





This pilot study has been accomplished through the collaboration and commitment of colleagues across the globe, who assisted with different stages of the project. At the design stage we were greatly helped by the expertise of Nico Drok, as well as feedback from Epp Lauk and Greg Treadwell. At the data-gathering stage the study benefited from the thoughtful and diligent contributions of Maria Avraamidou, Hanan Badr, Halliki Harro-Loit, Deimantas Jastramskis, Yiorgos Kakouris, Marianna Karakoulaki, Ilda Londo, Stefan Mertens, Rui Alexandre-Novais, Anda Rožukalne, Carmen Sammut, Ilva Skulte, Josef Trappel and Louiselle Vassallo. At the data-processing stage we were lucky to depend on the skills and insight of Craig Robertson. MDI wishes herewith to thank all these individuals for their valuable input, as well as others who preferred not to be named.

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# INTRO

The Media Diversity Index, the first of its kind, is intended for use by stakeholders inside and outside the media industry as a benchmark for evaluating the performance of media outlets in relation to diversity and inclusion. To date, the media development sector has used a number of indexes to monitor, evaluate and rank national information systems in relation to press and internet freedom, civil and political rights, the trustworthiness of journalism and so on. As an annual exercise, the Media Diversity Index will complement these rankings by pioneering a set of indicators and a scoring system that can act as a barometer for progress or backsliding in the field of media diversity. The indicators are intended to reflect the environment for media diversity on two levels. The first is the underpinning of national regulatory and representative bodies operating in the media sector, in terms of their powers and how proactive they are in using the powers they have. The second seeks to track the extent to which media outlets promote and ensure diversity and inclusion both internally, through their workforce and recruitment, and externally, through their approach to representation.

Measuring such aspects of diversity can be objective to a degree, where they are based on laws, mandates, published guidelines and reports. The survey included some Yes/No answers and others where options were offered on a five-point ordinal scale. A few of the latter relied on judgements that, in the absence of solid data, were subjective, at least in part. Despite this drawback, contributors to this project strongly believed the attempt at measurement to be worthwhile. It is an important step towards trying to improve diversity in all aspects of media – behind the scenes and in media output – because it is only through more and better data about media practice, both good and bad, that we can hope to shine a spotlight on priorities for action on diversity across media industries and the media development sector.

Theories of media logic point to a potential preoccupation with the numerical findings of a measurement exercise because of the opportunities that exist for either naming and shaming or self-congratulation. That potential would seem to be amplified when the numbers in question are used to create rankings. However, precisely because this is a pilot index, we urge that the numerical findings should be treated with considerable caution. Indeed, the numbers are far from the most valuable findings. Instead, the pilot project has demonstrated the importance of qualitative data. Sources and arguments cited in support of answers selected in the questionnaire will provide indispensable pointers and considerations when it comes to further improving the questionnaire design. The completed questionnaires themselves also draw attention to specific actions needed in specific countries in the fields of media regulation, recruitment, representation and consultation. Finding a way to pinpoint these will be a crucial ingredient of the way a future Media Diversity Index is presented.

The pilot project had to select a limited number of countries and establish a criterion for country selection. It was decided to aim for 12 countries, all in Europe, but spread across the north, south, east and centre of the continent. The 12 chosen were those for which glaring discrepancies were noted between their rankings in the Economist Intelligence Unit 2023 Democracy Index and the Reporters sans frontières (RSF) 2024 Press Freedom index, given that the number of countries covered by both indexes (165 and 180) is reasonably similar and some countries (eg Finland, Ireland, Sweden, Luxembourg) get almost the exact same rank in both. The discrepancies found were mostly much larger than the difference of 15 in size of index – as much as 68 in the case of Greece, 45 for Malta and so on. For Slovakia the difference was 15 but with the smaller index (EIU) being the one to give the lower ranking. Inconsistencies like this make sense when indexes set out to measure different things with a different methodology. However, they also demonstrate the benefit of creating an index that focuses specifically on media diversity.

# TAKEAWAYS FROM THE PILOT EXPERIMENT

#### Issues beyond our control

No data' was one of the most frequent comments on questions in Section 3 of the questionnaire, which dealt with 'Ensuring access and representation'. In these cases, respondents were urged to rely on their own observations or those of colleagues, family and friends. For some countries, such as Portugal, the responses were mostly backed up by examples and clearly sourced studies. In others the absence of such studies reflects an absence of monitoring by academics or civil society groups or public debate on diversity. As one respondent commented in relation to what is known about representation of diversity in entertainment content put out by the public broadcaster, 'there is very little interest in this regard'. A lack of focus leading to a lack of studies perpetuates a lack of focus unless action is taken to break the cycle. It will be necessary in future surveys to find ways of pinpointing relevant data that can serve the purpose of providing insights into representations of diverse groups in society. This could include commissioning dedicated studies.

Questions about local monitoring capacity were raised for this exercise by the absence of any data from the Global Media Monitoring Project (GMMP) on women's representation in news media in Albania, Greece, Latvia, Lithuania or Slovakia. Strictly speaking this was within our control but was not discovered until the questionnaires had been circulated. The five-yearly GMMP data-gathering relies on input from local groups. Some respondents were able to substitute data from their own research but elsewhere the responses relied on extrapolations from patchy local studies or the Worlds of Journalism Study. This matter will need to be rectified in future, possibly by changing or reducing the selected indicators.

