

Open Data – a Tool for Better Project Co-Financing of Media Content

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Nedim Sejdinović | Duško Medić

OPEN DATA – A TOOL FOR BETTER PROJECT
CO-FINANCING OF MEDIA CONTENT

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For publisher:

Duško Medić

Authors:

**Nedim Sejdinović,
Duško Medić**

Associates:

**Leposava Milivojević,
Nataša Gvozdenović**

Collaborating organizations:

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Nedim Sejdinović | Duško Medić

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Introductory words

In front of you is a publication made within the project “Open Data – a Tool for Better Project Co-Financing of Media Content”, implemented by the Novi Sad Centre for Sustainable Communities in cooperation with the OSCE Mission to Serbia and the Ministry of Culture and Information of the Republic of Serbia. This is not the first time that our organization has analysed public calls for project-based co-financing of media content: we participated in the preparation of the White Book on Project-based Co-financing¹, in 2016, in cooperation with journalists’ and media associations.

The project “Open data – A Tool for Better Project Co-Financing of Media Content” included in its first part thorough and in-depth work on collecting available data on the process of project-based co-financing of public interest in the field of public information in the period from early 2015 to late September 2020, at all levels of government. Data were collected from the public calls of the Ministry of Culture and Information, the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities, and the competitions organized at the level of local self-governments, i.e. towns and municipalities. The fact that we collected and analysed data on as many as 11,506 approved media projects (1,514 applicants) is the best evidence of the scope of work. Existing databases on approved

¹ White Book on Project-based Co-financing of Public Interest in the Sphere of Public Information, April 2015- April 2016, Coalition of Journalists and Media Associations – Centre for Sustainable Communities, May 2016.

projects, such as the Journalists’ Association of Serbia (UNS) database or the “Ke\$formisanje” database, were used for missing information if the local self-government did not provide decisions on public calls during the project. The good news is that a huge percentage of local self-governments responded promptly to requests made under the Law on Free Access to Information of Public Importance. On the other hand, decisions on the allocation of funds of higher authorities (republic and province) are available on their websites. We would like to take this opportunity to thank our colleagues from UNS, other journalists’ and media organizations, as well as “Krik” (Crime and Corruption Reporting Network). We also thank the local self-governments that provided us with the requested data, in the hope that our project will contribute to improving the methodology of their further collection and publishing on the Open Data Portal².

The project’s aim, therefore, was not only to collect and analyse data but, in general, to promote open databases in the field of public services. The transparency of government and the improvement of public service standards largely depend on open and machine-readable data. The development of open databases enables and facilitates the control of the institutions’ performance results, which is a precondition for the development of a democratic and modern society. In that sense, as part of the project implementation, we have developed a web application that will allow the search and analysis of the collected data in different

2 The National Open Data Portal (data.gov.rs) is a repository of open data sets owned by state bodies of the Republic of Serbia (which includes state administration, autonomous province and local self-government bodies, as well as the organizations entrusted with the exercise of public functions – e.g. Government, ministries, municipalities, agencies, regulatory bodies, institutions, utilities and others). The Open Data Portal is conceived not only as a repository of open data of state bodies, but also as a place of interaction with the community that uses the data.

ways, but will also allow downloading them in a functional format for further manipulation. Therefore, the goal is to provide researchers, media representatives, government representatives, but also citizens, with access to data that can be the basis for some future research of the media market and the relationship between the authorities and the media outlets. In addition, you can download from our website³ other outputs of our project. There you can find a link to the code for creating the application and the on-line version of the publication, further contributing to the openness of our work and representing an important element in publishing open data, which is – their visual presentation. With the help of the code, users of the R programming language will be able to gain additional insight into the data and the way they are processed, and the code is reproducible and can be used for other works and analyses. The free-to-download code and methodology can serve those interested in creating similar web applications that make it easier to follow the processes of project-based co-financing of media content in local communities. We believe that our project and its outputs will contribute to the transparency of the entire process and the promotion of good practices, among other things through the evaluation of approved projects.

All data are also available on the Open Data Portal of the Republic of Serbia. Our goal is to support and assist with our recommendations the important task of the authorities in the process of European integration – to develop and make accessible and functional the data they “produce”.

Unlike the existing databases, our project for the first time introduces the classification of approved projects according to the

³ Web application can be found at https://centarzaodrizevezjednice.shinyapps.io/Projektno_sufinansiranje_medija_u_Srbiji/

thematic framework. The topics of the approved projects are derived from their titles, and are classified into eight categories: ecology, economics, news programme, culture, underprivileged groups, other, content in minority languages, sports. Although we are aware that project names are not a substitute for evaluating their content, produced with public money, we felt that they could indicate certain trends in this area.

The brochure is divided into the following parts: historical overview of project-based co-financing of media content in order to inform the general public about this process, followed by the methodology of work (it will be set aside in the application as a separate document for easier handling by the users), analysis of data collected during the project and, finally, recommendations in order to improve the transparency of project-based co-financing in the future. It is important to say that our project will be active in the coming period, i.e. that we will be happy to include any corrections (errors are possible due to the amount and complexity of data) and suggestions in our reports, so please feel free to contact us for this purpose⁴.

4 The project email is: medijskikonkursi@gmail.com

Project-based Co-Financing of Public Interest in the Field of Public Information – a Brief History

At the beginning of this decade, experts and media and journalists' organizations believed that legislative reforms, i.e. new media laws, could substantially improve the quality and change the media scene in Serbia, and encourage public information in compliance with the interests of citizens. The introduction to the reform was the adoption of the Media Strategy¹ in 2011, which – with some critical reservations – was supported by the professional public. The new government, constituted in 2012, formally continued on the path set out in the 2014 strategic document, and in accordance with it, adopted a set of media laws – the umbrella Law on Public Information and Media², the Law on Electronic Media³ and the Law on Public Media Services⁴. It was believed that the new regulatory framework that denoted the state's withdrawal from the ownership in the media sphere would enable fair market competition, strengthen media pluralism and reduce political influence on the media outlets.⁵

1 Strategy for the Development of the Public Information System in the Republic of Serbia until 2016 ("Official Gazette of the RS", No. 75/2011)

2 Law on Public Information and Media ("Official Gazette of the RS", No. 83/2014, 58/2015 and 12/2016 – authentic interpretation)

3 Law on Electronic Media ("Official Gazette of the RS", No. 83/2014 and 6/2016)

4 Law on Public Media Services ("Official Gazette of the RS", No. 83/2014, 103/2015 and 108/2016)

5 By the way, previous media laws, from the beginning of the 2000s, stipulated the state's exit from the ownership in the public media, but they were suspended by certain by-laws, under the pretext that the privatization of the media could jeopardize public information in the languages of national minorities.

Beside the state's withdrawal from the ownership in the media outlets, the main point of media reforms was – the establishment of a system of project-based co-financing of media content of public interest, which includes legal definition of public interest, procedure for allocating funds and independent commissions composed of media experts, or representatives of journalists' and media associations⁶. It was believed that this system would have provided the citizens of Serbia with significantly more quality media content. Even before these legislative changes, the Ministry of Culture and Information, the Provincial Secretariat for Culture and Public Information and some local self-governments financed the media outlets and media content through public calls, but those were more examples of good practice than a product of clearly defined and binding procedures.

