conditions and labour rights in local media houses**

As far as working conditions and labour rights in local media houses are concerned, the examinees have generally tended to link this problem with financial situation in local media houses. If media houses experience financial situation we could then expect that employees there would have contracts and associated labour rights. Unlike this, poor finances bring along uncertain labour rights of their employees, regardless to whether we refer to part – time or casual contracts, lower and delayed salaries or lack of other privileges associated with work contracts. In this sense, examinees commonly hold that financial situation of local media houses has seemed poorer than those on national level and consequently, in terms of financial wages, journalists being engaged with local media houses are financially on a lower level than those working for media houses at national level.

I personally believe that working status of any journalist is not the biggest problem; instead it is media status. Everything depends on the local community, that is, it depends on local municipality, town or city finances. We have to manage with what we have got; we try to improvise our work with all pressures we have been imposed against. Our situation is not easy. We all need wages and salaries (editor, public RTV).

I believe that media houses from larger and bigger towns and cities, such as Sarajevo, Banjaluka, and Tuzla Etc have more opportunities to make profit. They come from larger and bigger centres; marketing relies on larger and bigger centres so we from smaller places have less possibilities to make profit. Financial part does have an impact and influences labour rights, because everything depends on finances (editor, private online media).

The point is that local media houses experience bigger problems. These financial problems do deprive of labour rights in terms of working norms as much as they limit their salaries which again represent one of the most important segments to all journalists rather than having to work overtime. They basically demand higher salaries. In local communities we have been limited a lot more for those amounts. I think that there is great difference from one local community to another; including the possibilities and economic growth in that particular place and other things as well (a female journalist, owner of private radio station). As far as the salaries are concerned, you seem to be pushed against the wall; therefore you get what you pay for and at the end it is left up to you; you could either continue to work under given circumstances or you could simply quit. A common trend in a local community is that if you don't like what you have, you might as well just leave; someone else will turn up eventually and this does not apply to journalism; it is a generally common thing (a female journalist, public radio station).

Certain examinees point out that this issue is not only about salaries but they concern a line of rights related to payment issues.

We believe that local media houses generally have problems with financing. National media houses must have all their employees registered legally and pay their salaries according to law. Local media houses are not in a position (particularly private media houses) to register their employees on a full or part time basis. Therefore, we have here journalists that have been working for ten or twelve years and they have never been legally registered as employees. Their years of services have never been recorded. Furthermore and in terms of these labour rights on local and national level we cannot even begin to compare these two different entities, particularly regarding younger generation that seek a starting point in their careers. So they often accept to receive whatever is there for them and accept to work anywhere and as years pass on their agony continues and it may last for a decade or even two decades with some journalists (editor, private online media).

On the other hand, some examinees consider that there are certain advantages regarding engagement in local media houses as far as the protection of labour right is concerned, because it is reasonably easier to reach institutions and relevant figures that may be considered responsible for public media houses in smaller communities as oppose to media in bigger places.

I think that we are in a little bit better position that media houses on national level. We know exactly we should address if we have problems with certain issue since we are small community and our founder is a single institution. We address our founder and have managing board that addresses to municipal official authorities directly including town or municipal council. Should we have problems we talk to them immediately, although, and this does occur often, we are deprived of receiving feedback that we expect but as far as state level is concerned, we can clearly see that our colleagues from Federal TV and BHT 1 are facing serious problems (female journalist, public radio station).

Labour rights are more or less the same; there is not much difference in that sense. Smaller community is about knowing each other and certain problems, disputes or issues can be solved in some different locally – based way (female journalist, private radio owner).

Looking strictly at local media houses, the examinees highlighted that there have been differences between working conditions and labour rights between employees working in public media houses and those working in private media houses. It is a common opinion of examinees that working condition are better in public media houses which can be confirmed by statements given by the persons that have been working in public media houses.

It seems that working in public local media is easier than working in private media because the employer there must obey certain laws as oppose to private media employers (editor, public RTV).