Questionnaire completion was highly complicated for Cyprus, where data were gathered for the internationally recognised Republic of Cyprus, but with regard paid to the treatment of Turkish Cypriots in Greek Cypriot media – a problematic endeavour given that this could not always be measured in relation to conventional definitions (eg of minorities).

Finally, Hungary featured in the original group of 12 European countries identified but had to be omitted from the scoring because of non-delivery of the questionnaire. It is left in the comparisons below because the EIU and RSF rankings provided the criteria for country selection.

#### Credibility issues and interpreting the findings

In light of the difficulties thrown up in relation to our small sample and deficiencies identified in the next section below on 'Survey design and wording', it will not be surprising if there are doubts about the credibility of the final scores. For that reason, it is proposed to discuss the findings in three groupings, described as Tier 1, Tier 2 and Tier 3, since doing so puts the emphasis on general indicators and structural issues rather than small differences that could be the result of over-generous or over-harsh assessments.

For the purpose of the present analysis, Tier 1 comprises countries with scores around 60, namely Belgium, Lithuania and Portugal. It will be seen that these three countries also ranked near the top or relatively high on the RSF list for the 12 selected countries. Scores for the countries in question were boosted by evidence of diversity provision being built into regulation, recruitment and handling complaints.

Tier 2 countries, with scores between 43 and 48, are five in number: Greece, Austria, Latvia, Estonia and Slovakia. This indicates lower scores for proactive approaches to diversity; non-discrimination may be enshrined in law and inclusivity may be aspired to in principle, but this does not necessarily translate into deliberate policies to recognise the implications of diversity for media recruitment and representation. Openings can be identified here for targeted advocacy.

EIU rank order	RSF rank order	MDI rank order	MDI scores out of 80*
Austria	Estonia	Belgium	62.50
Greece	Portugal	Lithuania	59.75
Estonia	Latvia	Portugal	59.25
Malta	Lithuania	Greece	47.75
Portugal	Belgium	Austria	45.25
Belgium	Slovakia	Latvia	44.75
Cyprus	Austria	Estonia	44.25
Latvia	Cyprus	Slovakia	43.00
Lithuania	Hungary	Cyprus	35.25
Slovakia	Malta	Albania	33.25
Hungary	Greece	Malta	28.75
Albania	Albania	Hungary	n/a

<sup>\*</sup>Out of 80 distinct possible responses, answers were weighted so that Yes/No scored 1/0 and ordinal variables were scored on a five-point scale from 1 to 0 (1; 0.75; 0.5; 0.25; 0).

Tier 3 countries are the three (Cyprus, Albania and Malta) which were scored at above or below 30. The same three also come low on the RSF list. It is noteworthy that in these three cases relevant legislation relating to diversity or protecting minorities is often stalled for historical and political reasons. Alternatively de facto diversity is in place but is not recorded as such. In Albania, for example, the public broadcaster has to employ people from minority ethnic and linguistic groups in order to be able to broadcast in minority languages, even though there is no specific mention of diversity requirements. In Cyprus likewise informal actions are not always written into mandates, while legislation that would give the Cyprus Radiotelevision Authority certain powers is pending. The same applies to Malta where laws are stuck in parliament or shelved, leaving bodies in limbo waiting for powers to be transferred. The GMMP scores for Malta are low and minorities, whether ethnic, linguistic or religious, are not recognised even though the country's migrant communities are growing rapidly, as is the number of mixed-heritage Maltese.

#### Survey design and wording

The Guide booklet devised to help with survey completion contained a section entitled 'Notes on Terminology', but there were various terms and categories that not all respondents found to be self-explanatory. In some cases the categories had been simplified from draft versions of the questionnaire in an effort to streamline it. Where the simplification did not help it will be necessary to come up with alternative questions. Examples include the following:

- 'Top commercial media outlets (as measured by audience)'. Performance in terms of diversity representation and recruitment can differ markedly between print, audiovisual and online outlets that qualify for the description 'top commercial'.
- 'Fair representation'. This phraseology is too vague. The aim is to know whether/how far representation of diverse groups is normalised, eg whether it is routine to see reporters or actors with disabilities, whether storylines routinely involve gay relationships, whether people on low incomes are routinely interviewed on current affairs shows etc.
- 'Robust and transparent'. Criteria will need to be found to establish what is meant by these terms in relation to institutional handling of complaints about poor practice.

Future versions of the survey will also need to give thought to whether it is necessary to link between institutions and functions. For example, aspects of diversity data may be collected and published in a country but not by the body described in a given question. Regulatory controls may apply but be enforced by an entity other than the one designated in the question. The solution may lie in prioritising the function and framing the question around it.

### CONCLUSION

This pilot project is one of a number conducted to mark the launch of MDI's Media Diversity Research Centre, which becomes official on December 10, International Human Rights Day, 2024. It is hoped the discussion it stimulates will feed into an expanded and improved Media Diversity Index survey in 2025.