The goals of the two interdependent elements of media reforms – privatization and project-based co-financing – were to establish a different relationship between the state and the media. By withdrawing from the ownership, the state does not lose its constitutional obligations⁷ to provide information in accordance with the public interest. Instead of through state or public companies, it meets its obligations, according to the new legal solutions, through public calls for media project proposals at the level of the republic, province and local self-government. Thus, the state intervenes in the media sphere – following the spirit of

⁶ The Law on Public Information and Media stipulates that the members of the commissions shall be appointed by the head of the body that launched the public call, from the ranks of independent media experts and media workers who are not in conflict of interest and do not hold a public office. The majority of members, the law says, shall be appointed based on the proposal of journalists' and media associations if such a proposal exists and if the proposed persons meet the conditions prescribed by law.

⁷ The Constitution of Serbia, in Article 51, reads that everyone has the right to be informed accurately, fully and timely about issues of public importance.

the law – in order to provide citizens with good quality information, free from political, economic or other interests of those who have power and/or authority in the society. Commissions, which would comprise competent and indisputably moral individuals in accordance with the spirit of the law, should be a guarantee that by spending public money the government will not exert political influence on the financing of the media.

Legal solutions are also supported by key international stakeholders, because it was clear that without investing state money in the media sphere, many good quality media outlets and media content would not be able to survive in a very fragile media market. In the conditions of low media literacy and the absence of donations from abroad – this market does not allow a competition to be won by the media outlets and content that largely respect the professional and ethical standards of journalism and open new horizons of media freedom in accordance with those standards. Quite the opposite. Due to the media laws, in 2014 and 2015, Serbia experienced a significant rise in the comparative rankings of international organizations that measure media freedoms in the world, with the conviction that creating fair market competition, along with the aforementioned qualitative state intervention, can ensure media sustainability and higher level of media freedoms.

Almost six and a half years have passed since the adoption of the media laws, and today we can say with considerable certainty that the great expectations of the professional public have been largely betrayed, because media reforms have not improved the Serbian media scene nor provided much-needed pluralism in public information. Some believe that the problem the media scene is facing is complementary to the problems in other areas – and that is a

poor implementation of laws, while others believe that the situation could be significantly improved by re-amending those laws. The fact is, however, that the first key point of the reform has not been fully implemented (Tanjug, for example, is still state-owned⁸, Radio-Television Kragujevac was returned to the ownership of the town). As for the second point, if we exclude a few examples of good practice at the republic level, as a rule, especially at lower levels of government, the spirit of the law which should prevent the authorities from exerting political influence on the media outlets, has not been complied with. In practice, the media outlets that are under a more or less strong influence of politicians in power, or the media outlets that during the privatization fell into the hands of individuals associated with the ruling parties – with considerable media coverage thereof, are favoured.

Although the Rulebook⁹ on project-based co-financing of public interest content in the field of public information states among the important criteria for project evaluation – compliance with ethical and professional standards¹⁰, it happens very often in

8 The Tanjug agency was supposed to cease its operations in 2015, since it was not privatized. "The decision on the legal consequences of the termination of the Public Company News Agency Tanjug" was signed by the then Prime Minister Aleksandar Vučić, and it came into force on the day of its publication in the "Official Gazette". The Decision states that Tanjug ceased its operations on 31 October 2015, in accordance with the Article 146 of the Law on Public Information and Media. According to the Government decision of 3 November 2015, on the termination of Tanjug operations, only the moment of submitting the application for deletion from the Register of Business Entities to the Business Registers Agency (APR) was postponed. That application was to be submitted after the payment of salaries, severance pay and other performance based income and other obligations. However, the agency is still working today.

9 The Rulebook is a by-law issued by the Ministry of Culture and Information and valid for all levels of government.

10 The Rulebook on project-based co-financing for the realization of public interest in the field of public information ("Official Gazette", No. 16/2016 and 8/2017) states the criteria on the basis of which the evaluation of the applicants will be performed: 1) the extent to which the proposed project activity is suitable for achieving the public interest in the field of public information; and 2) a measure for providing a greater guarantee of

practice that the media outlets which violate the Code Ethics of Journalists of Serbia regularly, on daily basis, in an undisguised way, receive significant amounts of funds through the mechanism of project-based co-financing¹¹. In addition, anonymous persons reasonably suspected for not deciding on the quality of the project but only implementing the earlier decisions of the government officials, are appointed to the independent commissions, which should be composed – as stated – of professional and indisputably moral persons with rich experience, which is in significant contrast to the spirit of media reform.

Expert Analyses and Recommendations

Already the first expert analyses of the process of project-based co-financing of the public interest in the field of public information have identified problems in the implementation of this model of state intervention in the media sphere. The White Book¹², published by journalists' and media associations and monitoring this process in the first two years of the implementation of the law, stated that the biggest problems faced by project-based co-financing were – incomplete legislation, insufficient transparency of the process, lack of evaluation of the implemented projects (and of the process itself), as well as the absence of sanctions for the bodies responsible for public information in case of violation of the law. The paper records a large number of “circumventions” of the law, and it states that representatives of non-representative associations very often enter the commis-

adherence to professional and ethical media standards.

11 Take, for example, the Press Council's research entitled “Co-financing of Media Violating Ethical Standards” (Press Council, Belgrade, June 2020).

12 White Book on Project-based Co-financing of Public Interest in the Sphere of Public Information, April 2015- April 2016, Coalition of journalists' and media associations – Centre for Sustainable Communities, May 2016.

sions, which is “the most common signal for possible irregularities and malfunctioning.” The White Book, among other things, recommends that mechanisms be provided for enabling transparency of the process, evaluation of projects, and participation in the commissions of competent and unquestionably moral persons. Besides, it is recommended that local governments undertake to organise public calls for media, as it was established for some of them not to have done so, which is contrary to their legal obligation¹³. In addition, the White Book compares the amount of money allocated for the public calls to the local self-government budget, and one of the members of the Coalition – the Journalists’ Association of Serbia – led a campaign to legally oblige self-governments to allocate two percent of their budget for the media outlets.¹⁴

Unfortunately, the findings and recommendations of the White Book have never been answered by the amendments to the laws, by-laws or improvements to the practice of government bodies organising public calls for media. On the contrary, the practice deteriorated significantly in the following years, which was regularly reported by numerous media outlets – most often by research centres such as CINS, KRIK and BIRN. The message of a large number of research and analytical papers on competitions, primarily at the local level, is that the media outlets close to the government (including those not caring too much for the Code of Ethics of Journalists of Serbia) are absolute favourites when receiving funding

13 Article 20 (paragraph 10) of the Law on Local Self-Government (“Official Gazette of the RS”, No. 129/2007, 83/2014 – other law, 101/2016 – other law and 47/2018) classifies among the competencies of local self-government “taking care of the public information on the territory of the municipality”.

14 Note that the Town of Kragujevac, since 2014, since the adoption of the new set of media laws, has never organised a public call for project-based co-financing media content of public interest. Some other local self-governments have organised public calls of symbolic value, which do not meet – according to the association – the needs of the citizens.

at public calls, while the media outlets with critical stance towards the authorities are complete outsiders. In many cases, project-based co-financing has essentially turned into payment for marketing services, i.e. media financing for the sake of uncritical promotion of the activities of government representatives, which is deeply inconsistent with the goal and significance of media reforms.