Frankly speaking, there are differences between public and private media houses. As far as labour rights are concerned, there is only one public service in Bosnia and Herzegovina. This radio experienced certain financial difficulties, however through the period of last couple of years it managed to stabilise. I think that labour rights are on an acceptable level even though there is always space for additional progress. As far as private media are concerned, I had an opportunity to work on two private radio stations.



The situation there was just as same as in the rest of BiH in terms of finances and labour rights. Journalists' salaries were low there and labour and other associated rights were completely disregarded. When I mentioned disregarding of labour rights I was referring to working hours (editor, private online media).

Generally speaking, we have not had significant problems regarding labour rights including journalists' rights and working conditions too. Naturally, I believe that financial situation in every media house could be better and that fact that we, media staff working at local media houses, including media reporters working for public media houses manage to fill in the budget, does speak for itself. As far as labour rights are concerned, we have not experienced notable violations of these rights either (female journalist, public radio station).

Salaries in public media houses are guaranteed for every single employee, regardless to their amounts. In private media houses we have been, for the period of last ten years, facing the situations where firms centralized their offices in Sarajevo. During this particular period, we lost the possibility to, through commercial marketing campaigns, make some profit in this specific area that would help us ensure and provide decent salaries. Encountered with such problem, we simply had no way to find this money (editor, private online media).

Public media, when it comes to salaries that they receive are based to contributions that must be paid according to the law. In private media houses, we have a situation where employees receive certain amounts on their bank accounts (the amounts for which their employers must pay all contributions) and they receive the rest on "cash-in-hand" basis. Additionally, this creates a large problem once journalists meet the criteria for their retirement. Also, the comparison between public and private media is by both principles questionable because, when an employer sacks his employee she/he simply ordered her/his employee not to come to work next day and I want to emphasize this because the union/syndicate and having years of service being paid for (on legal and regular basis without delay or significant pause) is extremely important and this problem is unlike to occur in public media houses, as oppose to private media houses. The employee that has been sacked (dismissed) shall most definitely complain to managing or supervisory board (also including the founder) and she/he shall find the way to fight for her or his rights, while on the other hand, this particular type of legal fight is almost impossible within private media houses, because disempowered employee has been deprived of labour rights and we have known this for the period of last 20 years (editor, private media house)

However, in many public local media houses the situation is rather difficult especially when we talk about modernizing the equipment and technology thus creating better working conditions. One examinee noted that common financial crisis in local media houses, which included very old equipment and modest technical and human resources, results in the reducing of motivation among all employees to attempt to make additional effort, particularly with most demanding issues and that, to certain extent, these poor working conditions in local media houses do make an impact and influence journalists' rights to perform their tasks and duties in best possible and more qualitative way.

There are significant differences that, above all, mostly concern required equipment and as far as the possibility of selecting and choosing issues and subjects. Therefore, it would have to be something that is also included into labour rights or something which is more complex form of journalists' expressions. My workmates work in reasonably small studio, small director's room with very small mix board. They also share equipment with their colleagues from television department. They also use one vehicle and are required and need to do a lot of things what is actually expected from a cantonal radio and television station. This is all a consequence caused by financial terms, that is, a complete absence of understanding by the founder to provide journalists, editors, cameramen and editing team with possible equipment. Commercial income is as a result very difficult to attain. Furthermore, it diminishes the possibility to strengthen human resources department, expanding capacities Etc (journalist, public radio and television station, retired).

### **Working overtime**

As far as working time is concerned, that is, being paid for working overtime, the examinees were convinced that the situation in local private media is not on a satisfactory level. Unlike this, this problem does not significantly appear in local public media houses.

I worked on local private television and am quite familiar with the situation on another local private television where I believe, that the work on local television stations was very difficult. Working time was never precisely defined, duty work on weekends were not subject to overtime pay Etc. Basically, nobody took care about how long do staff actually had to work; not to mention salaries the employees there were receiving. In public local media houses working hours are precisely defined so I personally think that the situation there was much better (editor, local online media house).