The White Book, which, as stated, observed the application of the law during 2015 and 2016, does not state as a significant problem the co-financing of media outlets that continuously and dramatically violate the Code of Ethics of Journalists of Serbia. For the simple reason that substantially this was not the case. Indeed, the analysis in front of you shows that this problem occurred later, i.e. that contrary to the criteria set by the Rulebook on Project-based Co-financing, there was a large outflow of citizens' money to media outlets that usually violate the professional code only in the period from 2017 onwards.

Today, the situation is very bad in that respect, and a few months ago the Journalists' Association of Serbia (UNS) published an analysis according to which in the first five months of this year tabloids close to the authorities ("Alo", "Kurir", "Srpski Telegraf" and "Informer") received slightly less than 26 million dinars at local public calls. According to the monitoring of the Press Council, these same media outlets violated the Code of Ethics of Journalists of Serbia as many as 3,900 times in the second half of 2019¹⁵. UNS, together with other journalists' and media associations, has a data base of project-based co-financing, and from time to time comes out with useful analyses of this process.

15 See the text "Break the code a couple of thousand times and get millions" on the UNS website (<http://www.uns.org.rs/desk/UNS-news/99123/prekrsi-kodeks-par-hiljadaputa-i-dobij-milione.html>).

KRIK's portal "Raskrikavanje" also kept records of project-based co-financing of media content in recent years, and also came to the conclusion that huge citizens' funds ended up in the pockets of media owners close to the authorities who are both record holders in violating the law and code of ethics, and in spreading fake news and hate speech¹⁶. There is another rule: lesser-known production companies are also applying for the competition with great success, the ones related primarily to the electronic media outlets close to the government, mostly serving only as another channel for financing these media outlets.

The research and analysis in front of you show that the state of Serbia in the observed period, at all levels, allocated for media projects from 9.5 million to slightly more than 14 million Euro (increasing trend from year to year). With such application of the law and the noted problems, the conclusion is self-evident – project-based co-financing has been largely transformed into a system for financing "obedient media", and not for good quality information content that is in line with the interests of citizens, which will help them make important decisions in life.

What is the Way Forward?

In addition to the White Book, there are a number of studies that have dealt with project-based co-financing of media content in recent years. We have already mentioned some but not the others¹⁷, although they are all in agreement that there are many problems in this area, and that increasing the transparency of

¹⁶ Look at: <https://www.raskrikavanje.rs/kesformisanje/index.php>

¹⁷ Take a look, for example, at the very useful analysis "Regulating Project-Based Co-Financing of Media Content: Legal Analysis with Recommendations", BIRN, Belgrade 2017.

the entire process is a precondition for their solution. Adopted earlier this year, the new Media Strategy¹⁸ pays great attention to project-based co-financing and the ways in which this process can be improved, combining all previous professional insights and analyses. Judging by the scope and solutions, this segment was probably addressed the most. It is clear that this document also strongly supports the transparency of the process.

The Strategy, as well as numerous analyses, state that the media outlets “close to the ruling party in terms of editorial policy” are favoured in the distribution of funds during the public calls for project-based co-financing. It is also stated that such implementation of the law is one of the “dominant forms of pressure” on the media outlets, especially at the impoverished, local level. The strategy envisages a number of measures that need to be taken to ensure “adequate realization of the purpose of project-based co-financing”, so it is proposed to amend the existing regulations in terms of introducing missing content analysis, sanctions for non-compliance with laws, prescribing criteria for members of commissions for the assessment of the quality of projects and their stronger commitment to take into account the respect of professional and ethical norms of the applicant when assessing the quality of certain projects.

The Media Strategy and its accompanying document, the Action Plan, envisage, in addition, the obligation of independent evaluation of the implemented projects and the exclusion of the possibility that project-based co-financing serves to cover costs outside the associated costs of producing content of public interest. Especially interesting is the paragraph referring to the transparency of the whole process, which implies “the introduction of

18 Strategy for the Development of the Public Information System in the Republic of Serbia 2020-2025 (“Official Gazette”, No. 11 of 7 February 2020)

the possibility of a centralized system for application through a single information platform, which would, among other things, enable the implementation of legal provisions prohibiting funding, over a certain percentage, of the same projects by different levels of authorities, but also the availability of content funded in this way to all, in areas wider than those that the media initially covers. That would be realized in such a way that the information platform would enable the search for projects, applications and decisions, and contain links to broadcast or published content funded in this way.”

This information platform is in line with the initiative of the Human Rights Committee from Niš, which has been advocating for years that all media content supported through project-based co-financing be easily accessible and free of charge to the citizens, which will simplify project evaluation, improve their quality and reduce potential abuse¹⁹.

Let’s get back to the Strategy. It is clear that the members of the working group for drafting this document – as we said – really tried to ensure that the area of project-based co-financing was properly addressed, but the key question remains – can the government be forced to comply with the laws by amending the law? Namely, some media experts warn that in a political context that does not imply a high degree of rule of law, as evidenced by the reports of European institutions on Serbia’s progress in the European integration process, it is easy to find mechanisms to circumvent the most perfect legal provisions. However, we can only hope that the law amendments resulting from the strategic document will alter the practice of the government directing public funds to “its me-

19 “How to improve the transparency of media content co-financed with public money?”, Analysis, Human Rights Committee, Niš, November 2020.

dia outlets” through the mechanism of project-based co-financing, and possibly leaving some crumbs for the independent ones.

Specifically, let’s look at, for example, the provisions that stipulate that members of commissions have the necessary, defined expertise. It is certainly something that is good and important, but to be honest, the government will – if it wants – find dozens of experts who won’t even consider projects, but will only implement political decisions made in advance. Some warn that neither state bodies nor non-governmental organizations have the capacity to conduct a quality evaluation of projects given their huge number, as our analysis shows. Namely, in the period from 2015 to 2020 (end of September), a total of 11,506 media projects were financed at all levels of government.

Existing analyses and searchable data on the project co-financing process (such as this web application in front of you) provide us with a good understanding of the project-based co-financing process since 2015 (the first year of the application of the Law), for finding solutions to improve it, even if it will benefit some other future times, when we will live in a democratic country nurturing the independence of institutions and the tradition of media freedoms.

Finally, it should be said that the process of project-based co-financing of media content is a model that, if it were really implemented as intended and as seen by the professional public, could really significantly improve our media scene. Therefore, it should not be easily given up, and neither should its improvement.

Methodology

The main subject of our analysis were decisions on the allocation of funds in public calls for co-financing the public interest in the sphere of public information, which we collected by referring to the Law on Free Access to Information of Public Importance or searching the portals of authorities – in this case of the Ministry of Culture and Information and the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities and some other local self-governments with functional websites. We collected a small part of the data thanks to the existing databases of project-based co-financing, which we reported on in the section Introductory words in this publication.

We remind you that according to the Law on Public Information and Media, each authority that launched the public call makes a decision on the allocation of funds in the form of a resolution (with an explanation). In the past six years of the project-based co-financing process, there has been a noticeable progress in the making of decisions, which in the first years were largely inadequate²⁰. Not only do they now contain, for the most part, explanations of the decision, but other available information is also supplemented, which has made it easier for us to work on data selection. However, in our opinion, the content of the decision is still far from what should be in them, and we have stated so in the recommendations that you can find at the end of this

²⁰ Many decisions did not contain some of the basic data, some omitted the name of the project applicant, others the name of the media outlet or the project name.

brochure. First of all, they do not contain machine-readable data, which greatly complicates the work of researchers and analysts.