As the oldest person among all of you, I have a professional doubt and dilemma. Do working hours exist for journalists? Regardless to the fact that working hours have been strictly defined by the law or by certain internal local media houses, I cannot forget huge army of my colleagues (including media reporters from smaller communities with a significant number of journalists living and working in small communities and working as reporters at the same time. They have never complained when they had to work for media and get paid for their work. This is about having certain norms in regard with what had been done, rather than at what time the job is being done (journalist, local public radio).

There are no norms regarding the overtime work. Naturally, we who would have to stay after 4 or 5 p.m. (until our working hours are officially over) so we could get wanted information in order to reveal, release, post or broadcast it. However, it is the owners of private media houses that misuse this fact and consider it as regular work that applies to every journalist since it reflects the nature of their work. Basically, information that is received in the afternoon hours and the information whose broadcasting is urgent to broadcast should serve as a stimulating factor, that is, the journalists who had to stay late until the information is broadcasted should be rewarded for it (editor, local online media).

### **Assaults and attacks on journalists**

Few focus – group participants identified pressures, assaults and attacks imposed on journalists as one of the biggest problems that journalist in local media have been facing. Others decided not express their opinion regarding this problem. It seems that journalists that try to practice investigative reporting had personal experience in this sense and that their views to large extent illustrated the situation they have been, including other journalists (both female and male journalists) that, in local media, also try to practice and display this particular type of journalism.

It is obvious that the problem of free journalism, that is, assaults and attacks on journalist is the most important problem for journalists, and here we have people who (all of them) wanted to share their experiences. I truly do not know whether to distinct what is more important; an assault and attack on journalists or assault on journalism which seems to happen to all of us. Someone has mentioned that working in local media house is better because you may have easier access to decision maker sources. You actually pay a high price for this because decision making sources tend to hold your destiny in their hands. When we talk about certain cooperation in editing offices, I had decided to try with online journalism because I could not have worked in my head office, that is, in local radio service since there were issues considered as important to local public that had been put aside and to some extent banned as well. We had been advised not to deal with these issues so figures that had been providing us with our salaries would not get angry. If you, as journalists accept to admit that they have been financing us, I shall, in return say “No, we receive our salaries through public budget and shall not allow those that distribute and allocate budget money hold my destiny in their hands. That is our money and journalists should continuously repeat this fact regardless to the fact that their choice is often unheard. We must have clear view about this issue and anyone distributing and allocating budget money is not paying their own money for my salary. It is the public that pays for my salary and I clearly want to say this (female journalist, public radio station).

Assaults and attacks are one of the biggest problems in BiH. |furthermore, there are no sanctions against the perpetrators and assaulters that attack journalists. BH Journalists have conducted research and survey where citizens said that slapping and kicking journalists from time to time was not a bad idea because journalists tend to write everything. This only illustrated a great paradox, having in mind that we seek democracy and as journalists, should enlighten general public. Let us remind the affair regarding medical ventilators and countless affairs and you shall see how many times our colleagues got assaulted and attacked in Banja Luka where even, official governing authorities talk against journalist (during press conferences) where we all quietly sit without reactions and replies and it is no surprise that the situation, as far as this particular problem is concerned, is only getting worse (journalist, public radio station).

## **Authenticity of local media – serving public interests or political instrumentalisation**

Examinees' views regarding the authenticity of local media have been different. Some of them believe that local media serve public interests and that they manage to achieve, in adequate way, provide general public with information about most important issues and local affairs.

As far as this issue is concerned, I really cannot say that I have been working for media houses that has been respectable and appreciated in our region. If someone thinks that we receive certain amount of money from local municipality, we say that they do not allocate the entire amount of money that we require during the months. I do not reckon that they control our work in this way. I shall outline a raw sample in this respect. When I, as "Oslobodjenje" and "Slobodna Evropa" reporter, reporting from my own home time appointed to work on a certain story, it is a common sense that this story had already been done by our media representatives in most adequate way, including criticism that follows. It would be hypocrisy from my side that I criticise this particular work while being engaged with "Oslobodjenje" on one hand, and omit any type of criticism while working at local radio on the other hand. We had a situation when they said: "excuse me, what are you doing", but we were never sanctioned as far as this specific situation was concerned. We indeed revealed most sensitive current affairs and attempted to highlight them and initiate the talks, however, we would not have to be asked what was happening (female journalist, public radio station).