All data, systematized, and web application can be found on and freely downloaded from our website²¹, where you can find other products of our project as well. On the website you can find a link to the code for creating the application²². With the help of the code, users of the R programming language will be able to gain additional insight into the data and the way they are processed, and the code is reproducible and can be used for other works and analyses.

The significance of the methodological notes in front of you is primarily to understand the process of collecting and selecting data for the development of the web application, but also to facilitate its use.

Explanation of the Data Columns on the Web Application

The table that you can download in excel and csv format contains the following columns:

1. **AUTHORITY LAUNCHING THE COMPETITION / MUNICIPALITY** – refers to the institution that organising the public call: the Ministry of Culture and Information, the Provincial Secretariat for Culture, Public Information and Relations with Religious Communities and 152 local self-governments (cities and municipalities). Since the town municipalities are not obliged to launch public calls for project-based co-financing, only those town municipalities

21 The site is at: https://centarzaodrzivezajednice.shinyapps.io/Projektno_sufinansiranje_medija_u_Srbiji/

22 https://github.com/Centarzaodrzivezajednice/Projektno_sufinansiranje_medija_u_Srbiji

that have launched the public calls at least once are listed (for Belgrade they are Lazarevac, Mladenovac and Obrenovac, and for Niš – Pantelejš, Crveni Krst and Mediana).

2. YEAR – column that refers to the year when the decision on the allocation of funds was made.
3. PROJECT APPLICANT – This column records the names of project applicants (companies, agencies, etc.) as registered with the Business Registers Agency (APR). The data were checked on the website apr.gov.rs. Due to the inconsistent use of upper-case and lower-case letters in the APR register, all project applicants are written in capital letters. In some situations, the project applicant represents an institution such as a faculty or a religious organization not registered in the APR. In that case, their name was taken from the decision on the public call.
4. APPLICANT ID NUMBER- This column is only available for download in excel and csv format. The ID number is taken from the APR website. Since institutions such as the Faculty of Political Sciences or the Association of Jewish Municipalities of Sombor are among the project applicants, ID numbers have been taken from the registers they are entered in. Also, there is a case of one applicant (UNIVERSAL COMPANY, LAZAREVAC, DOO) without any information on the ID number on the APR website, and there are some applicants registered in the territory of AP Kosovo and Metohija who are not in the register, so they are registered under code 11111111. If the applicant are entities registered outside the borders

of the Republic of Serbia, they have been assigned the code 22222222.

5. MEDIA OUTLET NAME – This column refers to the name of the media outlet to which funds have been allocated. Please note that there is a separate register of media outlets that is kept by APR, and that the media outlets do not have the status of a legal entity, but their founder (project applicant) has it. Media names have also been aligned with the APR database. If the funding was for expert meetings, conferences or workshops and this was clearly indicated in the project name – this column is left blank. If no information was given to which media outlet the funds for the production of content were allocated, the key was taken from some public call decisions, e.g. by the Provincial Secretariat, and the word “Production” was entered in this column. In situations when the media publisher is the owner of only one media outlet according to the APR, and the name of the media is not stated in the decision on the public call, the name of that media from the APR is entered.
6. PROJECT NAME – This column is filled in if the decisions contain project names. If they are not specified, the field remains blank. If the public call has been cancelled, has not been organised or the funds have not been allocated, everything is listed under the item – funds not allocated. In the case of the public calls in the Autonomous Province of Kosovo and Metohija and the public call for information in the Serbian language outside the territory of the Republic of Serbia – that

information is added in brackets immediately after the name of the project.

7. PROJECT TOPIC – Project topics are derived from their names, where they were listed. We have identified and classified eight thematic frameworks: ecology and health care, economy, news programme, culture and education, underprivileged groups, other, minority content and sports. These topics follow the definition of the public interest from the Law on Public Information and Media. Where there was no project name, this column remained blank. A number of project names that do not fall under any of the above topics are registered under – Other. It is clear that this is not a perfect methodological approach and that a clear definition of the thematic framework could only be determined through project evaluation. Therefore, it is rather an indication of topics, which in our opinion can demonstrate certain trends. We hope that the results of our project will allow for easier work of the researchers on deeper and more specific analyses of project-based co-financing.

- a. Ecology and Health Care

This topic broadly covers everything related to environmental protection and health care.

- b. Economy

This topic broadly covers agriculture, tourism, the economic segment of the European integration and rural development.

- c. News programme

This topic covers production of the news programme. Although the co-financing of the news programme was justified in some cases, the impression remains that in many cases it was not the public interest defined by law that was financed, but regular media production. This can also be a topic for deeper analysis.

d. Culture and Education

This topic covers a wide range of cultural and various educational contents, including the organization of expert meetings.

e. Minority Content

This topic covers not only the production of content in the minority language, but also the content about certain minorities and their culture. All media content in minority languages is placed in the “minority category”, although they are, of course, thematically diverse. The aim of such an approach was to treat information in minority languages as a separate phenomenon – with the aim of observing how the state takes care of it. Of course, we also recommend further, deeper research on this topic, the basis of which can be data and web applications created during the implementation of this project.

f. Underprivileged Groups

This topic is broadly set to include various groups, such as persons with disabilities, diabetes, multiple

sclerosis, but also groups such as – women, youth, elderly and children. This classification is too broad and could be further divided into certain subtopics.

g. Sports

This topic covers the production of sports media content.

h. Other

This topic covers sub-topics such as religion, or increasing the birth rate. Topics that were not clearly defined to be unequivocally included in any of the above areas are also classified in this category.

8. FUNDS IN DINARS – This column represents the nominal values allocated to a specific project applicant based on the decision to allocate funds. Since these values are nominal, they are not used for comparisons by year and for cumulative graphs, but the FUNDS IN EUROS column is used for this.

9. FUNDS IN EUROS – This column is calculated based on the middle annual exchange rate for the Euro for each year in the period 2015-2019 and the middle monthly exchange rate for August 2020, and the data are taken from the website of the National Bank of Serbia²³. For this reason, this column is used for comparisons by year and cumulative values in graphs and tables. Researchers are aware that a more realistic presentation would be to

²³ https://www.nbs.rs/sr_RS/finansijsko_trziste/medjubankarsko-devizno-trziste/kursna-lista/prosecni-kursevi/index.html

use real values that would be recalculated based on the consumer price index, but due to easier understanding of the entire table, it was decided to use the middle exchange rate for the Euro.

Code for Web Application and On-Line Publication

The code can be downloaded from the following link²⁴ – it is written in the R programming language. The whole application was created primarily with the help of the shiny library. The code, which you can find in the app.R file on the previous link, is divided into 3 parts: processing of the data, ui (user interface) which refers to defining the appearance of the application and the server part where the interactivity and connectivity of different parts of the application is actually created. The sections marked with # represent comments that explain what each piece of the code is used for. This should make the understanding of the code easier. The code and the data can be downloaded under the Creative Commons Zero v1.0 Universal license²⁵. While this is the most open license possible, we would appreciate letting us know if you use the data or code for web application, so we can track its further use in development. Thank you in advance. In addition to the code for creating the application, you also have the opportunity to download the code used to create the on-line version of the publication²⁶ (Index.html and Index.Rmd files), which will be updated if the data changes. This is another way in which we want to support the full transparency and reproducibility of research in this area with the ultimate goal that others

24 https://github.com/Centarzaodrzivezajednice/Projektno_sufinansiranje_medija_u_Srbiji

25 <https://creativecommons.org/publicdomain/zero/1.0/>

26 <https://projektnosufinansiranjehtmlpublikacija.netlify.app>

can contribute to the improvement of both the application and the analysis. We are confident that by working together, with an open approach, we can make this process significantly better.