As oppose to this, the experiences by some examinees confirmed that any critics in local media houses was considered as an assault against the governing official authorities and many would thus be tagged as traitors.

We commonly face this problem in certain public discourse where any type of criticism, particularly those in local media is often identically treated and considered as treachery or I shall rather say defeatist - based views (female, public radio station).

It is obvious that local media work largely depends on the dynamics by political life and level of democratization in local communities. Generalizing about scope of conditions applying to local media houses is rather difficult, but it has become obvious that in areas where strong and powerful political figures ordinate, there is a very little space and room for the development of completely and utterly independent journalism.. Simply, everyone expects that all votes during the election process at certain point support back up and encourage newly elected governing official authorities. In this sense, we assume that long – lasting degrading and discrediting of democratic standards in political life of BiH at all governing levels, produces negative consequences that additionally impact the work of journalist in local media houses.

Journalists are individuals and distinct persons with each and every one of them having their own way of approach. Should we take average public media at local level into consideration, we shall see that it currently and during the broadcasting of its news program, must follow local current affairs, including the municipal mayor, municipal (city) council, local enterprises and companies Etc. Local affairs take at least half the time of news programs. An ordinary viewer may say: "OK, you only talk about local government and thus support them", and this is a common sense and what happens to journalists then? They work very hard in this place working 4 – 5 reports a day and completing as many articles and texts. The quality is thus questioned. If a journalist works so much she or he does not have time to be self – critical, including critics directed against media they work in because they claim that they work too much and work best they possibly can, following at the same everything they have to. Actually, they follow and cover policy of their media houses on local level. The policy is incorporated with the interests of local politics which governs over this particular place (editor, local online media).

When it comes to trend, I would say that it is rather negative as far as rights issues are concerned and this can best be seen during the period of last three years or shall we say last ten years (female journalist, public radio station).

It would be incorrect that public local media houses in particular keep inappropriate ties with local governing authorities. Furthermore, in many places the financing of public media has become a burden for local communities, so they turned to local private media houses whose affection they may get for less money and without long – term duties and obligations. Focus – group participants agree that this is new reality with local media houses having their say and that governing officials in various places managed to establish preferred relations with certain private media houses.

We almost have no higher differences in approach between private and public media houses. In fact private media houses are even more biased towards governing authorities, because public media houses would still get financed from the public budget regardless to their approach, while private media houses, on the other hand, are sceptic since they have to apply next year as well. If they get off the official political line, they will certainly not stand a

Having in mind that I have worked in private media house, I could say that governing official authorities use web sites for their own purposes thus discrediting and degrading the very same internet web sites that tend to be critical to local community officials, including the work of local assemblies and governments. Internet web sites are thus forced to open more and more gaining thus financial profit and receive more money from public budget sources. Private media in our country receive enormous money from public budget so they could, in return, work for certain political structures or local politicians (editor, local online media house):

Unfortunately, in the field of media, we have massive unfair competition. We have so called journalists and quasi – web sites. Basically, people with their own and safe jobs manage to have their web sites legally registered based on different ground and get financed by local governing institutions (female journalists, private radio entrepreneur).

### **Local media future: Privatization**

In terms of local media future, most participants believe that changes are required and necessary and they will emerge with or without them. However, it seems that nobody is clear in what direction these changes shall occur. On one hand, the views and opinions about the model that most participants favour (privatisation model) appeared very negative. Unlike that, there is a common opinion is that media should serve public interest, but the question of how to attain and accomplish this still remains unclear.

Several participants talked about the necessity of changes.

After the war, media in Bosnia and Herzegovina managed to make more advancement comparing to BiH society. They managed to make progress and at the time, we were on top of the ladder regarding media freedoms and liberties. However, particular stagnation made things worse and today we are behind everyone in this sense. We have had an economic transition unlike media where the transition never actually emerged. We must enter media transition process and transition will lead itself into this direction, should we compare the process with those in Europe and America. We will follow their model sooner or later and the question is whether we are ready for it. Of course we are not ready yet, and our analysis only confirmed that we will not be ready to enter the transitional process, but in the forthcoming period of 5 to 10 years we must enter the stage where we must keep our national public media and everything below this national level should be in private hands. Whether we like it or not this is indeed going to be a painful process (editor, local online media).

I have followed part of these changes and structures and I think that changes must emerge.

All countries have certain type of public services but these models are different from ours. I advocate that our public services should not be sold, to prevent their privatisation, however, they most certainly must undergo particular type of structures where we should attempt to have this model, to some extent, resembles the BBC model, because BBC is a public service of Great Britain (female journalists, private radio station)

Whether certain media shall become subject to further sale or not, shall not depend on us (journalists), but rather on those that had founded those local media houses. Naturally, general public should have their say in this process, because these media houses had long time ago been established and launched their operations with public financial means I do not oppose the idea that one the privatisation process shall occur; however it will depend on their quality in the first place, because anyone ready to invest money shall be seeking quality media houses (journalist, public radio station).

Still, the privatisation model does not appear convincing to focus – group participants, because they had already experienced it and seen it and they exactly knew what it meant for them, or because they believe that this process would not contribute general public interests.

Unfortunately, our radio did go through privatisation process. We were the very first media that was sold between 1998 and 1999. We were bought by a local person who simply did not know what to do with it. It was a complicated story, but with help provided by the OSCE, we managed to get away from this mess. We thanked them a lot and we managed to get back from where we had been and I believe that, at present, this is the right path to success (female journalists, public radio – station).

There were similar cases in Serbia too. Practically, all local media houses that had been privatised, experienced a complete contrariety comparing to their genuine functions and that was providing public with local issues, themes, topics and affairs or these media were simply shot down. Therefore, the privatisation, according to my opinion proved to be very bad model. On the hand, nobody knows what type of model it will prove to be in future, even though I personally think that some kind of local financial contribution or this kind of financing from the public budget could serve the purpose, but bearing in mind that public budget must not be in hands of local politicians running local community (municipality). Perhaps, it could some kind of model that we should aspire in near future. Generally speaking, media and their destiny shall depend on the situation in local community. We are not isolated island that may function and operate for our own purposes only (female journalist, radio station).

We must find some kind of model that would satisfy all of us together and I do not encourage privatisation model because our most recent experience from Serbia, including surrounding countries as well, proved completely opposite; that is, privatisation process is often misused (female journalist, private radio entrepreneur).

### **Advancing labour rights: recommendations**

Focus – group participants expressed their views regarding current situation and provided several recommendations and suggestion purposed to improve labour rights, including g journalists' working conditions. Some recommendations concerned strategic goals that should be accomplished and attained. These goals display concrete problems that should be resolved and some were aimed and directed in accomplishing the goals that journalists as professional community set for themselves.

Strategic recommendation was that local media houses should attempt to eliminate outer pressures imposed by local political structures and to begin to work as autonomous entities with the purpose of serving the public in the first place. This, above all, includes, providing financial independence., but also includes the establishing of autonomous status of professional occupation that would bring decisions without political interference This recommendation is of a strategic character and should be subject to frequent discussions. Focus – group has failed to provide the answer as in how to accomplish this solution.

We should try this as a long – term solution despite the fact the, at this particular moment, thinking about media financing being distanced from political interference is practically impossible. Today, the politics appoints editors and defines how much money, from tiny savings box, should be allocated to a certain media houses. We as journalists association must demand that certain rules should imposed with the purpose of trying to liberate media houses from political claws. I have been travelling throughout BiH and have been working almost three decades abroad. I have realized that the smaller the place, town or city is, the bigger influence local politics has on this place in most direct way. How is the above solution possible? This question should set journalists' association with a 5 – 10 years long term period where we would be able to solve this problem, because it is indeed a huge problem and I think personally think we could not solve it for another 5- 10 years anyway \*editor, local online media).

Second solution were more concrete in terms of identifying the problem, but it also lacked specific mechanisms required to solve certain problems. One of these suggestion included legal regulations that would ensure greater level of journalists' autonomy.