Analysis of Collected Data

The analysis of data collected during the implementation of the project “Open Data – a Tool for Better Project Co-Financing of Media Content”, that is in front of you, is not comprehensive, but is just an example of how the data can be approached to and how it can be treated. As stated in the introduction, the goal of our project was primarily to provide researchers, media outlets and government representatives and other stakeholders with access to systematized data and their functional use. The data and the accompanying application can be useful for various researches, but also as a basis for further work on gathering the necessary information for some future, deeper and more extensive analyses. Unlike the existing databases, this allows data to be downloaded in an open and machine-readable format for further analysis, and, in addition, introduces a classification of approved projects based on the thematic scope. In the methodology, we explained how we performed the thematic categorization of the approved projects.

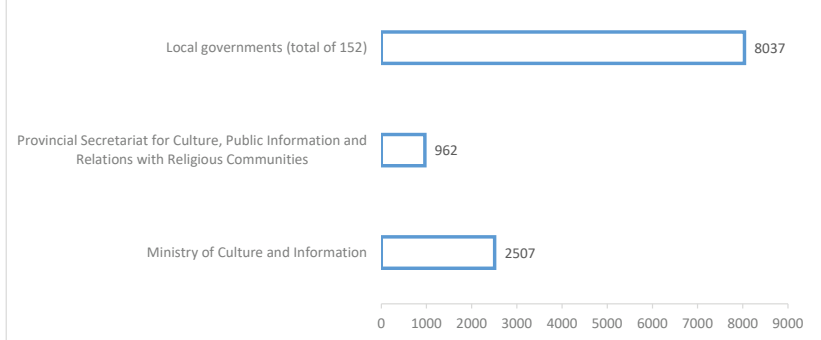
As previously pointed out, 2015 was the first year of the implementation of the media laws adopted in August 2014. Our research covers the period from the beginning of that year to October 2020, when we collected the last data. In that sense, we cannot confirm with certainty that the collected data cover the whole 2020, i.e. that some public calls were not launched after the completion of information collection. In addition, the data do not include the so-called individual payments, i.e. funds that are distributed under

the decision of the head of the body responsible for public information affairs, without conducting a public call.

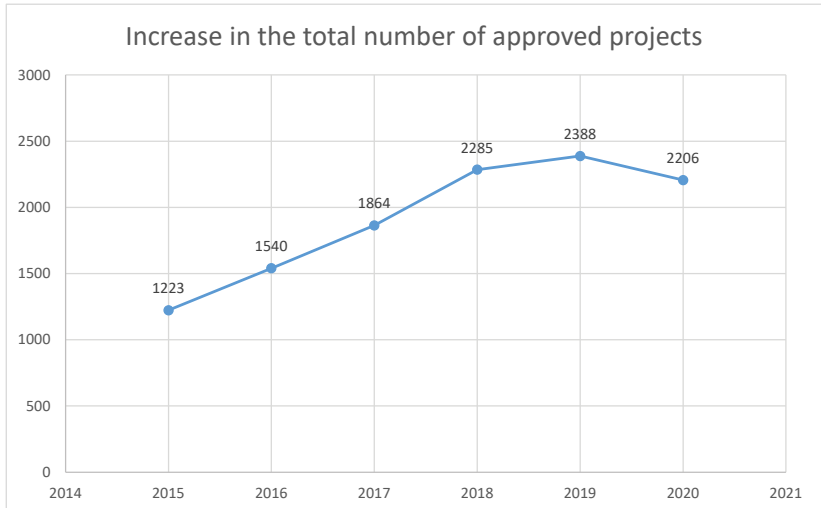
Some media experts also called 2015 the “baseline year” of the law implementation, implying that many local self-governments would encounter for the first time the phenomenon of project-based co-financing of media content, i.e. that it would be a completely new mechanism for them. In that sense, some omissions are expected, i.e. discrepancies in the new legal reality. We have already pointed out that the Ministry of Culture and Information (hereinafter: the Ministry), Provincial Secretariat for Culture and Information (hereinafter: the Secretariat), and some local self-governments organised public calls for media in the previous period, so it can be concluded that they were ready for the new media legislation.

In the period from the beginning of 2015 to the end of September 2020, the total number of approved media projects at all levels was 11,506, of which the Ministry financed 2,507, the Secretariat 962, and local self-governments (total of 152) – 8,037. It should be borne in mind that 11 local self-governments out of 152 analysed (Batočina, Bosilegrad, Gadžin Han, Golubac, Kostolac, Kragujevac, Lapovo, Lučani, Rača, Sjenica and Žabari) did not organise a single public call in the period from 2015 to 2020. Most of the town municipalities did not organise any public calls either, but they were not taken into account (except for the Belgrade municipalities of Obrenovac, Mladenovac and Lazarevac and Niš municipalities of Medijana, Crveni Krst and Pantelejš), because according to the interpretation of the law they were not obliged to co-finance the media outlets through the project-based co-financing.

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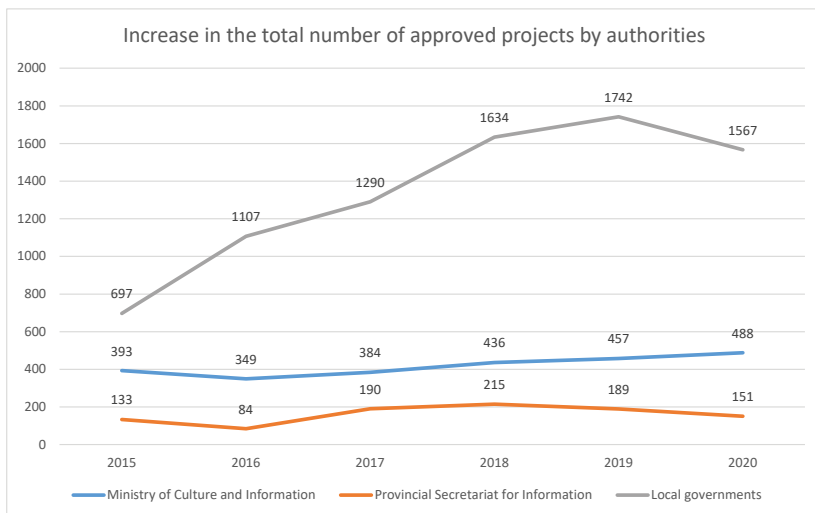


The number of approved media projects is increasing from year to year. The total number of supported projects at all levels of government during 2015 was 1,223, and later it grew from year to year (2016 – 1,540; 2017 – 1,864; 2018 – 2,285; 2019 – 2,388). The fact that a slight decrease (2,206) was recorded in



2020 may be a consequence of the fact that this research did not cover the last quarter of that year.