We all know that media regulation at BiH level has never been completed. There is no law in BiH that would somehow regulate the question that we discuss today. How to disallow political powerful centres to appoint editors, to dismiss editors and simply to interfere in creating program schedule (journalists, public radio station)?

Second suggestion was to increase the number of employees in local media houses thus decreasing the pressure imposed on journalists in order to have professional tasks and assignments completed in most appropriate and quality way.

Small community and small media house is what we can often hear. If ten people work in editing office, with five of them being journalists and when two of them are missing, other have to work more and take the burden upon themselves. They also have to work double shifts so program scheme can be fully fulfilled as pre – planned. I think that we should put pressure upon employers to engage more people. In most editing offices, according to my opinion, the scope of work is lot bigger in regard with the number of employees (journalist, public radio station).

Finally, several focus – group participants outlined the necessity of solidarity and organizing journalists on professional basis and public emphasising the problems that journalists have been facing and encountering. Only this kind of approach, they reckon, may result in expected outcomes in terms of improving gender – equal status of journalists.



We as professional journalists must be unique and unified but we never seem to reach this point. In local media houses, depending on who protects and prefers whom (actually who belongs to which political party), we witness the violation of labour rights and if labour violator is our political party colleague we support the actions instead of protecting journalists' labour rights. I have nothing against the fact that there are 20 journalists' associations, but if all of these 20 journalists associations would contribute in journalists' better status than their existence is justified. On the other hand, if these associations would separate us, on Entity or some other levels, including political preferences, then we have serious problem. Our first task is to show unity (editor, local public radio station).

Number of journalists' association is irrelevant and according to my personal view and opinion, one of the crucial things here is having all journalists united in fight for their labour rights. The most important thing is that journalists unite, regardless to which media house they come from, whether it is public or private media house, because our problems are very much similar and I believe that uniting and courage to bring all problems out that discredit and degrade all journalists is the only way to make progress. We should publically speak about problems because only by bringing the problems out we could achieve something and create pressure upon those that bring decisions on our behalf (editor, local online media).

## CONCLUSION

Key conclusions from pervious chapters are presented in this part.

### **a) Legislative framework**

Legislative framework provides solid base for local media functioning. Taking into consideration that local media and their employees face and encounter with circumstances that vastly coincide from those defined by the law, many legal solutions actually serve as the orientations and guideline to what direction they should be heading for.

Undoubtedly, laws and other legal regulations that define local media work should be advanced through their unification process throughout entire BiH territory by eliminating the disadvantages confirmed in practice and reality and through the following of most recent international standards, particularly EU standards in this specific field.

Media freedom is confirmed through constitutional guaranties in Bosnia and Herzegovina, but there are neither appropriate legal solutions nor associated commonly – accepted guidelines (Press Council Code) that would outline, emphasize and also, reinforce and strengthen media freedoms and their independence. As possible reasons for this situation we may see the lack of unified media law enabling these concepts to develop accordingly. Still, surprisingly, this issue has not been highlighted so far having taken into consideration the fact that media freedoms and their independence have been subjects to discussions on daily basis.

Mechanisms that ensure local media independence have, to a certain extent, been already established and developed. These mostly relate to regulations that define the processes of appointing managing structures in local public media houses and they should enable a clear distinction between politics from public media managing bodies. However, the existing legal provisions often appear unclear and insufficiently defined, and in reality and practice are bypassed and stepped over in daily basis.

Serving public interests, as one of the crucial journalism principles that allows journalists to ensure credibility in their communities, has not been sufficiently outlines in documents that regulate the work of local media houses. According to Vukojevic (2008), the role of public media houses is poorly defined and program enquiries are not precisely defined comparing to common requests for particular ratio between informative and educational program contents. The role of these media houses is not precisely defined either in regard with necessities of local communities and there have not been concrete requests, demanding that the part of program content should be devoted to local affairs” Similar situation, if not even worse, can be found at local private media houses and media houses that have not been under the authority supervision of regulatory body (printed press and online media).