We note a gradual increase in the number of media projects approved by the Ministry (2015 – 393; 2016 – 349; 2017 – 384; 2018 – 436; 2019 – 457; 2020 – 488), while the implemented projects at the level of local governments have more than doubled in the observed period (2015 – 697; 2016 – 1,107; 2017 – 1,290; 2018 – 1,634; 2019 – 1,742; 2020 – 1,567). The number of projects approved by the Secretariat has also increased (2015 – 133; 2016 – 84; 2017 – 190; 2018 – 215; 2019 – 189; 2020 – 151). For all these data there is a reservation related to 2020, which, as we said, has not been completely processed.

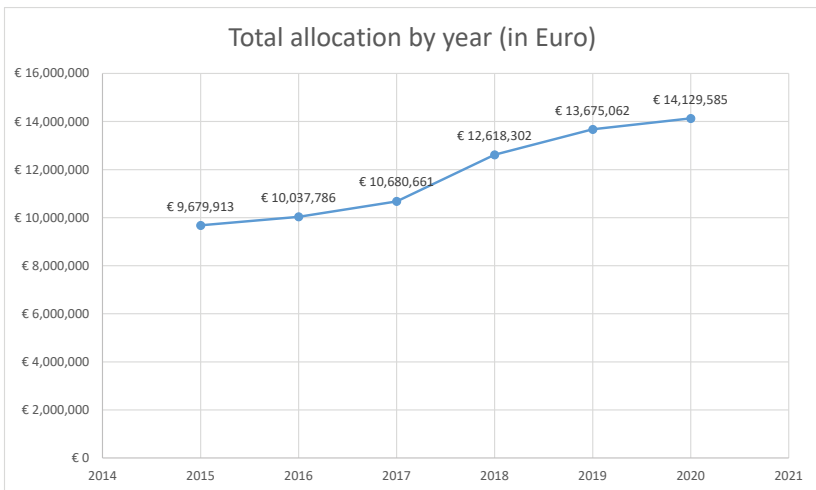


If we cross-reference the data on the number of approved projects with those that say that, in parallel, the total amounts allocated for the public interest in the sphere of public information are increasing, the conclusion could be the following: if the system of project-

based co-financing were implemented in accordance with legal provisions and good practices, it would have significantly improved the quality of the media offer, including media and content pluralism.

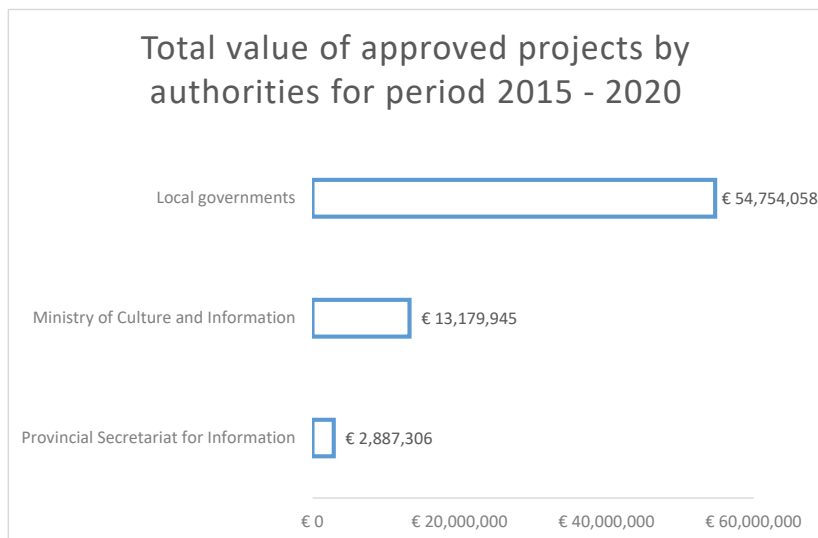
Project values

The total funds that the state has allocated at all levels for project-based co-financing of the media in the observed period amount to – 70,821,309 Euro. And there is a noticeable ascending trend curve from year to year, so the media outlets and media organizations received about 9.7 million in 2015, and in 2016 slightly over 10 million Euro. In 2017, the amount was approximately 10.7 million Euro, and in 2018 – 12.6 million Euro. In 2019, the



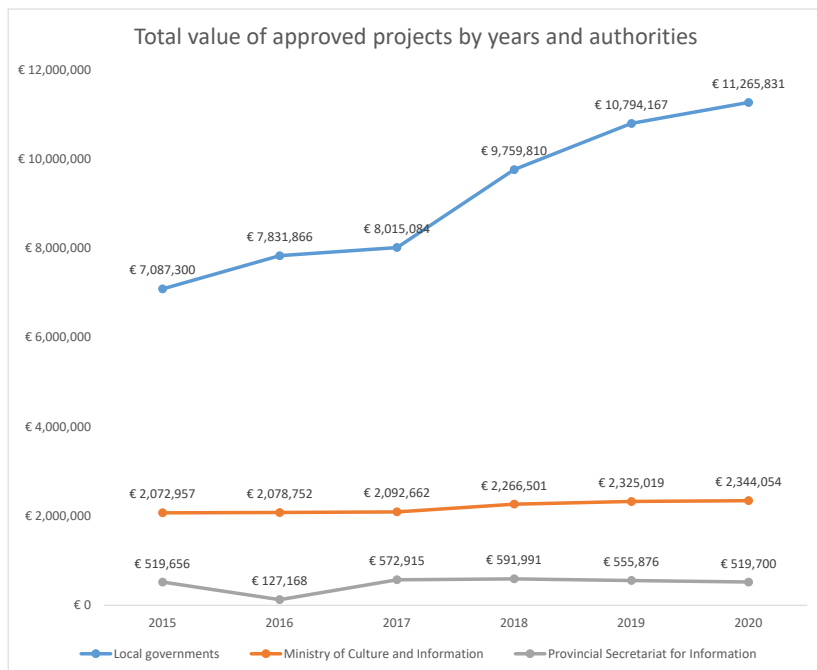
state intervened through a public calls in the media sphere with as much as 13.7 million Euro, and in 2020 (although only nine months of that year were taken into account) a record of as much as 14.1 million Euro was reached.

Local self-governments set aside a total of 54.8 million Euro for the purpose of project-based co-financing, the Ministry – 13.2 million, while the Provincial Secretariat spent 2.9 million Euro on public calls for media over six years. However, it



should be emphasized that this last body allocates considerable funds (around 300 million dinars a year) for media outlets in the languages of national minorities founded by National Minority Councils, but not through project-based co-financing process but through direct payments, which indicates the inconsistency of the existing media legislation.