Labour legislation in BiH has largely been conformed to relevant international convention, however, some particular provisions, such the provision on cancelling work contracts have not been clearly defined and in practice and reality, they allow arbitrary dismissing and sacking employees and staff. Employers accordingly justify their actions by outlining poor economic, technical or organizational reasons, so therefore it would be highly recommended that these provisions were clearly defined, fulfilled and determined in order to terminate the practice of sacking media staff under the above mentioned circumstances.

## **b) Poll research and survey**

### **Work conditions and labour rights**

Female and male journalists in most cases face and encounter overtime work. Even 40 percent of examinees stated that they have to work over 40 hours per week. This problem is mostly outlined with examinees that work in private media houses and with those that work in television stations. Low wages are what most journalists have to deal with in local media houses. Almost half the examinees receive lower wages than what the average salary in BiH is (48%). 28 percent of them have salaries that are lower by almost one third of the amount of average wage in BiH.

The worst situation is with the examinees owned by non-governmental organizations followed by those that work in private media houses.

Largest numbers of examinees receive regular salaries (almost 80%) of them. If wages are late they are usually up to 30 days late. Delayed wages is mostly frequent with media owned by non – governmental organisations.

The examinees with full time positions have their contributions, including years of service, retirement and health fund contributions paid on regular basis (80%).

Largest number of examinees (84%) claimed that their media houses would allow joining the union / syndicate with the purpose of journalists' protection and promotion of professional journalism. Examinees that stated that this type of joining cannot be allowed do not come from public media houses.

Far more number of examinees are members of journalists' associations rather than members of union / syndicate. Only 18% of examinees are members of some unions / syndicates, while 62 percent of them are members of certain journalists' associations.

Largest numbers of examinees believe that for the period of last three years there had been no improvements or deterioration of work conditions in their media.

In terms of satisfaction with different inner – media factors that impact the work conditions and labour rights of journalists, the examinees demonstrated most notable satisfaction with the autonomy they have in their work, followed by media support in cases of outer pressures and assaults (attacks). Least satisfaction level was shown in the field of special and additional trainings and wages (salaries).

Examinees also identify documents that determine the work of employees in media houses and have impacts on work conditions, as well as journalists' labour rights. Biggest number said that their media had Book of Rules and least number confirmed that their media had Rule on Advancement book.

Biggest number of examinees identified the auto censure as an occurrence that they rarely (sometimes) face and encounter on daily basis (70%). Examinees said that they face censure during certain period in 58% cases and with inappropriate requests they write about certain issues or about a person in 42 per cent of cases.

As far as outer pressure imposed against journalist is concerned, the examinees identified the politicians as those that impose biggest pressure against journalist. Even three quarters of examines (78%) said that governing official politicians during certain periods of their governing time do impose pressure against journalist. They are followed by opposition politicians and commercial advertisers.

Even 40 per cent of examines said that they, during the period of last three years, had been exposed to assaults, attacks or threats. This included physical attacks, threat via internet or direct threats, including "the launching of campaigns with the purpose of degrading or discrediting, sacking (dismissing) of work, mobbing at work, precluding reports from particular locations, hacker attacks, sharing hate speech Etc.

When it comes to violation of journalist rights, examinees had, in largest number, identified the politicians as a group that reacts in most inadequate way, while journalists' community and non – governmental sector had been tagged and marked as those that often and utterly make appropriate reactions when it comes to such situations.

### **Perception of authenticity (credibility)**

Examined journalists (including both female and male journalists) had in most cases expressed their valuing of authenticity, credibility and integrity of their media houses in local communities. Even three quarters of them believe that authenticity (credibility) and integrity have mostly been on a satisfactory level or at least on a highest possible level.

Unlikely, there are very few people that tend to criticise media house they work for. Only 6% of examinees believe that authenticity, credibility and integrity of their media were on a dissatisfactory level or that they had none of these characteristics at all.

### **Environment where media and journalists work in**

Generally looking, examinees believe that they have been familiar with fundamental laws, rules and guidelines that altogether regulate the work of local media houses. Only 9% of them stated that they were not familiar with some of the documents provided, and only 6% of them were familiar with these documents should the codes that do not relate to all examinees were taken into consideration.