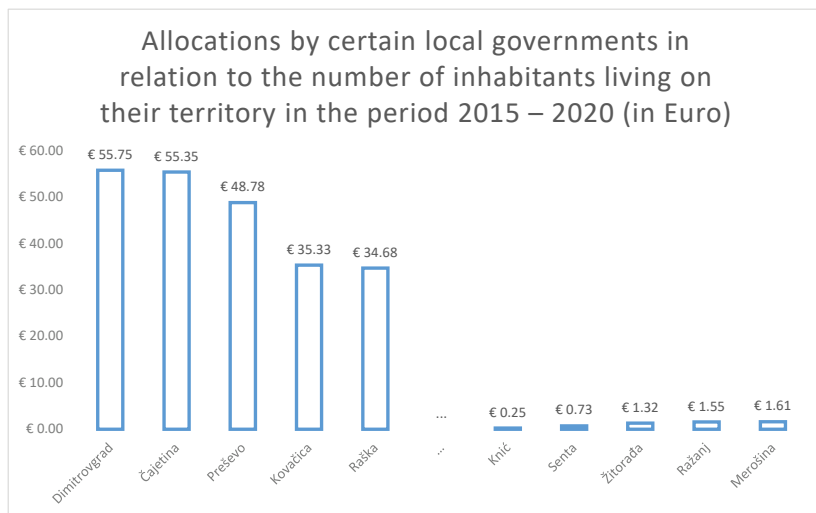
When we look at the value of approved projects by the authorities, we notice that the amount allocated by the Ministry has increased, but not significantly (2015 – 2,072,957; 2016 – 2,078,752; 2017 – 2,092,662; 2018 – 2,266,501; 2019 – 2,325,019; 2020 – 2,344,054 Euro), that the Secretariat's



funding, if we exclude 2016, are more or less constant (2015 – 519,656; 2016 – 127,168; 2017 – 572,915; 2018 – 591,991; 2019 – 555,876; 2020 – 519,700 Euro), and that the value of media projects supported by local self-governments increased significantly in the period from 2015 to September 2020 (2015 – 7,087,300; 2016 – 7,831,866; 2017 – 8,015,084; 2018 – 9,759,810; 2019 – 10,794,167; 2020 – 11,265,831).

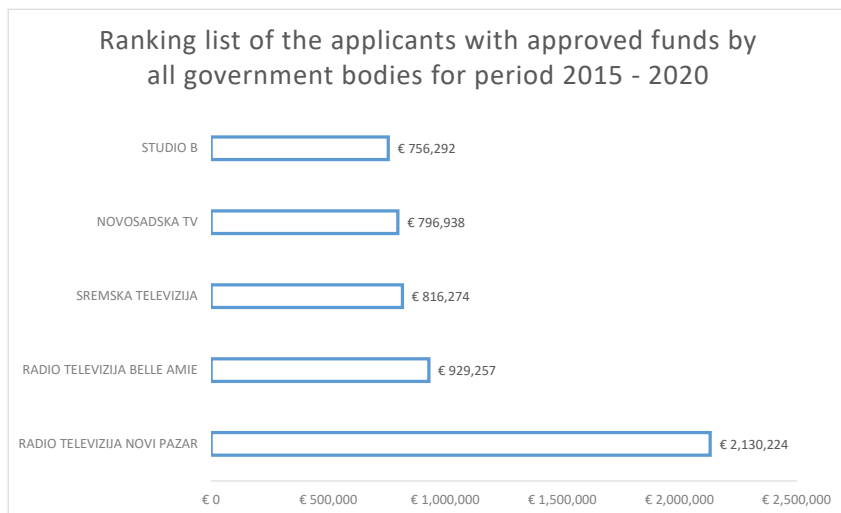
The five towns that allocated the largest funds for project-based co-financing in the observed period are Belgrade (3,809,115 Euro), Niš (2,937,615), Novi Sad (2,620,016), Novi Pazar (2,395,149) and Pančevo (1,583,470). More or less, these data follow the size of these local self-governments, with the exception of Kragujevac, which all these years has not allocated a single dinar for project-based co-financing of the public interest

in the field of public information. Apropos, Kragujevac financed the Radio-Television Kragujevac in other ways, whose privatization was annulled and returned to the “ownership” of the town.



It is interesting to observe how much has been allocated for public information by certain local self-governments in the past period in relation to the number of inhabitants living on their territory. In this analysis we did not include local self-governments that did not organise any public call for media content, nor city municipalities (of Belgrade and Niš) due to their specificity. The highest funds for the public interest in the field of public information, per capita, were allocated by the Municipality of Dimitrovgrad (55.75 Euro per capita), followed by the Municipalities of Čajetina (55.35), Preševo (48.78), Kovačica (35.33) and Raška (34.68). The least funds in the six year period were spent by the Municipalities Knić (0.25 Euro per capita), Senta (0.73), Žitorađa (1.32), Ražanj (1.55) and Merošina (1.61).

As far as project applicants are concerned, the most money – collectively looking at all government bodies – was allocated to the Radio-Television Novi Pazar (2,130,224 Euro for 13 projects), followed by the Radio-Television Belle Amie (929,257 for 119 projects), Television Šid from Srem (816,274 for 27 projects), Novi Sad TV (796,938 for 79 projects) and Studio B (756,292 for 22 projects). Among the five first place winners, there are as many as four media companies that were the subject of privatization during 2015 and 2016. It is clear from the above stated that some media outlets are oriented towards a smaller number of authorities with larger projects, while for others the funds they receive through the competition are dispersed.



At the public calls organised by the Ministry of Culture and Information, Radio-Television Vranje received the most funds (188,502 Euro), followed by the Journalists' Association of Serbia (134,548), the Women's Forum from Prijepolje (127,217) and Television Apatin (126,837). During the six years, the Secretariat

valued the most the media projects submitted by the Association of the Blind of Vojvodina (120,732 Euro), the publisher of “Dnevnik”, the company Dnevnik Vojvodina Press (109,332), the Joint Council of Vukovar Municipalities (106,941) and the Association of the Deaf and Hard of Hearing of Vojvodina (97,922).

At the local level, it has been noticed that some media outlets receive funds even in the territories of the local self-governments where their programme is not broadcast, at least not significantly. When we look at all local self-governments, the most funds in their public calls were allocated to the Radio-Television Novi Pazar (2,080,895 Euro), followed by Radio-Television Belle Amie (901,486), Television Sremska Šid (775,813) and Novosadska TV (758,770). From all the above stated it can be concluded that there are media outlets that are favoured at the local level, while they are allocated significantly less funds at the provincial and republic level.

Thematic Frameworks

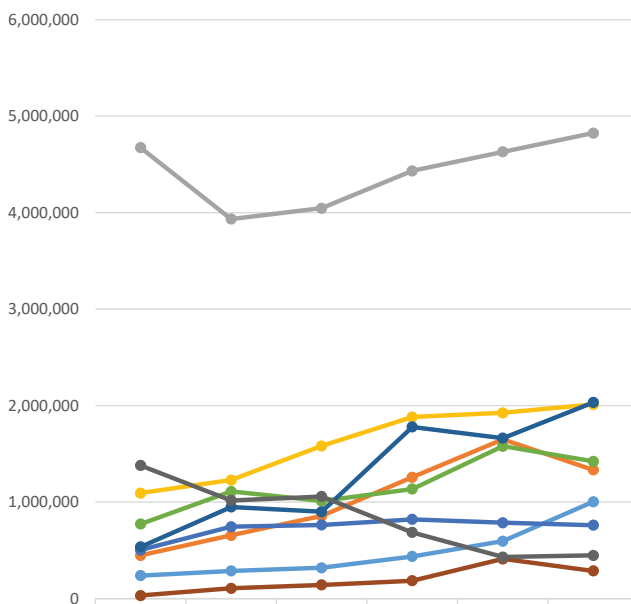
We have classified the supported projects according to the thematic frameworks, and aligned the thematic frameworks with the definition of public interest in the Law on Public Information and Media, but also according to the occurrences of some topics, which we have stated during the research. We have determined the thematic framework from the name of the approved project. By far the most represented projects are those related to the news program, while other topics are: ecology and health care, economy, culture and education, minority content, underprivileged groups, sports and other. It is important to note that, in line with the methodology, we have classified all contents in the minority language into the same group (minority contents),

regardless of the topic they cover. Among the minority contents we have also classified those whose topic is the national minority community and their culture, for example. It would be interesting to conduct a separate study on the kind of media content in minority languages that the state encourages.