Biggest number of them identified the laws regarding free access to information and rules regarding media conduct during the elections as those that they were significantly familiar with it completely familiar.

Examinees think that the existing laws, rules, regulations and guidelines in largest number of cases under certain scope were adequate and appropriate. Only 5% of examinees said that some of provided documents had not been adequate and appropriate. Biggest number of examines marked the rules regarding media conduct during the election process period, followed by laws on free access to information as most appropriate and adequate. As oppose to this, Law on Copyrights and Related Rights has been marked as least appropriate and adequate.

### **c) Focus-group research and survey**

#### **Common situation regarding work conditions and labour rights in local media houses**

Examinees believed that work conditions and labour rights must be taken into consideration in the context of common financial media situation and state. They think that financial situation of local media house is worse than those on national level, and additionally that financial means that journalists from local media houses receive through their salaries and wages were lower than those of journalists that have been working for media houses on national level. Certain examinees outlined that this issue was not about being concerned about salaries and wages, but it also related to whole line of rights in regard with payments.

Examines emphasised that there were differences between work conditions and labour rights with employees in public media and those in private media houses. It is a common opinion and view of all examines that work conditions were better in public media, although the situation, as far as finances are concerned, with certain number of public local media houses is also on a very poor level.

#### **Overtime work**

As far as working hours are concerned, that is, getting paid on fair basis for working overtime, examinees think that the situation on local media houses in on an unsatisfactory level, while this problem is not exceptionally outlined with local public media houses.

#### **Assaults and attacks on journalists**

Few participants of focused – group have identified pressures and assaults as one of the biggest problems that journalist have been facing in local media. Other participants refused to express their opinion regarding this issue.

### **Authenticity and credibility of local media: Public interests serving or political instrumentalisation**

Examinees' opinions regarding the authenticity and credibility have been different. Some believe that local media serve public interests and that they manage to achieve, in most appropriate way, provide general public with information in regard with most important local issues, themes and topics, including the examinees.

As oppose to this, the experience of some examines confirmed that every critics in local media is considered as direct assault directed against the governing authorities and this is often treated and considered as betrayal.

### **Local media future: Privatization?**

Most participants consider that changes must emerge and that they shall occur with or without examinees. Opinions about privatisation model are mostly non - affirmative and rather negative. Unlike this, there is general view that media should serve public interests, but the process of having this attained is not clearly defined.

### **Advancing work conditions and labour rights**

Strategic recommendation is that local media should liberate themselves from political pressures and to begin to operate and function as autonomous entities serving the public in the first place. This, above all, should include the ensuring of financial independence, but also general establishing of autonomous status of professional journalism that would, without political pressures, bring decisions.

One of the suggestions is to have legal regulations created and tailored so it could ensure larges scope of journalists' autonomy.

Another recommendation is to have more people employees in local media houses in order to reduce the pressure imposed against journalists with the purpose of having better quality whilst performing their professional duties.

Few focus – group participants outlined to a necessity of solidarity and organising of journalists on professional basis, including public highlighting to problems they have been facing.

## **RECOMMENDATIONS**

### **1. The existing mechanisms and initiatives tending to reduce assaults and attacks on journalists should have wider support.**

Assaults and attacks are not acceptable and it seems they represent journalists' daily occurrence.

**2. Launching strategic activities that would attempt to reduce the impact and influence by the politics imposed on local media houses**

These activities must have a nucleus in journalists' community, but different entities from a non – governmental sector should recognize this as significant problem not only for normal media functioning but also for a democratic society functioning. In the end, these activities should result in with passing of legal guarantees, media independence and conduct alterations with key figures that tend to limit media independence in general.

However, for the beginning, it would be necessary to recognise and indentify this, rather sensitive issue, and put it in focus of discussions, including advocating activities as well.

**3. Start serious discussions regarding local media future**

Changes are investable and it is better to be proactive in given situation. Solutions that bound public interest of local community, freedom and media independence and their financial consolidation should be priority; regardless to weather they comprehend the existing model of public media, privatisation or their transformation to community media houses.