The fact that classic news content dominates is logical, but an in-depth analysis reveals that there is much among them that should represent the usual activity of the media outlets and that does not represent, at least not as a rule, the public interest. Also, we have concluded that there is a lot of content that represents the so-called monitoring of the work of government bodies, which is in fact contrary to what project-based co-financing should encourage, and that is – among other things – a critical stance towards the authorities. In this case, too, it would be interesting to perform an additional analysis to determine what percentage of projects actually represent a kind of marketing activity of the authorities. In any case, such projects are mostly present at the local self-government level.

As can be seen in the chart, by far the most money is allocated by the state for the news programme, almost twice as much as for other media content. In 2015, the authorities allocated 4,673,710 Euro, followed by a decline, and then a constant increase until 2020, when it amounted to – 4,825,566. For example, that year for all other contents 9,304,019 Euro were set aside. In previous years, the allocation for culture and education has also increased (the second thematic framework in terms of total allocation), so from 1,093,504 Euro in 2015, it reached 2,012,883. It is interesting to note that over the past three years we have seen, albeit slightly, a decline in the amount of project-based co-financing in the field of minority language content.

Total allocated funds by project topics for period 2015 – 2020 (in Euro)

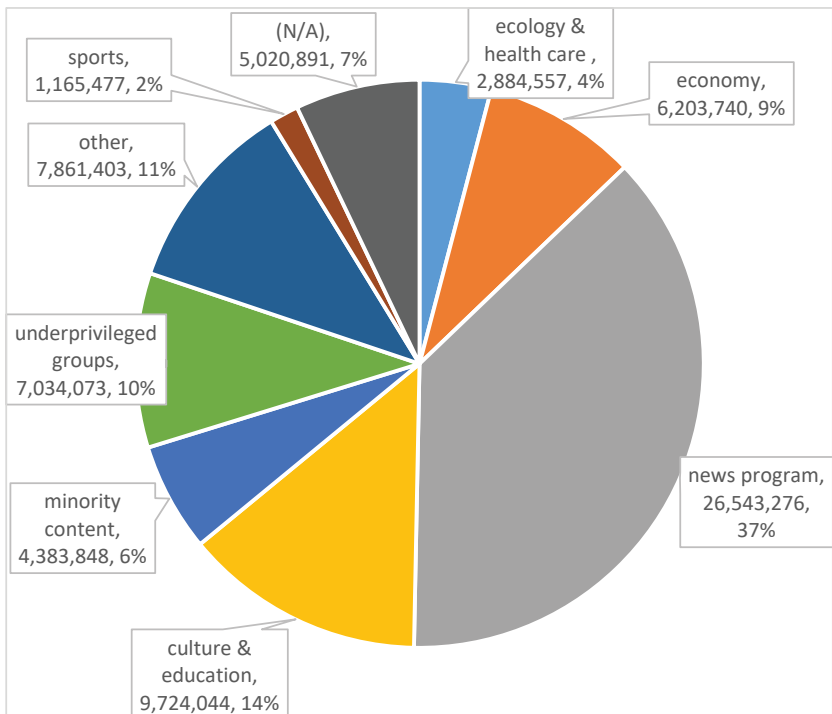


	2015	2016	2017	2018	2019	2020
ecology & health care	238,747	287,562	320,002	437,491	596,107	1,004,648
economy	448,265	656,248	857,099	1,257,771	1,650,332	1,334,025
news program	4,673,710	3,934,009	4,046,235	4,433,044	4,630,712	4,825,566
culture & education	1,093,504	1,229,066	1,581,864	1,881,688	1,925,039	2,012,883
minority content	504,035	745,883	763,658	822,028	786,529	761,715
underprivileged groups	773,764	1,110,539	1,011,140	1,135,925	1,580,132	1,422,573
other	535,734	949,973	900,354	1,778,859	1,662,770	2,033,713
sports	31,603	107,424	142,221	185,048	412,117	287,064
(N/A)	1,380,551	1,017,082	1,058,088	686,448	431,324	447,398

In 2018 it amounted to 822,028 Euro, in 2019 it dropped to 786,529, and this year it was – 761,715 Euro.

When we look at the total amounts for all years and all the applicants, a total of 26,543,276 Euro or 37.48% of the total allocated funds for project-based co-financing in the period from 2015 to 2020 was allocated for the news programme. The next topic, cul-

ture and education, received 9,724,044 Euro or 13.73% of the total six-year budget for media projects. It is followed by projects that do not fall under any classification (other, 7,861,403 Euro or 11.1%), then by projects related to underprivileged groups (7,034,073 or 9.93%), the economy (6,203,740 or 8.76%), minority content (4,383,848 or 6.19%), ecology and health care (2,884,557 or 4.07%) and, finally, sports (1,165,477 or 1.65%). Funds in the amount of 5,020,891 Euro or 7.09 % of the total money went to projects for which we were not able to detect the topic, for the simple reason that some decisions on the allocation of funds, at the local self-government level, do not specify the names of projects. In the previous chart, we see that the number of such decisions is significantly declining, which is good news.



Recommendations for Increasing the Transparency of Project-based Co-Financing of Media Content

1. Amendments to the laws should require the authorities organizing public calls for financing the public interest in the field of public information to deliver data to the Open Data Portal, in a machine-readable format.
2. The Ministry of Culture and Information should amend the Rulebook on co-financing of public interest in the field of public information to precisely specify which data should be contained in the decision on the allocation of funds. This data should correspond to the data submitted to the Open Data Portal. We recommend that the resolutions contain the following information: project applicant, identification number of the project applicant, name of the media outlet (in case of production, the name of the media outlet or names of media outlets publishing or broadcasting certain content), media registration number, project name, thematic framework, requested amount, amount obtained.
3. The Ministry of Culture and Information should amend the Rulebook on project-based co-financing of public interest in the field of public information to ensure that short descriptions (from the forms) of approved and rejected project proposals are found in the decisions on the

allocation of funds, in order to facilitate the definition and verification of the thematic framework.

4. By amending the law, ensure that all documents related to competition procedures, including narrative and financial reports on implemented projects, are publicly available.
5. The Ministry of Culture and Information should amend the Rulebook on project-based co-financing of public interest in the field of public information to unify the thematic frameworks of approved projects in accordance with the public interest in the media sphere defined by the Law on Public Information and Media. This set of topics should not be a limiting factor, and a thematic framework “other” should be provided as well.
6. It is necessary to organize training sessions for representatives of government bodies who organise public calls for the development of a similar application, if they want to visually present data on project-based co-financing in their local community.
7. It is recommended that at all levels of government, for the purpose of “affirmative action”, separate public calls be organised for members of national minorities, in accordance with the representation of the minority population on the territory of a certain local self-government.
8. Although this was not the topic of our project, but for the sake of greater transparency, the Ministry of Culture and Information, by amending the Rulebook on project-based

co-financing of public interest in the field of public information, should stipulate that the Decision on appointing members of the commissions contains information who proposed their appointment and a brief biography of the members of the commissions.

9. For the purpose of full transparency of project-based co-financing of media content, it is necessary to support initiatives that imply that all media content produced through the implementation of the project be accessible to citizens, preferably on one portal.



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